

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
NOTICE OF PERMIT

In the matter of an
Application for Permit by:

DEP File No. AC 41-232096
PSD-FL-205
Manatee County

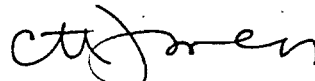
Mr. Ivan Nance
Piney Point Phosphates, Inc.
13300 U.S. Highway 41 North
Palmetto, Florida 34221-8662

Enclosed is Permit Number AC 41-232096 [PSD-FL-205] to replace an existing 96 MMBtu/hour boiler with a new 190 MMBtu/hour process boiler and increase the operating hours from 876 to 8760 hours/year at the Piney Point Phosphates, Inc. facility in Palmetto, Manatee County, Florida. This permit is issued pursuant to Section 403, Florida Statutes.

Any party to this Order (permit) has the right to seek judicial review of the permit 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 32399-2400; 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 this Notice is filed with the Clerk of the Department.

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION



C. H. Fancy, P.E., Chief
Bureau of Air Regulation
2600 Blair Stone Road
Tallahassee, FL 32399-2400
904-488-1344

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this NOTICE OF PERMIT and all copies were mailed before the close of business on 9/23/94 to the listed persons.

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED,
on this date, pursuant to
§120.52(11), Florida Statutes,
with the designated Department
Clerk, receipt of which is hereby
acknowledged.

Charlotte J. Hayes
(Clerk)

9/23/94
(Date)

Copies furnished to:
Bill Thomas, SW District
Rob Baum, Manatee County
John Bunyak, NPS
Jewell Harper, U.S. EPA
Doug Beason, OGC
John Koogler, K & A

Final Determination

**Piney Point Phosphates, Inc.
Manatee County
Palmetto, Florida**

**Construction Permit Modification
Permit No. AC 41-232096
PSD-FL-205**

**Department of Environmental Protection
Division of Air Resources Management
Bureau of Air Regulation**

September 15, 1994

Final Determination

Piney Point Phosphates, Inc.

AC 41-232096

PSD-FL-205

The application for a permit from Piney Point Phosphates to construct a new 190 MMBtu/hr process boiler and increase the operating hours from 876 to 8760 hours per year has been reviewed by the Bureau of Air Regulation. The existing 96 MMBtu/hour boiler shall be permanently shut down when its new 190 MMBtu/hour process boiler has been constructed and in operation. Public Notice of the Department's Intent to Issue the construction permit was published in the Bradenton Herald on June 24, 1994.

Copies of the preliminary determination has been available for public inspection at the Department's Southwest District office in Tampa, at the Manatee County Environmental Action Commission in Bradenton, and at the Department's Bureau of Air Regulation office in Tallahassee.

Comments were received from EPA and concurred with the proposed permit and BACT.

The final action of the Department will be to issue the permit as noticed during the public notice period.



Department of Environmental Protection

Lawton Chiles

Governor

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Virginia B. Wetherell

Secretary

PERMITTEE:

Piney Point Phosphates, Inc.
13300 US Highway 41 North
Palmetto, FL 34221-8662

Permit No. : AC 41-232096
PSD-FL-205
Exp. Date : July 1, 1995
County : Manatee
Lat./Long. : 27°37'58"N
82°32'08"W
Project : 190 MMBtu/hour
Process Steam Boiler

This permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-210, 62-212, 62-272, 62-275, 62-296, and 62-297; and, 62-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawings, plans, and other documents attached hereto or on file with the Department and specifically described as follows:

For the construction of a 190 MMBtu/hour process steam boiler. This boiler is permitted to be fired with new No. 2 distillate fuel oil only. The maximum fuel consumption rate will be 1349 gallons/hour and the maximum heat input rate will be 190 MMBtu/hour while producing a maximum of 150,000 pounds/hour of steam. The boiler may be operated at 8760 hours/year. Nitrogen oxides emissions will be controlled with low-NO_x burners, flue gas recirculation, and proper operation practices. Sulfur dioxide emissions will be controlled by only firing No. 2 fuel oil containing no more than 0.05% sulfur, by weight. The facility will be located at 13300 US Highway 41 North, Palmetto, Manatee County, Florida.

The UTM coordinates of this facility are Zone 17, 348.5 km E and 3057.3 km N.

The source/emission unit shall be constructed in accordance with the permit application, plans, documents, amendments and drawings, except as otherwise noted in the General and Specific Conditions.

Attachments are listed below:

1. Application received May 28, 1993.
2. DEP letter dated June 24, 1993.
3. KA letter dated July 30, 1993
4. KA letter dated September 17, 1993.
5. KA memorandum dated November 22, 1993.
6. KA letter dated January 18, 1994.
7. EPA letter dated July 15, 1994.

PERMITTEE:
Piney Point Phosphates, Inc.

Permit Number : AC 41-232096
PSD-FL-205
Expiration Date: July 1, 1995

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 403.727, or 403.859 through 403.861, F.S. 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 F.S. 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 facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.

PERMITTEE:
Piney Point Phosphates, Inc.

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GENERAL CONDITIONS:

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:

- 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 F.S. 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 F.S. after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by F.S. or Department rules.

PERMITTEE:
Piney Point Phosphates, Inc.

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GENERAL CONDITIONS:

11. This permit is transferable only upon Department approval in accordance with Rules 62-4.120 and 62-730.300, 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.

12. This permit or a copy thereof shall be kept at the work site of the permitted activity.

13. This permit also constitutes:

- (x) Determination of Best Available Control Technology (BACT)
- (x) Determination of Prevention of Significant Deterioration (PSD)
- (x) 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.

PERMITTEE:
Piney Point Phosphates, Inc.

Permit Number : AC 41-232096
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Expiration Date: July 1, 1995

GENERAL CONDITIONS:

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.

SPECIFIC CONDITIONS:

1. This permit, AC 41-232096, shall be valid only when the permittee formally surrenders permits AC 41-226205 and AC 41-211848. Issuance of this permit AC 41-232096 constitutes revocation of AC 41-226205 and AC 41-211848. When the new 190 MMBtu per hour boiler is constructed and in operation the existing 96 MMBtu per hour boiler shall be permanently shut down. Until that time the 96 MMBtu per hour boiler is authorized to operate under the conditions of AO 41-156789.

Construction Details

2. Construction of the proposed process steam boiler shall reasonably conform to the plans described in the application. The facility shall be designed, constructed, and operated so that its maximum heat input and maximum fuel consumption shall not exceed 190 MMBtu per hour and 1349 gallons per hour of new* No. 2 distillate fuel oil, respectively. The sulfur content of the fuel oil shall not exceed 0.05%, by weight, which is defined as "very low sulfur oil in 40 CFR 60.41b." The permittee shall provide the Department with engineering, monitoring, and reporting plans for the process steam boiler within 30 days after the plans become available.

* New oil means an oil which has been refined from crude oil and has not been used in any manner that may contaminate it.

3. The stack sampling facilities (sample ports, work platforms, access, and electrical power) must comply with Rule 62-297.345, F.A.C., and 40 CFR 60.8(e).

4. The boiler shall be equipped with instruments to measure the fuel feed rate, steam production, steam pressure, and steam temperature.

5. The boiler shall be equipped with:

- Low-NO_x burners designed for a maximum reduction in oxides of nitrogen; and,
- Induced flue gas recirculation technology which will maximize the dilution of oxygen rich combustion air with oxygen deficient recirculated flue gas.

PERMITTEE:
Piney Point Phosphates, Inc.

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SPECIFIC CONDITIONS:

6. The permittee shall construct and install a continuous emission monitoring device on the boiler exhaust for opacity. The continuous emission monitoring device shall meet the applicable requirements of Rule 62-297.500, F.A.C., and 40 CFR 60.48b(a).

7. During land clearing and site preparation, wetting operations or other soil treatment techniques appropriate for controlling unconfined particulates, including grass seeding and mulching of disturbed areas, shall be undertaken and implemented. Any open burning of land clearing debris on this site shall be performed in accordance with Chapters 62-256 and 5I-2, F.A.C., and all applicable local regulations.

Operational and Emission Restrictions

8. The issuance of this permit does not relieve the permittee from complying with applicable emission limiting standards or other requirements of Chapters 62-210, 62-212, 62-272, 62-275, 62-296, 62-297 and 62-4, F.A.C. or any other requirements under federal, state or local law (Rule 62-210.300, F.A.C.).

9. This process steam boiler is subject to and shall meet all the applicable requirements of 40 CFR 60, Subpart Db (Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units) of the Federal New Source Performance Standards (NSPS) (Rule 62-296.800, F.A.C.).

10. The maximum permitted operating hours for this process steam boiler is 8760 hours/year.

11. The visible emissions from this process steam boiler shall not exceed 20% opacity (6-minute average), except for one 6-minute period per hour during which the opacity shall not exceed 27%. These opacity standards shall apply at all times, except during periods of startup, shutdown or malfunction.

PERMITTEE:
Piney Point Phosphates, Inc.

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SPECIFIC CONDITIONS:

12. The maximum allowable emission rates for the process boiler based on a No. 2 distillate fuel oil consumption of 1349 gallons/hour shall not exceed the following limits:

190 MMBtu/hour Process Boiler
Maximum Allowable Emission

<u>Pollutant</u>	<u>lbs/hr</u>	<u>TPY*</u>
PM/PM ₁₀	2.7	11.8
SO ₂	9.6	42.0
NO _x	28.5	124.8

*Based on 8760 hours of operation per year

13. The Best Available Control Technology (BACT) determination for controlling NO_x emissions was determined to be flue gas recirculation and low-NO_x burners. [Rule 62-296.330, F.A.C.]

Compliance Requirements

14. The process steam boiler shall conduct performance tests for the pollutants listed in specific condition No. 12 and visible emissions within 60 calendar days after achieving the maximum firing rate at which this boiler will be operated, but no later than 180 operating days after initial startup. The permittee shall conduct performance and visible emissions tests during normal operations (at or no less than 90% of the maximum heat input). A written report of the performance test results shall be submitted to the Department within 45 days after the test. The performance tests shall be conducted according to the requirements of 40 CFR 60, Subpart Db, and Rule 62-296.800, F.A.C.

15. Compliance with the pollutants respective maximum allowable emission limits referenced in specific condition No. 12 shall be demonstrated using the applicable EPA methods as contained in 40 CFR 60, Appendix A (July 1, 1993 version), and adopted by reference in Chapter 62-297, F.A.C. The prescribed methods for those pollutants other than SO₂ are contained in the following table. The test method for SO₂ is contained in specific condition No. 16. The minimum test requirements for new stationary source emissions test procedures and reporting requirements shall be in accordance with Chapter 62-297, F.A.C., and 40 CFR 60, Appendix A.

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SPECIFIC CONDITIONS:

<u>For Determination of</u>	<u>U.S. EPA. Test Method</u>
Sample and Velocity Traverse	Method 1
Velocity and Volumetric Flow Rate	Method 2
Particulate Matter (PM)/(PM ₁₀)	Method 3A or 3B with Method 5/201 or 201A
Opacity	Method 9
Nitrogen Oxides (NO _x)	Method 7, 7A, 7E or 19

16. SO₂ emissions shall be determined in accordance with Section 5.2.2 of EPA Method 19. Calculations of SO₂ emissions shall be based on the sulfur content of the fuel as determined by the supplier pursuant to 40 CFR 60.45b(j) and 40 CFR 60.49b(r).

17. The permittee shall comply with the excess emissions rule contained in Rule 62-210.700, F.A.C. The permittee is allowed excess emissions during startup conditions, provided such excess emissions do not exceed a duration of two hours.

18. The permittee shall notify the appropriate Air Sections of the Department, Manatee County Environmental Action Commission and the Southwest District Office of the Department in writing at least 15 days prior to the date on which each compliance test is to begin. The notification will include the date, time, and place of each test, and the test contact person who will be responsible for coordinating and having such test conducted (Rule 62-297.340 (1)(i), F.A.C.).

19. Testing of emissions shall be conducted with the source operating at capacity. Capacity is defined as 90-100% of rated capacity. If it is impractical to test at capacity, then sources may be tested at less than capacity; in this case subsequent source operation is limited to 110% of the test load until a new test is conducted. Once the unit is so limited, then operation at higher capacities is allowed for no more than fifteen days for purposes of additional compliance testing to regain the rated capacity in the permit, with prior notification to the Department.

Monitoring and Recordkeeping Requirements

20. The permittee shall calibrate, maintain and operate a continuous emission monitoring system for opacity, and record the output of the system on a 6-minute average opacity basis (Rule 62-296.800, F.A.C.; and, 40 CFR 60.48b(a), Subpart Db).

PERMITTEE:
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SPECIFIC CONDITIONS:

21. The permittee shall maintain daily records of the hours of operation of the process steam boiler along with the quantity of fuel burned. On a monthly basis, the annual hours of operation of the boiler for the previous 12 months shall be determined and included in the records (Rule 62-4.070(3), F.A.C.).

22. The permittee shall maintain the daily continuous monitoring records as required by 40 CFR 60.49b(g) and Rules 62-296.800 and 62-297.500, F.A.C.

23. If the permittee elects to demonstrate compliance with the nitrogen oxides emission standard by monitoring steam generator unit operating conditions and predict nitrogen oxides emission rates, the permittee shall submit a plan for approval as specified in 40 CFR 60.49b(c).

24. In order to document continuing compliance with Specific Condition No. 2, the permittee shall obtain and maintain at the facility fuel oil analysis from the fuel oil supplier which certifies that the oil received for firing in this boiler meets the specifications for No. 2 distillate fuel oil [Rules 62-4.070(3), 62-296.800, and 62-297.500, F.A.C.; and, 40 CFR 60.49b(r)].

25. All records required by this permit and/or 40 CFR 60.49b, shall be retained for a minimum of two years following the date of such records and be made available for inspection by the Department upon request [Rules 62-4.070(3), 62-296.800, and 62-297.500, F.A.C.; and, 40 CFR 60.49b(o)].

Reporting Requirements

26. The permittee shall submit quarterly opacity and nitrogen oxide excess emission reports in accordance with 40 CFR 60.7(c) and 40 CFR 60.49b(h) and (i). If there are no excess emissions during a calendar quarter the permittee shall submit a report stating that no excess emissions occurred during the reporting period [Rules 62-296.800 and 62-297.500, F.A.C.; and, 40 CFR 60.49b(h)].

27. The permittee shall submit quarterly reports certifying that only No. 2 distillate fuel oil with a maximum sulfur content of 0.05% by weight was fired in this boiler in the preceding calendar quarter [Rules 62-4.070(3), 62-296.800 and 62-297.500, F.A.C.; and, 40 CFR 60.49b(r)].

28. All reports required by this permit and/or 40 CFR 60.49b shall be submitted to the Air Sections of the Manatee County Environmental Action Commission and the Southwest District Office of the Department. All quarterly reports shall be postmarked by the 30th day following the end of the calendar quarter.

PERMITTEE:
Piney Point Phosphates, Inc.

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PSD-FL-205
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SPECIFIC CONDITIONS:

29. The permittee shall submit to the Air Sections of the Manatee County Environmental Action Commission and the Southwest District Office of the Department each calendar year on or before March 1 a completed DEP Form 17-213.900(4), an "Annual Operating Report for Air Pollutant Emitting Facility", for the preceding calendar year [Rule 62-210.300(2), F.A.C.].

30. The permittee shall provide the Southwest District office with the following notifications required by 40 CFR 60.7:

- When construction commenced within 30 days of commencement of construction
- Anticipated date of initial starting 30 to 60 days prior to startup
- Actual date of startup within 15 days after the starting
- Notification of the date of the compliance tests not less than 15 days prior to the test

Permitting Requirements

31. Any change in the method of operation, fuels or equipment that affect potential emissions shall be submitted to the Air Sections of the Manatee County Environmental Action Commission and the Southwest District Office of the Department for review and approval (Rule 62-212.200(46), F.A.C.).

32. All applicable rules of the Department and design discharge limitations specified in the application must be adhered to. The permit holder may also need to comply with county, municipal, federal, or other state regulations prior to construction (Rule 62-4.070(7), F.A.C.).

33. The permittee, for good cause, may request that this construction permit be extended. Such a request shall be submitted to the Bureau of Air Regulation prior to 60 days before the expiration of the permit (Rule 62-4.090, F.A.C.).

34. An operation permit application must be submitted to the Southwest District Office at least 90 days prior to the expiration date of this construction permit. To properly apply for an operation permit, the applicant shall submit the appropriate

PERMITTEE:
Piney Point Phosphates, Inc.

Permit Number : AC 41-232096
PSD-FL-205
Expiration Date: July 1, 1995

SPECIFIC CONDITIONS:

application form, fee, and certification that construction was completed noting any deviations from the conditions in the construction permit, and compliance test reports as required by this permit (Rules 62-4.055 and 62-4.220, F.A.C.).

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION

Virginia B. Wetherell
Virginia B. Wetherell, Secretary
Department of Environmental
Protection

Best Available Control Technology (BACT) Determination
Piney Point Phosphates, Inc.
Manatee County
AC 41-232096
PSD-FL-205

The applicant has submitted a request to increase the maximum operating hours for the existing auxiliary boiler at its Palmetto, Florida facility from 876 hours/year to 8760 hours/year. The maximum heat input and consumption of new No. 2 distillate fuel oil is 190 MMBtu/hour and 1349.0 gallons per hour (gph), respectively. The new No. 2 distillate fuel oil will contain no more than 0.05%, by weight, of sulfur.

A BACT determination is required for nitrogen oxides (NO_x), as set forth in Rule 62-212.400(5)(a), (b) and (c), Florida Administrative Code (F.A.C.) - Prevention of Significant Deterioration (Preconstruction Review Requirements), since this pollutant would be emitted in amounts exceeding the PSD-significant levels as follows:

<u>Pollutant</u>	<u>Actual Emissions</u>	<u>Proposed Emissions</u>	<u>Increase</u>	<u>PSD-Significant Levels</u>
NO _x	11.0 TPY	166.4 TPY	155.4 TPY	40 TPY

The Department performed a BACT determination for NO_x, since the proposed emissions for this pollutant exceeded the PSD significant rate of 40 tons per year. A BACT determination is required for particulate matter (PM) and sulfur dioxide (SO₂) in accordance with Rule 62-296.406, F.A.C.

BACT Determination Requested by the Applicant:

The applicant submitted the control of NO_x emissions using low-NO_x burners in conjunction with induced flue gas recirculation as a BACT determination. The applicant has proposed using distillate No. 2 fuel oil with a sulfur content not to exceed 0.05 percent, by weight, for compliance with the emission limits for PM and SO₂, which would not exceed the emission limits allowed under Rule 62-296.406, F.A.C.

Submittal Date of BACT Application:

May 28, 1993

BACT Determination Procedure:

In accordance with Rule 62-212.410, F.A.C., BACT Determination, Stationary Source-Preconstruction Review, this BACT determination is based on the maximum degree of reduction of each pollutant

emitted which the Department, on a case by case basis, taking into account energy, environmental and economic impacts, and other costs, determines is achievable through application of production processes and available methods, systems, and techniques. In addition, the regulations state that in making the BACT determination the Department shall give consideration to:

- (a) Any Environmental Protection Agency determination of Best Available Control Technology pursuant to 40 CFR 52.21, and any emission limitation contained in 40 CFR Part 60 (Standards of Performance for New Stationary Sources) or 40 CFR Part 61 (National Emission Standards for Hazardous Air Pollutants).
- (b) All scientific, engineering, and technical material and other information available to the Department.
- (c) The emission limiting standards or BACT determinations of any other state.
- (d) The social and economic impact of the application of such technology.

The EPA currently stresses that BACT should be determined using the "top-down" approach. The first step in this approach is to determine for the emission source in question the most stringent control available for a similar or identical source or source category. If it is shown that this level of control is technically or economically infeasible for the source in question, then the next most stringent level of control is determined and similarly evaluated. This process continues until the BACT level under consideration cannot be eliminated by any substantial or unique technical, environmental, or economic objections.

DEP BACT Determination:

Nitrogen Oxide (NO_x) emissions shall not exceed 0.15 pounds/MMBtu of heat input while utilizing low-NO_x burners in conjunction with flue gas recirculation. The boiler shall be fired with distillate fuel oil with a sulfur content not to exceed 0.05 percent, by weight.

BACT Determination Rationale:

Sulfur content in fuel oil is a primary air pollution concern since most of the fuel sulfur becomes sulfur dioxide (SO₂). Also, particulate matter emissions from fuel oil burning are related to sulfur content. The Department has determined that the firing of No. 2 fuel oil with a maximum of 0.05% sulfur content is BACT for particulates and SO₂. These sulfur content limitations are representative of what has been recently established as BACT for oil-fired equipment.

The emission rate of nitrogen oxides proposed by the applicant is 0.20 pound per million BTU heat input. NO_x emissions will be controlled by using low-NO_x burners and flue gas recirculation. A review of other BACT determinations for oil fired boilers indicates that the proposed emission level for nitrogen oxides is higher than several of the determinations on record and that an emissions level of 0.15 pounds of nitrogen oxides per million Btu heat input is achievable on new boilers. Additional NO_x control could be provided by using add on control devices, such as selective catalytic reduction (SCR) or selective noncatalytic reduction (SNCR). The applicant indicated that the costs for these technologies would range from \$6,675 to \$9,557 per ton of NO_x removed. Other reviews of these control technologies indicates a cost effectiveness ranging from \$6802 to \$7321 per ton of NO_x removed. These costs exceed those which have been previously judged to be representative of BACT, thereby dismissing these technologies as BACT for this facility. Based on the manufacturers information, a 0.15 pounds of nitrogen oxides per million BTU heat input is achievable and, therefore, is considered BACT for this source.

Details of the Analysis May be Obtained by Contacting:

John C. Brown, Jr., P.E.
Department of Environmental Protection
Bureau of Air Regulation
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Recommended by:

Approved by:

C. H. Fancy
C. H. Fancy, P.E., Chief
Bureau of Air Regulation

9/15, 1994
Date

Virginia B. Wetherell
Virginia B. Wetherell, Secretary
Dept. of Environmental Protection

9-22-94, 1994
Date

Is your RETURN ADDRESS completed on the reverse side?

SENDER:

- Complete items 1 and/or 2 for additional services.
- Complete items 3, and 4a & b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):

- Addressee's Address
- Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:
 Mr. Ivan Nance
 Piney Point PHosphates, Inc.
 13300 U.S. Highway 41 North
 Palmetto, FL 34221-8662

4a. Article Number
 P 751 859 983

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

7. Date of Delivery
 9/25/94

5. Signature (Addressee)

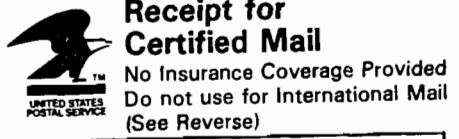
6. Signature (Agent)
[Signature]

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

PS Form 3811, December 1991 U.S. GPO: 1992-323-402 **DOMESTIC RETURN RECEIPT**

Thank you for using Return Receipt Service

Z 751 859 983



PS Form 3800, March 1993

Sent to Mr. Ivan Nance, Piney Point	
Street and No. Phosphates 13300 U.S. Highway 41 North	
P.O., State and ZIP Code Palmetto, FL 34221-8662	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date Mailed: 9-23-94 Permit: AC 41-232096 PSD-FL-205	

Florida Department of
Environmental Protection

Memorandum

TO: Virginia Wetherell
FROM: Howard L. Rhodes *HLR*
DATE: September 14, 1994
SUBJECT: Approval of Construction Permit
AC 41-232096, PSD-FL-205
Piney Point Phosphates, Inc.

Attached for your approval and signature is a construction permit and Best Available Control Technology (BACT) Determination prepared by the Department's Bureau of Air Regulation for the subject facility. This permit will allow the facility to replace an existing 96 MMBtu/hour steam boiler with a new 190 MMBtu/hour process steam boiler and to increase the operating hours from 876 to 8760 hours per year.

Nitrogen oxide (NO_x) emissions will be controlled and minimized by utilizing low-NO_x burners in conjunction with flue gas recirculation. Sulfur dioxide and particulate matter emissions will be controlled and minimized by firing only low sulfur No. 2 fuel oil.

The facility is located in Palmetto, Manatee County, Florida. Comments were received from EPA during the public comment period and concurred with the proposed permit and BACT.

I recommend your approval and signature.

HLR/CSL/bjb

Attachment

Florida Department of
Environmental Protection

Memorandum

CLAIR
TO VW
9/19

TO: Virginia Wetherell

FROM: Howard L. Rhodes *HLR*

DATE: September 14, 1994

SUBJECT: Approval of Construction Permit
AC 41-232096, PSD-FL-205
Piney Point Phosphates, Inc.

Attached for your approval and signature is a construction permit and Best Available Control Technology (BACT) Determination prepared by the Department's Bureau of Air Regulation for the subject facility. This permit will allow the facility to replace an existing 96 MMBtu/hour steam boiler with a new 190 MMBtu/hour process steam boiler and to increase the operating hours from 876 to 8760 hours per year.

Nitrogen oxide (NO_x) emissions will be controlled and minimized by utilizing low-NO_x burners in conjunction with flue gas recirculation. Sulfur dioxide and particulate matter emissions will be controlled and minimized by firing only low sulfur No. 2 fuel oil.

The facility is located in Palmetto, Manatee County, Florida. Comments were received from EPA during the public comment period and concurred with the proposed permit and BACT.

I recommend your approval and signature.

HLR/CSL/bjb

Attachment



Department of Environmental Protection

Lawton Chiles
Governor

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Virginia B. Wetherell
Secretary

September 9, 1998

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Ivan Nance
Corporation Environmental Manager
Piney Point Phosphates, Inc.
13300 U.S. Highway North
Palmetto, Florida 34221

Re: DEP No. AC 41-232096
190 MMBtu/Hour; Process Steam Boiler

Dear Mr. Nance:

We received your letter September 4 requesting an extension for the above mentioned permit. Since the facility currently holds a Title V permit issued by the Department, and this is a non-PSD permit, no permit fee is requested pursuant to FDEP Rule 62-4.050(4)(a)2. Therefore, enclosed herewith is the check you submitted with your request.

If you have any questions regarding this matter, please call me at (85)921-9523.

Sincerely,

A handwritten signature in cursive script that reads "A. A. Linero" followed by the date "9/9".

A. A. Linero, P.E.
Administrator
New Source Review Section

AAL/kt

PINEY POINT



PHOSPHATES, INC.

**CERTIFIED/RETURN RECEIPT
NO. Z 313 136 301**

26 August 1998

RECEIVED

SEP 04 1998

**BUREAU OF
AIR REGULATION**

State of Florida
Department of Environmental Protection
Division of Air Resources Management
2600 Blair Stone Road
Tallahassee, FL 32399-2400

RE: FDEP Permit AC41-232096;
190 MMBTU/Hour;
Process Steam Boiler

Dear Sirs:

Piney Point Phosphates, Inc. ("PPP") requests to extend this construction permit until 31 December 1999. This extension requested due to PPP being unable to utilize steam produced by the subject boiler in the near future. Further, PPP estimates that initial startup and compliance testing costs exceed \$500,000, without benefit of the steam utilization.

The boiler has been installed at this time but has not been operated.

Accompanying this letter is a check in the amount of \$50.00 submitted as the needed processing fee.

Should further information or response be required, please contact our offices.

Very truly yours,

Ivan Nance
Corporate Environmental Manager

/sml

Enclosure

Is your RETURN ADDRESS completed on the reverse side?

SENDER:

- Complete items 1 and/or 2 for additional services.
- Complete items 3, 4a, and 4b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):

- Addressee's Address
- Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:

Mr. Ivan Dance, CEM
Piney Point Phosphates
13300 US Hwy North
Palmetto, FL

34221

4a. Article Number

P 265 659 415

4b. Service Type

- Registered
- Express Mail
- Return Receipt for Merchandise
- Certified
- Insured
- COD

7. Date of Delivery

9/14/98

5. Received By: (Print Name)

6. Signature: (Addressee or Agent)

X Susan Weck

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

PS Form 3811, December 1994

102595-97-B-0179

Domestic Return Receipt

Thank you for using Return Receipt Service.

P 265 659 415

US Postal Service

Receipt for Certified Mail

No Insurance Coverage Provided.

Do not use for International Mail (See reverse)

Sent to	
Ivan Dance	
Street & Number	
Piney Point	
Post Office, State, & ZIP Code	
Palmetto, FL	
Postage	\$
Certified Fee	
Special Delivery Fee	
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	
9-10-98	

PS Form 3800, April 1995



Department of Environmental Protection

Lawton Chiles
Governor

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Virginia B. Wetherell
Secretary

September 9, 1998

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Ivan Nance
Corporate Environmental Manager
Piney Point Phosphates, Inc.
13300 U.S. Highway North
Palmetto, Florida 34221

Re: Amendment of Construction Permit No. AC 41-232096
Process Steam Boiler - FID No. 0810002

Dear Mr. Nance:

The Department has reviewed your September 4, 1998 letter requesting an extension of the expiration date of the above referenced permit. This request is acceptable and the expiration date is hereby extended from December 31, 1998 to December 31, 1999.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under Sections 120.569 and 120.57 of the 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 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 notice of intent. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3) of the Florida Statutes must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of this notice of intent, whichever occurs first. Under Section 120.60(3), however, any person who asked the Department for notice of agency action may file a petition within fourteen days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. 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 28-106.205 of the Florida Administrative Code.

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

Printed on recycled paper.

A petition that disputes the material facts on which the Department's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner, the name, address, and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of how and when petitioner received notice of the agency action or proposed action; (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate; (e) A concise statement of the ultimate facts alleged, as well as the Rules and statutes which entitle the petitioner to relief; and (f) A demand for relief.

A petition that does not dispute the material facts upon which the Department's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301

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 notice. 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.

Mediation is not available in this proceeding.

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 notice of intent.

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.

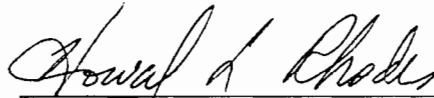
The Department will grant a variance or waiver when the petition demonstrates both that the application of the Rule would create a substantial hardship or violate principles of fairness, as each

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 the EPA and by any person under the Clean Air Act unless and until the Administrator separately approves any variance or waiver in accordance with the procedures of the federal program.

A copy of this letter shall be filed with the referenced permit and shall become part of the permit.

Sincerely,



Howard L. Rhodes, Director
Division of Air Resources
Management

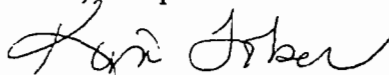
CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this AMENDMENT was sent by certified mail (*) and copies were mailed by U.S. Mail before the close of business on 9-10-98 to the person(s) listed:

Mr. Ivan Nance, Piney Point Phosphates*
Mr. Bill Thomas, SWD
Ms. Karen Collins, Manatee Co.

Clerk Stamp

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



(Clerk)

9-10-98

(Date)

Fold at line over top of envelope to

Is your RETURN ADDRESS completed on the reverse side?

SENDER:

- Complete items 1 and/or 2 for additional services.
- Complete items 3, 4a, and 4b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):

1. Addressee's Address
2. Restricted Delivery

Consult postmaster for fee.

<p>3. Article Addressed to: Mr. Juan Tance, CEM Piney Point Phosphates 13300 US Hwy North Palmetto, FL 34221</p>	<p>4a. Article Number P 265 659 417</p>
<p>5. Received By: (Print Name)</p>	<p>4b. Service Type</p> <p><input type="checkbox"/> Registered <input checked="" type="checkbox"/> Certified</p> <p><input type="checkbox"/> Express Mail <input type="checkbox"/> Insured</p> <p><input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> COD</p>
<p>6. Signature? (Addressee or Agent)</p> <p><input checked="" type="checkbox"/> Susan Lfleck</p>	<p>7. Date of Delivery 9/11/98</p>
<p>8. Addressee's Address (Only if requested and fee is paid)</p>	

Thank you for using Return Receipt Service.

PS Form 3811, December 1994

102595-97-B-0179

Domestic Return Receipt

P 265 659 417

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

Sent to	Juan Tance
Street & Number	Piney Point
Post Office, State, & ZIP Code	Palmetto FL
Postage	\$
Certified Fee	
Special Delivery Fee	
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	9-10-98
	AC41-232096

PS Form 3800, April 1995



Department of Environmental Protection

Lawton Chiles
Governor

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Virginia B. Wetherell
Secretary

September 19, 1997

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Ivan Nance
Corporate Environmental Manager
Piney Point Phosphates, Inc.
13300 U.S. Highway 41 North
Palmetto, Florida 34221

Re: DEP File No. 0810002-002-AC
190 MMBtu/hour Process Steam Boiler
Piney Point Phosphates, Inc.
Original Permit No. AC41-232096 (PSD-FL-205A)

Dear Mr. Nance:

The Department has reviewed your letter dated September 4, 1997 requesting another extension of the expiration date of the above referenced permit. This request is acceptable and the permit is hereby extended from December 31, 1997 to December 31, 1998.

A person whose substantial interests are affected by this permit amendment 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, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000, telephone: 850/488-9730, fax: 850/487-4938. Petitions must be filed within fourteen days of receipt of this permit amendment. A petitioner must mail a copy of the petition to the applicant at the address indicated above, at the time of filing. 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 of the Florida Administrative Code. Mediation is not available for this action.

A petition must contain the following information: (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the 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 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.

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

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 amendment. 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 amendment.

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 the EPA and by any person under the Clean Air Act unless and until the Administrator separately approves any variance or waiver in accordance with the procedures of the federal program.

This permit amendment is final and effective on the date filed with the Clerk of the Department unless a petition is filed in accordance with the above paragraphs 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 62-103.070, F.A.C. Upon timely filing of a petition or a request for an extension of time this permit amendment will not be effective until further order of the Department.

When the Order (Permit Amendment) 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 Legal Office; and by filing a copy of the Notice of Appeal accompanied by the applicable filing fees with the appropriate District

Mr. Ivan Nance
Page 3
September 19, 1997

Court of Appeal. The Notice of appeal must be filed within 30 (thirty) days from the date this Notice is filed with the Clerk of the Department.

A copy of this letter shall be filed with the referenced permit and shall become part of the permit.

Sincerely,



Howard L. Rhodes, Director
Division of Air Resources
Management

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this **PERMIT AMENDMENT** was sent by certified mail (*) and copies were mailed by U.S. Mail before the close of business on 9-23-97 to the person(s) listed:

Mr. Ivan Nance, PPP*
Mr. John Koogler, P.E.
Mr. Brian Beals, EPA
Mr. John Bunyak, NPS
Mr. Bill Thomas, SWD

Clerk Stamp

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

Keri Tolson 9-23-97
(Clerk) (Date)

Is your RETURN ADDRESS completed on the reverse side?

SENDER:

- Complete items 1 and/or 2 for additional services.
- Complete items 3, 4a, and 4b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):

- 1. Addressee's Address
- 2. Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:
 Mr. Ivan Nance, CEM
 Piney Point Phosphates
 13300 US Hwy 41 N.
 Palmetto, FL 34221

4a. Article Number
 P 265 659 461

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

7. Date of Delivery
 9/25/97

5. Received By: (Print Name)

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

6. Signature: (Addressee or Agent)
 X Susan Speck

PS Form 3811, December 1994

Domestic Return Receipt

Thank you for using Return Receipt Service.

P 265 659 461

US Postal Service
Receipt for Certified Mail

No Insurance Coverage Provided.
 Do not use for International Mail (See reverse)

Sent to Ivan Nance	
Street & Number Piney Point Phos.	
Post Office, State, & ZIP Code Palmetto FL	
Postage	\$
Certified Fee	
Special Delivery Fee	
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	9-23-97
0810002-002-AC	

PS Form 3800, April 1995

3755

2223

291859

PINEY POINT PHOSPHATES, INC.



CERTIFIED/RETURN RECEIPT NO. Z 313 136 301

4 September 1997

State of Florida
Department of Environmental Protection
Division of Air Resources Management
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Re: FDEP Permit AC41-232096;
190 MMBTU/Hour;
Process Steam Boiler

0810002-002-AC

Dear Sirs:

Piney Point Phosphates, Inc. ("PPP") requests to extend this construction permit until 31 December 1998. This extension is being requested due to PPP being unable to utilize steam produced by the subject boiler in the near future. Further, PPP estimates that initial startup and compliance testing costs will exceed \$500,000, without benefit of the steam utilization.

The boiler has been installed at this time but has not been operated.

Accompanying this letter is a check in the amount of \$50.00 submitted as the needed processing fee.

Should further information or response be required, please contact our offices.

Very truly yours,

[Handwritten signature of Ivan Nance]

Ivan Nance
Corporate Environmental Manager

/rmm

Enclosure

RECEIVED
MAIL ROOM
SEP 10 97

RECEIVED

SEP 15 1997

BUREAU OF
AIR REGULATION

PINEY POINT PHOSPHATES, INC.

General Disbursements
13300 U.S. Hwy. 41 N.
Palmetto, FL 34221-8662

9-5-97 \$50.00 FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

REMITTANCE ADVICE

DETACH BEFORE DEPOSITING

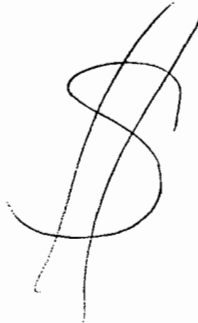
Fold at line over top of envelope to
the right of the return address

CERTIFIED

MULBEE

Z 313 136 301

MAIL



State of Florida
Department of Environmental Protection
Division of Air Resources Management
2600 Blair Stone Road
Tallahassee, FL 32399-2400

32399-2400





Department of Environmental Protection

Lawton Chiles
Governor

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Virginia B. Wetherell
Secretary

April 28, 1997

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Ivan Nance
Corporate Environmental Manager
Piney Point Phosphates, Inc.
13300 U.S. Highway 41 North
Palmetto, Florida 34221

Re: Amendment of Construction Permit No. AC41-232096 (PSD-FL-205A)
190 MMBtu/hour Process Steam Boiler
Piney Point Phosphates, Inc.

08 10002-002-AC

Dear Mr. Nance:

The Department reviewed your letter dated April 16 requesting another extension of the expiration date of the above referenced permit. This request is acceptable and the expiration date is changed as shown below:

Expiration Extension Date

From: July 1, 1997

To: December 31, 1997

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, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000, telephone: 904/488-9730, fax: 904/487-4938. Petitions must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of this notice of intent, whichever occurs first. A petitioner must mail a copy of the petition to the applicant at the address indicated above, at the time of filing. 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 of the Florida Administrative Code.

A petition must contain the following information: (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the 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 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 notice of intent.

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 notice of intent. 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.

A copy of this letter shall be filed with the referenced permit and shall become part of the permit.

Sincerely,



Howard L. Rhodes, Director
Division of Air Resources
Management

HLR/jr


CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this AMENDMENT was sent by certified mail (*) and copies were mailed by U.S. Mail before the close of business on 4-30-97 to the person(s) listed:

Mr. Ivan Nance, PPP*
Mr. John Koogler, P.E.
Mr. Brian Beals, EPA
Mr. John Bunyak, NPS
Mr. Bill Thomas, SWD

Clerk Stamp

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


(Clerk)

4-30-97
(Date)

Florida Department of
Environmental Protection

Memorandum

TO: Howard L. Rhodes

THRU: Clair Fancy *CAF*
Al Linero *Al Linero 4/25*

FROM: John Reynolds *AAL for JR*

DATE: April 25, 1997

SUBJECT: Amendment of Construction Permit No. AC41-232096
Piney Point Phosphates

Kim

Attached is a letter that will extend the expiration date of the subject construction permit. The extension is needed because of delays in obtaining a local building permit from Manatee County.

I recommend your approval and signature.

JR/kt

is your RETURN ADDRESS completed on the reverse side?

SENDER:

- Complete items 1 and/or 2 for additional services.
- Complete items 3, 4a, and 4b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):

- 1. Addressee's Address
- 2. Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:
 Ivan Nance, CEM
 Piney Point Phosphates
 13300 US Hwy 41 North
 Palmetto, FL
 34221

4a. Article Number
P 265 659 200

4b. Service Type

- Registered Certified
- Express Mail Insured
- Return Receipt for Merchandise COD

7. Date of Delivery

5. Received By: (Print Name)

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

6. Signature (Addressee or Agent)

[Signature]

RS Form 3811, December 1994

Domestic Return Receipt

Thank you for using Return Receipt Service.

P 265 659 200

US Postal Service
Receipt for Certified Mail

No Insurance Coverage Provided.
 Do not use for International Mail (See reverse)

Sent to	Ivan Nance
Street & Number	Piney Point Phos.
Post Office, State, & ZIP Code	Palmetto, FL
Postage	\$
Certified Fee	
Special Delivery Fee	
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	4-30-97

PS Form 3800, April 1995

AE41-232096
 PSD-FL-205A



Department of Environmental Protection

Lawton Chiles
Governor

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Virginia B. Wetherell
Secretary

April 28, 1997

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Ivan Nance
Corporate Environmental Manager
Piney Point Phosphates, Inc.
13300 U.S. Highway 41 North
Palmetto, Florida 34221

Re: Amendment of Construction Permit No. AC41-232096 (PSD-FL-205A)
190 MMBtu/hour Process Steam Boiler
Piney Point Phosphates, Inc.

0810002-002-AC

Dear Mr. Nance:

The Department reviewed your letter dated April 16 requesting another extension of the expiration date of the above referenced permit. This request is acceptable and the expiration date is changed as shown below:

Expiration Extension Date

From: July 1, 1997

To: December 31, 1997

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, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000, telephone: 904/488-9730, fax: 904/487-4938. Petitions must be filed within fourteen days of receipt of this letter. A petitioner must mail a copy of the petition to the applicant at the address indicated above, at the time of filing. 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 of the Florida Administrative Code.

A petition must contain the following information: (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the 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 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 notice of intent.

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 notice of intent. 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.

A copy of this letter shall be filed with the referenced permit and shall become part of the permit.

Sincerely,



Howard L. Rhodes, Director
Division of Air Resources
Management

HLR/jr

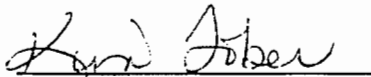
CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this AMENDMENT was sent by certified mail (*) and copies were mailed by U.S. Mail before the close of business on 4-30-97 to the person(s) listed:

Mr. Ivan Nance, PPP*
Mr. John Koogler, P.E.
Mr. Brian Beals, EPA
Mr. John Bunyak, NPS
Mr. Bill Thomas, SWD

Clerk Stamp

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


(Clerk)

4-30-97
(Date)

Fold at line over top of envelope to

Is your RETURN ADDRESS completed on the reverse side?

SENDER:

- Complete items 1 and/or 2 for additional services.
- Complete items 3, 4a, and 4b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):

- 1. Addressee's Address
- 2. Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:
 Mr. Ivan Nance, CEM
 Pineis Point Phosphates
 13300 US Hwy 41 N.
 Palmetto, FL 34221

4a. Article Number
P 265 659 213

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

7. Date of Delivery
5-14-97

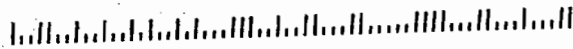
5. Received By: (Print Name)
Ivan Nance

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

6. Signature: (Addressee or Agent)
Ivan Nance

X

PS Form 3811



Thank you for using Return Receipt Service.

P 265 659 213

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

Sent to	
Ivan Nance	
Street & Number	
Pineis Point	
Post Office, State, & ZIP Code	
Palmetto, FL	
Postage	\$
Certified Fee	
Special Delivery Fee	
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	corrected 5-9-97 pass

PS Form 3800, April 1995

PINEY POINT



PHOSPHATES, INC.

RECEIVED

APR 22 1997

**BUREAU OF
AIR REGULATION**

CERTIFIED/RETURN RECEIPT
NO. 430 369 172

16 April 1997

State of Florida
Department of Environmental Protection
Division of Air Resources Management
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Re: FDEP Permit AC41-232096
190 MMBTU/Hour Process Steam Boiler

Dear Sirs:

Piney Point Phosphates, Inc. ("PPP") requests to extend this construction permit until 31 December 1997. This extension is being requested as PPP will not be able to complete the construction, perform test operations and submit an operation permit application, as required by the permit.

PPP has received the boiler at the site, but has been unable to complete the installation for operation under permit AC41-232096. PPP is awaiting a local building permit issuance from Manatee County, as you are aware.

Accompanying this letter is a check in the amount of \$50.00 submitted as the needed processing fee.

Should further information or response be required, please contact our offices.

Very truly yours,

Ivan Nance
Corporate Environmental Manager

/rmm

Enclosure

13300 U.S. Hwy. 41 N., Palmetto, FL 34221 • Phone 941-722-4555 • Fax 941-729-3589

PINEY POINT PHOSPHATES, INC.

General Disbursements
13300 U.S. Hwy. 41 N.
Palmetto, FL 34221-8662

4-16-97 \$50.00 FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

REMITTANCE ADVICE

DETACH BEFORE DEPOSITING

PINEY POINT PHOSPHATES, INC.

General Disbursements
13300 U.S. Hwy. 41 N.
Palmetto, FL 34221-8662

ACCOUNTS PAYABLE CHECK

No 10803763

DATE 4-16-97

CHECK
NUMBER

803763

63-600/631
8

PAY EXACTLY FIFTY AND NO/100

AMOUNT
\$50.00



039-008
6990 S. Florida Ave.
Lakeland, Florida 33813

Pay
to the
order of

FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

Nela J. Kenwright
AUTHORIZED SIGNATURE



Department of Environmental Protection

Lawton Chiles
Governor

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Virginia B. Wetherell
Secretary

May 10, 1996

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Ivan Nance
Corporate Environmental Manager
Piney Point Phosphates, Inc.
13300 U.S. Highway 41 North
Palmetto, Florida 34221

Dear Mr. Nance:

Re: Amendment to Construction Permit
AC 41-232096 (PSD-FL-205A) - Auxiliary Boiler
Piney Point Phosphates, Inc.

The Department has reviewed your letter dated April 24, 1996 requesting an extension of the construction permit expiration date. The permit is amended as follows:

Expiration Date Extension:

From: July 1, 1996
To: July 1, 1997

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 (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, Tallahassee, Florida 32399-3000. Petitions filed by the applicant of the amendment request/application and the parties listed below must be filed within 14 days of receipt of this amendment. Petitions filed by other persons must be filed within 14 days of the amendment issuance or within 14 days of their receipt of this amendment, whichever occurs first. 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, F.S.

Mr. Ivan Nance
Page Two
May 10, 1996

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 warrant 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 the 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 amendment. Persons whose substantial interests will be affected by any decision of the Department with regard to the amendment request/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 amendment in the Office of General Counsel at 3900 Commonwealth Boulevard, Tallahassee, Florida 32399-3000. 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 60Q-2.010, Florida Administrative Code.

Mr. Ivan Nance
Page Three
May 10, 1996

This letter shall be attached to permit No. AC41-232096 (PSD-FL-205A) and shall become a part of the permit.

Sincerely,



Howard L. Rhodes, Director
Division of Air Resources
Management

HLR/jr/t

Enclosure

cc: B. Thomas, SWD
J. Kissel, SWD
J. Harper, EPA
J. Bunyak, NPS
J. Koogler, K&A

CERTIFICATE OF SERVICE

This is to certify that this **PERMIT AMENDMENT** and all copies were mailed on the close of business on 5-15-96 to the listed persons.

FILING AND ACKNOWLEDGMENT FILED,
on this date, pursuant to Chapter
120.52(11), Florida Statutes, with
with the designated Deputy Clerk,
receipt of which is hereby
acknowledged.

Kym Jobey 5-15-96
(Clerk) (Date)

SENDER:

- Complete items 1 and/or 2 for additional services.
- Complete items 3, and 4a & b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):

1. Addressee's Address

2. Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:
 Ivan Nance, CEM
 Piney Point Phos, Inc
 13300 US Hwy 41 North
 Palmetto, FL 34221

4a. Article Number
 Z 127 633 209

4b. Service Type

Registered Insured

Certified COD

Express Mail Return Receipt for Merchandise

7. Date of Delivery
 5-20-96

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

5. Signature (Addressee)
[Signature]

6. Signature (Agent)
Elijah Johnson Jr.

PS Form 3811, December 1991 U.S. GPO: 1993-352-714

DOMESTIC RETURN RECEIPT

Is your RETURN ADDRESS completed on the reverse side? Thank you for using Return Receipt Service.

Z 127 633 209



Receipt for Certified Mail

No Insurance Coverage Provided
 Do not use for International Mail
 (See Reverse)

PS Form 3800, March 1993

Sent to <i>Ivan Nance</i>	
Street and No. <i>Piney Point Phos.</i>	
P.O. State and Zip Code <i>Palmetto, FL</i>	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	<i>5-15-96</i>
<i>PSD-FI-205A</i>	

PINEY POINT PHOSPHATES, INC.

13300 U. S. Hwy. 41 North
Palmetto, Florida 34221
(941) 722-4555

RECEIVED

MAY 01 1996

BUREAU OF
AIR REGULATION

**CERTIFIED/RETURN RECEIPT
NO. P 576 124 704**

24 April 1996

State of Florida
Department of Environmental Protection
Bureau of Air Regulation
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Re: FDEP Permit No. AC-41 232096
190 MM BTU/Hour Process Steam Boiler

Dear Sirs:

Piney Point Phosphates, Inc. (PPP) requests to extend this construction permit until July 1997. Enclosed is the processing fee of \$50.00 required for this request.

PPP has not yet begun construction of this boiler. PPP anticipates construction of this boiler late in 1996, but does not anticipate completion of construction prior to July 1, 1996.

PPP appreciates your cooperation and attention in this matter. Should further information or response be required, please contact our offices.

Very truly yours,



Ivan Nance
Corporate Environmental Manager

/rmm

Enclosure

cc: Mr. Pradeep Raval - Koogler & Associates

PINEY POINT PHOSPHATES, INC.

General Disbursements
13300 U.S. Hwy. 41 N.
Palmetto, FL 34221-8662

DEPT OF ENVIRONMENTAL

INVOICE	INV DATE	DUE DATE	INV AMOUNT	DISCOUNT	NET AMOUNT
BOILR PERM	04/23/96	04/23/96	50.00	.00	50.00

REMITTANCE ADVICE

CHECK NO. 0802118 50.00

50.00

DETACH BEFORE DEPOSITING

Reynolds • Reynolds LITHO IN U.S.A. GPO

PINEY POINT PHOSPHATES, INC.

ACCOUNTS PAYABLE CHECK

General Disbursements
13300 U.S. Hwy. 41 N.
Palmetto, FL 34221-8662

No 10 802118

DATE 04/25/96

CHECK NUMBER 0802118

PAY EXACTLY FIFTY AND NO/100

AMOUNT \$50.00



SunBank/Mid-Florida, N.A.
Mulberry Office 185
400 North Church Avenue
Mulberry, FL 33860

Pay
to the
order of

DEPT. OF ENVIRONMENTAL
PROTECTION
2600 BLAIR STONE ROAD
TALLAHASSEE FL 32399-2400

Elijah Johnson Jr.
AUTHORIZED SIGNATURE



Memorandum

Florida Department of
Environmental Protection

TO: C.H. Fancy
FROM: A.A. Linero *AA Linero*
DATE: September 7, 1995
SUBJ: Piney Point Phosphates, Inc. - TEPD/Proposed Permit

Attached for your review and signature is the preliminary package for the subject company to construct a 2,700 tons/day sulfuric acid plant. This is the same as the previous one (Farmland) except for capacity and emission tonnages. The BACT and the permit conditions are essentially the same.

Attachments

AAL/jr

*Clear - Double absorption for SO_2 & SO_3 +
mist eliminator. New 2700 TPD plant
replaces a 2000 TPD plant. *al**

*Ken Prui b
Randy Maclean*



Department of Environmental Protection

Lawton Chiles
Governor

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Virginia B. Wetherell
Secretary

September 8, 1995

CERTIFIED MAIL - RETURN RECEIPT REQUESTED


Mr. Ivan Nance
Environmental/Technical Manager
Piney Point Phosphates, Inc.
13300 U.S. Highway 41 North
Palmetto, Florida 34221

Dear Mr. Nance:

Attached is one copy of the Technical Evaluation and Preliminary Determination, Best Available Control Technology (BACT) determination, Intent to Issue, and proposed permit for Piney Point Phosphates, Inc., to construct a 2,700 tons/day sulfuric acid plant at the Piney Point facility, Manatee County, Florida. Also included is the Notice of Intent to Issue for you to publish as indicated.

Please submit any written comments to be considered concerning the Department's proposed action to Mr. A. A. Linero, P.E., Administrator, New Source Review Section, at the above address. If you have any questions, please call Mr. John Reynolds at 904-488-1344.

Sincerely,


C. H. Fancy, P.E.
Chief
Bureau of Air Regulation

CHF/jr/t

Attachments

CC: W. Thomas, SWD
G. Johnson, Manatee Co.
J. Harper, EPA
J. Bunyak, NPS
J. Koogler, K&A

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

NOTICE OF INTENT TO ISSUE PERMIT

PSD-FL-144

The Department of Environmental Protection (Department) gives notice of its intent to issue a permit to Piney Point Phosphates, Inc., 13300 U.S. Highway 41 North, Palmetto, Florida 34221. This company operates a phosphate fertilizer manufacturing facility at that address. The permit will allow the construction of a 2,700 tons/day sulfuric acid plant to replace the existing 2,000 tons/day plant which will be permanently shut down. A determination of Best Available Control Technology (BACT) was required since the proposed project is subject to Prevention of Significant Deterioration (PSD) regulations. BACT consists of the double absorption process for sulfur dioxide control plus high efficiency mist eliminators for controlling acid mist. Modeling results indicate that the proposed project is not expected to cause or significantly contribute to any violation of the ambient air quality standards. The Department is issuing this Intent to Issue for the reasons stated in the Technical Evaluation and Preliminary Determination.

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 (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 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, F.S.

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 warrant 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 Notice. 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 publication of this notice 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, Florida Administrative Code.

The application/request 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:

Department of Environmental Protection
Bureau of Air Regulation
111 S. Magnolia Drive
Tallahassee, Florida 32301

Department of Environmental Protection
Southwest District
8407 Laurel Fair Circle
Tampa, Florida 33619

Any person may send written comments on the proposed action to Administrator, New Source Review Section, Bureau of Air Regulation, at the Department's Tallahassee address. All comments received within 30 days of the publication of this notice will be considered in the Department's final determination.

Further, a public hearing can be requested by any person(s). Such requests must be submitted within 30 days of this notice.

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

CERTIFIED MAIL

In the Matter of an
Application for Permit by:

DEP File No. PSD-FL-144
AC 41-173305
Manatee County

Mr. Ivan Nance
Environmental/Technical Manager
Piney Point Phosphates, Inc.
13300 U.S. Highway 41 North
Palmetto, Florida 34221

INTENT TO ISSUE

The Department of Environmental Protection (Department) gives notice of its intent to issue an air construction permit (copy attached) for the applicant's facility as detailed in the application specified above for the reasons stated in the Technical Evaluation and Preliminary Determination.

The applicant, Piney Point Phosphates, Inc., applied on April 26, 1995, to the Department for a permit to construct a 2,700 tons/day sulfuric acid plant at their facility located in Manatee County.

The Department has permitting jurisdiction under the provisions of Chapter 403, Florida Statutes (F.S.), and Chapters 62-212 and 62-4, Florida Administrative Code (F.A.C.). The project is not exempt from permitting procedures. The Department has determined that a permit is required for the proposed project.

Pursuant to Section 403.815, F.S., and 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. The applicant shall provide proof of publication to the Department's Bureau of Air Regulation, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, within seven days of publication. Failure to publish the notice and provide proof of publication within the allotted time may result in the 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, 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 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, F.S.

The Petition shall contain the following information;

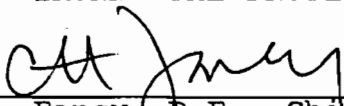
- (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed;
- (b) A statement of how and when each petitioner received notice of the Department's action or proposed action;
- (c) 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 warrant 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 Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION


C. H. Fancy, P.E., Chief
Bureau of Air Regulation
2600 Blair Stone Road
Tallahassee, Florida 32399
904-488-1344

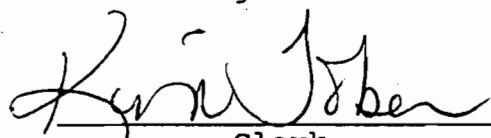
CERTIFICATE OF SERVICE

The undersigned duly designated deputy clerk hereby certifies that all copies of this INTENT TO ISSUE PERMIT were mailed by certified mail before the close of business on 8-12-95 to the listed persons.

Clerk Stamp

FILING AND ACKNOWLEDGMENT

FILED, on this date, pursuant to §120.52(11), Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.


Clerk 8-12-95
Date

Copies furnished to:

W. Thomas, SWD
G. Johnson, Manatee Co.
J. Harper, EPA
J. Bunyak, NPS
J. Koogler, K&A

Technical Evaluation
and
Preliminary Determination

Piney Point Phosphates, Inc.
Palmetto, Manatee County, Florida

SULFURIC ACID PLANT

Department File No.: AC 41-173305
PSD-FL-144

Department of Environmental Protection
Division of Air Resources Management
Bureau of Air Regulation

September 8, 1995

I. General Information

A. Applicant

Piney Point Phosphates, Inc.
13300 U.S. Highway 41 North
Palmetto, Florida 34221

B. Request

On April 26, 1995, the applicant submitted an application for a permit to construct a 2,700 tons/day sulfuric acid plant (SAP) to replace the existing 2,000 tons/day SAP. The application was considered complete on June 8, 1995, when the Department received additional information requested.

C. Classification

The applicant's facility (SIC 2819) is located off U.S. Highway 41 in Piney Point, Manatee County, Florida. The UTM coordinates for this facility are Zone 17, 348.5 km E and 3057.3 km N.

II. Project Description/Emissions

The applicant proposes to construct a 2,700 tons/day sulfuric acid plant (SAP) to replace an outdated SAP that was originally constructed as a single absorption plant in the 1960's and later converted to double absorption with a capacity of 2,000 tons/day. The old SAP will be permanently shut down when the new plant becomes operational. Emissions of sulfur dioxide (SO₂), sulfuric acid mist (SAM) and nitrogen oxides (NO_x) are shown below in tons per year:

<u>Pollutant</u>	<u>Old SAP Actuals (1990/1991 avg.)</u>	<u>New SAP Allowables</u>	<u>Net Increase</u>	<u>PSD Level</u>
SO ₂	820.5	1,971.0	1,150.5	40
SAM	17.4	73.9	56.5	7
NO _x	19.7	39.4	19.7	40

As stated in the BACT determination, emission limits for the new plant are based on the applicable federal new source performance standards. An insignificant increase in NO_x is presumed based on a previously-assumed NO_x emission factor of 0.12 lb/ton.

The amount by which the allowables exceed actual emissions might suggest the need for lower allowables in the BACT determination. However, in cases such as this where the process itself is the "control device", a lower allowable limit does not of itself force lower emissions. In a typical sulfuric acid plant, SO₂ emissions are lowest just after a catalyst change and gradually rise as the catalyst loses reactivity. Continuous emission monitoring data typically show that SO₂ emissions start out very low after a catalyst change and then may rise to near the new source performance standard (4.0 lb/ton) at the end of the catalyst's life. The effect of lowering the allowable

limit would be to require more frequent catalyst changes at greatly increased costs which would likely be prohibitive.

III. Rule Applicability

The construction permit application is subject to review under the provisions of Chapter 403, Florida Statutes, and Chapters 62-209 through 62-297, Florida Administrative Code (F.A.C.). The facility is located in an area designated as attainment for each of the regulated air pollutants. The proposed project is subject to the Prevention of Significant Deterioration Regulations, Rule 62-212.400, F.A.C., because the emissions increases of sulfur dioxide and acid mist from the sulfuric acid plants exceed the significant emission rates listed in Table 212.400-2 of Rule 62-212, F.A.C. Preconstruction review must include a determination of Best Available Control Technology (BACT) pursuant to Rule 62-212.410, F.A.C. The applicant is also subject to the other preconstruction review requirements listed in Rule 62-212.400, F.A.C. In addition, the proposed modifications are subject to 40 CFR 60, Subpart H, Standards of Performance for Sulfuric Acid Plants.

IV. Air Quality Analysis

The production rate increases due to the proposed project will result in emissions increases which are projected to be greater than the PSD significant rates for SO₂ and SAM. The air quality impact analyses required by the PSD regulations for these pollutants include:

- o An analysis of existing air quality.
- o A PSD increment analysis for SO₂.
- o An Ambient Air Quality Standards (AAQS) analysis.
- o An analysis of impacts on soils, vegetation, visibility, and growth-related air quality impacts.
- o A Good Engineering Practice (GEP) stack height determination

The analysis of existing air quality generally relies on preconstruction monitoring data collected in accordance with EPA-approved methods. The PSD increment and AAQS analyses are based on air quality dispersion modeling completed in accordance with EPA guidelines.

Based on these required analyses, the Department has reasonable assurance that the projected production rate increase, as described and subject to the conditions of approval proposed herein, will not cause or significantly contribute to a violation of any PSD increment or AAQS. However, the following EPA-directed stack height language is included: "In approving this permit, the Department has determined that the application complies with the applicable provisions of the stack height regulations as revised by EPA on July 8, 1985 (50 FR 27892). Portions of the regulations have been remanded by a panel of the U.S. Court of Appeals for the D.C. Circuit in NRDC v. Thomas, 838 F. 2d 1224 (D.C. Cir. 1988). Consequently, this permit may be subject to modification if and when EPA revises the regulation in response to the court decision. This may result in revised emission limitations or may affect other actions taken by the source owners or operators."

Preconstruction ambient air quality monitoring may be required for pollutants subject to PSD review. However, an exemption to the monitoring requirement may be obtained if the maximum air quality impact resulting from the projected emissions increase, as determined by air quality modeling, is less than a pollutant-specific de minimus concentration. If the projected emissions increase is greater than the de minimus concentration, previously existing representative monitoring data may be used to satisfy the preconstruction monitoring requirement instead of preconstruction ambient air quality monitoring.

However, even if preconstruction ambient monitoring is exempted, determination of background concentrations may still be necessary for use in any required AAQS analysis. These concentrations may be established from the required preconstruction ambient air quality monitoring analysis or from previously existing representative monitoring data. These background ambient air quality concentrations are added to pollutant impacts predicted by modeling and represent the air quality impacts of sources not included in the modeling. The predicted maximum concentration increase for SO₂ is given in Table 1.

There are no monitoring de minimus concentrations for SAM. As shown in Table 1, the predicted impact for SO₂ is less than the corresponding de minimus concentration; therefore, no preconstruction monitoring is required for SO₂.

However, there are previously existing representative SO₂ monitoring data in the vicinity of the proposed project. Data collected during 1994 from the SO₂ monitor in Parrish were used by the Department to establish a background concentration of 14 ug/m³ for use in the SO₂ AAQS analysis for all averaging times.

The EPA-approved Industrial Source Complex Short-Term (ISCST2) dispersion model was used to evaluate the pollutant emissions from the proposed project and other existing major facilities. The model determines ground-level concentrations of gases or small particles emitted into the atmosphere by point, area and volume sources. The model incorporates elements for plume rise, transport by the mean wind, Gaussian dispersion, and pollutant removal mechanisms such as deposition. The ISCST2 model allows for the separation of sources, building wake downwash, and various other input and output features. A series of specific model features, recommended by the EPA, are referred to as the regulatory options. The applicant used the EPA recommended regulatory options in each modeling scenario. Direction-specific downwash parameters were used for all sources for which downwash was considered.

Initially, for the significant impact analysis, concentrations were predicted at polar receptors placed along 36 standard radial directions (10 degrees apart) surrounding the sulfuric acid plant at downwind distances extending from 1.25 to 10 km. Discrete receptors were placed along the facility property boundary at 100 m intervals. The results of this analysis showed that the increases in ambient ground-level SO₂ concentrations were significant out to 4.9 km, thus requiring the applicant to do a full impact analysis for comparison with the AAQS and the PSD Class II SO₂ increments.

The receptor grids for both the AAQS and PSD Class II analyses contained polar and discrete receptors. Receptors were placed along 36 standard radial directions surrounding the sulfuric acid plant at the following downwind distances: 3.0, 4.0, 5.0, 7.5, 10.0, 13.0, 15.0, 20.0 and 25.0 km. In addition, a total of 240 discrete receptors were placed along the plant boundary.

Impacts for the PSD Class I Chassahowitzka National Wilderness Area (CNWA) were predicted at 13 standard discrete receptors approved by the Department. This Class I area is located 110 km to the northwest of Piney Point.

Five years of sequential hourly surface and mixing depth data from the Tampa, Florida National Weather Service collected during 1987 through 1991 were used in this model. Since five years of data were used, the highest-second high, short-term predicted concentrations are compared with the appropriate ambient air quality standards or PSD increments. For the annual averages, the highest predicted yearly average was compared with the standards.

For the pollutants subject to an AAQS review, the total impact on ambient air is obtained by adding a "background concentration" to the maximum modeled concentration. This "background concentration" takes into account all sources of a particular pollutant that are not explicitly modeled. The results of the AAQS analysis for SO₂ are summarized in Table 3. As shown in this table, emissions from the proposed project are not expected to cause or contribute to a violation of an AAQS.

The PSD increment represents the amount that new sources in an area may increase predicted ambient ground level concentrations of a pollutant. Atmospheric dispersion modeling, as previously described, was performed to quantify the amount of PSD increment consumed. The results, summarized in Table 4, show that the maximum SO₂ increment consumption will not exceed the allowable Class II PSD increments.

The nearest PSD Class I area is the CNWA located 110 km northwest of the facility. Maximum SO₂ concentrations predicted for the proposed modification only at receptors in this area show impacts greater than the National Park Service (NPS) recommended significance levels for the 3-hour and 24-hour averaging times, as shown in Table 5. Therefore, for these averaging times, a more extensive PSD Class I modeling analysis was performed using all increment-consuming sources in the area of the CWNA. The results of this analysis are shown in Table 6. The maximum predicted 3-hour and 24-hour concentrations due to all increment-consuming sources in the vicinity of this Class I area exceed the PSD Class I increments on numerous occasions. In order to assess the proposed modification's contribution to any predicted Class I exceedances, an analysis was performed to determine all time periods and receptors at which an exceedance was predicted to occur. For each case, the proposed modification's impact was determined and compared to the NPS recommended significance levels. The impact of the proposed

modification was always less than these significance levels at any receptor and for any time period when there were predicted exceedances or violations of increments. Therefore, the proposed modification will not contribute significantly to any predicted exceedance or violation of Class I increments.

SAM is a non-criteria pollutant, which means that neither a national AAQS nor a PSD increment has been defined for this pollutant; therefore, no air quality dispersion modeling was required for SAM.

The applicant did an air quality related values (AQRV) analysis for both the PSD Class II area near the facility and for the Chassahowitzka Class I area located 110 km to the northwest of the project. The increased emissions from the project are not expected to impact the AQRVs of either area. The AQRV analysis includes impacts on vegetation, soils, wildlife and visibility. In addition, the proposed modification will not significantly change employment, population, housing or commercial/industrial development in the area to the extent that a significant air quality impact will result.

V. Conclusion

Based on the information provided by Piney Point Phosphates, Inc., the Department has reasonable assurance that the proposed project, as described in this evaluation, and subject to the conditions proposed herein, will not cause or contribute to a violation of any air quality standard, PSD increment, or any other technical provision of Chapters 62-209 through 62-297 of the Florida Administrative Code.

CAF 9/8

modification was always less than these significance levels at any receptor and for any time period when there were predicted exceedances or violations of increments. Therefore, the proposed modification will not contribute significantly to any predicted exceedance or violation of Class I increments.

SAM is a non-criteria pollutant, which means that neither a national AAQS nor a PSD increment has been defined for this pollutant; therefore, no air quality dispersion modeling was required for SAM.

The applicant did an air quality related values (AQRV) analysis for both the PSD Class II area near the facility and for the Chassahowitzka Class I area located 110 km to the northwest of the project. The increased emissions from the project are not expected to impact the AQRVs of either area. The AQRV analysis includes impacts on vegetation, soils, wildlife and visibility. In addition, the proposed modification will not significantly change employment, population, housing or commercial/industrial development in the area to the extent that a significant air quality impact will result.

V. Conclusion

Based on the information provided by Piney Point Phosphates, Inc., the Department has reasonable assurance that the proposed project, as described in this evaluation, and subject to the conditions proposed herein, will not cause or contribute to a violation of any air quality standard, PSD increment, or any other technical provision of Chapters 62-209 through 62-297 of the Florida Administrative Code.



Piney Point Phosphates, Inc Sulfuric Acid Plant
PSD-FL-144

Table 1. Maximum Project Air Quality Impacts for Comparison to the De Minimus Ambient Levels.

Pollutant	Avg. Time	Max Predicted Impact ¹ (ug/m ³)	De Minimus Level (ug/m ³)
SO ₂	24-hour	11	13

1. Highest, second-highest value over a five year period for 24-hour averaging time.

Table 2. Maximum Project Air Quality Impacts for Comparison to the PSD Class II Significant Impact Levels.

Pollutant	Avg. Time	Max Predicted Impact ¹ (ug/m ³)	Significant Impact Level (ug/m ³)
SO ₂	Annual	1.1	1
	24-hour	16.5	5
	3-hour	89.2	25

1. Highest, -high value over a five year period for all averaging times.

Table 3. Ambient Air Quality Impacts

Pollutant	Averaging Time	Major Sources Impact ¹ (ug/m ³)	Background Conc. (ug/m ³)	Total Impact (ug/m ³)	Florida AAQS (ug/m ³)
SO ₂	Annual	20	14	34	60
	24-hour	186	14	200	260
	3-hour	587	14	601	1300

1. Highest, second-highest value over a five year period for 3-hour and 24-hour averaging times.

Piney Point Phosphates, Inc Sulfuric Acid Plant
PSD-FL-144

Table 4. PSD Class II Increment Analysis

Pollutant	Averaging Time	Max. Predicted Impact ¹ (ug/m ³)	Allowable Increment (ug/m ³)
SO ₂	Annual	0	20
	24-hour	9	91
	3-hour	51	512

1. Highest, second-highest value over a five year period for 3-hour and 24-hour averaging times.

Table 5. Maximum Project Air Quality Impacts for Comparison to the PSD Class I Significant Impact Levels

Pollutant	Averaging Time	Max. Predicted Impact ¹ (ug/m ³)	National Park Service (NPS) Significant Impact Level (ug/m ³)
SO ₂	Annual	0.018	0.025
	24-hour	0.23	0.07
	3-hour	1.38	0.48

1. Highest, -high value over a five year period for all averaging times.

Table 6. PSD Class I Increment Analysis

Pollutant	Averaging Time	Max. Predicted Impact ¹ (ug/m ³)	Allowable Increment (ug/m ³)
SO ₂	Annual	0	2
	24-hour	7.7 ²	5
	3-hour	39.7 ²	25

1. Highest, second-highest value over a five year period for 3-hour and 24-hour averaging times.
2. The project has less than significant impacts for all predicted exceedances of SO₂ increments.



Department of Environmental Protection

Lawton Chiles
Governor

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Virginia B. Wetherell
Secretary

PERMITTEE:
Piney Point Phosphates, Inc.
13300 U.S. Highway 41 North
Palmetto, Florida 34221

Permit Number: AC 41-173305
PSD-FL-144
Expiration Date: August 31, 1997
County: Manatee
UTM Coordinates: 17-348.5 km E
17-3057.3 km N
Project: New Sulfuric Acid Plant

This permit is issued under the provisions of Chapter 403, Florida Statutes; Chapters 62-210, 212, 272, 296 and 297, Florida Administrative Code (F.A.C.); and, Chapter 62-4, F.A.C. The above named permittee is hereby authorized to perform the work or operate the emission unit/source shown on the application and approved drawings, plans, and other documents attached hereto or on file with the Department of Environmental Protection (Department) and specifically described as follows:

For the construction of a 2,700 tons/day sulfuric acid plant. The plant will be located at the permittee's facility in Palmetto, Manatee County, Florida.

The construction shall be in accordance with the permit application, plans, documents, amendments and drawings, except as otherwise noted in the General and Specific Conditions.

Attachments are listed below:

1. Application received on April 26, 1995
2. Department's letter dated May 24, 1995
3. USDOE's letter dated May 30, 1995
4. Koogler & Assoc. letter dated June 6, 1995
5. Memorandum of Understanding Regarding Best Operational Start-up Practices for Sulfuric Acid Plants, 1989

PERMITTEE:
Piney Point Phosphates, Inc.

Permit Number: AC 41-173305
PSD-FL-144
Expiration Date: August 31, 1997

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 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), Florida Statutes, 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

PERMITTEE:
Piney Point Phosphates, Inc.

Permit Number: AC 41-173305
PSD-FL-144
Expiration Date: August 31, 1997

GENERAL CONDITIONS:

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:

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

Best Available Copy

PERMITTEE:
Piney Point Phosphates, Inc.

Permit Number: AC 41-173305
PSD-FL-144
Expiration Date: August 31, 1997

GENERAL CONDITIONS:

arising under the Florida Statutes or Department rules, except where such use is prescribed by Sections 403.73 and 403.111, Florida Statutes. 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 Rules 62-4.120 and 62-30.300, 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.

12. This permit or a copy thereof shall be kept at the work site of the permitted activity.

13. This permit also constitutes:

- (x) Determination of Best Available Control Technology (BACT)
- (x) Determination of Prevention of Significant Deterioration (PSD)
- (x) 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

PERMITTEE:
Piney Point Phosphates, Inc.

Permit Number: AC 41-173305
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Expiration Date: August 31, 1997

GENERAL CONDITIONS:

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.

SPECIFIC CONDITIONS:

1. Unless otherwise indicated, the subject modification shall be in accordance with the capacities and specifications stated in the application.

2. The maximum production rate for the sulfuric acid plant shall be 2,700 tons/day based on 100% sulfuric acid (H₂SO₄). [Rule 62-212.200(56), F.A.C.]

3. The sulfuric acid plant may operate on a full-time basis (8,760 hours per year). [Rule 62-212.200(56), F.A.C.]

4. Emissions of sulfur dioxide (SO₂), sulfuric acid mist (SAM) and visible emissions (VE) from the sulfuric acid plant shall not exceed the following limits [Rule 62-212.410, F.A.C.]:

<u>Pollutant</u>	<u>lbs/hr</u>	<u>tons/year</u>
SO ₂	450	1,971
SAM	16.9	74
VE	- 10% Opacity	-

PERMITTEE:
Piney Point Phosphates, Inc.

Permit Number: AC 41-173305
PSD-FL-144
Expiration Date: August 31, 1997

SPECIFIC CONDITIONS:

5. Before this permit expires, performance testing of emissions from the unit shall be conducted with the emission unit operating at permitted capacity. Permitted capacity is defined as 90-100% of the maximum operating rate allowed by the permit. If it is impracticable to test at permitted capacity, then emission units may be tested at less than 90% of the maximum operating rate allowed by the permit. In this case, subsequent emission unit operation is limited to 110% of the test load until a new test is conducted. Once the emission unit is so limited, then operation at higher capacities (with prior notification provided to the Department) is allowed for no more than 15 consecutive days for the purpose of additional compliance testing to regain the permitted capacity in the permit. [Rule 62-297.340(1)(a), F.A.C.]

6. Performance testing shall be conducted and compliance determined using the test methods and procedures set forth in 40 CFR 60.85(a) through (c). Pursuant to Rule 62-297.340(1)(i), the Department's Southwest District office shall be notified 15 days prior to performance testing. Pursuant to Rule 62-297.570(1) and (2), written reports of the test results shall be submitted to that office within 45 days of test completion.

7. A continuous monitoring system for the measurement of sulfur dioxide emissions shall be installed, calibrated, operated and maintained as described in 40 CFR 60.84(a) through (e). [Rule 62-296.800, F.A.C.; 40 CFR 60.84]

8. Objectionable odors associated with air emissions shall be prohibited. [Rule 62-296.320(2), F.A.C.]

9. Pursuant to Rule 62-210.700(1), F.A.C., excess emissions from the sulfuric acid plants resulting from startup, shutdown, malfunction, or load change shall be permitted providing (1) best operational practices to minimize emissions are adhered to and (2) the duration of excess emissions shall be minimized but in no case exceed three hours in any 24-hour period unless specifically authorized by the Department for a longer duration. Best operational start-up practices shall be followed as described in the attached Memorandum of Understanding signed in 1989.

10. Stack sampling facilities shall be provided by the permittee in accordance with Rule 62-297.345, F.A.C.

11. The permittee, for good cause, may request that this construction permit be extended. Such a request shall be submitted to the Department's Bureau of Air Regulation prior to 60 days before the expiration of the permit. [Rule 62-4.090, F.A.C.]

PERMITTEE:
Piney Point Phosphates, Inc.

Permit Number: AC 41-173305
PSD-FL-144
Expiration Date: August 31, 1997

SPECIFIC CONDITIONS:

12. An application for an operation permit must be submitted to the Department's Southwest District office at least 90 days prior to the expiration date of this construction permit or within 45 days after completion of compliance testing, whichever occurs first. The operation permit application shall include a set of conditions acceptable to the Department for startup/shutdown of the permittee's sulfuric acid plant. To properly apply for an operation permit, the applicant shall submit the appropriate application form, fee, certification that construction was completed noting any deviations from the conditions in the construction permit, and compliance test reports as required by this permit. [Rules 62-4.055 and 62-4.220, F.A.C.]

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION

Virginia B. Wetherell, Secretary

Best Available Copy

Best Available Control Technology (BACT) Determination
Piney Point Phosphates, Inc.
Manatee County
Permit Number AC 41-173305
PSD-FL-144

The applicant proposes to replace its existing 2,000 ton/day sulfuric acid plant (SAP) with a new 2,700 ton/day SAP at the applicant's phosphate fertilizer manufacturing facility on U.S. Highway 41 North in Piney Point, Manatee County, Florida. The proposed project will result in a significant increase in emissions of sulfur dioxide (SO₂) and sulfuric acid mist. The project is therefore subject to Prevention of Significant Deterioration (PSD) review in accordance with Rule 62-212.400, Florida Administrative Code (F.A.C.). The BACT determination is part of the PSD review requirements in accordance with Rule 62-212.410, F.A.C.

Date Application Received: April 26, 1995

Date Application Complete: June 8, 1995

BACT Determination Proposed by Applicant:

Control Technology: Double Absorption/Fiber Mist Eliminators

Emission Limits: SO₂: 4 lbs/ton of 100% H₂SO₄ produced
Acid Mist: 0.15 lb/ton of 100% H₂SO₄ produced
Visible Emissions: 10% opacity

BACT Determination Procedure:

In accordance with Chapter 62-212, F.A.C., this determination is based on the maximum degree of reduction of each pollutant emitted which the Department, on a case by case basis, taking into account energy, environmental and economic impacts, and other costs, determines is achievable through application of production processes and available methods, systems, and techniques. In addition, the regulations state that in making the BACT determination the Department shall give consideration to:

- (a) Any Environmental Protection Agency determination of Best Available Control Technology pursuant to Section 169, and any emission limitation contained in 40 CFR Part 60 (Standards of Performance for New Stationary Sources) or 40 CFR Part 61 (National Emission Standards for Hazardous Air Pollutants).
- (b) All scientific, engineering, and technical material and other information available to the Department.
- (c) The emission limiting standards or BACT determinations of any other state.

- (d) The social and economic impact of the application of such technology.

The EPA currently stresses that BACT should be determined using the "top-down" approach. The first step in this approach is to determine for the emission source in question the most stringent control available for a similar or identical source, or source category. If it is shown that this level of control is technically or economically infeasible for the source in question, then the next most stringent level of control is determined and similarly evaluated. This process continues until the BACT level under consideration cannot be eliminated by any substantial or unique technical, environmental, or economic objections.

BACT Determined by the Department:

Same as proposed by applicant

BACT Determination Rationale

The Department's BACT determination is the same as that proposed by the applicant. This is consistent with determinations completed by other states and the Standards of Performance for Sulfuric Acid Plants, 40 CFR 60 Subpart H, (double absorption process). The process itself is the control technology for SO₂. For this reason, more stringent limits have not been required. The emission limits reflect a conversion efficiency of around 99.4% of SO₂ to H₂SO₄. High efficiency mist eliminators are considered BACT for sulfuric acid mist. BACT/LAER Clearinghouse information indicates that double absorption technology and the use of high efficiency mist eliminators are representative of BACT using the top-down approach.

Environmental Impact Analysis

The impact analysis for the BACT determination is based on full-time operation (8,760 hours/year). The increment impact analysis and the ambient air quality analysis resulted in the following for SO₂ emissions:

Avg Time	Increment Impact (ug/m ³)	Allowable Increment (ug/m ³)	Predicted Ambient Air Quality Impact (ug/m ³)	Fla. AAQS (ug/m ³)
24-hr	9	91	200	260
3-hr	51	512	601	1300

Conclusion

The incremental impact and the ambient air quality impact from SO₂ emissions due to the proposed modification is in compliance with all air pollution regulations. It is concluded that the emission limits established herein represent BACT.

BACT Analysis Details Available From:

A. A. Linero, P.E., Administrator
New Source Review Section
Bureau of Air Regulation
Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Recommended by:

Approved by:

C. H. Fancy, P.E., Chief
Bureau of Air Regulation

Virginia B. Wetherell, Secretary
Dept. of Environmental Protection

_____, 1995
Date

_____, 1995
Date

Is your RETURN ADDRESS completed on the reverse side?

SENDER:

- Complete items 1 and/or 2 for additional services.
- Complete items 3, and 4a & b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):

- 1. Addressee's Address
- 2. Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:
 Ivan Dance, ETM
 Piney Point Phosphates
 13300 US Hwy 41 N.
 Palmetto, FL 34221

4a. Article Number
 Z 127 632 516

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

7. Date of Delivery
 9/14/95

5. Signature (Addressee)
Ivan Dance

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

6. Signature (Agent)

Thank you for using Return Receipt Service.

Z 127 632 516



Receipt for Certified Mail

No Insurance Coverage Provided
 Do not use for International Mail
 (See Reverse)

Sent to	<i>Ivan Dance</i>	
Street and No.	<i>Piney Point</i>	
P.O. State and ZIP Code	<i>Palmetto, FL</i>	
Postage	\$	
Certified Fee		
Special Delivery Fee		
Restricted Delivery Fee		
Return Receipt Showing to Whom & Date Delivered		
Return Receipt Showing to Whom, Date, and Addressee's Address		
TOTAL Postage & Fees	\$	
Postmark or Date	 <i>AC41-173305 9-12-95</i> <i>PSD-FL-144</i>	

PS Form 3800, March 1993



Department of Environmental Protection

Lawton Chiles
Governor

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Virginia B. Wetherell
Secretary

April 10, 1995

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Ivan Nance
Corporate Environmental Manager
Piney Point Phosphates, Inc.
13300 U. S. Highway 41 North
Palmetto, Florida 34221

Dear Mr. Nance:

RE: Amendment to Construction Permit
AC 41-232096 [PSD-FL-205(A)]
Piney Point Phosphates, Inc.

The Department has reviewed your letter dated March 20, 1995, requesting an extension of the construction permit expiration date. The permit is amended as follows:

A. Expiration Date Extension:

From:

July 1, 1995

To:

July 1, 1996

B. Attachment to be Incorporated:

Piney Point Phosphate letter dated March 20, 1995

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 applicant of the amendment request/application and the parties listed below

Mr. Ivan Nance
April 10, 1995
Page Two

must be filed within 14 days of receipt of this amendment. Petitions filed by other persons must be filed within 14 days of the amendment issuance or within 14 days of their receipt of this amendment, whichever occurs first. 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 warrant 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 the 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 amendment. Persons whose substantial interests will be affected by any decision of the Department with regard to the request/application have the right to petition to become a party to the

Mr. Ivan Nance
April 10, 1995
Page Three

proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of receipt of this amendment 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, Florida Statutes, 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, Florida Administrative Code.

This letter amendment must be attached to the construction permit, No. AC 41-232096 (PSD-FL-205A), and shall become part of the permit.

Sincerely,



Howard L. Rhodes, Director
Division of Air Resources
Management

HLR/cl/t

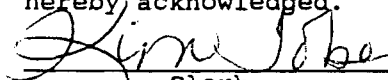
Attachment

cc: B. Thomas, SWD
J. Kissel, SWD
J. Harper, EPA
J. Bunyak, NPS
J. Koogler, K&A

CERTIFICATE OF SERVICE

The undersigned duly designated deputy clerk hereby certifies that this AMENDMENT and all copies were mailed by certified mail before the close of business on 4-12-95 to the listed persons.

FILING AND ACKNOWLEDGMENT FILED,
on this date, pursuant to 120.52(11),
Florida Statutes, with the designated
Department Clerk, receipt of which is
hereby acknowledged.


Clerk

4-12-95
Date

Is your RETURN ADDRESS completed on the reverse side?

SENDER:

- Complete items 1 and/or 2 for additional services.
- Complete items 3, and 4a & b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):

- 1. Addressee's Address
- 2. Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:
Ivan Tance
Corp. Encl. Mgr.
Piney Point Phosphates
13300 U.S. Hwy 41 N
Palmetto, FL 34221

4a. Article Number
2 311 902 935

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

7. Date of Delivery
4-18-95

5. Signature (Addressee)

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

6. Signature (Agent)
Elijah Johnson Jr.

PS

RETURN RECEIPT

Thank you for using Return Receipt Service.

2 311 902 935



Receipt for Certified Mail

No Insurance Coverage Provided
 Do not use for International Mail
 (See Reverse)

PS Form 3800, March 1993

Sent to	<i>Ivan Tance</i>
Street and No.	<i>Piney Point Phos</i>
P.O. State and ZIP Code	<i>Palmetto, FL</i>
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	<i>4-12-95</i>
<i>AC 41-232096</i>	
<i>PSO-FI-205(A)</i>	

PINEY POINT PHOSPHATES, INC.

13300 U. S. Hwy. 41 North
Palmetto, Florida 34221
(813) 722-4555

CERTIFIED RETURN RECEIPT
(P 268 873 121)

20 March 1995

State of Florida
Department of Environmental Protection
Bureau of Air Regulation
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Re: FDEP Permit No. AC-41 232096
190 MM BTU/Hour Process Steam Boiler

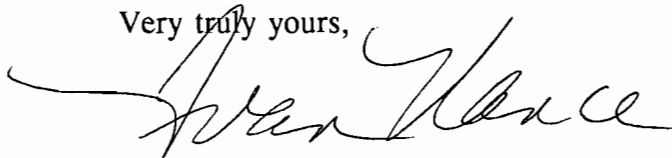
Dear Sirs:

Piney Point Phosphates, Inc. (PPP) requests to extend this construction permit until July 1996. Enclosed is the processing fee of \$50.00 required for this request.

PPP has not yet begun construction of this boiler. PPP is currently reviewing engineering studies to determine the most efficient manner in which to restart manufacturing operations at the facility. As this proposed boiler allows for a variety of operating scenarios in several plants, we are making this request for extension.

PPP appreciates your cooperation and attention in this matter. Should further information or response be required, please contact our offices.

Very truly yours,



Ivan Nance
Corporate Environmental Manager

/rmm

Enclosure

cc: Mr. Pradeep Raval - Koolger & Associates

1995 MAR 28 PM 2:41
RECEIVED
MAIL ROOM

BEST AVAILABLE COPY

ACCOUNTS PAYABLE CHECK

PINEY POINT PHOSPHATES, INC.

General Disbursements
13300 U.S. Hwy. 41 N.
Palmetto, FL 34221-8662

No 10 801435

DATE 03/21/95

CHECK NUMBER 102189

080143

63-526/631
BRANCH 185

PAY EXACTLY

FIFTY AND NO/100

AMOUNT \$50.00



SunBank/Mid-Florida, N.A.
Mulberry Office - 185
400 North Church Avenue
Mulberry, FL 33860

Pay
to the
order of

FLORIDA DEPT. OF ENVIRONMENTAL
PROTECTION
2600 BLAIR STONE RD.
TALLAHASSEE, FL 32399-2400

Elizabeth Johnson
AUTHORIZED SIGNATURE



PINEY POINT PHOSPHATES, INC.

General Disbursements
13300 U.S. Hwy. 41 N.
Palmetto, FL 34221-8662

FLORIDA DEPT. OF ENVIRONME

INVOICE	INV DATE	DUE DATE	INV AMOUNT	DISCOUNT	NET AMOUNT
BOILER EXT	03/20/95	03/21/95.	50.00	.00	50.00

REMITTANCE ADVICE

CHECK NO. 0801435 50.00

50.00

DETACH BEFORE DEPOSITING

Reynolds • Reynolds LITHO IN U.S.A. GPO

Received 4/7/95
cc: [Signature]

PINEY POINT PHOSPHATES, INC.

13300 U. S. Hwy. 41 North
Palmetto, Florida 34221
(813) 722-4555

VIA TELEFAX

7 April 1995

Mr. Charles Logan
DARM/Bureau of Air Regulation
Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Re: FDEP Permit No. AC41-232096
Specific Condition 1

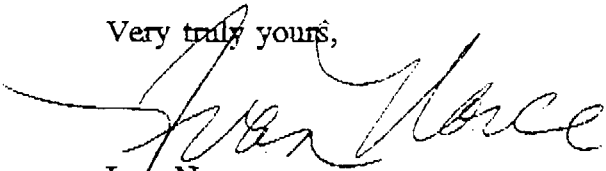
Dear Sir:

Piney Point Phosphates, Inc. (PPP) pursuant to specific condition 1 of the above-referenced permit provides this notification of surrender of FDEP permits AC41-226205 and AC41-211848. No construction of these sources has been initiated.

Also, find attached a copy of similar correspondence to the Southwest District Office concerning permit AC41-211848.

Should further information or response be required, please contact our offices.

Very truly yours,


Ivan Nance
Corporate Environmental Manager

/rmm

P.O. Drawer 797
Mulberry, Florida 33860



(813) 425-1176
FAX (813) 425-5446

CERTIFIED/RETURN RECEIPT

P112 313382

19 October 1994

Mr. George Richardson
Florida Department of Environmental Protection
3804 Coconut Palm Drive
Tampa, FL 33619-8318

Re: Piney Point Phosphates, Inc.:
Construction Permit File AC41-211848;
Auxiliary Boiler

Dear Sir:

Piney Point Phosphates, Inc. requests to withdrawal the above-referenced construction permit application.

Should further information or response be required, please contact our offices.

Very truly yours,

A handwritten signature in cursive script, appearing to read "Ivan Nance", is written over a horizontal line.

Ivan Nance
Corporate Environmental Manager

/rmm

cc: Mr. Pradeep Raval - Koogler & Associates

PERMITTEE:
Piney Point Phosphates, Inc.

Permit Number : AC 41-232096
PSD-FL-205
Expiration Date: July 1, 1995

GENERAL CONDITIONS:

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.

SPECIFIC CONDITIONS:

1. This permit, AC 41-232096, shall be valid only when the permittee formally surrenders permits AC 41-226205 and AC 41-211848. Issuance of this permit AC 41-232096 constitutes revocation of AC 41-226205 and AC 41-211848. When the new 190 MMBtu per hour boiler is constructed and in operation the existing 96 MMBtu per hour boiler shall be permanently shut down. Until that time the 96 MMBtu per hour boiler is authorized to operate under the conditions of AO 41-156789.

Construction Details

2. Construction of the proposed process steam boiler shall reasonably conform to the plans described in the application. The facility shall be designed, constructed, and operated so that its maximum heat input and maximum fuel consumption shall not exceed 190 MMBtu per hour and 1349 gallons per hour of new* No. 2 distillate fuel oil, respectively. The sulfur content of the fuel oil shall not exceed 0.05%, by weight, which is defined as "very low sulfur oil in 40 CFR 60.41b." The permittee shall provide the Department with engineering, monitoring, and reporting plans for the process steam boiler within 30 days after the plans become available.

* New oil means an oil which has been refined from crude oil and has not been used in any manner that may contaminate it.

3. The stack sampling facilities (sample ports, work platforms, access, and electrical power) must comply with Rule 62-297.345, F.A.C., and 40 CFR 60.8(e).

4. The boiler shall be equipped with instruments to measure the fuel feed rate, steam production, steam pressure, and steam temperature.

5. The boiler shall be equipped with:

- Low-NO_x burners designed for a maximum reduction in oxides of nitrogen; and,
- Induced flue gas recirculation technology which will maximize the dilution of oxygen rich combustion air with oxygen deficient recirculated flue gas.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET, N.E.
ATLANTA, GEORGIA 30365

RECEIVED
JUL 16 1994
Bureau of
Air Regulation

4APT-AEB

JUL 15 1994

Mr. Clair H. Fancy, P.E.
Chief
Bureau of Air Regulation
Florida Department of Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

SUBJ: Piney Point Phosphates, Inc. (PSD-FL-205)

Dear Mr. Fancy:

This is to acknowledge receipt of your preliminary determination and draft Prevention of Significant Deterioration (PSD) permit for the modifications at the above referenced facility by letter dated June 17, 1994. The modification involves increasing the permitted usage of an existing 190 mmBTU/hr fuel oil-fired boiler; and, shutting down an existing 96 mmBTU/hr fuel-oil fired boiler. The increase in hours of operation for the boiler will trigger PSD requirements for NO_x. SO₂ emissions will be limited through the use of very low sulfur (0.05%S) fuel oil. In addition, the boiler is subject to the NSPS subpart Db. We have reviewed this package and have no adverse comments.

Thank you for the opportunity to review and comment on the package. If you have any questions on these comments, please contact Mr. Gregg Worley of my staff at (404) 347-5014.

Sincerely yours,

Jewell A. Harper
Chief
Air Enforcement Branch
Air, Pesticides, and Toxics
Management Division

cc: Charles Logan
Bill Thomas / Jerry Kissel, SWD } 8-9-94 RAN
John Buzak, NPS



Bradenton Herald

102 MANATEE AVE. WEST, P.O. BOX 921
BRADENTON, FLORIDA 34206
TELEPHONE (813) 748-0411

Bradenton Herald
Published Daily
Bradenton, Manatee, Florida

STATE OF FLORIDA
COUNTY OF MANATEE:

Before the undersigned authority personally appeared Jill Rockefeller, who on oath says that she is Legal Advertising Representative of the Bradenton Herald, a daily newspaper published at Bradenton in Manatee County, Florida; that the attached copy of the advertisement, being a Legal Advertisement in the matter of

Notice of Intent to Issue Permit

_____ in the _____ Court,
was published in said newspaper in the issues of

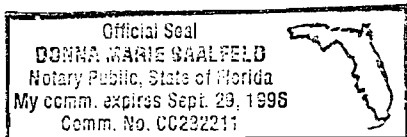
6/24/94

Affiant further says that the said publication is a newspaper published at Bradenton, in said Manatee County, Florida, and that the said newspaper has heretofore been continuously published in said Manatee County, Florida, each day and has been entered as second-class mail matter at the post office in Bradenton, in said Manatee County, Florida, for a period of 1 year next preceding the first publication of the attached copy of advertisement; and affiant further says that she has neither paid nor promised any person, firm or corporation any discount, rebate, commission or refund for the purpose of securing this advertisement for publication in the said newspaper.

Jill Rockefeller
(Signature of Affiant)

Sworn to and subscribed before me this

27 day of June, 1994
Deanna Marie Saalfeld
SEAL & Notary Public



Personally Known _____ or Produced Identification _____
Type of Identification Produced _____

RECEIVED

JUL 10 1994
Bureau of
Air Regulation

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 construction permit (AC 41-232096 to Piney Point Phosphates, Inc., 13300 US Highway 41 North, Palmetto, Florida 34221-8662 to increase the operating hours of a proposed 190 MMBtu/hr process steam boiler from 876 hours to 8780 hours per year. A determination of the Best Available Control Technology (BACT) was required for nitrogen oxides (NOx), particulate matter (PM) and sulfur dioxide (SO2). The PSD increment for nitrogen dioxide consumed by this facility and other sources in the Class II area is 3.02 ug/m3, annual average or 12 percent of the available increment of 25.0 ug/m3. The nitrogen oxides emissions from this project will have no significant impact in the Class I Chassahowitzka Wilderness Area. The Department is issuing this Intent to Issue for the reasons stated in the Technical Evaluation and Preliminary Determination.

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, within 14 days of publication of this notice. Petition 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 warrant 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 Notice. 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 publication of this notice 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.

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:
Department of Environmental Protection
Bureau of Air Regulation
111 S. Magnolia Drive, Suite 2
Tallahassee, FL 32301

Department of Environmental Protection
Southwest District
3804 Coconut Palm Drive
Tampa, FL 33619-8218

Manatee County Air Quality Division
202 6th Avenue East
Bradenton, FL 34208

Any person may send written comments on the proposed action to Mr. Preston Lewis at the Department of Environmental Protection, 2600 Blair Stone Road, Tallahassee, Florida, 32399-2400. All comments received within 30 days of the publication of this notice will be considered in the Department's final determination.

Further, a public hearing can be requested by any person(s). Such requests must be submitted within 30 days of this notice.

6/24/94



Department of Environmental Protection

Lawton Chiles
Governor

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Virginia B. Wetherell
Secretary

June 17, 1994

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Ivan Nance
Piney Point Phosphates, Inc.
13300 US Highway 41 North
Palmetto, Florida 34221-8662

Dear Mr. Nance:

Attached is one copy of the Technical Evaluation and Preliminary Determination, proposed Best Available Control Technology (BACT) Determination and proposed permit for a modification of the Piney Point Phosphates, Inc. facility. The facility is located at the above address in Palmetto, Florida, Manatee County.

Please submit any written comments you wish to have considered concerning the Department's proposed action to Mr. Preston Lewis at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400.

Sincerely,

C. H. Fancy, P.E.
Chief
Bureau of Air Regulation

CHF/CSL

Attachments

cc: Bill Thomas, SWD
Rob Baum, Manatee Co.
John Bunyak, NPS
Jewell Harper, U.S. EPA
Doug Beason, OGC
John Koogler, K&A

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

CERTIFIED MAIL

In the Matter of an
Application for Permit by:

DEP File No. AC 41-232096
PSD-FL-205
Manatee County

Mr. Ivan Nance
Piney Point Phosphates, Inc.
13300 US Highway 41 North
Palmetto, FL 34221-8662

INTENT TO ISSUE

The Department of Environmental Protection gives notice of its intent to issue an air construction permit (copy attached) for the proposed project as detailed in the application specified above, for the reasons stated in the attached Technical Evaluation and Preliminary Determination.

The applicant, Piney Point Phosphates, Inc., applied on May 28, 1993, to the Department of Environmental Protection for a permit to modify the construction permit (AC 41-211848) for a proposed 190 MMBtu/hr process boiler by increasing the hours of operation from 876 hours to 8760 hours per year. The facility is located at 13300 US Highway 41 North, Palmetto, Florida.

The Department has permitting jurisdiction under the provisions of Chapter 403, Florida Statutes and Florida Administrative Code (F.A.C.) Chapters 17-212 and 17-4. The project is not exempt from permitting procedures. The Department has determined that a construction permit is required for the proposed work.

The Department's Bureau of Air Regulation has chosen to publish at their expense the enclosed Notice of Intent to Issue Permit. The notice will 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.

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;

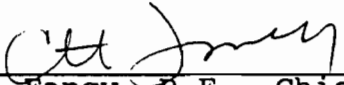
- (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed;
- (b) A statement of how and when each petitioner received notice of the Department's action or proposed action;
- (c) 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 warrant 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 Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

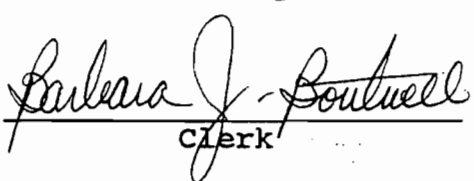

C. H. Fancy, P.E., Chief
Bureau of Air Regulation
2600 Blair Stone Road
Tallahassee, Florida 32399
904-488-1344

CERTIFICATE OF SERVICE

The undersigned duly designated deputy clerk hereby certifies that this INTENT TO ISSUE and all copies were mailed by certified mail before the close of business on 6/20/94 to the listed persons.

Clerk Stamp

FILING AND ACKNOWLEDGMENT
FILED, on this date, pursuant to §120.52(11), Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.


Barbara J. Boutwell Clerk 6/20/94 Date

Copies furnished to:

- B. Thomas, SWD
- R. Baum, Manatee Co.
- J. Bunyak, NPS
- J. Harper, U.S. EPA
- D. Beason, OGC
- J. Koogler, K&A

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 construction permit (AC 41-232096) to Piney Point Phosphates, Inc., 13300 US Highway 41 North, Palmetto, Florida 34221-8662 to increase the operating hours of a proposed 190 MMBtu/hr process steam boiler from 876 hours to 8760 hours per year. A determination of the Best Available Control Technology (BACT) was required for nitrogen oxides (NO_x), particulate matter (PM) and sulfur dioxide (SO₂). The PSD increment for nitrogen dioxide consumed by this facility and other sources in the Class II area is 3.02 ug/m³, annual average or 12 percent of the available increment of 25.0 ug/m³. The nitrogen oxides emissions from this project will have no significant impact in the Class I Chassahowitzka Wilderness Area. The Department is issuing this Intent to Issue for the reasons stated in the Technical Evaluation and Preliminary Determination.

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, 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 warrant 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 Notice. 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 publication of this notice 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.

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:

Department of Environmental Protection
Bureau of Air Regulation
111 S. Magnolia Drive, Suite 4
Tallahassee, Florida 32301

Department of Environmental Protection
Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619-8218

Manatee County Air Quality Division
202 6th Avenue East
Bradenton, Florida 34208

Any person may send written comments on the proposed action to Mr. Preston Lewis at the Department of Environmental Protection, 2600 Blair Stone Road, Tallahassee, Florida, 32399-2400. All comments received within 30 days of the publication of this notice will be considered in the Department's final determination.

Further, a public hearing can be requested by any person(s). Such requests must be submitted within 30 days of this notice.

Technical Evaluation
and
Preliminary Determination

Piney Point Phosphates, Inc.
Palmetto, Florida
Manatee County

Construction Permit Modification
Permit No. AC 41-232096
PSD-FL-205

Department of Environmental Protection
Division of Air Resources Management
Bureau of Air Regulation

June 17, 1994

I. Application

A. Applicant

Piney Point Phosphates, Inc.
13300 US Highway 41 North
Palmetto, Florida 34221-8662

B. Project Description/Location/Classification

The Department received an application on May 28, 1993 to modify an existing permit by increasing the operating hours from 876 hours to 8760 hours per year for the proposed 190 MMBtu/hr process boiler at the applicant's facility in Palmetto, Manatee County, Florida. The operating hours will be increased while firing new low sulfur No. 2 fuel oil. The existing 96 MMBtu/hr boiler will be replaced by a new 190 MMBtu/hr boiler. Subsequent to construction of the proposed 190 MMBtu/hr boiler, it may be utilized as the primary source of steam at the facility. UTM coordinates of the site are Zone 17, 348.5 km E and 3057.3 km N. The latitude and longitude for the site are 27°37'58" and 82°32'08". This project is considered a major modification since the significant emission rate for nitrogen oxides (NO_x) will be exceeded. Since a significant emission rate will be exceeded, the project is subject to Prevention of Significant Deterioration (PSD) review and a Best Available Control Technology (BACT) determination. The application was considered complete subsequent to receiving additional information on September 21, 1993. Maximum fuel consumption and heat input for the boiler will be 1349 gallons/hour and 190 MMBtu/hr., respectively. Piney Point Phosphates, Inc. will fire only new No. 2 fuel oil containing no more than 0.05% sulfur by weight in the boiler. This modification will require a physical change of equipment but will not affect the emissions of any other source at the facility.

II. Emissions/Technical Evaluation

The modification requested by Piney Point Phosphates, Inc. to increase the operating hours will be accomplished by increasing the consumption of fuel oil by approximately 1074 gal/hour. The fuel oil will contain no more than 0.05% sulfur by weight.

The current actual emissions at the affected sources were calculated using 1989, 1990, and 1991 fuel consumption data. Also, AP-42 emission factors and the emission factor for NO_x from the previous permit application were used in the calculations for the current actual emissions.

The request by Piney Point Phosphates, Inc. to increase the operating hours of the boiler up to 8760 hours will allow the boiler to be utilized as the primary source of steam for the facility. Also, the request to increase the operating hours will create an exceedance of the "significant emission rate" for NO_x. The proposed modification is subject to Prevention of Significant Deterioration (PSD) review in accordance with F.A.C. Rule 17-212.400 and will require a determination of the Best Available Control Technology (BACT) for NO_x. A BACT determination is also required for PM and SO₂ in accordance with Rule 17-296.406. Both of the PSD and BACT requirements are discussed in the rule applicability section. The actual, proposed and net emissions submitted in the application are as follows:

Pollutant	Actual Emissions #/hr(ton/yr)	Proposed* Emissions #/hr(ton/yr)	Net Emissions #/hr(ton/yr)	Significant Emission ton/yr
PM	1.4(0.3)	2.7 (11.8)	1.3(11.5)	15
SO ₂	87.4(14.7)	9.6(42.0)	-77.8(27.3)	40
NO _x	53.8(11.0)	38.0(166.4)	-15.8(155.4)	40
VOC	0.2(0.03)	0.3(1.2)	0.1(1.17)	40
CO	3.4(0.7)	6.7(29.3)	3.3(28.6)	100

*Refer to the BACT Determination for details on calculations of future emission values.

The applicants proposed emissions were calculated using 8760 hours of operation and uncontrolled emission factors for distillate fuel oil combustion in industrial boilers from AP-42, Table 1.3-1. The emission calculations are based on 0.05 and 0.02 percent by weight of sulfur and ash, respectively.

The following table provides the Department's maximum proposed allowable emissions:

190 MMBtu/hour Process Boiler
Maximum Allowable Emission

Pollutant	lb/hr	ton/yr*
PM/PM ₁₀	2.7	11.8
SO ₂	9.6	42.0
NO _x	28.5	124.8

*Based on 8760 hours of operation per year

III. Rule Applicability

The proposed project is subject to preconstruction review in accordance with Chapter 403 of the Florida Statutes and Florida Administrative Code (F.A.C.) Chapters 17-4, 17-210, 17-212, 17-292, 17-275, 17-296, and 17-297. The proposed facility will be located in an area classified as attainment for all regulated pollutants (F.A.C. Rule 17-275.400). The federal new source performance standards under 40 CFR 60 Subpart Db (Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units) applies to this source. F.A.C. Rule 17-296 requires a BACT analysis for nitrogen oxides (NO_x) since the significant emission level for this pollutant will be exceeded. Since the new source is a small boiler it is subject to a BACT determination for PM and SO₂ in accordance with 17-296.406.

As originally filed, the application is a request to modify a construction permit of a major source and is subject to the provisions of F.A.C. Rule 17-212.400, Prevention of Significant Deterioration (PSD), since the proposed modification would cause an exceedence of the PSD significant emission rate for NO_x. The BACT Determination (attached) established the allowable emissions for NO_x.

IV. Air Quality Analysis

A. Introduction

The proposed project will result in an emission increase which is projected to be greater than the PSD significant emission rate for NO_x. Therefore, the project is subject to the PSD review requirements contained in F.A.C. Rule 17-212.400. An air quality impact analysis for this pollutant is required. This includes:

- o A PSD increment analysis;
- o An analysis of existing air quality;
- o An Ambient Air Quality Standards (AAQS) analysis;
- o An analysis of impacts on soils, vegetation, visibility, and growth-related air quality impacts; and,
- o A Good Engineering Practice (GEP) stack height determination.

The analysis of existing air quality generally relies on preconstruction monitoring data collected in accordance with EPA-approved methods. The PSD increment and AAQS analyses are based on air quality dispersion modeling completed in accordance with EPA guidelines.

Based on these required analyses, the Department has reasonable assurance that the proposed project, as described in this report and subject to the conditions of approval proposed herein, will not cause or contribute to a violation of any PSD increment or AAQS. "In approving this permit, the Florida Department of Environmental

Protection has determined that the application complies with the applicable provisions of the stack height regulations as revised by EPA on July 8, 1985 (50 FR 27892). Portions of the regulations have been remanded by a panel of the U.S. Court of Appeals for the D.C. Circuit in NRDC v. Thomas, 838 F. 2d 1224 (D.C. Cir. 1988). Consequently, this permit may be subject to modification if and when EPA revises the regulation in response to the court decision. This may result in revised emission limitations or may affect other actions taken by the source owners or operators." A brief description of the modeling method used and results of the required analyses follow. A more complete description is contained in the permit application on file.

B. Analysis of the Existing Air Quality

Preconstruction ambient air quality monitoring may be required for pollutants subject to PSD review. However, an exemption to the monitoring requirement can be obtained if the maximum predicted air quality impact resulting from the projected emissions increase, as determined through air quality modeling, is less than a pollutant-specific de minimus concentration. The predicted maximum concentration increase for NO_x is 2.91 ug/m³, annual average, which is less than the PSD de minimus concentration for NO_x of 14 ug/m³, annual average. Therefore, this project is not subject to preconstruction ambient air quality monitoring.

C. Modeling Method

The EPA-approved Industrial Source Complex Short-Term (ISCST2) dispersion model was used by the applicant to predict the impact of the proposed project on the surrounding ambient air. All recommended EPA default options were used. Downwash parameters were used because the stacks were less than the good engineering practice (GEP) stack height. Five years of sequential hourly surface and mixing depth data from the Tampa, Florida National Weather Service (NWS) station collected during 1985 through 1989 were used in the model. The highest predicted yearly average was compared with the standards.

D . Modeling Results

The applicant first evaluated the potential increase in ambient ground-level concentrations associated with the project to determine if the maximum predicted ambient concentration increase would be greater than the specified PSD significant impact level for NO_x. Dispersion modeling was performed with receptors placed along the 36 standard radial directions (10 degrees apart) surrounding the auxiliary boiler at the following downwind distances: 460, 500, 600, 700, 1000, 1500, 2000, and 3000 m. The

maximum predicted ambient NO_x concentration increase was 2.6 ug/m³. This value is greater than the PSD significant impact level of 1.0 ug/m³, thus requiring the applicant to do a full impact analysis for comparison with the AAQS and PSD Class II increment. The following maximum predicted concentrations are the results of the full impact analysis: 30.0 ug/m³, annual average, which is less than the AAQS of 100 ug/m³, annual average; and 3.02 ug/m³, which is less than the PSD Class II increment of 25 ug/m³, annual average. The value of 30.0 ug/m³ includes a background of 19 ug/m³ based on 1992 data collected at the Gandy Boulevard NO₂ monitor in Tampa (4360-065-G01).

The nearest PSD Class I area is the Chassahowitzka National Wilderness Area located 110 km from the facility. The predicted impact of the proposed project on this area was evaluated by using the ISCST2 model. The maximum predicted impact was 0.007 ug/m³, annual average. This value is less than the National Park Service's proposed significant impact level of 0.025 ug/m³, annual average. Therefore, no further analysis of this project's impact on the Class I area was necessary.

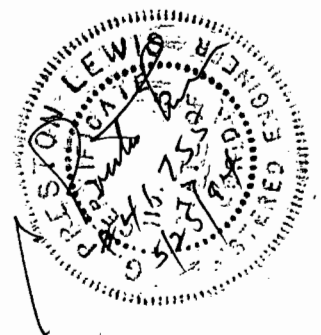
E. Additional Impacts Analysis

A Level-1 screening analysis using the EPA model, VISCREEN was used to determine any potential adverse visibility impacts on the Class I Chassahowitzka National Wilderness Area. Based on this analysis, the maximum predicted visual impacts due to the proposed project are less than the screening criteria both inside and outside the Class I area. Because the maximum predicted impact of the project is significantly less than the National Park Service's proposed significant impact level, no further air quality related values analysis was required.

In addition, the proposed modification will not significantly change employment, population, housing or commercial/industrial development in the area to the extent that a significant air quality impact will result.

VI. Conclusion

Based on the information provided by Piney Point Phosphates, Inc., the Department has reasonable assurance that the proposed modification of the permit for this installation, as described in this evaluation, and subject to the conditions proposed herein, will not cause or contribute to a violation of any air quality standard, PSD increment, or any other technical provision of Chapters 17-212 of the Florida Administrative Code.





Florida Department of Environmental Protection

Lawton Chiles
Governor

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Virginia B. Wetherell
Secretary

PERMITTEE:
Piney Point Phosphates, Inc.
13300 US Highway 41 North
Palmetto, FL 34221-8662

Permit No. : AC 41-232096
PSD-FL-205
Exp. Date : July 1, 1995
County : Manatee
Lat./Long. : 27°37'58"N
82°32'08"W
Project : 190 MMBtu/hour
Process Steam Boiler

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 17-210, 212, 272, 275, 296, and 297; and 17-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawings, plans, and other documents attached hereto or on file with the Department and specifically described as follows:

For the construction of a 190 MMBtu/hour process steam boiler. This boiler is permitted to be fired with new No. 2 distillate fuel oil only. The maximum fuel consumption rate will be 1349 gallons/hour and the maximum heat input rate will be 190 MMBtu/hour while producing a maximum of 150,000 pounds/hour of steam. The boiler may be operated at 8760 hours/year. Nitrogen oxides emissions will be controlled with low-NO_x burners, flue gas recirculation, and proper operation practices. Sulfur dioxide emissions will be controlled by only firing No. 2 fuel oil containing no more than 0.05% sulfur by weight. The facility will be located at 13300 US Highway 41 North, Palmetto, FL, Manatee County.

The UTM coordinates of this facility are Zone 17, 348.5 km E and 3057.3 km N.

The source shall be constructed in accordance with the permit application, plans, documents, amendments and drawings, except as otherwise noted in the General and Specific Conditions.

Attachments are listed below:

1. Application received May 28, 1993.
2. DEP letter dated June 24, 1993.
3. KA letter dated July 30, 1993
4. KA letter dated September 17, 1993.
5. KA memorandum dated November 22, 1993.
6. KA letter dated January 18, 1994.

PERMITTEE:
Piney Point Phosphates, Inc.

Permit Number : AC 41-232096
PSD-FL-205
Expiration Date: July 1, 1995

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 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), Florida Statutes, 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 facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.

PERMITTEE:
Piney Point Phosphates, Inc.

Permit Number : AC 41-232096
PSD-FL-205
Expiration Date: July 1, 1995

GENERAL CONDITIONS:

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:

- 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, Florida Statutes. 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.

PERMITTEE:
Piney Point Phosphates, Inc.

Permit Number : AC 41-232096
PSD-FL-205
Expiration Date: July 1, 1995

GENERAL CONDITIONS:

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.

12. This permit or a copy thereof shall be kept at the work site of the permitted activity.

13. This permit also constitutes:

- (x) Determination of Best Available Control Technology (BACT)
- (x) Determination of Prevention of Significant Deterioration (PSD)
- (x) 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

PERMITTEE:
Piney Point Phosphates, Inc.

Permit Number : AC 41-232096
PSD-FL-205
Expiration Date: July 1, 1995

GENERAL CONDITIONS:

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.

SPECIFIC CONDITIONS:

1. This permit, AC 41-232096, shall be valid only when the permittee formally surrenders AC 41-226205 and AC 41-211848. Issuance of this permit AC 41-232096 constitutes revocation of AC 41-226205 and AC 41-211848. When the new 190 MMBtu per hour boiler is constructed and in operation the existing 96 MMBtu per hour boiler shall be permanently shut down. Until that time the 96 MMBtu per hour boiler is authorized to operate under the conditions of AO 41-156789.

Construction Details

2. Construction of the proposed process steam boiler shall reasonably conform to the plans described in the application. The facility shall be designed, constructed, and operated so that its maximum heat input and maximum fuel consumption shall not exceed 190 MMBtu per hour and 1349 gallons per hour of new* No. 2 distillate fuel oil, respectively. The sulfur content of the fuel oil shall not exceed 0.05% by weight, which is defined as "very low sulfur oil in 40 CFR 60.41b, Subpart Db." The permittee shall provide the Department with engineering, monitoring, and reporting plans for the process steam boiler within 30 days after the plans become available.

* New oil means an oil which has been refined from crude oil and has not been used in any manner that may contaminate it.

3. The stack sampling facilities (sample ports, work platforms, access, and electrical power) must comply with F.A.C. Rule 17-297.345 and 40 CFR 60.8(e).

4. The boiler shall be equipped with instruments to measure the fuel feed rate, steam production, steam pressure, and steam temperature.

5. The boiler shall be equipped with:

- Low-NO_x burners designed for a maximum reduction in oxides of nitrogen; and
- Induced flue gas recirculation technology which will maximize the dilution of oxygen rich combustion air with oxygen deficient recirculated flue gas.

PERMITTEE:
Piney Point Phosphates, Inc.

Permit Number : AC 41-232096
PSD-FL-205
Expiration Date: July 1, 1995

SPECIFIC CONDITIONS:

6. The permittee shall construct and install a continuous emission monitoring device on the boiler exhaust for opacity. The continuous emission monitoring device shall meet the applicable requirements of Rule 17-297.500, F.A.C., and 40 CFR 60.48b(a).

7. During land clearing and site preparation, wetting operations or other soil treatment techniques appropriate for controlling unconfined particulates, including grass seeding and mulching of disturbed areas, shall be undertaken and implemented. Any open burning of land clearing debris on this site shall be performed in accordance with Chapter 17-256 F.A.C., 5I-2 F.A.C. and all applicable local regulations.

Operational and Emission Restrictions

8. The issuance of this permit does not relieve the permittee from complying with applicable emission limiting standards or other requirements of Chapters 17-210, 17-212, 17-272, 17-275, 17-296, 17-297 and 17-4, or any other requirements under federal, state or local law (Rule 17-210.300, F.A.C.).

9. This process steam boiler is subject to and shall meet all the applicable requirements of 40 CFR 60, Subpart Db (Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units) of the Federal New Source Performance Standards (NSPS) (Rule 17-296.800, F.A.C.).

10. The maximum permitted operating hours for this process steam boiler is 8760 hours/year.

11. The visible emissions from this process steam boiler shall not exceed 20% opacity (6-minute average), except for one 6-minute period per hour during which the opacity shall not exceed 27%. These opacity standards shall apply at all times, except during periods of startup, shutdown or malfunction.

PERMITTEE:
Piney Point Phosphates, Inc.

Permit Number : AC 41-232096
PSD-FL-205
Expiration Date: July 1, 1995

SPECIFIC CONDITIONS:

12. The maximum allowable emission rates for the process boiler based on a No. 2 distillate fuel oil consumption of 1349 gallons/hour shall not exceed the following limits:

190 MMBtu/hour Process Boiler
Maximum Allowable Emission

Pollutant	lb/hr	ton/yr*
PM/PM ₁₀	2.7	11.8
SO ₂	9.6	42.0
NO _x	28.5	124.8

*Based on 8760 hours of operation per year

13. The Best Available Control Technology (BACT) determination for controlling NO_x emissions was determined to be flue gas recirculation and low-NO_x burners. [Rule 17-296.330, F.A.C.]

Compliance Requirements

14. The process steam boiler shall conduct performance tests for the pollutants listed in specific condition No. 12 and visible emissions within 60 calendar days after achieving the maximum firing rate at which this boiler will be operated, but no later than 180 operating days after initial startup. The permittee shall conduct performance and visible emissions tests during normal operations (at or no less than 90% of the maximum heat input). A written report of the performance test results shall be submitted to the Department within 45 days after the test. The performance tests shall be conducted according to the requirements of 40 CFR 60 Subpart Db and F.A.C. Rule 17-296.800.

15. Compliance with the pollutants respective maximum allowable emission limits referenced in specific condition No. 12 shall be demonstrated using the applicable EPA methods as contained in 40 CFR 60, Appendix A, (July, 1993) and adopted by reference in Chapter 17-297, F.A.C. The prescribed methods for those pollutants other than SO₂ are contained in the following table. The test method for SO₂ is contained in specific condition No. 16. The minimum test requirements for new stationary source emissions test procedures and reporting requirements shall be in accordance with Chapter 17-297, F.A.C. and 40 CFR 60, Appendix A.

PERMITTEE:
Piney Point Phosphates, Inc.

Permit Number : AC 41-232096
PSD-FL-205
Expiration Date: July 1, 1995

SPECIFIC CONDITIONS:

<u>For Determination of</u>	<u>U.S. EPA. Test Method</u>
Sample and Velocity Traverse	Method 1
Velocity and Volumetric Flow Rate	Method 2
Particulate Matter (PM)/(PM ₁₀)	Method 3A or 3B with Method 5/201 or 201A
Opacity	Method 9
Nitrogen Oxides (NO _x)	Method 7, 7A, 7E or 19

16. SO₂ emissions shall be determined in accordance with Section 5.2.2 of EPA Method 19. Calculations of SO₂ emissions shall be based on the sulfur content of the fuel as determined by the supplier pursuant to 40 CFR 60.45b(j) and 40 CFR 60.49b(r).

17. The permittee shall comply with the excess emissions rule contained in F.A.C. Rule 17-210.700. The permittee is allowed excess emissions during startup conditions, provided such excess emissions do not exceed a duration of two hours.

18. The permittee shall notify the appropriate Air Sections of the Department, Manatee County Environmental Action Commission and the Southwest District Office of the Department in writing at least 15 days prior to the date on which each compliance test is to begin. The notification will include the date, time, and place of each test, and the test contact person who will be responsible for coordinating and having such test conducted (Rule 17-297.340 (1) (i), F.A.C.).

19. Testing of emissions shall be conducted with the source operating at capacity. Capacity is defined as 90-100% of rated capacity. If it is impractical to test at capacity, then sources may be tested at less than capacity; in this case subsequent source operation is limited to 110% of the test load until a new test is conducted. Once the unit is so limited, then operation at higher capacities is allowed for no more than fifteen days for purposes of additional compliance testing to regain the rated capacity in the permit, with prior notification to the Department.

Monitoring and Recordkeeping Requirements

20. The permittee shall calibrate, maintain and operate a continuous emission monitoring system for opacity, and record the output of the system on a 6-minute average opacity basis (Rule 17-296.800, F.A.C. and 40 CFR 60.48b(a), Subpart Db).

PERMITTEE:
Piney Point Phosphates, Inc.

Permit Number : AC 41-232096
PSD-FL-205
Expiration Date: July 1, 1995

SPECIFIC CONDITIONS:

21. The permittee shall maintain daily records of the hours of operation of the process steam boiler along with the quantity of fuel burned. On a monthly basis, the annual hours of operation of the boiler for the previous 12 months shall be determined and included in the records (Rule 17-4.070(3), F.A.C.).

22. The permittee shall maintain the daily continuous monitoring records as required by 40 CFR 60.49b(g), Subpart Db, Rule 17-296.800 and Rule 17-297.500, F.A.C.

23. If the permittee elects to demonstrate compliance with the nitrogen oxides emission standard by monitoring steam generator unit operating conditions and predict nitrogen oxides emission rates, the permittee shall submit a plan for approval as specified in 40 CFR 60.49b(c).

24. In order to document continuing compliance with Specific Condition No. 2, the permittee shall obtain and maintain at the facility fuel oil analysis from the fuel oil supplier which certify that the oil received for firing in this boiler meets the specifications for No. 2 distillate fuel oil (Rules 17-4.070(3), 17-296.800, 17-297.500, F.A.C. and 40 CFR 60.49b(r)).

25. All records required by this permit and/or 40 CFR 60.49b, Subpart Db, shall be retained for a minimum of two years following the date of such records and be made available for inspection by the Department upon request (Rules 17-4.070(3), 17-296.800, 17-297.500, F.A.C. and 40 CFR 60.49b(o), Subpart Db).

Reporting Requirements

26. The permittee shall submit quarterly opacity and nitrogen oxide excess emission reports in accordance with 40 CFR 60.7(c) and 40 CFR 60.49b(h) & (i), Subpart Db. If there are no excess emissions during a calendar quarter the permittee shall submit a report stating that no excess emissions occurred during the reporting period (Rule 17-296.800 & 17-297.500, F.A.C. and 40 CFR 60.49b(h)).

27. The permittee shall submit quarterly reports certifying that only No. 2 distillate fuel oil with a maximum sulfur content of 0.05% by weight was fired in this boiler in the preceding calendar quarter (Rules 17-4.070(3) and 17.296.800 & 17-297.500, F.A.C. and 40 CFR 60.49b(r), Subpart Db).

28. All reports required by this permit and/or 40 CFR 60.49b shall be submitted to the Air Sections of the Manatee County Environmental Action Commission and the Southwest District Office of the Department. All quarterly reports shall be postmarked by the 30th day following the end of the calendar quarter.

PERMITTEE:
Piney Point Phosphates, Inc.

Permit Number : AC 41-232096
PSD-FL-205
Expiration Date: July 1, 1995

SPECIFIC CONDITIONS:

29. The permittee shall submit to the Air Sections of the Manatee County Environmental Action Commission and the Southwest District Office of the Department each calendar year on or before March 1 a completed DEP Form 17-213.900(4), an "Annual Operating Report for Air Pollutant Emitting Facility", for the preceding calendar year (Rule 17-210.300(2), F.A.C.).

30. The permittee shall provide the Southwest District office with the following notifications required by 40 CFR 60.7:

- When construction commenced within 30 days of commencement of construction
- Anticipated date of initial starting 30 to 60 days prior to startup
- Actual date of startup within 15 days after the starting
- Notification of the date of the compliance tests not less than 15 days prior to the test

Permitting Requirements

31. Any change in the method of operation, fuels or equipment that affect potential emissions shall be submitted to the Air Sections of the Manatee County Environmental Action Commission and the Southwest District Office of the Department for review and approval (Rule 17-210, F.A.C.).

32. All applicable rules of the Department and design discharge limitations specified in the application must be adhered to. The permit holder may also need to comply with county, municipal, federal, or other state regulations prior to construction (Rule 17-4.070(7), F.A.C.).

33. The permittee, for good cause, request that this construction permit be extended. Such a request shall be submitted to the Bureau of Air Regulation prior to 60 days before the expiration of the permit (F.A.C. Rule 17-4.090).

PERMITTEE:
Piney Point Phosphates, Inc.

Permit Number : AC 41-232096
PSD-FL-205
Expiration Date: July 1, 1995

SPECIFIC CONDITIONS

34. An operation permit application must be submitted to the Southwest District Office at least 90 days prior to the expiration date of this construction permit. To properly apply for an operation permit, the applicant shall submit the appropriate application form, fee, and certification that construction was completed noting any deviations from the conditions in the construction permit, and compliance test reports as required by this permit (F.A.C. Rules 17-4.055 and 17-4.220).

Issued this _____ day
of _____, 1994

**STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION**

Virginia B. Wetherell, Secretary
Department of Environmental
Protection

Best Available Control Technology (BACT) Determination
Piney Point Phosphates, Inc.
Manatee County
AC 41-232096
PSD-FL-205

The applicant has submitted a request to increase the maximum operating hours for the auxiliary boiler at their Palmetto, Florida facility from 876 hours/year to 8760 hours/year. The maximum heat input and consumption of new No. 2 distillate fuel oil is 190 MMBtu/hour and 1349.0 gallons per hour (gph), respectively. The new No. 2 distillate fuel oil will contain no more than 0.05% by weight of sulfur. The boiler is scheduled to operate 8760 hours per year.

A BACT determination is required for nitrogen oxides (NO_x), as set forth in the Florida Administrative Code Rule 17-212.400(5)(a), (b) and (c) - Prevention of Significant Deterioration (Preconstruction Review Requirements), since this pollutant would be emitted in amounts exceeding the PSD-significant levels as follows:

<u>Pollutant</u>	<u>Actual Emissions</u>	<u>Proposed Emissions</u>	<u>Increase</u>	<u>PSD-Significant Levels</u>
NO _x	11.0 TPY	166.4 TPY	155.4	40

The Department performed a BACT determination for nitrogen oxides (NO_x) since the proposed emissions for this pollutant exceeded the PSD significant rate of 40 tons per year. A BACT determination is required for PM and SO₂ in accordance with Rule 17-296.406, F.A.C.

BACT Determination Requested by the Applicant:

Control of NO_x emissions with low-NO_x burners in conjunction with induced flue gas recirculation. The applicant has proposed using distillate fuel oil with a sulfur content not to exceed 0.05 percent, by weight, for compliance with the emission limits for PM and SO₂ which would not exceed the emission limits allowed under Rule 17-296.406, F.A.C.

Submittal Date of BACT Application:

May 28, 1993

BACT Determination Procedure:

In accordance with Florida Administrative Code Chapter 17-212.410, Best Available Control Technology Determination, Stationary Source-Preconstruction Review, this BACT determination is based on the maximum degree of reduction of each pollutant emitted which the Department, on a case by case basis, taking into account energy, environmental and economic impacts, and other costs, determines is

achievable through application of production processes and available methods, systems, and techniques. In addition, the regulations state that in making the BACT determination the Department shall give consideration to:

- (a) Any Environmental Protection Agency determination of Best Available Control Technology pursuant to 40 CFR 52.21, and any emission limitation contained in 40 CFR Part 60 (Standards of Performance for New Stationary Sources) or 40 CFR Part 61 (National Emission Standards for Hazardous Air Pollutants).
- (b) All scientific, engineering, and technical material and other information available to the Department.
- (c) The emission limiting standards or BACT determinations of any other state.
- (d) The social and economic impact of the application of such technology.

The EPA currently stresses that BACT should be determined using the "top-down" approach. The first step in this approach is to determine for the emission source in question the most stringent control available for a similar or identical source or source category. If it is shown that this level of control is technically or economically infeasible for the source in question, then the next most stringent level of control is determined and similarly evaluated. This process continues until the BACT level under consideration cannot be eliminated by any substantial or unique technical, environmental, or economic objections.

DEP BACT Determination:

Nitrogen Oxide (NO_x) emissions shall not exceed 0.15 pounds/MMBtu of heat input while utilizing low-NO_x burners in conjunction with flue gas recirculation. The boiler shall be fired with distillate fuel oil with a sulfur content not to exceed 0.05 percent, by weight.

BACT Determination Rationale:

Sulfur content in fuel oil is a primary air pollution concern since most of the fuel sulfur becomes sulfur dioxide (SO₂). Also, particulate matter emissions from fuel oil burning are related to sulfur content. The Department has determined that the firing of No. 2 fuel oil with a maximum of 0.05% sulfur content is BACT for particulates and SO₂. These sulfur content limitations are representative of what has been recently established as BACT for oil-fired equipment.

The emission rate of nitrogen oxides proposed by the applicant is 0.20 pound per million BTU heat input. NO_x emissions will be controlled using Low-NO_x burners and flue gas recirculation. A review of other BACT determination for oil fired boilers indicates that the proposed emission level for nitrogen oxides is higher than several of the determinations on record and that an emissions level of 0.15 pounds of nitrogen oxides per million Btu heat input is achievable on new boilers. Additional NO_x control could be provided by using add on control devices such as selective catalytic reduction (SCR) or selective noncatalytic reduction (SNCR). The applicant indicated that the costs for these technologies would range from \$6,675 to \$9,557 per ton of NO_x removed. Other reviews of these control technologies indicates a cost effectiveness ranging from \$6802 to \$7321 per ton of NO_x removed. These costs exceed those which have been previously judged to be representative of BACT, thereby dismissing these technologies as BACT for this facility. Based on the manufacturers information, a 0.15 pounds of nitrogen oxides per million BTU heat input is achievable and, therefore, is considered BACT for this source.

Details of the Analysis May be Obtained by Contacting:

Doug Outlaw, P.E., BACT Coordinator
Department of Environmental Protection
Bureau of Air Regulation
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Recommended by:

Approved by:

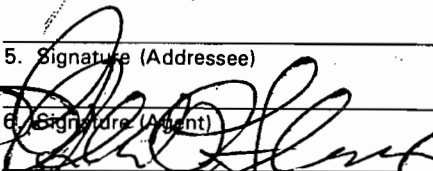
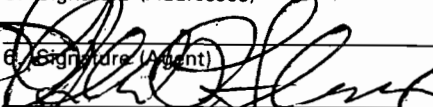
C. H. Fancy, P.E., Chief
Bureau of Air Regulation

Virginia B. Wetherell, Secretary
Dept. of Environmental Protection

Date 1993

Date 1993

Is your RETURN ADDRESS completed on the reverse side?

SENDER: • Complete items 1 and/or 2 for additional services. • Complete items 3, and 4a & b. • Print your name and address on the reverse of this form so that we can return this card to you. • Attach this form to the front of the mailpiece, or on the back if space does not permit. • Write "Return Receipt Requested" on the mailpiece below the article number. • The Return Receipt will show to whom the article was delivered and the date delivered.		RECEIVED JUL 01 1994 Bureau of		I also wish to receive the following services (for an extra fee): 1. <input type="checkbox"/> Addressee's Address 2. <input type="checkbox"/> Restricted Delivery Consult postmaster for fee.	
3. Article Addressed to: Air Regulation Mr. Ivan Nance Piney Point Phosphates, Inc. 13300 US Highway 41 North Palmetto, Florida 34221-3662		4a. Article Number P 872 562 717		4b. Service Type <input type="checkbox"/> Registered <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD <input type="checkbox"/> Express Mail <input type="checkbox"/> Return Receipt for Merchandise	
5. Signature (Addressee) 		7. Date of Delivery 6/22/94		8. Addressee's Address (Only if requested and fee is paid)	
6. Signature (Agent) 					

Thank you for using Return Receipt Service.

PS Form 3811, December 1991 *U.S. GPO: 1992-323-402 **DOMESTIC RETURN RECEIPT**

P 872 562 717



Receipt for Certified Mail
 No Insurance Coverage Provided
 Do not use for International Mail
 (See Reverse)

PS Form 3800, JUNE 1991

Sent to Mr. Ivan Nance	
Street and No. 13300 US Highway 41 North	
P.O., State and ZIP Code Palmetto, Florida 34221-86	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date Mailed: 6/20/94 AC 41-232096	

APPENDIX 10.6

SITE AND ADJACENT AREA
PROPERTY OWNERSHIP



KOGLER & ASSOCIATES
ENVIRONMENTAL SERVICES
4014 NW THIRTEENTH STREET
GAINESVILLE, FLORIDA 32609
904/377-5822 • FAX 377-7158

RECEIVED

APR 14 1994

Bureau of
Air Regulation

KA 527-92-04

April 11, 1994

Mr. William Congden, Esq.
Office of General Counsel
Florida Department of
Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Subject: Motion for Extension of Time to
File a Petition
Piney Point Phosphates, Inc.

Dear Mr. Congden:

Attached is a request for an extension of time to file for a hearing in
accordance with Rule 17-103.070, FAC.

If you have any questions concerning this request, please do not hesitate
to contact me.

Very truly yours,

KOGLER & ASSOCIATES


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

JBK:par
Enc.

c: Ms. Patty Adams, FDEP
Mr. Ivan Nance, PPP
Ms. Sue Bidwell, PPP

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

In the Matter of an Application
for Air Permit by

Piney Point Phosphates, Inc.
13300 US Highway 41 North
Palmetto, Florida 34221-8662

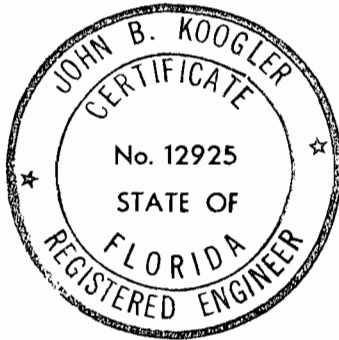
DEP File No. AC41-232096
Manatee County - AP

MOTION FOR EXTENSION OF TIME

The Applicant, Piney Point Phosphates, Inc., by and through its undersigned Engineer of Record and pursuant to Rule 17-103.070, FAC, requests the Secretary of DEP to grant a 60-day extension of time in which to file a petition. The additional time will allow Piney Point Phosphates to evaluate DEP comments and submit additional information on the boiler permit application review.

Ms. Patty Adams, Projects Coordinator, DEP, has indicated that she has no objection to such an extension.

Dated the 11th day of April, 1994 in Gainesville, Alachua County, Florida.



Koogler & Associates
Environmental Services

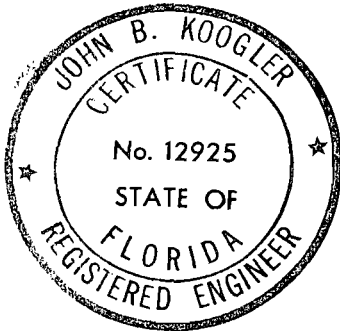
A handwritten signature in black ink, appearing to read "J. B. Koogler", written over a horizontal line.

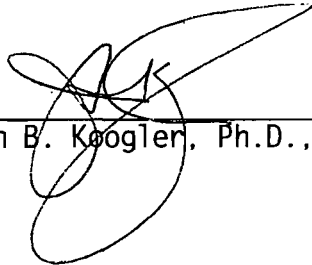
John B. Koogler, Ph.D., P.E.
Florida Registration No. 12925
4014 N.W. 13th Street
Gainesville, FL 32609
(904) 377-5822
Engineer of Record for
Piney Point Phosphates, Inc.



CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing has been furnished to Mr. William Congden, OGC, DEP, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400 and Ms. Patty Adams, DEP, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400 and Mr. Ivan Nance, Piney Point Phosphates, Inc., 13300 US Highway 41 North, Palmetto, Florida 34221-8662 by FAX and U.S. Mail, this 11th day of April 1994.





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



STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

PINEY POINT PHOSPHATES, INC.,

Petitioner,

vs.

OGC CASE NO. 93-4777

RECEIVED

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION,

MAR 24 1994

Respondent.

Bureau of
Air Regulation

ORDER GRANTING SECOND REQUEST FOR EXTENSION
OF TIME TO FILE PETITION FOR HEARING

This cause has come before the Florida Department of Environmental Protection (Department) on receipt of a request made by Petitioner Piney Point Phosphates, Inc. under rule 17-103.070 of the Florida Administrative Code to grant an extension of time to file a petition for an administrative hearing on Application No. AC41-232096. See Exhibit 1.

Petitioner's representative has discussed this request with counsel for the Respondent State of Florida Department of Environmental Protection, which has no objection to it.

Therefore,

IT IS ORDERED:

The request for an extension of time to file a petition for administrative proceeding is granted. Petitioner shall have until April 14, 1994, to file a petition in this matter. Filing shall be complete on receipt by the Office of General Counsel, Department of Environmental Protection, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400.

DONE AND ORDERED on this 23rd day of March 1994 in
Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION



KENNETH J. PLANTE
General Counsel

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400
Telephone: (904) 488-9314

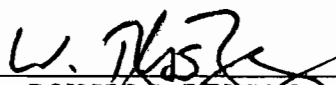
CERTIFICATE OF SERVICE

I CERTIFY that a true copy of the foregoing was mailed to:

John B. Koogler, P.E.
4014 N.W. 13th Street
Gainesville, Florida 32609

on this 25th day of March 1994.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION



W. DOUGLAS BEASON
Assistant General Counsel

2600 Blair Stone Road
Tallahassee, FL 32399-2400
Telephone: (904) 488-9730

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

In the Matter of an Application
for Air Permit by

Piney Point Phosphates, Inc.
13300 US Highway 41 North
Palmetto, Florida 34221-8662

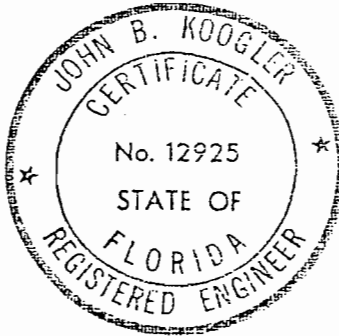
DEP File No. AC41-232096
Manatee County - AP

MOTION FOR EXTENSION OF TIME

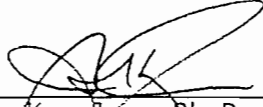
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Ms. Patty Adams, Projects Coordinator, DEP, has indicated that she has no objection to such an extension.

Dated the 14th day of March, 1994 in Gainesville, Alachua County, Florida.



Koogler & Associates
Environmental Services

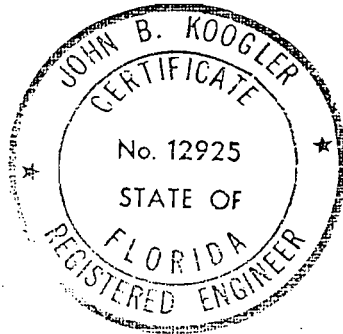


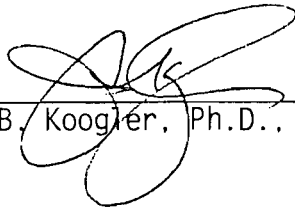
John B. Koogler, Ph.D., P.E.
Florida Registration No. 12925
4014 N.W. 13th Street
Gainesville, FL 32609
(904) 377-5822
Engineer of Record for
Piney Point Phosphates, Inc.



CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing has been furnished to Mr. William Congden, OGC, DEP, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400 and Ms. Patty Adams, DEP, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400 and Mr. Ivan Nance, Piney Point Phosphates, Inc., 13300 US Highway 41 North, Palmetto, Florida 34221-8662 by FAX and U.S. Mail, this 14th day of March 1994.





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





KOGLER & ASSOCIATES
ENVIRONMENTAL SERVICES
4014 NW THIRTEENTH STREET
GAINESVILLE, FLORIDA 32609
904/377-5822 • FAX 377-7158

KA 527-92-04

March 14, 1994

RECEIVED

MAR 16 1994

Bureau of
Air Regulation

Mr. William Congden, Esq.
Office of General Counsel
Florida Department of
Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400

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Very truly yours,

KOGLER & ASSOCIATES


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

JBK:par
Enc.

c: Ms. Patty Adams, FDEP
Mr. Ivan Nance, PPP
Ms. Sue Bidwell, PPP

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

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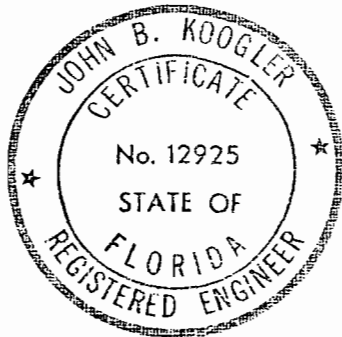
DEP File No. AC41-232096
Manatee County - AP

MOTION FOR EXTENSION OF TIME

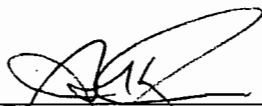
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Dated the 14th day of March, 1994 in Gainesville, Alachua County, Florida.



Koogler & Associates
Environmental Services

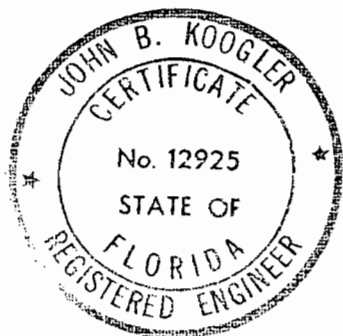


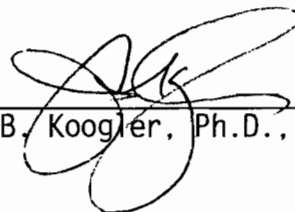
John B. Koogler, Ph.D., P.E.
Florida Registration No. 12925
4014 N.W. 13th Street
Gainesville, FL 32609
(904) 377-5822
Engineer of Record for
Piney Point Phosphates, Inc.



CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing has been furnished to Mr. William Congden, OGC, DEP, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400 and Ms. Patty Adams, DEP, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400 and Mr. Ivan Nance, Piney Point Phosphates, Inc., 13300 US Highway 41 North, Palmetto, Florida 34221-8662 by FAX and U.S. Mail, this 14th day of March 1994.





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





United States Department of the Interior

FISH AND WILDLIFE SERVICE
1875 Century Boulevard
Atlanta, Georgia 30345

IN REPLY REFER TO:

January 20, 1994

RECEIVED

JAN 25 1994

Bureau of
Air Regulation

Mr. Clair H. Fancy
Chief, Bureau of Air Regulation
Florida Department of
Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399

Dear Mr. Fancy:

We have reviewed the Prevention of Significant Deterioration Application, Preliminary Determination, and Technical Evaluation for Piney Point Phosphates (PPP). PPP proposes to modify the construction permit for a 190 MMBtu process steam boiler by increasing the hours of operation from 876 to 8,760 hours/yr. The boiler is located at a facility approximately 109 km south of the Chassahowitzka Wilderness Area (WA), a Class I air quality area administered by the Fish and Wildlife Service. The project would result in significant increases in emissions of sulfur dioxide (SO₂) and nitrogen oxides (NO_x). Emissions of particulate matter (PM) would increase slightly.

Best Available Control Technology Analysis

PPP proposes to use No. 2 fuel oil with a maximum sulfur content of 0.05 percent to minimize SO₂ emissions. We agree that this low sulfur fuel represents SO₂ best available control technology (BACT) for this project.

The FDER has determined that 0.15 lb/MMBtu represents BACT for NO_x emissions. We agree that BACT should be at least 0.15 lb/MMBtu. Wisconsin required boilers at Consolidated Paper and Appleton Paper Companies to meet a limit of 0.05 lb/MMBtu (0.095 at low loads). In addition, they are currently reviewing a Consolidated Paper application in which 0.05 lb/MMBtu will be required at all times due to the availability of better burners. This lower NO_x limit may be feasible for the PPP boiler. We suggest that FDER consult with the state of Wisconsin.

Air Quality Modeling Analysis

The Class I air quality analysis contained in FDER's preliminary determination for the proposed 190 Mmbtu/hour boiler was not performed correctly. FDER's modeling analysis assumed offsetting

emissions and impacts from a proposed 135 Mmbtu/hour boiler which was never built. This type of "paper offset" is not acceptable. Therefore, we performed the Class I impact analysis for the proposed boiler.

We modeled impacts from the proposed 190 Mmbtu/hour boiler with the EPA Industrial Source Complex Short Term (ISCST) model using National Weather Service data (1982-86) from Tampa, Florida, and FDER's proposed SO₂, NO_x, and PM emission rates. Concentrations of SO₂, NO₂, and PM were calculated at 13 discrete receptors at Chassahowitzka WA. The modeling analysis indicates that the proposed boiler will not significantly impact the wilderness area for the short term Class I SO₂ and PM increments; nor the SO₂, NO₂, and PM annual increments.

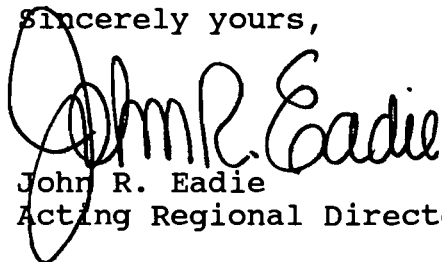
The visibility analysis performed with the EPA VISCREEN model indicates that there should be no impact of a coherent visible plume from the project at Chassahowitzka WA.

Air Quality Related Values Analysis

PPP incorrectly applied Class I significant impact levels. PPP concluded that there would be no adverse impacts to air quality related values (AQRVs) at Chassahowitzka WA, because the project's predicted impacts are less than the recommended Class I significant impact levels. In a phone conversation several months ago with Mr. Cleve Holladay of your office, we emphasized that it is the Federal Land Manager's responsibility to make this determination. We advised Mr. Holladay that because of the relatively low impacts from the project and the distance to the wilderness area, a more extensive AQRV analysis would not be required of PPP. However, we ask that FDER require future applicants to consider cumulative impacts to AQRVs even if a proposed project is not predicted to exceed Class I significant impact levels.

Thank you for giving us the opportunity to comment on this permit application. We appreciate your cooperation in notifying us of proposed projects with the potential to impact the air quality and related resources of our Class I air quality areas. If you have questions, please contact Ms. Ellen Porter of our Air Quality Branch in Denver at 303/969-2071.

Sincerely yours,


John R. Eadie
Acting Regional Director

cc: C. Logan
C. Holladay
B. Thomas, sd Dist
R. Baum, Manatee Co.
G. Harper, EPA
J. Koogler, K+A

*Patty
copy & file*



KOUGLER & ASSOCIATES
ENVIRONMENTAL SERVICES
4014 NW THIRTEENTH STREET
GAINESVILLE, FLORIDA 32609
904/377-5822 • FAX 377-7158

KA 527-92-04

January 18, 1994

RECEIVED

JAN 19 1994

Bureau of
Air Regulation

Mr. Preston Lewis
Florida Department of
Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Subject: Comments on FDEP's Intent to Issue and
Submittal of Additional Information
Piney Point Phosphates, Inc.
Boiler Permit Application
Permit File Nos. AC41-232096, PSD-FL-205

Dear Mr. Lewis:

The following comments and additional information are in response to the FDEP's Technical Evaluation and Preliminary Determination for the above Piney Point Phosphates, Inc. (PPP) project.

GENERAL

1. General Comment:

The correct name of the company is Piney Point Phosphates, Inc.

NOTICE OF INTENT TO ISSUE PERMIT

2. 1st Paragraph, Line 8:

As the proposed project is expected to consume approximately 0.3% of the allowable Class I PSD NO_x increment and 10% of the allowable Class II PSD NO_x increment, it may be necessary to reword the Notice for the sake of accuracy.

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

3. Page 2, Sec. I.B., Line 9:

The sulfuric acid plant is the primary source of steam at the plant. The proposed boiler will serve as a back-up steam supply during periods of sulfuric acid plant start-up and shutdown.

4. Page 2, Sec. II, Paragraph 1, Line 3:

As a result of the proposed project, the allowable fuel consumption will increase from 684 gallons per hour (for the existing boiler) to 1349 gallons per hour (for the proposed boiler), an increase of 665 gallons per hour.

5. Page 3, Paragraph 1, Line 3:

The proposed boiler will not be utilized as the primary source of steam at the facility (see Comment No. 3).

6. Page 3, Paragraph 2, Net Emission Table:

The significant emission rate for NO_x is 40 tons per year, in accordance with Table 212.400-2, Florida Administrative Code (FAC).

7. Page 3, Paragraph 2, Allowable Emission Table:

The allowable NO_x emissions (lbs/hr, tons/yr) in this condition are not in agreement with the emission limitation of 0.2 pounds/MMBtu, stated in the "DEP BACT Determination" on page 2 of the BACT determination document. PPP is in agreement with the "DEP BACT Determination" on page 2. The corresponding maximum allowable NO_x emission rates should read 38 lbs/hr and 166.4 tpy.

DRAFT PERMIT

8. Page 1, Paragraph 2, Line 6:

The sentence should be reworded to reflect that the boiler may be operated for upto 8760 hours per year.

9. Page 5, Specific Condition (S.C.) No. 2, Line 8:

A typographical error needs to be corrected to reflect the use of a fuel which is defined in 40CFR60.41b as a very low sulfur oil.

10. Page 5, S.C. No. 2, Line 9:

It is not clear what the Department is requiring in terms of engineering plans for the proposed project. Based on FDEP requirements for package boilers in the past, it is anticipated that a manufacturer's brochure on the boiler will suffice.



11. Page 6, S.C. No. 6, Line 4:

A typographical error needs to be corrected to reflect a rule requirement in 40CFR60.48b(a).

12. Page 6, S.C. No. 8:

Please indicate the rule requirement or the need for this permit condition, especially the requirements for an O&M plan and monitoring of emission control equipment efficiency. As the source will comply with all the applicable NSPS requirements, it is requested that this condition be deleted.

13. Page 7, S.C. No. 13:

The NOx emission limits (lbs/hr, tons/yr) in this condition should be corrected to match the emission limitation of 0.2 pounds/MMBtu, stated in the "DEP BACT Determination" on page 2 of the BACT determination document. PPP is in agreement with the "DEP BACT Determination" on page 2. The corresponding maximum allowable NOx emission rates should read 38 lbs/hr and 166.4 tpy.

14. Page 7, S.C. No. 15, Line 11:

A typographical error needs to be corrected to reflect a rule requirement in 40CFR60.46b.

15. Page 7, S.C. No. 16, Line 8:

It is not clear why FDEP is requiring a test protocol or its submittal 90 days prior to testing. The test requirements and procedures have already been referenced by rule in the same condition. Furthermore, in past permits for similar sources FDEP has not chosen not to burden itself and the permittees with such a requirement. Therefore, it is requested that the last sentence on Page 7 be deleted.

16. Page 8, S.C. No. 16:

In accordance with NSPS requirements, the wording for the test method for sulfur dioxide should be corrected to read as follows:

"Use of fuel receipts in accordance with 40CFR60.42b(j)(2) and 40CFR60.49b(r)."

17. Page 8, S.C. No. 16:

It is also requested that the following sentence, included in many other FDEP permits, be added at the end of the S.C. to provide flexibility:

"The permittee may use either the test methods prescribed above or other methods with FDEP approval."

18. Page 8, S.C. No. 18, Line 3:

The 15-day requirement in this condition conflicts with the 30-day requirement in S.C. No. 30. It is suggested that a 30-day notification be a requirement of both S.C. No. 18 and 30.

19. Page 9, S.C. No. 24, Line 3:

As the information in parenthesis regarding the contents of the fuel analysis is inaccurate and unnecessary, it is requested that it be deleted.

20. Page 9, S.C. No. 25, Line 5:

A typographical error needs to be corrected to reflect a rule requirement in 40CFR60.49b(o).

21. Page 10, S.C. No. 30, last line:

See Comment No. 18.

22. Page 11, S.C. No. 34, Line 1:

A typographical error needs to be corrected to reflect submittals to the Southwest District Office.

BACT DETERMINATION

23. Page 2, Paragraph 1, Line 4:

A typographical error needs to be corrected to reflect that fuel oil is the fuel source.



Mr. Preston Lewis
Florida Department of
Environmental Protection

January 18, 1994
Page 5

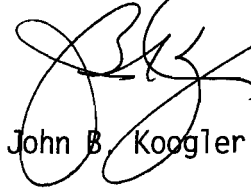
24. Pages 2 and 3:

PPP is in agreement with the "DEP BACT Determination" for NO_x of 0.20 pounds/MMBtu stated on Page 2 of the BACT Determination document. However, the last sentence of the "BACT Determination Rationale" (on Page 3) refers to a NO_x limitation of 0.15 lbs/MMBtu.

If there are any questions, please do not hesitate to give Pradeep Raval, or myself a call.

Very truly yours,

KOGLER & ASSOCIATES



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

JBK:par

c: Ms. Susanne Bidwell
Mr. Ivan Nance

C. Hogan

C. Holladay

B. Thomas, see Dist.

R. Baum, Manatee Co.

J. Harph, EPA

J. Bunch, NPS



Dally - file

*FVI/VC
ALL*



National Park Service

AIR QUALITY DIVISION

P.O. Box 25287 Denver, CO 80225-0287

FACSIMILE COVER SHEET

Date: 1-18-94

Telephone: (303) 969-2070
Fax: (303) 969-2822

To: Cleve Holladay
Charles Log

From: Ellen Porter

Subject: Piney Point Phosphates, Manatee County Memo and Letter

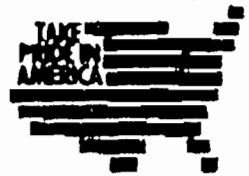
Number of pages: 3
(including this cover sheet)

Office location: Room 215, 12795 W. Alameda Parkway, Lakewood, CO 80228



Best Available Copy

United States Department of the Interior



FISH AND WILDLIFE SERVICE
WASHINGTON, D.C. 20240

ADDRESS ONLY THE DIRECTOR,
FISH AND WILDLIFE SERVICE

January 14, 1994

Memorandum

To: Regional Director, Region 4
From: Chief, Air Quality Branch
Subject: Permit Review - Piney Point Phosphates, Manatee County,
Palmetto, Florida

We have reviewed the material that the Florida Department of Environmental Regulation (FDER) forwarded to us regarding Piney Point Phosphates (PPP), Manatee County, Palmetto, Florida, located 109 km south of Chassahowitzka Wilderness Area (WA). PPP proposes to modify the construction permit for a proposed 190 MMBtu/hr process steam boiler by increasing the hours of operation from 876 to 8760 hr/yr. The increase would result in significant increases in emissions of sulfur dioxide (SO₂) and nitrogen oxides (NO_x). Emissions of particulate matter (PM/PM₁₀) would increase slightly.

Pollutant	Pounds per Hour	Tons per Year
NO _x	28.5	124.8
SO ₂	9.6	42.0
PM/PM ₁₀	2.7	11.8

We agree that using No. 2 fuel oil with a maximum sulfur content of 0.05% represents SO₂ best available control technology (BACT) for this project. We agree that an emission rate of 0.15 lb/MMBtu represents BACT for NO_x, but suggest that lower rates may be achievable.

FDER's Class I air quality modeling analysis was not done correctly, as it assumed offsetting emissions and impacts from a proposed 135 MMBtu boiler that was never built. Therefore, we performed the analysis. The analysis predicted that emissions from the proposed boiler would result in concentrations of nitrogen dioxide (NO₂), SO₂, and PM at Chassahowitzka WA well below the recommended Class I significant impact levels.

The VISCREEN analysis indicated that there should be no impact of a coherent visible plume at Chassahowitzka WA from the project.

We remind FDER that it is incorrect to conclude that because predicted impacts are below significant impact levels, then no adverse impacts to air quality related values will occur. This determination must be made by the Federal Land Manager on a case by case basis.

In conclusion, because of the relatively low emissions, and the distance from the wilderness area, we do not anticipate that resources at Chassahowitzka WA will be adversely affected by emissions from the proposed PPP project.

We ask that you sign the attached letter and forward it to the State. If you have questions, please contact me or Ellen Porter at (303) 969-2071.

Sandra V. Silva

Sandra V. Silva

Attachment

01 13 81 05.10 2000 000 000
Mr. C. H. Fancy
Chief, Bureau of Air Regulation
Florida Department of Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Dear Mr. Fancy:

We have reviewed the Prevention of Significant Deterioration Application, Preliminary Determination, and Technical Evaluation for Piney Point Phosphates (PPP). PPP proposes to modify the construction permit for a 190 MMBtu process steam boiler by increasing the hours of operation from 876 to 8760 hr/yr. The boiler is located at a facility approximately 109 km south of Chassahowitzka Wilderness Area (WA), a Class I air quality area administered by the U.S. Fish and Wildlife Service. The project would result in significant increases in emissions of sulfur dioxide (SO₂) and nitrogen oxides (NO_x). Emissions of particulate matter (PM) would increase slightly.

Best Available Control Technology Analysis

PPP proposes to use No. 2 fuel oil with a maximum sulfur content of 0.05% to minimize SO₂ emissions. We agree that this low sulfur fuel represents SO₂ best available control technology (BACT) for this project.

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Air Quality Modeling Analysis

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BEST AVAILABLE COPY

2

and PM emission rates. Concentrations of SO₂, NO₂, and PM were calculated at 13 discrete receptors at Chassahowitzka WA. The modeling analysis indicates that the proposed boiler will not significantly impact the wilderness area for the short term Class I SO₂ and PM increments; nor the SO₂, NO₂, and PM annual increments.

The visibility analysis performed with the EPA VISCREEN model indicates that there should be no impact of a coherent visible plume from the project at Chassahowitzka WA.

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PPP incorrectly applied Class I significant impact levels. PPP concluded that there would be no adverse impacts to air quality related values (AQRVs) at Chassahowitzka WA, because the project's predicted impacts are less than the recommended Class I significant impact levels. In a phone conversation with Mr. Cleve Holladay of your office, several months ago, we emphasized that it is the Federal Land Manager's responsibility to make this determination. We advised Mr. Holladay that because of the relatively low impacts from the project and the distance to the wilderness area, a more extensive AQRV analysis would not be required of PPP. However, we ask that FDER require future applicants to consider cumulative impacts to AQRVs even if a proposed project is not predicted to exceed Class I significant impact levels.

Thank you for giving us the opportunity to comment on this permit application. We appreciate your cooperation in notifying us of proposed projects with the potential to impact the air quality and related resources of our Class I air quality areas. If you have questions, please contact Ellen Porter of our Air Quality Branch in Denver at (303) 969-2071.

Sincerely,

James W. Pulliam, Jr.
Regional Director

cc: Jewell Harper, Chief
Air Enforcement Branch
Air, Pesticides and Toxic Management Division
U.S. EPA, Region 4
345 Courtland Street, NE
Atlanta, Georgia 30365.

bcc:
FWS-REG 4: AQC
CPAS: Refuge Manager
AOD-DEN: Ellen Porter
National Park Service - AIR
P.O. Box 25287
Denver, CO 80225

I N T E R O F F I C E M E M O R A N D U M

Date: 03-Jan-1994 11:07am ES
From: Holly Burnaman TAL
BURNAMAN_H
Dept: Office General Counsel
Tel No: 904/488-9730
SUNCOM:

TO: Cleve Holladay TAL
TO: Charles Logan TAL
TO: Patty Adams TAL

(HOLLADAY_C)
(LOGAN_C)
(ADAMS_P)

CC: Duane Revell TPA

(REVELL_D @ A1 @ TPA1)

Subject: PINEY POINT PHOSPHATES INC

ON DECEMBER 27, 1993, WE RECEIVED A REQUEST FOR EXTENSION OF TIME FROM PINEY POINT PHOSPHATES ON PERMIT NO. AC41-232096.



KOOGLER & ASSOCIATES
ENVIRONMENTAL SERVICES
4014 NW THIRTEENTH STREET
GAINESVILLE, FLORIDA 32609
904/377-5822 • FAX 377-7158

KA 527-92-04

December 23, 1993

REC'D
DEC 28 1993

HAZARDOUS WASTE
PERMITTING

Mr. William Congden, Esq.
Office of General Counsel
Florida Department of
Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Subject: Motion for Extension of Time to
File a Petition
Piney Point Phosphates, Inc.

Dear Mr. Congden:

Attached is a request for an extension of time to file for a hearing in accordance with Rule 17-103.070, FAC.

If you have any questions concerning this request, please do not hesitate to contact me.

Very truly yours,

KOOGLER & ASSOCIATES

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

JBK:par
Enc.

c: Mr. Doug Outlaw, FDEP
Mr. Ivan Nance, PPP
Ms. Sue Bidwell, PPP

Best Available Copy

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

RECEIVED
DEC 28 1993
HAZARDOUS WASTE
PERMITTING

In the Matter of an Application
for Air Permit by

Piney Point Phosphates, Inc.
13300 US Highway 41 North
Palmetto, Florida 34221-8662

DEP File No. AC41-232096
Manatee County - AP

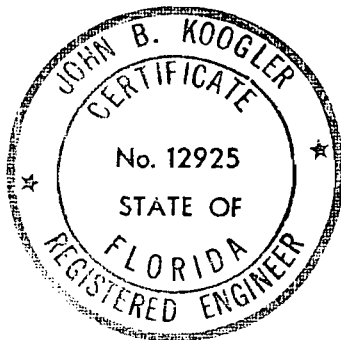
MOTION FOR EXTENSION OF TIME

The Applicant, Piney Point Phosphates, Inc., by and through its undersigned Engineer of Record and pursuant to Rule 17-103.070, FAC, requests the Secretary of DEP to grant a 60-day extension of time in which to file a petition. The additional time will allow Piney Point Phosphates to submit additional information to DEP on the boiler permit application review.

Mr. Doug Outlaw, BACT Coordinator, DEP, has indicated that he has no objection to such an extension.

Dated the 23th day of December, 1993 in Gainesville, Alachua County, Florida.

Koogler & Associates
Environmental Services



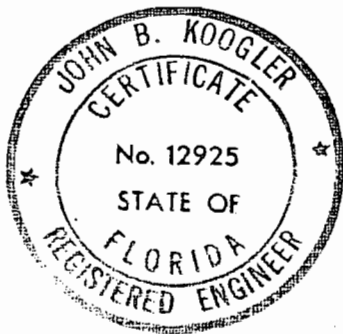
A handwritten signature in black ink, appearing to read "J. Koogler", written over a horizontal line.

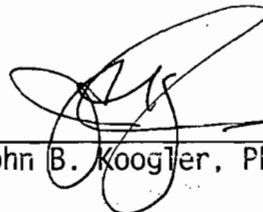
John B. Koogler, Ph.D., P.E.
Florida Registration No. 12925
4014 N.W. 13th Street
Gainesville, FL 32609
(904) 377-5822
Engineer of Record for
Piney Point Phosphates, Inc.



CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing has been furnished to Mr. William Congden, OGC, DEP, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400 and Mr. Doug Outlaw, DEP, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400 and Mr. Ivan Nance, Piney Point Phosphates, Inc., 13300 US Highway 41 North, Palmetto, Florida 34221-8662 by U.S. Mail, this 23rd day of December 1993.





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





Florida Department of Environmental Protection

Lawton Chiles
Governor

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Virginia B. Wetherell
Secretary

December 16, 1993

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Ivan Nance
Piney Point Phosphate, Inc.
13300 US Highway 41 North
Palmetto, Florida 34221-8662

Dear Mr. Nance:

Attached is one copy of the Technical Evaluation and Preliminary Determination, proposed Best Available Control Technology (BACT) Determination and proposed permit for a modification of the Piney Point Phosphate, Inc. facility. The facility is located at the above address in Palmetto, Florida, Manatee County.

Please submit any written comments you wish to have considered concerning the Department's proposed action to Mr. Preston Lewis at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400.

Sincerely,

for John H. Fancy, P.E.
C. H. Fancy, P.E.
Chief
Bureau of Air Regulation

CHF/CSL

Attachments

cc: Bill Thomas, SWD
Rob Baum, Manatee Co.
John Bunyak, NPS
Jewell Harper, U.S. EPA
Doug Beason, OGC
John Koogler, K&A

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

CERTIFIED MAIL

In the Matter of an
Application for Permit by:

DEP File No. AC 41-232096
PSD-FL-205
Manatee County

Mr. Ivan Nance
Piney Point Phosphate, Inc.
13300 US Highway 41 North
Palmetto, FL 34221-8662

INTENT TO ISSUE

The Department of Environmental Protection gives notice of its intent to issue an air construction permit (copy attached) for the proposed project as detailed in the application specified above, for the reasons stated in the attached Technical Evaluation and Preliminary Determination.

The applicant, Piney Point Phosphate, Inc., applied on May 28, 1993, to the Department of Environmental Protection for a permit to modify the construction permit (AC 41-211848) for a proposed 190 MMBtu/hr process boiler by increasing the hours of operation from 876 hours to 8760 hours per year. The facility is located at 13300 US Highway 41 North, Palmetto, Florida.

The Department has permitting jurisdiction under the provisions of Chapter 403, Florida Statutes and Florida Administrative Code (F.A.C.) Chapters 17-212 and 17-4. The project is not exempt from permitting procedures. The Department has determined that a construction permit is required for the proposed work.

Pursuant to Section 403.815, Florida Statutes and Rule 17-103.150, 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. The applicant shall provide proof of publication to the Department's Bureau of Air Regulation, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, within seven days of publication. Failure to publish the notice and provide proof of publication within the allotted time may result in the 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 warrant 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 Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION

for John Brown Jr
C. H. Fancy, P.E., Chief
Bureau of Air Regulation
2600 Blair Stone Road
Tallahassee, Florida 32399
904-488-1344

CERTIFICATE OF SERVICE

The undersigned duly designated deputy clerk hereby certifies that this INTENT TO ISSUE and all copies were mailed by certified mail before the close of business on 12/16/93 to the listed persons.

Clerk Stamp

FILING AND ACKNOWLEDGMENT

FILED, on this date, pursuant to §120.52(11), Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.

Barbara J. Postwell 12/16/93
Clerk Date

Copies furnished to:

B. Thomas, SWD
R. Baum, Manatee Co.
J. Bunyak, NPS
J. Harper, U.S. EPA
D. Beason, OGC
J. Koogler, K&A

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 construction permit (AC 41-232096) to Piney Point Phosphates, Inc., 13300 US Highway 41 North, Palmetto, Florida 34221-8662 to increase the operating hours of a proposed 190 MMBtu/hr process steam boiler from 876 hours to 8760 hours per year. A determination of the Best Available Control Technology (BACT) was required for nitrogen oxides (NO_x), particulate matter (PM) and sulfur dioxide (SO₂). No PSD Class I or II increments are consumed by this project. The Department is issuing this Intent to Issue for the reasons stated in the Technical Evaluation and Preliminary Determination.

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, 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 warrant 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 Notice. 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 publication of this notice 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.

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:

Department of Environmental Protection
Bureau of Air Regulation
111 S. Magnolia Drive, Suite 4
Tallahassee, Florida 32301

Department of Environmental Protection
Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619-8218

Manatee County Air Quality Division
202 6th Avenue East
Bradenton, Florida 34208

Any person may send written comments on the proposed action to Mr. Preston Lewis at the Department of Environmental Protection, 2600 Blair Stone Road, Tallahassee, Florida, 32399-2400. All comments received within 30 days of the publication of this notice will be considered in the Department's final determination.

Further, a public hearing can be requested by any person(s). Such requests must be submitted within 30 days of this notice.

Technical Evaluation
and
Preliminary Determination

Piney Point Phosphate, Inc.
Palmetto, Florida
Manatee County

Construction Permit Modification
Permit No. AC 41-232096
PSD-FL-205

Department of Environmental Protection
Division of Air Resources Management
Bureau of Air Regulation

December 16, 1993

I. Application

A. Applicant

Piney Point Phosphate, Inc.
13300 US Highway 41 North
Palmetto, Florida 34221-8662

B. Project Description/Location/Classification

The Department received an application on May 28, 1993 to modify an existing permit by increasing the operating hours from 876 hours to 8760 hours per year for the proposed 190 MMBtu/hr process boiler at the applicant's facility in Palmetto, Manatee County, Florida. The operating hours will be increased while firing new low sulfur No. 2 fuel oil. The existing 96 MMBtu/hr boiler will be replaced by a new 190 MMBtu/hr boiler. Subsequent to construction of the proposed 190 MMBtu/hr boiler it will be utilized as the primary source of steam at the facility. UTM coordinates of the site are Zone 17, 348.5 km E and 3057.3 km N. The latitude and longitude for the site are 27°37'58" and 82°32'08". This project is considered a major modification since the significant emission rate for nitrogen oxides (NO_x) will be exceeded. Since a significant emission rate will be exceeded, the project is subject to Prevention of Significant Deterioration (PSD) review and a Best Available Control Technology (BACT) determination. The application was considered complete subsequent to receiving additional information on September 21, 1993. Maximum fuel consumption and heat input for the boiler will be 1349 gallons/hour and 190 MMBtu/hr., respectively. Piney Point Phosphate, Inc. will fire only new No. 2 fuel oil containing no more than 0.05% sulfur by weight in the boiler. This modification will require a physical change of equipment but will not affect the emissions of any other source at the facility.

II. Emissions/Technical Evaluation

The modification requested by Piney Point Phosphate, Inc. to increase the operating hours will be accomplished by increasing the consumption of fuel oil by approximately 1320.5 gal/hour. The fuel oil will contain no more than 0.05% sulfur by weight.

The current actual emissions at the affected sources were calculated using 1989, 1990, and 1991 fuel consumption data. Also, AP-42 emission factors and the emission factor for NO_x from the previous permit application were used in the calculations for the current actual emissions.

The request by Piney Point Phosphate, Inc. to increase the operating hours of the auxiliary boiler will allow the boiler to be utilized as the primary source of steam for the facility and will also create exceedences of the "significant emission rates" for NO_x. The proposed modification is subject to Prevention of Significant Deterioration (PSD) in accordance with F.A.C. Rule 17-212.400 and will require a determination of the Best Available Control Technology (BACT) for NO_x. A BACT determination is also required for PM and SO₂ in accordance with Rule 17-296.406. Both of the PSD and BACT requirements are discussed in the rule applicability section. The actual, proposed and net emissions submitted in the application are as follows:

Pollutant	Actual Emissions #/hr(ton/yr)	Proposed* Emissions #/hr(ton/yr)	Net Emissions #/hr(ton/yr)	Significant Emission ton/yr
PM	01.4(0.3)	2.7 (11.8)	1.3(11.5)	15
SO ₂	87.4(14.7)	9.6(42.0)	-77.8(27.3)	40
NO _x	53.8(11.0)	38.0(166.4)	-15.8(155.4)	100
VOC	0.2(0.03)	0.3(1.2)	0.1(1.17)	40
CO	3.4(0.7)	6.7(29.3)	3.3(28.6)	100

*Refer to the BACT Determination for details on calculations of future emission values.

The applicants proposed emissions were calculated using 8760 hours of operation and uncontrolled emission factors for distillate fuel oil combustion in industrial boilers from AP-42, Table 1.3-1. The emission calculations are based on 0.05 and 0.02 percent by weight of sulfur and ash, respectively.

The following table provides the Department's maximum proposed allowable emissions:

190 MMBtu/hour Process Boiler
Maximum Allowable Emission

Pollutant	lb/hr	ton/yr*
PM/PM ₁₀	2.7	11.8
SO ₂	9.6	42.0
NO _x	28.5	124.8

*Based on 8760 hours of operation per year

III. Rule Applicability

The proposed project is subject to preconstruction review in accordance with Chapter 403 of the Florida Statutes and Florida Administrative Code (F.A.C.) Chapters 17-4, 17-210, 17-212, 17-292, 17-275, 17-296, and 17-297. The proposed facility will be located in an area classified as attainment for all regulated pollutants (F.A.C. Rule 17-275.400). The federal new source performance standards under 40 CFR 60 Subpart Db (Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units) applies to this source. F.A.C. Rule 17-296 requires a BACT analysis for nitrogen oxides (NO_x) since the significant emission level for this pollutant will be exceeded. Since the new source is a small boiler it is subject to BACT for PM and SO₂ in accordance with 17-296.406.

As originally filed, the application is a request to modify a construction permit of a major source and is subject to the provisions of F.A.C. Rule 17-212.400, Prevention of Significant Deterioration (PSD), since the proposed modification would cause an exceedence of the PSD significant emission rate for NO_x. The BACT Determination (attached) established the allowable emissions for NO_x.

IV. Air Quality Analysis

A. Introduction

The proposed project will result in an emission increase which is projected to be greater than the PSD significant emission rate for NO_x. Therefore, the project is subject to the PSD review requirements contained in F.A.C. Rule 17-212.400. An air quality impact analysis for this pollutant is required. This includes:

- o A PSD increment analysis;
- o An analysis of existing air quality;
- o An Ambient Air Quality Standards (AAQS) analysis;
- o An analysis of impacts on soils, vegetation, visibility, and growth-related air quality impacts; and,
- o A Good Engineering Practice (GEP) stack height determination.

The analysis of existing air quality generally relies on preconstruction monitoring data collected in accordance with EPA-approved methods. The PSD increment and AAQS analyses are based on air quality dispersion modeling completed in accordance with EPA guidelines.

Based on these required analyses, the Department has reasonable assurance that the proposed project, as described in this report and subject to the conditions of approval proposed herein, will not cause or contribute to a violation of any PSD increment or AAQS. A brief description of the modeling method used and results of the required analyses follow. A more complete description is contained in the permit application on file.

B. Analysis of the Existing Air Quality

Preconstruction ambient air quality monitoring may be required for pollutants subject to PSD review. However, an exemption to the monitoring requirement can be obtained if the maximum predicted air quality impact resulting from the projected emissions increase, as determined through air quality modeling, is less than a pollutant-specific de minimus concentration. The predicted maximum concentration increase for NO_x is 2.6 ug/m^3 , annual average, which is less than the PSD de minimus concentration for NO_x of 14 ug/m^3 , annual average. Therefore, this project is not subject to preconstruction ambient air quality monitoring.

C. Modeling Method

The EPA-approved Industrial Source Complex Short-Term (ISCST2) dispersion model was used by the applicant to predict the impact of the proposed project on the surrounding ambient air. All recommended EPA default options were used. Downwash parameters were used because the stacks were less than the good engineering practice (GEP) stack height. Five years of sequential hourly surface and mixing depth data from the Tampa, Florida National Weather Service (NWS) station collected during 1985 through 1989 were used in the model. The highest predicted yearly average was compared with the standards.

D . Modeling Results

The applicant first evaluated the potential increase in ambient ground-level concentrations associated with the project to determine if the maximum predicted ambient concentration increase would be greater than the specified PSD significant impact level for NO_x . Dispersion modeling was performed with receptors placed along the 36 standard radial directions (10 degrees apart) surrounding the auxiliary boiler at the following downwind distances: 460, 500, 600, 700, 1000, 1500, 2000, and 3000 m. The maximum predicted ambient NO_x concentration increase was 2.6 ug/m^3 . This value is greater than the PSD significant impact level of 1.0 ug/m^3 , thus requiring the applicant to do a full impact analysis for comparison with the AAQS and PSD Class II increment. The following maximum predicted concentrations are the results of the

full impact analysis: 29.0 ug/m³, annual average, which is less than the AAQS of 100 ug/m³, annual average; and 2.71 ug/m³, which is less than the PSD Class II increment of 25 ug/m³, annual average. The value of 29.0 ug/m³ includes a background of 19 ug/m³ based on 1992 data collected at the Gandy Boulevard NO₂ monitor in Tampa (4360-065-G01).

The nearest PSD Class I area is the Chassahowitzka National Wilderness Area located 110 km from the facility. The predicted impact of the proposed project on this area was evaluated by using the ISCST2 model. The maximum predicted impact was 0.007 ug/m³, annual average. This value is less than the National Park Service's proposed significant impact level of 0.025 ug/m³, annual average. Therefore, no further analysis of this project's impact on the Class I area was necessary.

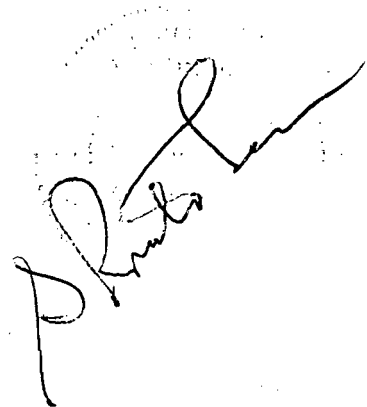
E. Additional Impacts Analysis

A Level-1 screening analysis using the EPA model, VISCREEN was used to determine any potential adverse visibility impacts on the Class I Chassahowitzka National Wilderness Area. Based on this analysis, the maximum predicted visual impacts due to the proposed project are less than the screening criteria both inside and outside the Class I area. Because the maximum predicted impact of the project is significantly less than the National Park Service's proposed significant impact level, no further air quality related values analysis was required.

In addition, the proposed modification will not significantly change employment, population, housing or commercial/industrial development in the area to the extent that a significant air quality impact will result.

VI. Conclusion

Based on the information provided by Piney Point Phosphate, Inc., the Department has reasonable assurance that the proposed modification of the permit for this installation, as described in this evaluation, and subject to the conditions proposed herein, will not cause or contribute to a violation of any air quality standard, PSD increment, or any other technical provision of Chapters 17-212 of the Florida Administrative Code.

A handwritten signature in black ink, appearing to read "Phosphate", is located in the bottom right corner of the page. The signature is written in a cursive style and is positioned over the page number "6".



Florida Department of Environmental Protection

Lawton Chiles
Governor

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Virginia B. Wetherell
Secretary

PERMITTEE:
Piney Point Phosphate, Inc.
13300 US Highway 41 North
Palmetto, FL 34221-8662

Permit No. : AC 41-232096
PSD-FL-205
Exp. Date : January 1, 1995
County : Manatee
Lat./Long. : 27°37'58"N
82°32'08"W
Project : 190 MMBtu/hour
Process Steam Boiler

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 17-210, 212, 272, 275, 296, and 297; and 17-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawings, plans, and other documents attached hereto or on file with the Department and specifically described as follows:

For the construction of a 190 MMBtu/hour process steam boiler. This boiler is permitted to be fired with new No. 2 distillate fuel oil only. The maximum fuel consumption rate will be 1349 gallons/hour and the maximum heat input rate will be 190 MMBtu/hour while producing a maximum of 150,000 pounds/hour of steam. The boiler will be operated at 8760 hours/year. Nitrogen oxides emissions will be controlled with low-NO_x burners, flue gas recirculation, and proper operation practices. Sulfur dioxide emissions will be controlled by only firing No. 2 fuel oil containing no more than 0.05% sulfur by weight. The facility will be located at 13300 US Highway 41 North, Palmetto, FL, Manatee County.

The UTM coordinates of this facility are Zone 17, 348.5 km E and 3057.3 km N.

The source shall be constructed in accordance with the permit application, plans, documents, amendments and drawings, except as otherwise noted in the General and Specific Conditions.

Attachments are listed below:

1. Application received May 28, 1993.
2. DEP letter dated June 24, 1993.
3. KA letter dated July 30, 1993
4. KA letter dated September 17, 1993.
5. KA memorandum dated November 22, 1993.

PERMITTEE:
Piney Point Phosphate, Inc.

Permit Number : AC 41-232096
PSD-FL-205
Expiration Date: January 1, 1995

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 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), Florida Statutes, 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 facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.

PERMITTEE:
Piney Point Phosphate, Inc.

Permit Number : AC 41-232096
PSD-FL-205
Expiration Date: January 1, 1995

GENERAL CONDITIONS:

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:

- 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, Florida Statutes. 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.

PERMITTEE:
Piney Point Phosphate, Inc.

Permit Number : AC 41-232096
PSD-FL-205
Expiration Date: January 1, 1995

GENERAL CONDITIONS:

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.

12. This permit or a copy thereof shall be kept at the work site of the permitted activity.

13. This permit also constitutes:

- (x) Determination of Best Available Control Technology (BACT)
- (x) Determination of Prevention of Significant Deterioration (PSD)
- (x) 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

PERMITTEE:
Piney Point Phosphate, Inc.

Permit Number : AC 41-232096
PSD-FL-205
Expiration Date: January 1, 1995

GENERAL CONDITIONS:

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.

SPECIFIC CONDITIONS:

1. This permit, AC 41-232096, shall be valid only when the permittee formally surrenders AC 41-226205 and AC 41-211848. Issuance of this permit AC 41-232096 constitutes revocation of AC 41-226205 and AC 41-211848. When the new 190 MMBtu per hour boiler is constructed and in operation the existing 96 MMBtu per hour boiler shall be permanently shut down. Until that time the 96 MMBtu per hour boiler is authorized to operate under the conditions of AO 41-156789.

Construction Details

2. Construction of the proposed process steam boiler shall reasonably conform to the plans described in the application. The facility shall be designed, constructed, and operated so that its maximum heat input and maximum fuel consumption shall not exceed 190 MMBtu per hour and 1349 gallons per hour of new* No. 2 distillate fuel oil, respectively. The sulfur content of the fuel oil shall not exceed 0.05% by weight, which is defined as "very low sulfuric oil in 40 CFR 60.41b, Subpart Db." The permittee shall provide the Department with engineering, monitoring, and reporting plans for the process steam boiler within 30 days after the plans become available.

* New oil means an oil which has been refined from crude oil and has not been used in any manner that may contaminate it.

3. The stack sampling facilities (sample ports, work platforms, access, and electrical power) must comply with F.A.C. Rule 17-297.345 and 40 CFR 60.8(e).

4. The boiler shall be equipped with instruments to measure the fuel feed rate, steam production, steam pressure, and steam temperature.

5. The boiler shall be equipped with:

- Low-NO_x burners designed for a maximum reduction in oxides of nitrogen; and
- Induced flue gas recirculation technology which will maximize the dilution of oxygen rich combustion air with oxygen deficient recirculated flue gas.

PERMITTEE:
Piney Point Phosphate, Inc.

Permit Number : AC 41-232096
PSD-FL-205
Expiration Date: January 1, 1995

SPECIFIC CONDITIONS:

6. The permittee shall construct and install a continuous emission monitoring device on the boiler exhaust for opacity. The continuous emission monitoring device shall meet the applicable requirements of Section 17-297.500, F.A.C., and 40 CFR 60.48(b)(a).

7. During land clearing and site preparation, wetting operations or other soil treatment techniques appropriate for controlling unconfined particulates, including grass seeding and mulching of disturbed areas, shall be undertaken and implemented. Any open burning of land clearing debris on this site shall be performed in compliance with Department regulations.

Operational and Emission Restrictions

8. Prior to operation of the source, the permittee shall submit to the Department an operation and maintenance plan that will allow the permittee to monitor emission control equipment efficiency and enable the permittee to return malfunctioning equipment to proper operation as expeditiously as possible.

9. The issuance of this permit does not relieve the permittee from complying with applicable emission limiting standards or other requirements of Rules 17-210, 17-212, 17-272, 17-275, 17-296, 17-297 and 17-4, or any other requirements under federal, state or local law (Rule 17-210.300, F.A.C.).

10. This process steam boiler is subject to and shall meet all the applicable requirements of 40 CFR 60, Subpart Db (Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units) of the Federal New Source Performance Standards (NSPS) (Rule 17-296.800, F.A.C.).

11. The maximum permitted operating hours for this process steam boiler is 8760 hours/year.

12. The visible emissions from this process steam boiler shall not exceed 20% opacity (6-minute average), except for one 6-minute period per hour during which the opacity shall not exceed 27%. These opacity standards shall apply at all times, except during periods of startup, shutdown or malfunction.

PERMITTEE:
Piney Point Phosphate, Inc.

Permit Number : AC 41-232096
PSD-FL-205
Expiration Date: January 1, 1995

SPECIFIC CONDITIONS:

13. The maximum allowable emission rates for the process boiler based on a No. 2 distillate fuel oil consumption of 1349 gallons/hour shall not exceed the following limits:

190 MMBtu/hour Process Boiler
Maximum Allowable Emission

Pollutant	lb/hr	ton/yr*
PM/PM ₁₀	2.7	11.8
SO ₂	9.6	42.0
NO _x	28.5	124.8

*Based on 8760 hours of operation per year

14. The Best Available Control Technology (BACT) determination for controlling NO_x emissions was determined to be flue gas recirculation and low-NO_x burners. [Rule 17-296.330, F.A.C.]

Compliance Requirements

15. The process steam boiler shall conduct performance tests for the pollutants listed in specific condition No. 13 and visible emissions within 60 calendar days after achieving the maximum firing rate at which this boiler will be operated, but no later than 180 operating days after initial startup. The permittee shall conduct performance and visible emissions tests during normal operations (at or no less than 90% of the maximum heat input). A written report of the performance test results shall be submitted to the Department within 45 days after the test. The performance tests shall be conducted according to the requirements of 40 CFR 60.46 and F.A.C. Rule 17-296.800.

16. Compliance with the pollutants respective maximum allowable emission limits referenced in specific condition No. 13 shall be demonstrated using the applicable EPA methods as contained in 40 CFR 60, Appendix A, (July, 1993) and adopted by reference in Rule 17-297, F.A.C. The minimum test requirements for new stationary source emissions test procedures and reporting requirements shall be in accordance with Rule 17-297, F.A.C. and 40 CFR 60, Appendix A. A test protocol shall be submitted for approval to the Departments Southwest District Office at least 90 days prior to testing.

PERMITTEE:
Piney Point Phosphate, Inc.

Permit Number : AC 41-232096
PSD-FL-205
Expiration Date: January 1, 1995

SPECIFIC CONDITIONS:

<u>For Determination of</u>	<u>U.S. EPA. Test Method</u>
Sulfur Dioxide (SO ₂)	Emissions rates from new No. 2 distillate fuel oil samples and analysis procedures under EPA Method 19 [ASTM D2880-88]
Sample and Velocity Traverse	Method 1
Velocity and Volumetric Flow Rate	Method 2
Particulate Matter (PM)/(PM ₁₀)	Method 3A or 3B with Method 5/201 or 201A
Opacity	Method 9
Nitrogen Oxides (NO _x)	Method 7, 7A, 7E or 19

17. The permittee shall comply with the excess emissions rule contained in F.A.C. Rule 17-210.700. The permittee is allowed excess emissions during startup conditions, provided such excess emissions do not exceed a duration of two hours.

18. The permittee shall notify the appropriate Air Sections of the Department, Manatee County Environmental Action Commission and the Southwest District Office of the Department in writing at least 15 days prior to the date on which each compliance test is to begin. The notification will include the date, time, and place of each test, and the test contact person who will be responsible for coordinating and having such test conducted (Rule 17-297.340 (1) (i), F.A.C.).

19. Testing of emissions shall be conducted with the source operating at capacity. Capacity is defined as 90-100% of rated capacity. If it is impracticable to test at capacity, then sources may be tested at less than capacity; in this case subsequent source operation is limited to 110% of the test load until a new test is conducted. Once the unit is so limited, then operation at higher capacities is allowed for no more than fifteen days for purposes of additional compliance testing to regain the rated capacity in the permit, with prior notification to the Department.

PERMITTEE:
Piney Point Phosphate, Inc.

Permit Number : AC 41-232096
PSD-FL-205
Expiration Date: January 1, 1995

SPECIFIC CONDITIONS:

Monitoring and Recordkeeping Requirements

20. The permittee shall calibrate, maintain and operate a continuous emission monitoring system for opacity, and record the output of the system on a 6-minute average opacity basis (Rule 17-296.800, F.A.C. and 40 CFR 60.48b(a), Subpart Db).

21. The permittee shall maintain daily records of the hours of operation of the process steam boiler along with the quantity of fuel burned. On a monthly basis, the annual hours of operation of the boiler for the previous 12 months shall be determined and included in the records (Rules 17-4.070(3), F.A.C.).

22. The permittee shall maintain the daily continuous monitoring records as required by 40 CFR 60.49b(g), Subpart Db and Rule 17-296.800.

23. If the permittee elects to demonstrate compliance with the nitrogen oxides emission standard by monitoring steam generator unit operating conditions and predict nitrogen oxides emission rates; the permittee shall submit a plan for approval as specified in 40 CFR 60.49b(c).

24. In order to document continuing compliance with Specific Condition No. 2, the permittee shall obtain and maintain at the facility fuel oil analysis (SO₂, trace metals, etc.) from the fuel oil supplier which certify that the oil received for firing in this boiler meets the specifications for No. 2 distillate fuel oil (Rules 17-4.070(3) and 17-296.800, F.A.C. and 40 CFR 60.49b(r)).

25. All records required by this permit and/or 40 CFR 60.49b, Subpart Db, shall be retained for a minimum of two years following the date of such records and be made available for inspection by the Department upon request (Rules 17-4.070(3), 17-296.800, F.A.C. and 40 CFR 60.49(o), Subpart Db).

Reporting Requirements

26. The permittee shall submit quarterly opacity and nitrogen oxide excess emission reports in accordance with 40 CFR 60.7(c) and 40 CFR 60.49b(h) & (i), Subpart Db. If there are no excess emissions during a calendar quarter the permittee shall submit a report stating that no excess emissions occurred during the reporting period (Rule 17-296.800 & 17-297.500, F.A.C. and 40 CFR 60.49b(h)).

PERMITTEE:
Piney Point Phosphate, Inc.

Permit Number : AC 41-232096
PSD-FL-205
Expiration Date: January 1, 1995

SPECIFIC CONDITIONS:

27. The permittee shall submit quarterly reports certifying that only No. 2 distillate fuel oil with a maximum sulfur content of 0.05% by weight was fired in this boiler in the preceding calendar quarter (Rules 17-4.070(3) and 17.296.800 & 17-297.500, F.A.C. and 40 CFR 60.49b(r), Subpart Db).

28. All reports required by this permit and/or 40 CFR 60.49b shall be submitted to the Air Sections of the Manatee County Environmental Action Commission and the Southwest District Office of the Department. All quarterly reports shall be postmarked by the 30th day following the end of the calendar quarter.

29. The permittee shall submit to the Air Sections of the Manatee County Environmental Action Commission and the Southwest District Office of the Department each calendar year on or before March 1 a completed DEP Form 17-213.900(4), an "Annual Operating Report for Air Pollutant Emitting Facility", for the preceding calendar year (Rule 17-210.300(2), F.A.C.).

30. The permittee shall provide the Southwest District office with the following notifications required by 40 CFR 60.7:

- When construction commenced within 30 days of commencement of construction
- Anticipated date of initial starting 30 to 60 days prior to startup
- Actual date of startup within 15 days after the starting
- Notification of the date of the compliance tests not less than 30 days prior to the test

Permitting Requirements

31. Any change in the method of operation, fuels or equipment that affect potential emissions shall be submitted to the Air Sections of the Manatee County Environmental Action Commission and the Southwest District Office of the Department for review and approval (Rule 17-210, F.A.C.).

32. All applicable rules of the Department and design discharge limitations specified in the application must be adhered to. The permit holder may also need to comply with county, municipal, federal, or other state regulations prior to construction (Rule 17-4.070(7), F.A.C.).

PERMITTEE:
Piney Point Phosphate, Inc.

Permit Number : AC 41-232096
PSD-FL-205
Expiration Date: January 1, 1995

SPECIFIC CONDITIONS

33. The permittee, for good cause, request that this construction permit be extended. Such a request shall be submitted to the Bureau of Air Regulation prior to 60 days before the expiration of the permit (F.A.C. Rule 17-4.090).

34. An operation permit application must be submitted to the South District Office at least 90 days prior to the expiration date of this construction permit. To properly apply for an operation permit, the applicant shall submit the appropriate application form, fee, and certification that construction was completed noting any deviations from the conditions in the construction permit, and compliance test reports as required by this permit (F.A.C. Rules 17-4.055 and 17-4.220).

Issued this _____ day
of _____, 1993

**STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION**

Virginia B. Wetherell, Secretary
Department of Environmental
Protection

Best Available Control Technology (BACT) Determination
Piney Point Phosphate, Inc.
Manatee County
AC 41-232096
PSD-FL-205

The applicant has submitted a request to increase the maximum operating hours for the auxiliary boiler at their Palmetto, Florida facility from 876 hours/year to 8760 hours/year. The maximum heat input and consumption of new No. 2 distillate fuel coal is 190 MMBtu/hour and 1349.0 gallons per hour (gph), respectively. The new No. 2 distillate fuel oil will contain no more than 0.05% by weight of sulfur. The boiler is scheduled to operate 8760 hours per year.

A BACT determination is required for nitrogen oxide (NO_x), as set forth in the Florida Administrative Code Rule 17-212.400(5)(a), (b) and (c) - Prevention of Significant Deterioration (Preconstruction Review Requirements), since this pollutant would be emitted in amounts exceeding the PSD-significant levels as follows:

<u>Pollutant</u>	<u>Actual Emissions</u>	<u>Proposed Emissions</u>	<u>Increase</u>	<u>PSD-Significant Levels</u>
NO _x	11.0 TPY	166.4 TPY	155.4	40

The Department performed a BACT determination for nitrogen oxides (NO_x) since the proposed emissions for this pollutant exceeded the PSD significant rate of 40 tons per year. A BACT determination is required for PM and SO₂ in accordance with Rule 17-296.406, F.A.C.

BACT Determination Requested by the Applicant:

Control of NO_x emissions with low-NO_x burners in conjunction with induced flue gas recirculation. The applicant has proposed using distillate fuel oil with a sulfur content not to exceed 0.05 percent, by weight, for compliance with the emission limits for PM and SO₂ which would not exceed the emission limits allowed under Rule 17-296.406, F.A.C.

Submittal Date of BACT Application:

May 28, 1993

BACT Determination Procedure:

In accordance with Florida Administrative Code Chapter 17-212.410, Best Available Control Technology Determination, Stationary Source-Preconstruction Review, this BACT determination is based on the maximum degree of reduction of each pollutant emitted which the Department, on a case by case basis, taking into account energy, environmental and economic impacts, and other costs, determines is

achievable through application of production processes and available methods, systems, and techniques. In addition, the regulations state that in making the BACT determination the Department shall give consideration to:

- (a) Any Environmental Protection Agency determination of Best Available Control Technology pursuant to 40 CFR 52.21, and any emission limitation contained in 40 CFR Part 60 (Standards of Performance for New Stationary Sources) or 40 CFR Part 61 (National Emission Standards for Hazardous Air Pollutants).
- (b) All scientific, engineering, and technical material and other information available to the Department.
- (c) The emission limiting standards or BACT determinations of any other state.
- (d) The social and economic impact of the application of such technology.

The EPA currently stresses that BACT should be determined using the "top-down" approach. The first step in this approach is to determine for the emission source in question the most stringent control available for a similar or identical source or source category. If it is shown that this level of control is technically or economically infeasible for the source in question, then the next most stringent level of control is determined and similarly evaluated. This process continues until the BACT level under consideration cannot be eliminated by any substantial or unique technical, environmental, or economic objections.

DEP BACT Determination:

Nitrogen Oxide (NO_x) emissions shall not exceed 0.20 pounds/MMBtu of heat input while utilizing low-NO_x burners in conjunction with flue gas recirculation. The boiler shall be fired with distillate fuel oil with a sulfur content not to exceed 0.05 percent, by weight.

BACT Determination Rationale:

Sulfur content in fuel oil is a primary air pollution concern since most of the fuel sulfur becomes sulfur dioxide (SO₂). Also, particulate matter emissions from fuel oil burning are related to sulfur content. The Department has determined that the firing of No. 2 fuel oil with a maximum of 0.05% sulfur content is BACT for particulates and SO₂. These sulfur content limitations are representative of what has been recently established as BACT for oil-fired equipment.

The emission rate of nitrogen oxides proposed by the applicant is 0.20 pound per million BTU heat input. NO_x emissions will be controlled using Low-NO_x burners and flue gas recirculation. A review of other BACT determination for oil fired boilers indicates that the proposed emission level for nitrogen oxides is higher than several of the determinations on record and that an emissions level of 0.15 pounds of nitrogen oxides per million Btu heat input is achievable on new boilers. Additional NO_x control could be provided by using add on control devices such as selective catalytic reduction (SCR) or selective noncatalytic reduction (SNCR). The applicant indicated that the costs for these technologies would range from \$6,675 to \$9,557 per ton of NO_x removed. Other reviews of these control technologies indicates a cost effectiveness ranging from \$6802 to \$7321 per ton of NO_x removed. These costs exceed those which have been previously judged to be representative of BACT, thereby dismissing these technologies as BACT for this facility. Based on the manufacturers information, a 0.15 pounds of nitrogen oxides per million BTU heat input is achievable and, therefore, is considered BACT for this source.

Details of the Analysis May be Obtained by Contacting:

Doug Outlaw, P.E., BACT Coordinator
Department of Environmental Protection
Bureau of Air Regulation
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Recommended by:

Approved by:

C. H. Fancy, P.E., Chief
Bureau of Air Regulation

Virginia B. Wetherell, Secretary
Dept. of Environmental Protection

Date 1993

Date 1993

P 872 562 510

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 (See Reverse)

PS Form 3800, JUNE 1991

Sent to	Mr. Ivan Nance
Street and No	13300 US Highway 41 North
Pg. Sign and Zip Code	Palmetto, Florida 34221-8662
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	Mailed: 12/16/93 AC 41-232096

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SENDER: <ul style="list-style-type: none"> Complete items 1 and/or 2 for additional services. Complete items 3, and 4a & b. Print your name and address on the reverse of this form so that we can return this card to you. Attach this form to the front of the mailpiece, or on the back if space does not permit. Write "Return Receipt Requested" on the mailpiece below the article number. The Return Receipt will show to whom the article was delivered and the date delivered. 	I also wish to receive the following services (for an extra fee): 1. <input type="checkbox"/> Addressee's Address 2. <input type="checkbox"/> Restricted Delivery Consult postmaster for fee.
	3. Article Addressed to: Mr. Ivan Nance Piney Point Phosphate, Inc. 13300 US Highway 41 North Palmetto, Florida 34221-8662
5. Signature (Addressee) 6. Signature (Agent) <i>The Bidwell</i>	4b. Service Type <input type="checkbox"/> Registered <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD <input type="checkbox"/> Express Mail <input type="checkbox"/> Return Receipt for Merchandise 7. Date of Delivery 12/16/93
	8. Addressee's Address (Only if requested and fee is paid)

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KOOGLER & ASSOCIATES
ENVIRONMENTAL SERVICES
4014 NW THIRTEENTH STREET
GAINESVILLE, FLORIDA 32609
904/377-5822 • FAX 377-7158

KA 527-92-04

September 17, 1993

RECEIVED
SEP 21 1993
Division of Air
Resources Management

Mr. John C. Brown, Jr.
Florida Department of
Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Subject: Additional Information
Auxiliary Steam Supply Boiler
Piney Point Phosphates
Manatee County, Florida
Permit File AC41-232096, PSD-FL-205

Dear Mr. Brown:

This is in response to your request for additional information dated September 3, 1993 (attached), on the above referenced project.

Based on Pradeep Raval's telephone conversation yesterday with Mr. Charles Logan, the following information is being submitted to resolve the pending items of incompleteness. The responses are in the order of your comments.

1. Piney Point Phosphates (PPP) presently has multiple air permits for an auxiliary steam supply boiler. FDEP would prefer to have only one permit to keep track of for the boiler.

PPP proposes the following wording for a Specific Condition of the new PSD permit, to resolve the matter:

Upon issuance of this construction permit, previous air construction permits AC41-211848 and AC41-226205 shall be null and void. Also, air operation permit A041-156789 shall be null and void upon issuance of an air operation permit for the new boiler.

This proposal accomplishes the following:

- A. PPP will be able to retain a valid back-up construction permit in case the PSD permit is not issued for any reason.
- B. If FDEP does issue the PSD permit, the previous construction permits will automatically be null and void.

- C. PPP will be able to retain a valid back-up operation permit in case an operation permit is not issued for the new boiler for any reason.
- D. If FDEP does issue an operation permit for the new boiler, the previous operation permit will automatically be null and void.

It should be noted that retaining a valid operation permit for an existing source until a proposed replacement source under a construction permit is operational, is consistent with the approach used by the Department in the past.

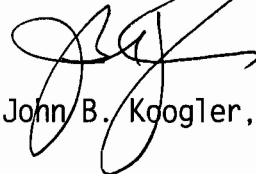
- 2. Enclosed is Page 2 of 12 of the air permit application form, duly signed and sealed, as requested by Mr. Charles Logan.
- 3. The issue concerning renumbered rule references has been resolved in Pradeep Raval's discussions with Mr. Charles Logan and Mr. Preston Lewis.
- 4. The reason for allowable annual operating hours of upto 8760 for the auxiliary steam supply boiler is to continue facility operations, dependent upon a steam supply, during periods of sulfuric acid plant shutdown. The boiler is also utilized during sulfuric acid plant start-up.

It is anticipated that this submittal will enable FDEP to proceed with the issuance of a draft PSD permit.

If you have questions, please do not hesitate to give me call.

Very truly yours,

KOOGLER & ASSOCIATES



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

JBK:par

c: Ivan Nance, PPP
Sue Bidwell, PPP

C. Fogarty
C. Halladay
B. Thomas, SW Dist.
G. Harper, EPA
J. Remyer, NPS
R. Baum, Manatee Co.



the pollution control facilities, when properly maintained and operated, will discharge an effluent that complies with all applicable statutes of the State of Florida and the rules and regulations of the department. It is also agreed that the undersigned will furnish, if authorized by the owner, the applicant a set of instructions for the proper maintenance and operation of the pollution control facilities and, if applicable, pollution sources.

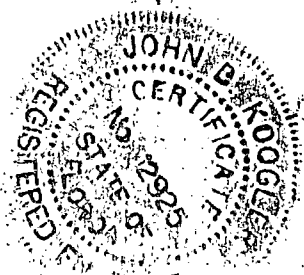
Signed _____

John B. Koogler, Ph.D., P.E.
Name (Please Type)

Koogler & Associates; Environmental Services
Company Name (Please Type)

4014 N.W. 13th Street, Gainesville, FL 32609
Mailing Address (Please Type)

Florida Registration No. 12925 Date: 9/17/93 Telephone No. (904) 377-5822



SECTION II: GENERAL PROJECT INFORMATION

A. Describe the nature and extent of the project. Refer to pollution control equipment, and expected improvements in source performance as a result of installation. State whether the project will result in full compliance. Attach additional sheet if necessary.

For the increase in the operating hours of the auxiliary boiler from 876 to 8760 hours per year. The source is currently permitted under AC41-211848. The proposed project will operate in compliance with all applicable air regulations.

B. Schedule of project covered in this application (Construction Permit Application Only) (Permitted source)
Start of Construction September 1993 Completion of Construction September 1994

C. Costs of pollution control system(s): (Note: Show breakdown of estimated costs only for individual components/units of the project serving pollution control purposes. Information on actual costs shall be furnished with the application for operation permit.)

D. Indicate any previous DER permits, orders and notices associated with the emission point, including permit issuance and expiration dates.

AC41-211848 : Issued 8-17-92 ; Expires 7-14-93, Extension Requested.

A041-156789 : Expires 1-24-94. (Replaced)

Patty



Florida Department of Environmental Protection

Lawton Chiles
Governor

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Virginia B. Wetherell
Secretary

September 3, 1993

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Ivan Nance
Environmental Manager
Piney Point Phosphate, Inc.
13300 US Highway 41 North
Palmetto, Florida 34221-8662

Re: Piney Point Phosphates, Inc.
Application to Construct AC 41-232096 (PSD-FL-205)
Submittal Date: May 28, 1993

Dear Mr. Nance:

The Department has received your July 30, 1993 response letter. Subsequent to our review of the responses, the application remains incomplete. Please respond to the following and send all supporting data:

1) Based on your responses and the events to date the Department is considering the proposed construction of the 196 MMBTU/hour, the 135 MMBTU/hour and the 190 MMBTU/hour heat input boilers as a phased project. Therefore, please submit a complete PSD emissions review project for all of the proposed boilers as a single project; or, surrender the permits for the above unconstructed sources at the existing facility to the Department. If you choose the latter, please resubmit the application reflecting a requirement for a new source, not a modification of a source which does not exist.

2) Please provide a new application, with seal, and associated documents as requested in comment No. 2 of the FDEP incompleteness letter of June 24, 1993.

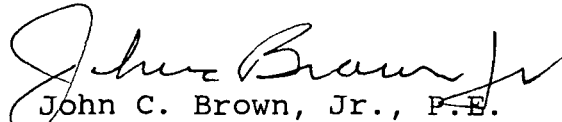
Mr. Ivan Nance
Piney Point Phosphate, Inc.
AC 41-232096 (Incompleteness)
September 3, 1993
Page 2 of 2

3) Please update the application to reflect the proper rule reference numbers per comment No. 3 of the FDEP incompleteness letter of June 24, 1993.

4) It is not clear from your response to comments No. 10 and No. 15 of the FDEP incompleteness letter of June 24, 1993 whether the auxiliary boiler will operate other than during shutdown and startup of the sulfuric acid plant. Please clarify and confirm that it is your intent to operate 8760 hours per year. Your comments seem to contradict the number of hours (8760) referenced.

If you have any questions concerning the above comments please call Charles Logan or myself at (904) 488-1344.

Sincerely;


John C. Brown, Jr., P.E.
Administrator
Air Permitting and Standards

JCB/CSL

cc: Bill Thomas, SWD
Rob Baum, Manatee Co.
John Bunyak, NPS
Jewell Harper, EPA
John Koogler, K&A
Doug Beason, OGC

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3. Article Addressed to:
Mr. Ivan Nance
Environmental Manager
Piney Point Phosphate, Inc.
13300 US Highway 41 North
Palmetto, FL 34221-8662

4a. Article Number
P 230 524 404

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

7. Date of Delivery
9/7/93

5. Signature (Addressee)
Ivan Nance

6. Signature (Agent)
Dianne Bidwell

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

PS Form 3811, December 1991 U.S. GPO: 1992-323-402 **DOMESTIC RETURN RECEIPT**

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P 230 524 404

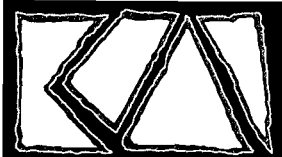


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PS Form 3800, June 1991

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Postage	\$
Certified Fee	
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Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	\$
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KOOGLER & ASSOCIATES
ENVIRONMENTAL SERVICES
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KA 527-92-04

July 30, 1993

RECEIVED

AUG 11 1993

**Division of Air
Resources Management**

Mr. C. H. Fancy
Florida Department of
Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Subject: Submittal of Additional Information ;
Piney Point Phosphates, Inc.
Auxiliary Boiler
Permit File No. AC41-232096 and PSD-FL-205

Dear Mr. Fancy:

This is in response to your letter dated June 24, 1993, requesting additional information on the above project.

1. Why have you requested modification of a permit (AC41-211848) which has been replaced? [If, as it appears, on 5/28/93, you requested a modification of a permit (AC41-211848) which was inactive on 5/3/93, you should consider withdrawing this application and submit and original application to meet your anticipated steam generating requirements.]

RESPONSE:

It is our understanding that a permittee has authorization to construct a source until the permit expiration date, unless superseded by a subsequent action by the department. Regarding the above referenced project, it is our understanding that the authorization to construct under permit No. AC41-211848 is superseded not by the authorization to construct under permit No. AC41-226205, but by the construction of the source itself, as stated in Specific Condition No. 31 of permit No. AC41-226205. As no construction has commenced under permit No. AC41-226205, the authorization to construct under permit No. AC41-211848 is valid. Therefore, a modification to a valid construction permit is appropriate. Furthermore, the applicant is willing to surrender permit No. AC41-226205 (which has caused some confusion) upon issuance of a permit for the proposed project.

2. The Application to Operate/Construct Air Pollution Sources (FDER Form 17-1.202(1)), was altered after it was signed and sealed. Therefore, a new application and associated documents should be submitted.

RESPONSE:

Concerning the items altered on the permit application form, updated pages 1 and 2 of the application form are provided, as suggested by FDEP, in Attachment 1.

3. The application should be updated to reflect the new reference numbers for the Florida Administrative Code rules for air pollution.

RESPONSE:

As DARM and the FDEP Information Center were out of copies of several of the pertinent renumbered air rules at the time of preparation of the permit application and at the time of submittal of the application, DARM staff had indicated that the old (17-2) citations would be acceptable in the interim period, possibly until the end of 1993. However, if necessary for the review of this application, the applicant will provide a revised permit application with new rule numbers.

4. Has construction of either the 190 MMBtu/hr or 135 MMBtu/hr boiler begun?

RESPONSE:

Construction has not begun on either boiler. Please note that the boiler with a heat input capacity of 135 MMBtu per hour will not need to be constructed if FDEP issues a permit for the proposed project.

5. Is the 96.2 MMBtu/hr (A041-156789) boiler operational and has it operated since AC41-226205 was approved? What are the actual emissions (all pollutants) during the last two years?

RESPONSE:

The information available is included in the last section of the application package submitted to FDEP. Calculations of actual emissions are provided in EMISSION CALCULATION section of the application package.



6. Was the 96.2 MMBtu/hr boiler operated since AC41-211848 was approved?

RESPONSE:

The existing auxiliary boiler has not been operated since August 1992.

7. Have you considered the possibility of natural gas (NG) as the primary fuel? Is NG available to the site? Can the unit burn NG? If so, provide the projected cost to burn NG as the primary fuel.

RESPONSE:

Natural gas is not available at this site. Installation of a natural gas pipeline would be cost prohibitive.

8. Expand the BACT to include the environmental effects, energy impact and economic analysis for the control technologies when burning oil and NG (if applicable). A table summarizing the top-down BACT impact analysis results should be included. A table summarizing the reduction on SO₂ and NO_x for various control technologies should be provided.

RESPONSE:

As indicated above, natural gas is not available at this site. A table summarizing the emission potential for SO₂ and NO_x given various control technologies is provided in Attachment 2.

9. What are costs/ton of SO₂ when burning new NO. 2 fuel oil containing a maximum sulfur content of 0.05%, 0.2% and 0.3% by weight at a maximum fuel consumption rate of 96.2 MMBtu/hr, 135 MMBtu/hr and 190 MMBtu/hr? Provide costs for 876, 2,600 and 8760 operating hours.

RESPONSE:

It is our understanding that a BACT cost analysis is required only for the proposed project, not for the previously permitted projects. Based on recent fuel availability information, PPP proposes to utilize a low sulfur content (0.05%) diesel fuel as BACT for sulfur dioxide. The estimated emissions are 9.6 pounds per hour (1.2 g/s), and 42 tons per year. A table summarizing the fuels considered is provided in Attachment 2.

10. Will the auxiliary boiler be operated when the sulfuric acid plant is being operated? What other sources of SO₂ and NO_x will be operated at the phosphate facility while the auxiliary boiler is being operated?

RESPONSE:

In accordance with previous permits, the auxiliary boiler can be operated during sulfuric acid plant start-ups and shut-downs. This permit provision is independent of other sources at the phosphate facility. Therefore, only the sulfuric acid plant and the auxiliary boiler have been considered in the permit application for the proposed project.

11. The modeling performed to determine the maximum annual average impacts due to SO₂ and NO_x emissions from the boiler is incomplete. All scenarios (i.e., 96 MMBtu/hr to 190 MMBtu/hr boiler, 96 MMBtu/hr boiler to 135 MMBtu/hr boiler, 135 MMBtu/hr boiler to 190 MMBtu/hr boiler) should be considered and screened to determine the worst case scenario. Actual hours of operation for each scenario should be used and input into the modeling.

RESPONSE:

It is our understanding that an ambient air impact analysis is required only for the proposed project, not for the previously permitted projects. In accordance with discussions with FDEP staff, the ambient air quality modeling to determine the maximum annual average impacts due to SO₂ and NO_x emissions associated with the proposed project has been revised and is provided in the Appendix. It should be noted that additional modeling for the 3-hour and 24-hour periods was not required as the maximum predicted impacts from the proposed project were not significant for those periods.

The modeling results for the annual period indicate that the proposed project will result in a significant impact only for nitrogen oxides, not for sulfur dioxide. The maximum predicted annual NO_x impact including significant nearby sources is 10.6 micrograms per cubic meter, or about ten percent of the ambient air quality standard. The maximum predicted NO_x Class II PSD increment consumption including significant nearby sources is 3.0 micrograms per cubic meter, or about six percent of the allowable increment.

12. Explain why the FDER Form 17-1.202 (1) for AC41-232096 does not reflect your request to modify the maximum heat input rate.



RESPONSE:

The permit application has been submitted for a modification of the operating hours previously permitted for the boiler (under permit No. AC41-211848), not for an increase in the heat input rate.

13. How much will the ash be increased and how will it be disposed of? Will additional waste water be generated and how will it disposed of?

RESPONSE:

There is no need for ash disposal for the proposed fuels. Waste water goes to a non-process water pond.

14. Sections VI and VII of FDER Form 17-1.202 (1) should be properly and adequately completed. When the attached report is referenced, indicate the section, page and paragraph of the report.

RESPONSE:

An updated permit application form with the requested information is presented in Attachment 1.

15. What is the intended use for this facility - base load, cycling, peaking, etc.?

RESPONSE:

The auxiliary boiler is intended to supply steam during sulfuric acid plant start-up and shutdown.

16. What is the intended schedule for starting construction, completing construction and compliance testing?

RESPONSE:

The following dates are proposed at this time: Start construction around September 1993; Complete construction around September 1994; Compliance testing around December 1994.

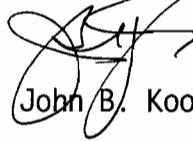
Mr. C. H. Fancy
Florida Department of
Environmental Regulation

July 30, 1993
Page 6

If you have questions, please do not hesitate to give me call.

Very truly yours,

KOGLER & ASSOCIATES



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

JBK:par
Enc

c: Sue Bidwell, PPP

C. Fogam
C. Walladay
B. Shornice, SW Dist
G. Harper, EPA
R. Baum, Mamate Co.



ATTACHMENT 1
UPDATED PERMIT APPLICATION FORM
(FOUR ORIGINALS)



ATTACHMENT 2

BACT SUMMARY TABLE
FOR SULFUR DIOXIDE AND NITROGEN OXIDES

PINEY POINT PHOSPHATES, INC.
MANATEE COUNTY, FLORIDA

CONTROL TECHNOLOGY	EMISSION LIMIT	COST	QUALIFY AS BACT
0.5% S Oil	SO ₂ @ 95.8 lbs/hr	60c/gal	NO
0.05% S Oil	SO ₂ @ 9.6 lbs/hr	60c/gal	YES
SCR	NO _x , Not Applicable	NA	NO
SNCR	NO _x , Not Applicable	NA	NO
Induced FGR	NO _x , 30% Reduction	\$ 4,625/ton	YES
Forced FGR	NO _x , 40% Reduction	\$18,600/ton	NO
Low-Nox Burner	NO _x , Factory Equipped	NA	YES

NOTE:

SCR - Selective Catalytic Reduction
 SNCR - Selective Non-Catalytic Reduction
 IFGR - Induced Flue Gas Recirculation
 FFGR - Forced Flue Gas Recirculation





Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

DER Form # _____
Form Title _____
Effective Date _____
DER Application No. _____
Filed in by DER# _____

APPLICATION TO OPERATE/CONSTRUCT AIR POLLUTION SOURCES

SOURCE TYPE: Auxiliary Boiler [] New¹ [x] Existing¹

APPLICATION TYPE: [x] Construction [] Operation [x] Modification

COMPANY NAME: Piney Point Phosphates, Inc. COUNTY: Manatee

Identify the specific emission point source(s) addressed in this application (i.e. Lime Kiln No. 4 with Venturi Scrubber; Peaking Unit No. 2, Gas Fired) Auxiliary Boiler

SOURCE LOCATION: Street 13300 US Highway 41 North City Palmetto

UTM: East (17) 348.5 km North 3057.3 km

Latitude 27 ° 37 ' 58 "N Longitude 82 ° 32 ' 08 "W

APPLICANT NAME AND TITLE: Ivan Nance, Environmental Manager

APPLICANT ADDRESS: 13300 US Hwy 41 N, Palmetto, Florida 34221-8662

SECTION I: STATEMENTS BY APPLICANT AND ENGINEER

A. APPLICANT

I am the undersigned owner or authorized representative* of Piney Point Phosphates, Inc

I certify that the statements made in this application for a construction permit are true, correct and complete to the best of my knowledge and belief. Further I agree to maintain and operate the pollution control source and pollution control facilities in such a manner as to comply with the provision of Chapter 403, Florida Statutes, and all the rules and regulations of the department and revisions thereof. I also understand that a permit, if granted by the department, will be non-transferable and I will promptly notify the department upon sale or legal transfer of the permit establishment.

*Attach letter of authorization

Signed: Ivan Nance

Ivan Nance, Environmental Manager
Name and Title (Please Type)

Date: 9/9/83 Telephone No. (813) 722-4555

B. PROFESSIONAL ENGINEER REGISTERED IN FLORIDA (where required by Chapter 471, F.S.)

This is to certify that the engineering features of this pollution control project have been designed/examined by me and found to be in conformity with modern engineering principles applicable to the treatment and disposal of pollutants characterized in the permit application. There is reasonable assurance, in my professional judgment, that

¹ See Florida Administrative Code Rule 17-2.100(57) and (104)

the pollution control facilities, when properly maintained and operated, will discharge an effluent that complies with all applicable statutes of the State of Florida and the rules and regulations of the department. It is also agreed that the undersigned will furnish, if authorized by the owner, the applicant a set of instructions for the proper maintenance and operation of the pollution control facilities and, if applicable, pollution sources.

Signed 

John B. Koogler, Ph.D., P.E.
Name (Please Type)

Koogler & Associates; Environmental Services
Company Name (Please Type)

4014 N.W. 13th Street, Gainesville, FL 32609
Mailing Address (Please Type)

Florida Registration No. 12925 Date: 7/29/93 Telephone No. (904) 377-5822

SECTION II: GENERAL PROJECT INFORMATION

- A. Describe the nature and extent of the project. Refer to pollution control equipment, and expected improvements in source performance as a result of installation. State whether the project will result in full compliance. Attach additional sheet if necessary.

For the increase in the operating hours of the auxiliary boiler from 876 to 8760 hours per year. The source is currently permitted under AC41-211848. The proposed project will operate in compliance with all applicable air regulations.

- B. Schedule of project covered in this application (Construction Permit Application Only) (Permitted source)
Start of Construction September 1993 Completion of Construction September 1994

- C. Costs of pollution control system(s): (Note: Show breakdown of estimated costs only for individual components/units of the project serving pollution control purposes. Information on actual costs shall be furnished with the application for operation permit.)

- D. Indicate any previous DER permits, orders and notices associated with the emission point, including permit issuance and expiration dates.

AC41-211848 : Issued 8-17-92 ; Expires 7-14-93, Extension Requested.

A041-156789 : Expires 1-24-94. (Replaced)

E. Requested permitted equipment operating time: hrs/day 24 ; days/wk 7 ; wks/yr 52 ;
if power plant, hrs/yr _____ ; if seasonal, describe: 8760 hrs/yr

F. If this is a new source or major modification, answer the following questions.
(Yes or No)

1. Is this source in a non-attainment area for a particular pollutant? NO
a. If yes, has "offset" been applied? NA
b. If yes, has "Lowest Achievable Emission Rate" been applied? NA
c. If yes, list non-attainment pollutants. NA
2. Does best available control technology (BACT) apply to this source?
If yes, see Section VI. YES¹
3. Does the State "Prevention of Significant Deterioration" (PSD)
requirement apply to this source? If yes, see Sections VI and VII. YES¹
4. Do "Standards of Performance for New Stationary Sources" (NSPS)
apply to this source? YES¹
5. Do "National Emission Standards for Hazardous Air Pollutants"
(NESHAP) apply to this source? NO
- H. Do "Reasonably Available Control Technology" (RACT) requirements apply
to this source? NO
a. If yes, for what pollutants? NA
b. If yes, in addition to the information required in this form,
any information requested in Rule 17-2.650 must be submitted. NA

Attach all supportive information related to any answer of "Yes". Attach any justifi-
cation for any answer of "No" that might be considered questionable.

¹ See attached report.

SECTION III: AIR POLLUTION SOURCES & CONTROL DEVICES (Other than Incinerators)

A. Raw Materials and Chemicals Used in your Process, if applicable:

Description	Contaminants		Utilization Rate - lbs/hr	Relate to Flow Diagram
	Type	% Wt		
Water			150,000	

B. Process Rate, if applicable: (See Section V, Item 1)

- Total Process Input Rate (lbs/hr): 150,000 water
- Product Weight (lbs/hr): 150,000 steam

C. Airborne Contaminants Emitted: (Information in this table must be submitted for each emission point, use additional sheets as necessary)

Name of Contaminant	Emission ¹		Allowed ² Emission Rate per Rule 17-2	Allowable ³ Emission lbs/hr	Potential ⁴ Emission		Relate to Flow Diagram
	Maximum lbs/hr	Actual T/yr			lbs/hr	T/yr	
PM	2.7	11.8	17-2.660	2.7	2.7	11.8	
SO ₂	9.6	42.0	17-2.660	9.6	9.6	42.0	
NO _x	38.0	166.4	17-2.660	38.0	38.0	166.4	
CO	6.7	29.5	--	--	6.7	29.5	
VOC	0.3	1.2	--	--	0.3	1.2	

¹See Section V, Item 2.

²Reference applicable emission standards and units (e.g. Rule 17-2.600(5)(b)2. Table II, E. (1) - 0.1 pounds per million BTU heat input)

³Calculated from operating rate and applicable standard.

⁴Emission, if source operated without control (See Section V, Item 3).

D. Control Devices: (See Section V, Item 4) NA

Name and Type (Model & Serial No.)	Contaminant	Efficiency	Range of Particles Size Collected (in microns) (If applicable)	Basis for Efficiency (Section V Item 5)

E. Fuels

Type (Be Specific)	Consumption*		Maximum Heat Input (MMBTU/hr)
	avg/hr	max./hr	
NO. 2 Fuel Oil	1349.0 gph	1349 gph	190

*Units: Natural Gas--MMCF/hr; Fuel Oils--gallons/hr; Coal, wood, refuse, other--lbs/hr.

Fuel Analysis:

Percent Sulfur: 0.05 Percent Ash: 0.02
 Density: 7.3 lbs/gal Typical Percent Nitrogen: _____
 Heat Capacity: 19,300 BTU/lb 140,000 BTU/gal
 Other Fuel Contaminants (which may cause air pollution): None

F. If applicable, indicate the percent of fuel used for space heating. NA

Annual Average _____ Maximum _____

G. Indicate liquid or solid wastes generated and method of disposal.

None

H. Emission Stack Geometry and Flow Characteristics (Provide data for each stack):

Stack Height: 29.0 ft. Stack Diameter: (Rect.) 4.5 ft x 10 ft.
 Gas Flow Rate: 130,000 ACFM 82,000 DSCFM Gas Exit Temperature: 310 °F.
 Water Vapor Content: 8 % Velocity: 48 FPS

SECTION IV: INCINERATOR INFORMATION

NA

Type of Waste	Type 0 (Plastics)	Type I (Rubbish)	Type II (Refuse)	Type III (Garbage)	Type IV (Pathological)	Type V (Liq. & Gas By-prod.)	Type VI (Solid By-prod.)
Actual lb/hr Incinerated							
Uncontrolled (lbs/hr)							

Description of Waste _____

Total Weight Incinerated (lbs/hr) _____ Design Capacity (lbs/hr) _____

Approximate Number of Hours of Operation per day _____ day/wk _____ wks/yr. _____

Manufacturer _____

Date Constructed _____ Model No. _____

	Volume (ft) ³	Heat Release (BTU/hr)	Fuel		Temperature (°F)
			Type	BTU/hr	
Primary Chamber					
Secondary Chamber					

Stack Height: _____ ft. Stack Diameter: _____ Stack Temp. _____

Gas Flow Rate: _____ ACFM _____ DSCFM* Velocity: _____ FPS

*If 50 or more tons per day design capacity, submit the emissions rate in grains per standard cubic foot dry gas corrected to 50% excess air.

Type of pollution control device: Cyclone Wet Scrubber Afterburner
 Other (specify) _____

Brief description of operating characteristics of control devices: _____

Ultimate disposal of any effluent other than that emitted from the stack (scrubber water, ash, etc.):

NOTE: Items 2, 3, 4, 6, 7, 8, and 10 in Section V must be included where applicable.

SECTION V: SUPPLEMENTAL REQUIREMENTS

See attached report.

Please provide the following supplements where required for this application.

1. Total process input rate and product weight -- show derivation [Rule 17-2.100(127)]
See page 4 of 12.
2. To a construction application, attach basis of emission estimate (e.g., design calculations, design drawings, pertinent manufacturer's test data, etc.) and attach proposed methods (e.g., FR Part 60 Methods 1, 2, 3, 4, 5) to show proof of compliance with applicable standards. To an operation application, attach test results or methods used to show proof of compliance. Information provided when applying for an operation permit from a construction permit shall be indicative of the time at which the test was made. See Emission Calculation Section of Report.
3. Attach basis of potential discharge (e.g., emission factor, that is, AP42 test).
See Emission Calculation Section of Report.
4. With construction permit application, include design details for all air pollution control systems (e.g., for baghouse include cloth to air ratio; for scrubber include cross-section sketch, design pressure drop, etc.) Not applicable.
5. With construction permit application, attach derivation of control device(s) efficiency. Include test or design data. Items 2, 3 and 5 should be consistent: actual emissions = potential (1-efficiency). Not applicable.
6. An 8 1/2" x 11" flow diagram which will, without revealing trade secrets, identify the individual operations and/or processes. Indicate where raw materials enter, where solid and liquid waste exit, where gaseous emissions and/or airborne particles are evolved and where finished products are obtained. Not necessary.
7. An 8 1/2" x 11" plot plan showing the location of the establishment, and points of airborne emissions, in relation to the surrounding area, residences and other permanent structures and roadways (Example: Copy of relevant portion of USGS topographic map).
See Page 3 of Report.
8. An 8 1/2" x 11" plot plan of facility showing the location of manufacturing processes and outlets for airborne emissions. Relate all flows to the flow diagram.
See Page 5 of Report.

9. The appropriate application fee in accordance with Rule 17-4.05. The check should be made payable to the Department of Environmental Regulation. \$7500
10. With an application for operation permit, attach a Certificate of Completion of Construction indicating that the source was constructed as shown in the construction permit. Not applicable.

SECTION VI: BEST AVAILABLE CONTROL TECHNOLOGY

See attached report.

- A. Are standards of performance for new stationary sources pursuant to 40 C.F.R. Part 60 applicable to the source?

Yes No See page 4 of 12 of application form.

Contaminant

Rate or Concentration

- B. Has EPA declared the best available control technology for this class of sources (If yes, attach copy)

Yes No See Section 4 of Report.

Contaminant

Rate or Concentration

- C. What emission levels do you propose as best available control technology?

See Section 4 of Report.

Contaminant

Rate or Concentration

- D. Describe the existing control and treatment technology (if any). None.

1. Control Device/System:

2. Operating Principles:

3. Efficiency:*

4. Capital Costs:

*Explain method of determining

5. Useful Life:

6. Operating Costs:

7. Energy:

8. Maintenance Cost:

9. Emissions:

Contaminant

Rate or Concentration

Contaminant	Rate or Concentration

10. Stack Parameters See page 6 of 12 of application form.

- a. Height: ft. b. Diameter: ft.
- c. Flow Rate: ACFM d. Temperature: °F.
- e. Velocity: FPS

E. Describe the control and treatment technology available (As many types as applicable, use additional pages if necessary). See Section 4 of the Report.

1.

- a. Control Device: b. Operating Principles:
- c. Efficiency:¹ d. Capital Cost:
- e. Useful Life: f. Operating Cost:
- g. Energy:² h. Maintenance Cost:
- i. Availability of construction materials and process chemicals:
- j. Applicability to manufacturing processes:
- k. Ability to construct with control device, install in available space, and operate within proposed levels:

2.

- a. Control Device: b. Operating Principles:
- c. Efficiency:¹ d. Capital Cost:
- e. Useful Life: f. Operating Cost:
- g. Energy:² h. Maintenance Cost:
- i. Availability of construction materials and process chemicals:

¹Explain method of determining efficiency.

²Energy to be reported in units of electrical power - KWH design rate.

- j. Applicability to manufacturing processes:
- k. Ability to construct with control device, install in available space, and operate within proposed levels:

3.

- a. Control Device:
- b. Operating Principles:
- c. Efficiency:¹
- d. Capital Cost:
- e. Useful Life:
- f. Operating Cost:
- g. Energy:²
- h. Maintenance Cost:
- i. Availability of construction materials and process chemicals:
- j. Applicability to manufacturing processes:
- k. Ability to construct with control device, install in available space, and operate within proposed levels:

4.

- a. Control Device:
- b. Operating Principles:
- c. Efficiency:¹
- d. Capital Costs:
- e. Useful Life:
- f. Operating Cost:
- g. Energy:²
- h. Maintenance Cost:
- i. Availability of construction materials and process chemicals:
- j. Applicability to manufacturing processes:
- k. Ability to construct with control device, install in available space, and operate within proposed levels:

F. Describe the control technology selected: See Additional Information submitted 7/93.

- 1. Control Device:
- 2. Efficiency:¹
- 3. Capital Cost:
- 4. Useful Life:
- 5. Operating Cost:
- 6. Energy:²
- 7. Maintenance Cost:
- 8. Manufacturer:
- 9. Other locations where employed on similar processes:
 - a. (1) Company:
 - (2) Mailing Address:
 - (3) City:
 - (4) State:

¹Explain method of determining efficiency.

²Energy to be reported in units of electrical power - KWH design rate.

(5) Environmental Manager:

(6) Telephone No.:

(7) Emissions:¹

Contaminant	Rate or Concentration

(8) Process Rate:¹

b. (1) Company:

(2) Mailing Address:

(3) City:

(4) State:

(5) Environmental Manager:

(6) Telephone No.:

(7) Emissions:¹

Contaminant	Rate or Concentration

(8) Process Rate:¹

10. Reason for selection and description of systems:

¹Applicant must provide this information when available. Should this information not be available, applicant must state the reason(s) why. See Additional Information submitted 7/93.

SECTION VII - PREVENTION OF SIGNIFICANT DETERIORATION

See attached report.

A. Company Monitored Data NA

1. _____ no. sites _____ TSP _____ () SO₂* _____ Wind spd/dir

Period of Monitoring _____ / _____ / _____ to _____ / _____ / _____
month day year month day year

Other data recorded _____

Attach all data or statistical summaries to this application.

*Specify bubbler (B) or continuous (C).

2. Instrumentation, Field and Laboratory NA

a. Was instrumentation EPA referenced or its equivalent? [] Yes [] No

b. Was instrumentation calibrated in accordance with Department procedures? [] Yes [] No [] Unknown

B. Meteorological Data Used for Air Quality Modeling

1. 5 Year(s) of data from / / 85 to / / 89
month day year month day year

2. Surface data obtained from (location) Tampa

3. Upper air (mixing height) data obtained from (location) Ruskin

4. Stability wind rose (STAR) data obtained from (location) NA

C. Computer Models Used

- 1. ISC-ST Modified? If yes, attach description.
2. Modified? If yes, attach description.
3. Modified? If yes, attach description.
4. Modified? If yes, attach description.

Attach copies of all final model runs showing input data, receptor locations, and principle output tables. See Appendix

D. Applicants Maximum Allowable Emission Data See page 4 of 12 of application form.

Table with 2 columns: Pollutant, Emission Rate. Rows for TSP and SO2 with blank lines for values and units (grams/sec).

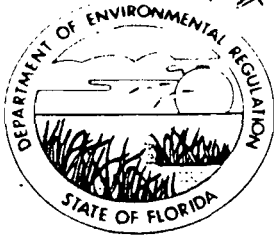
E. Emission Data Used in Modeling See Appendix.

Attach list of emission sources. Emission data required is source name, description of point source (on NEDS point number), UTM coordinates, stack data, allowable emissions, and normal operating time.

F. Attach all other information supportive to the PSD review. See Appendix.

G. Discuss the social and economic impact of the selected technology versus other applicable technologies (i.e., jobs, payroll, production, taxes, energy, etc.). Include assessment of the environmental impact of the sources. Not applicable.

H. Attach scientific, engineering, and technical material, reports, publications, journals, and other competent relevant information describing the theory and application of the requested best available control technology. Manufacture specifications quoted.



*Patly's
File* *Mailed on 6-29-93*

Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Lawton Chiles, Governor

Virginia B. Wetherell, Secretary

June 24, 1993

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Ivan Nance
Environmental Manager
Piney Point Phosphates, Inc.
13300 US Highway 41 North
Palmetto, Florida 34221-8662

Re: Piney Point Phosphates, Inc.
Application to Construct AC41-232096 (PSD-FL-205)
Submittal Date: May 28, 1993

Dear Mr. Nance:

Your application for an air permit to construct the above source has been reviewed and found to be incomplete. To review, chronologically, the recent events affecting this facility: On May 3, 1993, AC41-226205 for a new 135 MMBtu/hr boiler to operate 2,600 hours/year was approved by the FDER Southwest District Office. AC41-226205 states that it replaced AC41-211848 and AO41-156789. AC41-211848 is for a new 190 MMBtu/hr boiler to operate 876 hours/year. AO41-156789 is for a 96.2 MMBtu/hr boiler, which appears to still exist at the site, to operate 876 hours/year. On May 28, 1993, you requested that AC41-211848 be modified for a new 190 MMBtu/hr boiler to operate 8,760 hours/year. At a minimum, we need the following information:

- 1) Why have you requested modification of a permit (AC41-211848) which has been replaced? [If, as it appears, on 5/28/93, you requested a modification of a permit (AC41-211848) which was inactive as of 5/3/93, you should consider withdrawing this application and submit an original application to meet your anticipated steam generating requirements.]
- 2) The Application to Operate/Construct Air Pollution Sources (FDER Form 17-1.202(1)), was altered after it was signed and sealed. Therefore, a new application and associated documents should be submitted.
- 3) The application should be updated to reflect the new reference numbers for the Florida Administrative Code rules for air pollution.
- 4) Has construction of either the 190 MMBtu/hr or 135 MMBtu/hr boiler begun?

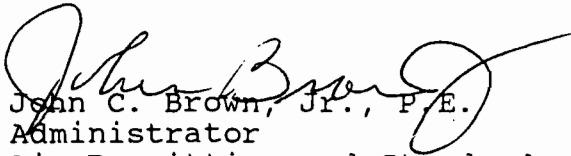
- 5) Is the 96.2 MMBtu/hr (AO41-156789) boiler operational and has it been operated since AC41-226205 was approved? What are the actual emissions (all pollutants) during the last two years.
- 6) Was the 96.2 MMBtu/hr boiler operated since AC41-211848 was approved?
- 7) Have you considered the possibility of natural gas (NG) as the primary fuel? Is NG available to the site? Can the unit burn NG? If so, provide the projected cost to burn NG as the primary fuel.
- 8) Expand the BACT to include the environmental effects, energy impact and economic analysis for the control technologies when burning oil and NG (if applicable). A table summarizing the top-down BACT impact analysis results should be included. A table summarizing the reduction in SO₂ and NO_x for various control technologies should be provided.
- 9) What are costs/ton of SO₂ when burning new No. 2 fuel oil containing a maximum sulfur content of 0.05%, 0.2% and 0.3% by weight at a maximum fuel consumption rate of 96.2 MMBtu/hr, 135 MMBtu/hr and 190 MMBtu/hr? Provide costs for 876, 2,600 and 8,760 operating hours.
- 10) Will the auxiliary boiler be operated when the sulfuric acid plant is being operated? What other sources of SO₂ and NO_x will be operated at the phosphate facility while the auxiliary boiler is being operated?
- 11) The modeling performed to determine the maximum annual average impacts due to SO₂ and NO_x emissions from the boiler is incomplete. All scenarios (i.e., 96 MMBtu/hr boiler to 190 MMBtu/hr boiler, 96 MMBtu/hr boiler to 135 MMBtu/hr boiler, 135 MMBtu/hr boiler to 190 MMBtu/hr boiler) should be considered and screened to determine the worst case scenario. Actual hours of operation for each scenario should be used and input into the modeling.
- 12) Explain why the FDER Form 17-1.202(1) for AC41-232096 does not reflect your request to modify the maximum heat input rate.
- 13) How much will the ash be increased and how will it be disposed of? Will additional waste water be generated and how will it be disposed of?
- 14) Sections VI and VII of FDER Form 17-1.202(1) should be properly and adequately completed. When the attached report is referenced, indicate the section, page and paragraph of the report.

Mr. Ivan Nance
Piney Point Phosphates, Inc.
AC41-232096 (Incompleteness)
Page 3 of 3

- 15) What is the intended use for this facility - base load, cycling, peaking, etc.?
- 16) What is the intended schedule for starting construction, completing construction and compliance testing?

In your response to the above questions, provide all calculations, state and justify all assumptions, identify the sources of any emission factors and provide copies of references where the emission factors or other information were obtained from sources other than AP-42. If you have any questions, call Charles Logan at (904) 488-1344. We have tried to call you several times, however, no one answers the telephone number listed on your permit application.

Sincerely,


John C. Brown, Jr., P.E.
Administrator
Air Permitting and Standards

JCB/CL/plm

cc: Bill Williams, SWD
Rob Baum, Manatee Co.
Ron Bunyak, NPS
Jewell Harper, EPA
John Koogler, K&A

SENDER:

- Complete items 1 and/or 2 for additional services.
- Complete items 3, and 4a & b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):

- Addressee's Address
- Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:
Mr. Ivan Nance
13300 US Hwy 41 N
Palmetto, FL 34221-8662

4a. Article Number
P230523751

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

7. Date of Delivery
4/28/93

5. Signature (Addressee)

6. Signature (Agent)

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

PS Form 3811, December 1991 U.S. GPO: 1992-323-402 **DOMESTIC RETURN-RECEIPT**

Is your RETURN ADDRESS completed on the reverse side?

Thank you for using Return Receipt Service.

P 230 523 751



Receipt for Certified Mail

No Insurance Coverage Provided
Do not use for International Mail
(See Reverse)

PS Form 3800, June 1991

Sent to	
I. Nance	
Street and No. 13300 US Hwy 41 N	
P.O., State and ZIP Code Palmetto, FL 34221-8662	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	



Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Lawton Chiles, Governor

Virginia B. Wetherell, Secretary

June 4, 1993

Ms. Jewell A. Harper, Chief
Air Enforcement Branch
U.S. EPA, Region IV
345 Courtland Street, N.E.
Atlanta, Georgia 30308

Dear Ms. Harper:

RE: Piney Point Phosphates, Inc.
Manatee County, PSD-FL-205
Increase in Operation Hours of Auxiliary Boiler

The Department has received the above referenced PSD application package. Please review this package and forward your comments to the Department's Bureau of Air Regulation by June 22, 1993. The Bureau's FAX number is (904)922-6979.

If you have any questions, please contact Charles Logan or Katherine Zhang at (904)488-1344 or write to me at the above address.

Sincerely,

Patricia G. Adams
for C. H. Fancy, P.E.
Chief
Bureau of Air Regulation

CHF/pa

Enclosures



Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Lawton Chiles, Governor

Virginia B. Wetherell, Secretary

June 4, 1993

Mr. John Bunyak, Chief
Policy, Planning and Permit Review Branch
National Park Service-Air Quality Division
P. O. Box 25287
Denver, CO 80225

Dear Mr. Bunyak:

RE: Piney Point Phosphates, Inc.
Manatee County, PSD-FL-205
Increase in Operation Hours of Auxiliary Boiler

The Department has received the above referenced PSD application package. Please review this package and forward your comments to the Department's Bureau of Air Regulation by June 22, 1993. The Bureau's FAX number is (904)922-6979.

If you have any questions, please contact Charles Logan or Katherine Zhang at (904)488-1344 or write to me at the above address.

Sincerely,

Patricia G. Adams

for e. H. Fancy, P.E.
Chief
Bureau of Air Regulation

CHF/pa

Enclosures

MEMORANDUM

TO: Patty Adams

FROM: Pradeep Raval

DATE: June 2, 1993

SUBJECT: Application for a PSD Construction Permit
Piney Point Phosphates, Inc.
Manatee County, Florida

Per your request, enclosed are three copies of the subject application package. If you have any questions, please do not hesitate to contact me.

RECEIVED

JUN 04 1993

Division of Air
Resources Management



PINEY POINT PHOSPHATES, INC.

**13300 U. S. Hwy. 41 North
Palmetto, Florida 34221
(813) 722-4555**

May 27, 1993

Mr. Clair H. Fancy
Florida Department of Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Subject: Air Construction Permit Application for Increase
in Operation Hours of Auxiliary Boiler
Piney Point Phosphates, Inc.
Manatee County, Florida

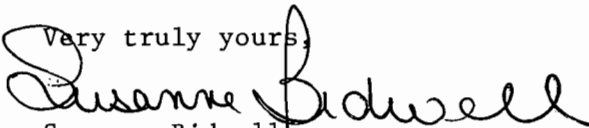
RECEIVED
DER - MAIL ROOM
1993 MAY 28 PM 12: 61

Dear Mr. Fancy:

Enclosed are four copies of the air construction permit application, one copy of the Appendix (air modeling output), and a check in the amount of \$7500 (permit processing fee).

This application is being submitted to request an increase in the allowable hours of operation of the auxiliary boiler from 876 to 8760 hours per year.

If you have any question, please contact this office.

Very truly yours,

Susanne Bidwell
Environmental Supervisor

Enclosure

cc: file

*B. Thomas, SW Dist,
J. Harper, EPA
J. Bunyard, NPS
R. Baum, Manatee Co.*

PINEY POINT PHOSPHATES, INC.

General Disbursements
13300 U.S. Hwy. 41 N.
Palmetto, FL 34221-8662

FLORIDA DER \$7500.00
BOILER PERMIT APPLICATION
PROCESSING FEE

REMITTANCE ADVICE CHECK NO. 800224 05/27/93 \$7500.00

DETACH BEFORE DEPOSITING

Reynolds • Reynolds LITHO IN U.S.A. GPD-083375

PINEY POINT PHOSPHATES, INC.

General Disbursements
13300 U.S. Hwy. 41 N.
Palmetto, FL 34221-8662

ACCOUNTS PAYABLE CHECK

No 10 800224

DATE

05/27/93

CHECK NUMBER 800224

63-526/631
BRANCH 185

PAY EXACTLY

SEVEN THOUSAND FIVE HUNDRED DOLLARS AND 00/100*****

AMOUNT

****\$7500.00



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400 North Church Avenue
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Pay
to the
order of

FLORIDA DER
TWIN OFFICE BLDG.
2600 BLAIR STONE RD.
TALLAHASSEE, FL 32399-2400

AUTHORIZED SIGNATURE

AN APPLICATION FOR A PSD
CONSTRUCTION PERMIT

PREPARED FOR:

PINEY POINT PHOSPHATES, INC.
MANATEE COUNTY, FLORIDA

NOVEMBER 1992

PREPARED BY:

KOGLER & ASSOCIATES
4014 N.W. 13TH STREET
GAINESVILLE, FLORIDA 32609
(904) 377-5822



Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

AC 41-232096
PSD-FL-205

DER Form # _____
Form Title _____
Effective Date _____
DER Application No. _____
Filed in by DER _____

\$7500 Pd.
5-28-93
Rept. #180961

APPLICATION TO OPERATE/CONSTRUCT AIR POLLUTION SOURCES

SOURCE TYPE: Auxiliary Boiler [] New¹ [x] Existing¹

APPLICATION TYPE: [x] Construction [] Operation [x] Modification

COMPANY NAME: Piney Point Phosphates, Inc. COUNTY: Manatee

Identify the specific emission point source(s) addressed in this application (i.e. Lime Kiln No. 4 with Venturi Scrubber; Peaking Unit No. 2, Gas Fired) Auxiliary Boiler

SOURCE LOCATION: Street 13300 US Highway 41 North City Palmetto

UTM: East (17) 348.5 km North 3057.3 km

Latitude 27 ° 37 ' 58 "N Longitude 82 ° 32 ' 08 "W

APPLICANT NAME AND TITLE: I Ivan Nance Environmental Manager

APPLICANT ADDRESS: 13300 US Hwy 41 N, Palmetto, Florida 34221-8662

SECTION I: STATEMENTS BY APPLICANT AND ENGINEER

A. APPLICANT

I am the undersigned owner or authorized representative* of Piney Point Phosphates, Inc.

I certify that the statements made in this application for a construction permit are true, correct and complete to the best of my knowledge and belief. Further I agree to maintain and operate the pollution control source and pollution control facilities in such a manner as to comply with the provision of Chapter 403, Florida Statutes, and all the rules and regulations of the department and revisions thereof. I also understand that a permit, if granted by the department, will be non-transferable and I will promptly notify the department upon sale or legal transfer of the permit establishment.

*Attach letter of authorization

Signed: Ivan Nance

Ivan Nance, Environmental Manager
Name and Title (Please Type)

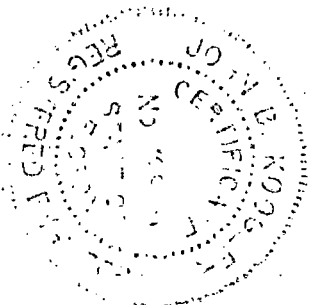
Date: 5/26/93 Telephone No. (813) 722-4555

B. PROFESSIONAL ENGINEER REGISTERED IN FLORIDA (where required by Chapter 471, F.S.)

This is to certify that the engineering features of this pollution control project have been ~~designed~~/examined by me and found to be in conformity with modern engineering principles applicable to the treatment and disposal of pollutants characterized in this permit application. There is reasonable assurance, in my professional judgment, that

¹ See Florida Administrative Code Rule 17-2.100(57) and (104)

the pollution control facilities, when properly maintained and operated, will discharge an effluent that complies with all applicable statutes of the State of Florida and the rules and regulations of the department. It is also agreed that the undersigned will furnish, if authorized by the owner, the applicant a set of instructions for the proper maintenance and operation of the pollution control facilities and, if applicable, pollution sources.



Signed _____

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

Name (Please Type)

Koogler & Associates; Environmental Services

Company Name (Please Type)

4014 N.W. 13th Street, Gainesville, FL 32609

Mailing Address (Please Type)

Florida Registration No. 12925 Date: 11/19/92 Telephone No. (904) 377-5822

SECTION II: GENERAL PROJECT INFORMATION

7. Describe the nature and extent of the project. Refer to pollution control equipment, and expected improvements in source performance as a result of installation. State whether the project will result in full compliance. Attach additional sheet if necessary.

For the increase in the operating hours of the auxiliary boiler from 876 to 8760 hours per year. The source is currently permitted under AC41-211848. The proposed project will operate in compliance with all applicable air regulations.

8. Schedule of project covered in this application (Construction Permit Application Only) (Permitted source)

Start of Construction August 1993 Completion of Construction August 1994

9. Costs of pollution control system(s): (Note: Show breakdown of estimated costs only for individual components/units of the project serving pollution control purposes. Information on actual costs shall be furnished with the application for operation permit.)

10. Indicate any previous DER permits, orders and notices associated with the emission point, including permit issuance and expiration dates.

AC41-211848 : Issued 8-17-92 ; Expires 7-14-93.

A041-156789 : Expires 1-24-94. (Replaced)

E. Requested permitted equipment operating time: hrs/day 24; days/wk 7; wks/yr 52; if power plant, hrs/yr _____; if seasonal, describe: 8760 hrs/yr

F. If this is a new source or major modification, answer the following questions. (Yes or No)

1. Is this source in a non-attainment area for a particular pollutant? NO
 - a. If yes, has "offset" been applied? NA
 - b. If yes, has "Lowest Achievable Emission Rate" been applied? NA
 - c. If yes, list non-attainment pollutants. _____ NA
2. Does best available control technology (BACT) apply to this source? If yes, see Section VI. YES¹
3. Does the State "Prevention of Significant Deterioration" (PSD) requirement apply to this source? If yes, see Sections VI and VII. YES¹
4. Do "Standards of Performance for New Stationary Sources" (NSPS) apply to this source? YES¹
5. Do "National Emission Standards for Hazardous Air Pollutants" (NESHAP) apply to this source? NO

- H. Do "Reasonably Available Control Technology" (RACT) requirements apply to this source? NO
- a. If yes, for what pollutants? _____ NA
 - b. If yes, in addition to the information required in this form, any information requested in Rule 17-2.650 must be submitted. NA

Attach all supportive information related to any answer of "Yes". Attach any justification for any answer of "No" that might be considered questionable.

¹ See attached report.

SECTION III: AIR POLLUTION SOURCES & CONTROL DEVICES (Other than Incinerators)

A. Raw Materials and Chemicals Used in your Process, if applicable:

Description	Contaminants		Utilization Rate - lbs/hr	Relate to Flow Diagram
	Type	% Wt		
Water			150,000	

B. Process Rate, if applicable: (See Section V, Item 1)

1. Total Process Input Rate (lbs/hr): 150,000 water

2. Product Weight (lbs/hr): 150,000 steam

C. Airborne Contaminants Emitted: (Information in this table must be submitted for each emission point, use additional sheets as necessary)

Name of Contaminant	Emission ¹		Allowed ² Emission Rate per Rule 17-2	Allowable ³ Emission lbs/hr	Potential ⁴ Emission		Relate to Flow Diagram
	Maximum lbs/hr	Actual T/yr			lbs/yr	hr	
PM	2.7	11.8	17-2.660	2.7	2.7	11.8	
SO ₂	95.8	419.5	17-2.660	95.8	95.8	419.5	
NO _x	38.0	166.4	17-2.660	38.0	38.0	166.4	
CO	6.7	29.5	--	--	6.7	29.5	
VOC	0.3	1.2	--	--	0.3	1.2	

¹See Section V, Item 2.

²Reference applicable emission standards and units (e.g. Rule 17-2.600(5)(b)2. Table II, E. (1) - 0.1 pounds per million BTU heat input)

³Calculated from operating rate and applicable standard.

⁴Emission, if source operated without control (See Section V, Item 3).

D. Control Devices: (See Section V, Item 4) NA

Name and Type (Model & Serial No.)	Contaminant	Efficiency	Range of Particles Size Collected (in microns) (If applicable)	Basis for Efficiency (Section V Item 5)

E. Fuels

Type (Be Specific)	Consumption*		Maximum Heat Input (MMBTU/hr)
	avg/hr	max./hr	
NO. 2 Fuel Oil	1349.0 gph	1349 gph	190

*Units: Natural Gas--MMCF/hr; Fuel Oils--gallons/hr; Coal, wood, refuse, other--lbs/hr.

Fuel Analysis:

Percent Sulfur: 0.5 (max.) Percent Ash: 0.02
 Density: 7.3 lbs/gal Typical Percent Nitrogen: _____
 Heat Capacity: 19,300 BTU/lb 140,000 BTU/gal
 Other Fuel Contaminants (which may cause air pollution): None

F. If applicable, indicate the percent of fuel used for space heating. NA

Annual Average _____ Maximum _____

G. Indicate liquid or solid wastes generated and method of disposal.

None

H. Emission Stack Geometry and Flow Characteristics (Provide data for each stack):

Stack Height: 29.0 ft. Stack Diameter: (Rect.) 4.5 ft x 10 ft.
 Gas Flow Rate: 130,000 ACFM 82,000 DSCFM Gas Exit Temperature: 310 °F.
 Water Vapor Content: 8 % Velocity: 48 FPS

SECTION IV: INCINERATOR INFORMATION

NA

Type of Waste	Type 0 (Plastics)	Type I (Rubbish)	Type II (Refuse)	Type III (Garbage)	Type IV (Pathological)	Type V (Liq. & Gas By-prod.)	Type VI (Solid By-prod.)
Actual lb/hr Incinerated							
Uncontrolled (lbs/hr)							

Description of Waste _____
 Total Weight Incinerated (lbs/hr) _____ Design Capacity (lbs/hr) _____
 Approximate Number of Hours of Operation per day _____ day/wk _____ wks/yr. _____
 Manufacturer _____
 Date Constructed _____ Model No. _____

	Volume (ft) ³	Heat Release (BTU/hr)	Fuel		Temperature (°F)
			Type	BTU/hr	
Primary Chamber					
Secondary Chamber					

Stack Height: _____ ft. Stack Diameter: _____ Stack Temp. _____
 Gas Flow Rate: _____ ACFM _____ DSCFM* Velocity: _____ FPS

*If 50 or more tons per day design capacity, submit the emissions rate in grains per standard cubic foot dry gas corrected to 50% excess air.

Type of pollution control device: Cyclone Wet Scrubber Afterburner
 Other (specify) _____

Brief description of operating characteristics of control devices: _____

Ultimate disposal of any effluent other than that emitted from the stack (scrubber water, ash, etc.):

NOTE: Items 2, 3, 4, 6, 7, 8, and 10 in Section V must be included where applicable.

SECTION V: SUPPLEMENTAL REQUIREMENTS

See attached report.

Please provide the following supplements where required for this application.

1. Total process input rate and product weight -- show derivation [Rule 17-2.100(127)]
2. To a construction application, attach basis of emission estimate (e.g., design calculations, design drawings, pertinent manufacturer's test data, etc.) and attach proposed methods (e.g., FR Part 60 Methods 1, 2, 3, 4, 5) to show proof of compliance with applicable standards. In an operation application, attach test results or methods used to show proof of compliance. Information provided when applying for an operation permit from a construction permit shall be indicative of the time at which the test was made.
3. Attach basis of potential discharge (e.g., emission factor, that is, AP42 test).
4. With construction permit application, include design details for all air pollution control systems (e.g., for baghouse include cloth to air ratio; for scrubber include cross-section sketch, design pressure drop, etc.)
5. With construction permit application, attach derivation of control device(s) efficiency. Include test or design data. Items 2, 3 and 5 should be consistent: actual emissions = potential (1-efficiency).
6. An 8 1/2" x 11" flow diagram which will, without revealing trade secrets, identify the individual operations and/or processes. Indicate where raw materials enter, where solid and liquid waste exit, where gaseous emissions and/or airborne particles are evolved and where finished products are obtained.
7. An 8 1/2" x 11" plot plan showing the location of the establishment, and points of airborne emissions, in relation to the surrounding area, residences and other permanent structures and roadways (Example: Copy of relevant portion of USGS topographic map).
8. An 8 1/2" x 11" plot plan of facility showing the location of manufacturing processes and outlets for airborne emissions. Relate all flows to the flow diagram.

9. The appropriate application fee in accordance with Rule 17-4.05. The check should be made payable to the Department of Environmental Regulation. \$7500
10. With an application for operation permit, attach a Certificate of Completion of Construction indicating that the source was constructed as shown in the construction permit.

SECTION VI: BEST AVAILABLE CONTROL TECHNOLOGY

See attached report.

- A. Are standards of performance for new stationary sources pursuant to 40 C.F.R. Part 60 applicable to the source?

Yes No

Contaminant

Rate or Concentration

- B. Has EPA declared the best available control technology for this class of sources (If yes, attach copy)

Yes No

Contaminant

Rate or Concentration

- C. What emission levels do you propose as best available control technology?

Contaminant

Rate or Concentration

- D. Describe the existing control and treatment technology (if any).

1. Control Device/System:

2. Operating Principles:

3. Efficiency:*

4. Capital Costs:

*Explain method of determining

5. Useful Life:

6. Operating Costs:

7. Energy:

8. Maintenance Cost:

9. Emissions:

Contaminant

Rate or Concentration

Contaminant	Rate or Concentration

10. Stack Parameters

- a. Height: ft.
- b. Diameter: ft.
- c. Flow Rate: ACFM
- d. Temperature: °F.
- e. Velocity: FPS

E. Describe the control and treatment technology available (As many types as applicable, use additional pages if necessary).

1.

- a. Control Device:
- b. Operating Principles:
- c. Efficiency:¹
- d. Capital Cost:
- e. Useful Life:
- f. Operating Cost:
- g. Energy:²
- h. Maintenance Cost:
- i. Availability of construction materials and process chemicals:
- j. Applicability to manufacturing processes:
- k. Ability to construct with control device, install in available space, and operate within proposed levels:

2.

- a. Control Device:
- b. Operating Principles:
- c. Efficiency:¹
- d. Capital Cost:
- e. Useful Life:
- f. Operating Cost:
- g. Energy:²
- h. Maintenance Cost:
- i. Availability of construction materials and process chemicals:

¹Explain method of determining efficiency.

²Energy to be reported in units of electrical power - KWH design rate.

j. Applicability to manufacturing processes:

k. Ability to construct with control device, install in available space, and operate within proposed levels:

3.

a. Control Device:

b. Operating Principles:

c. Efficiency:¹

d. Capital Cost:

e. Useful Life:

f. Operating Cost:

g. Energy:²

h. Maintenance Cost:

i. Availability of construction materials and process chemicals:

j. Applicability to manufacturing processes:

k. Ability to construct with control device, install in available space, and operate within proposed levels:

4.

a. Control Device:

b. Operating Principles:

c. Efficiency:¹

d. Capital Costs:

e. Useful Life:

f. Operating Cost:

g. Energy:²

h. Maintenance Cost:

i. Availability of construction materials and process chemicals:

j. Applicability to manufacturing processes:

k. Ability to construct with control device, install in available space, and operate within proposed levels:

F. Describe the control technology selected:

1. Control Device:

2. Efficiency:¹

3. Capital Cost:

4. Useful Life:

5. Operating Cost:

6. Energy:²

7. Maintenance Cost:

8. Manufacturer:

9. Other locations where employed on similar processes:

a. (1) Company:

(2) Mailing Address:

(3) City:

(4) State:

¹Explain method of determining efficiency.

²Energy to be reported in units of electrical power - KWH design rate.

(5) Environmental Manager:

(6) Telephone No.:

(7) Emissions:¹

Contaminant

Rate or Concentration

(8) Process Rate:¹

b. (1) Company:

(2) Mailing Address:

(3) City:

(4) State:

(5) Environmental Manager:

(6) Telephone No.:

(7) Emissions:¹

Contaminant

Rate or Concentration

(8) Process Rate:¹

10. Reason for selection and description of systems:

¹Applicant must provide this information when available. Should this information not be available, applicant must state the reason(s) why.

SECTION VII - PREVENTION OF SIGNIFICANT DETERIORATION

See attached report.

A. Company Monitored Data

1. _____ no. sites _____ TSP _____ () SO₂* _____ Wind spd/dir

Period of Monitoring _____ / _____ / _____ to _____ / _____ / _____
month day year month day year

Other data recorded _____

Attach all data or statistical summaries to this application.

*Specify bubbler (B) or continuous (C).

2. Instrumentation, Field and Laboratory

a. Was instrumentation EPA referenced or its equivalent? [] Yes [] No

b. Was instrumentation calibrated in accordance with Department procedures?
[] Yes [] No [] Unknown

Meteorological Data Used for Air Quality Modeling

1. _____ Year(s) of data from _____ / _____ / _____ to _____ / _____ / _____
month day year month day year

2. Surface data obtained from (location) _____

3. Upper air (mixing height) data obtained from (location) _____

4. Stability wind rose (STAR) data obtained from (location) _____

Computer Models Used

1. _____ Modified? If yes, attach description.

2. _____ Modified? If yes, attach description.

3. _____ Modified? If yes, attach description.

4. _____ Modified? If yes, attach description.

Attach copies of all final model runs showing input data, receptor locations, and principle output tables.

Applicants Maximum Allowable Emission Data

Pollutant	Emission Rate
TSP	_____ grams/sec
SO ²	_____ grams/sec

E. Emission Data Used in Modeling

Attach list of emission sources. Emission data required is source name, description of point source (on NEDS point number), UTM coordinates, stack data, allowable emissions, and normal operating time.

F. Attach all other information supportive to the PSD review.

G. Discuss the social and economic impact of the selected technology versus other applicable technologies (i.e., jobs, payroll, production, taxes, energy, etc.). Include assessment of the environmental impact of the sources.

H. Attach scientific, engineering, and technical material, reports, publications, journals, and other competent relevant information describing the theory and application of the requested best available control technology.

REPORT IN SUPPORT OF
AN APPLICATION FOR A PSD
CONSTRUCTION PERMIT REVIEW

PREPARED FOR:

PINEY POINT PHOSPHATES, INC.
MANATEE COUNTY, FLORIDA

NOVEMBER 1992

PREPARED BY:

KOGLER & ASSOCIATES
4014 N.W. 13TH STREET
GAINESVILLE, FLORIDA 32609
(904) 377-5822

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1.0 SYNOPSIS OF APPLICATION

1.1 APPLICANT

Piney Point Phosphates, Inc.
13300 US Hwy 41 North
Palmetto, Florida 34221-8662

1.2 FACILITY LOCATION

Piney Point Phosphates, Inc. (previously Royster Phosphates) operates a fertilizer plant located approximately nine miles north of Palmetto on US Highway 41 in Manatee County, Florida (see Figures 1-1 and 1-2). The UTM coordinates of the facility are Zone 17, 348.5 km east and 3057.3 km north.

1.3 PROJECT DESCRIPTION

Piney Point Phosphates proposes to increase the permitted hours of operation of the auxiliary boiler from 876 to 8760 hours per year.

The existing auxiliary boiler at the facility is in need of replacement. Piney Point Phosphates recently decided to replace the existing boiler and applied for an air construction permit for a new boiler. The FDER Southwest District office issued a construction permit (AC41-211848) on August 17, 1992, allowing Piney Point Phosphates to replace the existing auxiliary boiler and to operate the new boiler for no more than 876 hours per year. The function of the auxiliary boiler is to supply steam to the facility when the sulfuric acid plant (which supplies steam from waste heat recovery) is down. The auxiliary boiler is also operated for sulfuric acid plant startups.

Piney Point Phosphates is requesting an increase in the operating hours of the auxiliary boiler from 876 to 8760 hours per year so that key plant operations may continue during prolonged sulfuric acid plant down time. The auxiliary boiler is located adjacent to the sulfuric acid plant (see Figure 1-3).

Piney Point Phosphates is submitting this report in support of the application to the Florida Department of Environmental Regulation for an increase in the allowable operating hours of the auxiliary boiler. The report includes a description of the operations, a review of Best Available Control Technology, an ambient air quality analysis and an evaluation of the impact of the proposed permit modification on soils, vegetation and visibility.

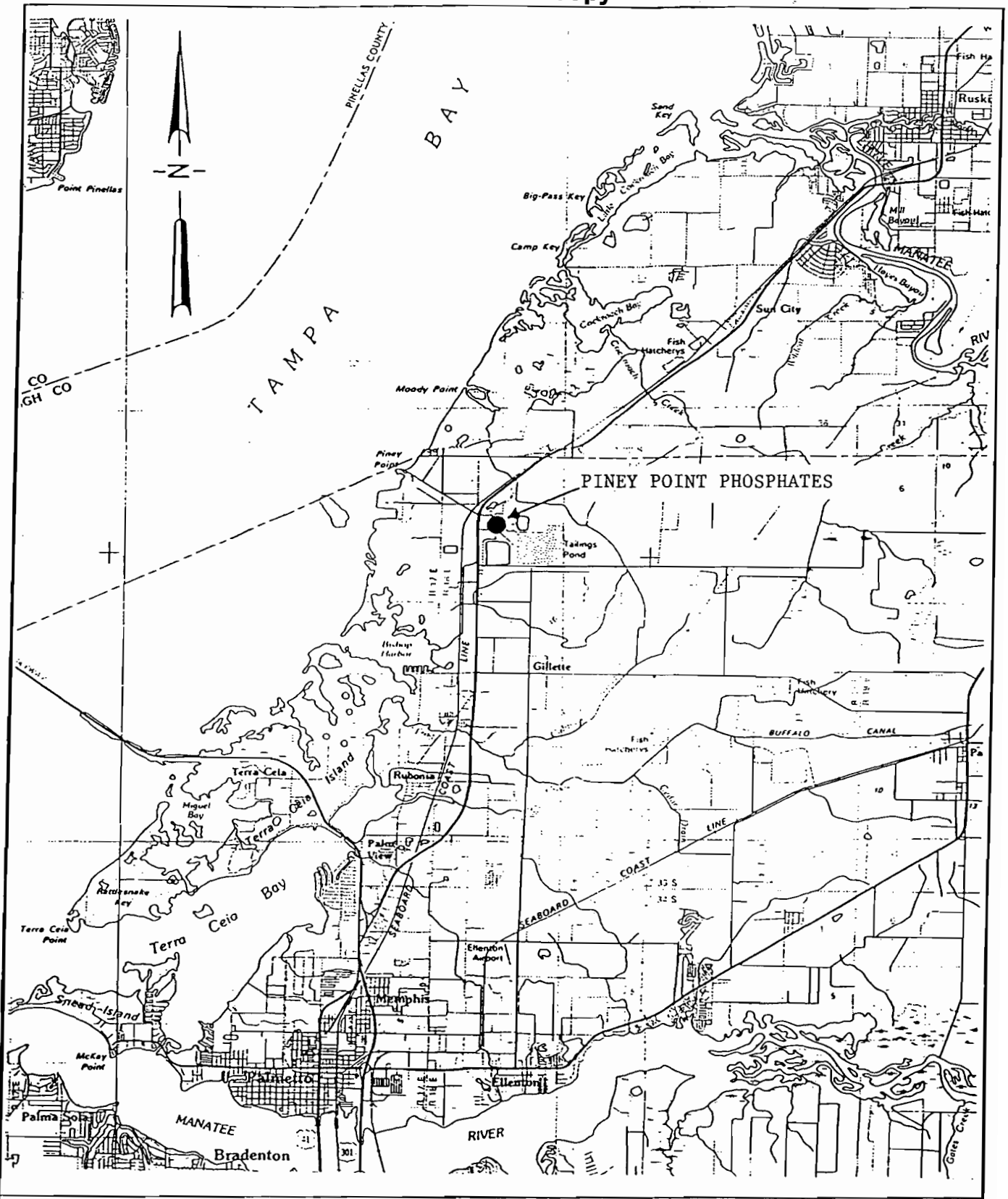


FIGURE 1-1

AREA LOCATION MAP

PINEY POINT PHOSPHATES, INC.



COCKROACH BAY, FLA.

N2737.5-W8230/7.5

1956
PHOTOREVISED 1969 AND 1972
AMS 4439 II NE-SERIES V847

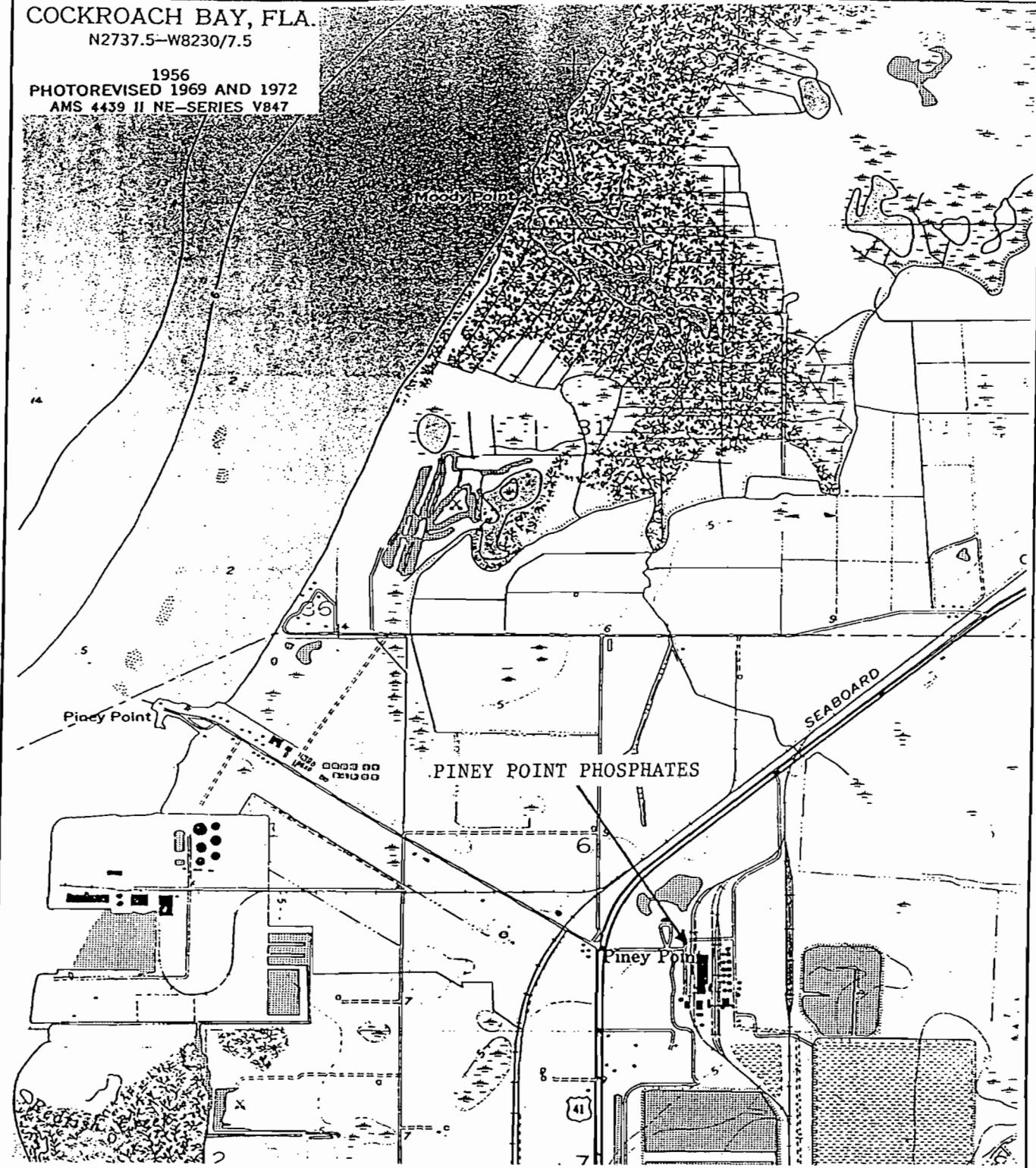
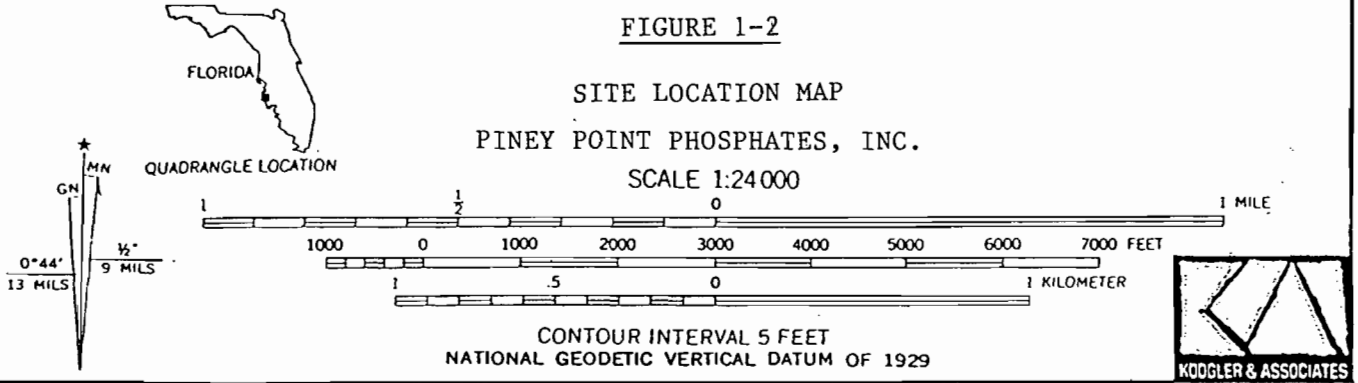


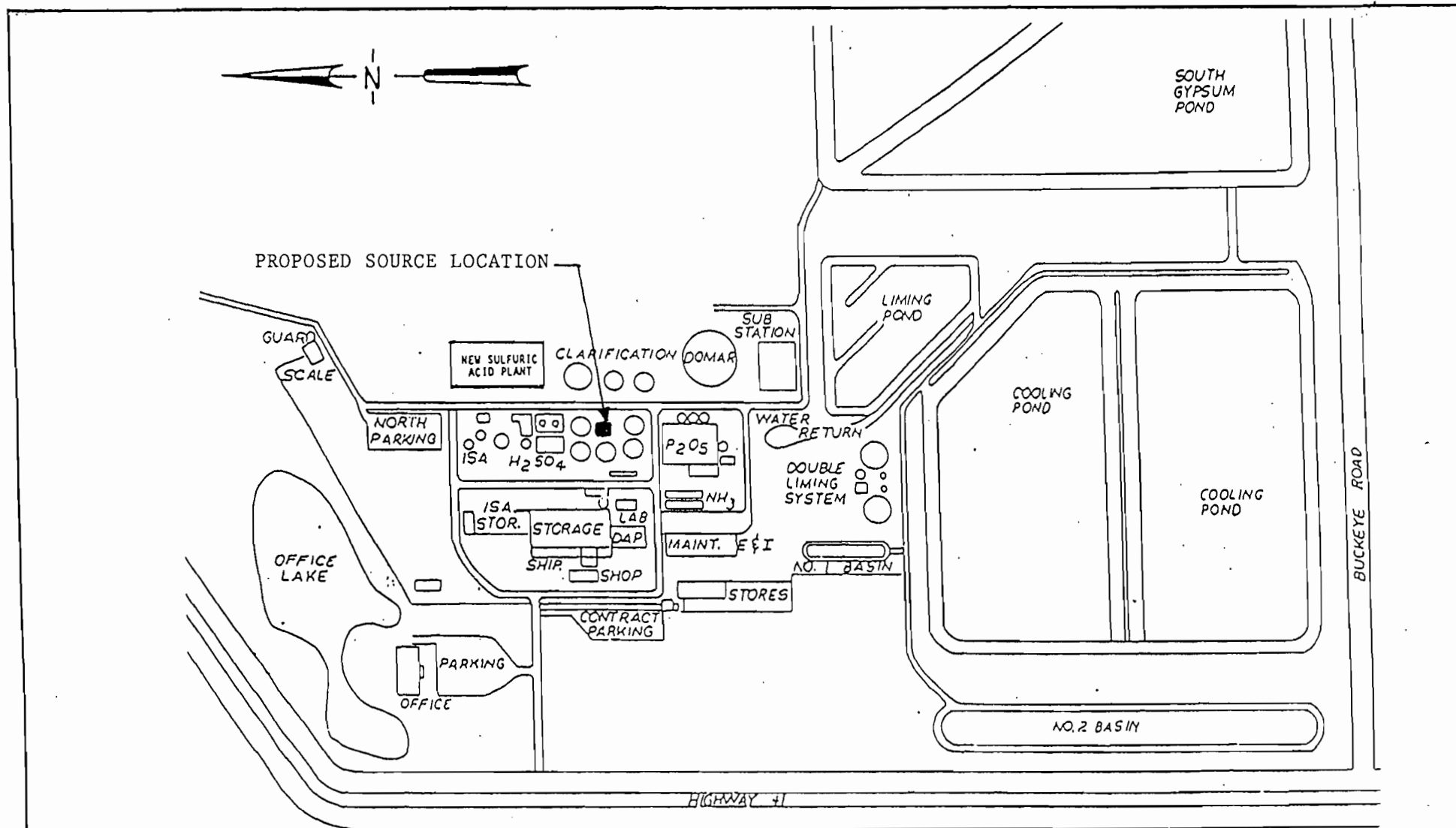
FIGURE 1-2

SITE LOCATION MAP
PINEY POINT PHOSPHATES, INC.

SCALE 1:24 000



CONTOUR INTERVAL 5 FEET
NATIONAL GEODETIC VERTICAL DATUM OF 1929



NOTE: Public access is precluded by a fence and personnel for plant security.

FIGURE 1-3

PLOT PLAN

PINEY POINT PHOSPHATES, INC.



2.0 FACILITY DESCRIPTION

The existing fertilizer complex consists of an auxiliary steam boiler, one sulfuric acid plant, one phosphoric acid plant, one diammonium phosphate plant, storage facilities for phosphate rock and fertilizer products, and shipping facilities for the fertilizer products.

2.1 EXISTING BOILER

The existing auxiliary boiler has a heat input capacity of 96 MMBtu/hour provided by No. 4 fuel oil with a maximum sulfur content of one percent. The auxiliary boiler permit (A041-156789) limited the boiler operation to 876 hours per year.

3.0 PROPOSED PROJECT

3.1 PROJECT DESCRIPTION

Piney Point Phosphates is requesting an increase in the allowable operating hours of the auxiliary boiler from 876 to 8760 hours per year so that key plant operations may continue during prolonged sulfuric acid plant down time.

The proposed project will result in a significant increase (as defined by FAC Rule 17-2.500) in the annual emission rates of sulfur dioxide and nitrogen oxides (see Tables 3-1 and 3-2). Therefore, the proposed permit modification is subject to a Prevention of Significant Deterioration (PSD) review.

3.2 RULE REVIEW

The following are the state and federal air regulatory requirements that apply to new or modified sources subject to a Prevention of Significant Deterioration (PSD) review.

In accordance with EPA and State of Florida PSD review requirements, all major new or modified sources of air pollutants regulated under the Clean Air Act (CAA) are subject to preconstruction review. Florida's State Implementation Plan (SIP), approved by the EPA, authorizes the Florida Department of Environmental Regulation (FDER) to manage the air pollution program in Florida.

The PSD review determines whether or not significant air quality deterioration will result from a new or modified facility. Federal PSD regulations are contained in 40CFR52.21, Prevention of Significant Deterioration of Air Quality. The state of Florida has adopted PSD regulations which are essentially identical to the federal regulations and are contained in Chapter 17-2 of the Florida Administration Code (FAC). All new major facilities and major modifications to existing facilities are subject to control technology review, source impact analysis, air quality analysis and additional impact analyses for each pollutant subject to a PSD review. A facility must also comply with the Good Engineering Practice (GEP) stack height rule.

A major facility is defined in the PSD rules as any one of the 28 specific source categories (see Table 3-3) which has the potential to emit 100 tons per year (tpy) or more, or any other stationary facility which has the potential to emit 250 tpy or more, of any pollutant regulated under the CAA. A major modification is defined in the PSD rules as a change at an existing major facility which increases the actual emissions by greater than significant amounts (see Table 3-4).

3.2.1 Ambient Air Quality Standards

The EPA and the state of Florida have developed/adopted ambient air quality standards, AAQS (see Table 3-5). Primary AAQS protect the public health while the secondary AAQS protect the public welfare from adverse effects of air pollution. Areas of the country have been designated as attainment or nonattainment for specific pollutants. Areas not meeting

the AAQS for a given pollutant are designated as nonattainment areas for that pollutant. Any new source or expansion of existing sources in or near these nonattainment areas are usually subject to more stringent air permitting requirements. Projects proposed in attainment areas are subject to air permit requirements which would ensure continued attainment status.

3.2.2 PSD Increments

In promulgating the 1977 CAA Amendments, Congress quantified concentration increases above an air quality baseline concentration level for sulfur dioxide and particulate matter which would constitute significant deterioration. The size of the allowable increment depends on the classification of the area in which the source would be located or have an impact. Class I areas include specific national parks, wilderness areas and memorial parks. Class II areas are all areas not designated as Class I areas and Class III areas are industrial areas in which greater deterioration than Class II areas would be allowed. There are no designated Class III areas in Florida.

In 1988, EPA promulgated PSD regulations for nitrogen oxides and PSD increments for nitrogen dioxide concentrations. FDER adopted the nitrogen dioxide increments in July 1990 (see Table 3-6 for PSD increments).

3.2.3 Control Technology Evaluation

The PSD control technology review requires that all applicable federal and state emission limiting standards be met and that Best Available Control

Technology (BACT) be applied to the source. The BACT requirements are applicable to all regulated pollutants subject to a PSD review.

BACT is defined in Chapter 17-2, FAC, as an emission limitation, including a visible emission standard, based on the maximum degree of reduction of each pollutant emitted which the Department, on a case-by-case basis, taking into account energy, environmental, and economic impacts, and other costs, determines is achievable through application of production processes and available methods, systems, and techniques (including fuel cleaning or treatment or innovative fuel combustion techniques) for control of such pollutant. If the Department determines that technological or economic limitations on the application of measurement methodology to a particular part of a source or facility would make the imposition of an emission standard infeasible, a design, equipment, work practice, operational standard or combination thereof, may be prescribed instead, to satisfy the requirement for the application of BACT. Such standard shall, to the degree possible, set forth the emissions reductions achievable by implementation of such design, equipment, work practice or operation. Each BACT determination shall include applicable test methods or shall provide for determining compliance with the standard(s) by means which achieve equivalent results.

The reason for evaluating the BACT is to minimize as much as possible the consumption of PSD increments and to allow future growth without significantly degrading air quality. The BACT review also analyzes if the most current control systems are incorporated in the design of a proposed

facility. The BACT, as a minimum, has to comply with the applicable New Source Performance Standard for the source. The BACT analysis requires the evaluation of the available air pollution control methods including a cost-benefit analysis of the alternatives. The cost-benefit analysis includes consideration of materials, energy, and economic penalties associated with the control systems, as well as environmental benefits derived from the alternatives.

EPA recently determined that the bottom-up approach (starting at NSPS and working up to BACT) was not providing the level of BACT originally intended. As a result, in December 1987, EPA strongly suggested changes in the implementation of the PSD program including the "top-down" approach to BACT. The top-down approach requires a technology evaluation to start with the most stringent control alternative, often Lowest Achievable Emission Rate (LAER), and justify its rejection or acceptance as BACT. Rejection of control alternatives may be based on technical or economical infeasibility, physical differences, locational differences, and environmental or energy impact differences when comparing a proposed project with a project previously subject to that BACT.

3.2.4 Air Quality Monitoring

An application for a PSD permit requires an analysis of ambient air quality in the area affected by the proposed facility or major modification. For a new major facility, the affected pollutants are those that the facility would potentially emit in significant amounts. For a major modification, the pollutants are those for which the net emissions

increase exceeds the significant emission rate.

Ambient air monitoring for a period of up to one year, but no less than four months, is required. Existing ambient air data for a location in the vicinity of the proposed project is acceptable if the data meet FDER quality assurance requirements. If not, additional data would need to be gathered. There are guidelines available for designing a PSD air monitoring network in EPA's "Ambient Monitoring Guidelines for Prevention of Significant Deterioration."

FDER may exempt a proposed major stationary facility or major modification from the monitoring requirements with respect to a particular pollutant if the emissions increase of the pollutant from the facility or modification would cause air quality impacts less than the de minimis levels (see Table 3-4).

3.2.5 Ambient Impact Analysis

A source impact analysis is required for a proposed major source subject to PSD for each pollutant for which the increase in emissions exceeds the significant emission rate. Specific atmospheric dispersion models are required in performing the impact analysis. The analysis should demonstrate the project's compliance with AAQS and allowable PSD increments. The impact analysis for criteria pollutants may be limited to only the new or modified source if the net increase in impacts due to the new or modified source is below significant impact levels.

Typically, a five-year period is used for the evaluation of the highest, second-highest short-term concentrations for comparison to AAQS or PSD increments. The term "highest, second-highest" refers to the highest of the second-highest concentrations at all receptors. The second-highest concentration is considered because short-term AAQS specify that the standard should not be exceeded at any location more than once a year. If less than five years of meteorological data are used in the modeling analysis, the highest concentration at each receptor is normally used.

3.2.6 Additional Impact Analysis

The PSD rules also require analyses of the impairment to visibility and the impact on soils and vegetation that would occur as a result of the project. A visibility impairment analysis must be conducted for PSD Class I areas. Impacts due to commercial, residential, industrial, and other growth associated with the source must be addressed.

3.2.7 Good Engineering Practice Stack Height

In accordance with Chapter 17-2, FAC, the degree of emission limitation required for control of any pollutant is not to be affected by a stack height that exceeds GEP, or any other dispersion technique. GEP stack height is defined as the highest of:

1. 65 meters (m), or
2. A height established by applying the formula:

$$H_g = H + 1.5 L$$

where:

H_g - GEP stack height,

H - Height of the structure or nearby structure, and
L - Lesser dimension, height or projected width of
nearby structure(s)

3. A height demonstrated by a model or field study.

The GEP stack height regulations require that the stack height used in modeling for determining compliance with AAQS and PSD increments not exceed the GEP stack height. The actual stack height may be higher or lower.

3.3 RULE APPLICABILITY

The increase in the annual emissions of sulfur dioxide and nitrogen oxides associated with an increase in the annual hours of operation of the auxiliary boiler will result in a major modification to a major facility subject to both state and federal regulations as set forth in Chapter 17-2, FAC. The facility is located in an area classified as attainment for each of the regulated air pollutants. The proposed project will result in a significant increase in the emissions of sulfur dioxide and nitrogen oxides as defined by FAC Rule 17-2.500(2)(e)2. Therefore, the proposed project is subject to PSD review requirements in accordance with FAC Rule 17-2.500. The PSD review requirements include a determination of Best Available Control Technology, an air quality review, a Good Engineering Practice stack height analysis and an evaluation of impacts on soils, vegetation and visibility.

TABLE 3-1
 AUXILIARY BOILER - CURRENT AND PROPOSED
 AIR EMISSION RATES

PINEY POINT PHOSPHATES, INC.
 MANATEE COUNTY, FLORIDA

POLLUTANT	EMISSIONS	
	lbs/hr	tpy
<u>Current Actual Emissions (1)</u>		
Particulate Matter	1.4	0.3
Sulfur Dioxide	87.4	14.7
Nitrogen Oxides	53.8	11.0
Carbon Monoxide	3.4	0.7
Volatile Organic Compounds	0.2	0.03
<u>Proposed Allowable Emissions (2)</u>		
Particulate Matter	2.7	11.8
Sulfur Dioxide	95.8	419.5
Nitrogen Oxides	38.0	166.4
Carbon Monoxide	6.7	29.5
Volatile Organic Compounds	0.3	1.2

(1) Based on 1989, 1990, and 1991 fuel oil usage and AP-42 emission factors. The emission factor for nitrogen oxides is from the previous permit application submitted to FDER.

(2) Based on 8760 hours/year operation and AP-42 emission factors. The proposed nitrogen oxides emission rate is based on the BACT determination and NSPS requirements.

TABLE 3-2
NET EMISSION INCREASES(1)
PINEY POINT PHOSPHATES, INC.
MANATEE COUNTY, FLORIDA

POLLUTANT	ACTUALS (tpy)	PROPOSED (tpy)	NET CHANGE (tpy)	PSD SIGNIFICANT (tpy) (2)
PM/PM10	0.3	11.8	11.5	25/15
S02	14.7	419.5	404.8	40
NOx	11.0	166.4	155.4	40
CO	0.7	29.5	28.8	100
VOCs	0.03	1.2	1.2	40

(1) See Appendix for emission calculations.
(2) Presented in Table 500.2, Chapter 17-2, FAC.

TABLE 3-3

MAJOR FACILITY CATEGORIES

PINEY POINT PHOSPHATES, INC.
MANATEE COUNTY, FLORIDA

Fossil fuel fired steam electric plants of more than 250 MMBTU/hr heat input
Coal cleaning plants (with thermal dryers)
Kraft pulp mills
Portland cement plants
Primary zinc smelters
Iron and steel mill plants
Primary aluminum ore reduction plants
Primary copper smelters
Municipal incinerators capable of charging more than 250 tons of refuse per day
Hydrofluoric acid plants
Sulfuric acid plants
Nitric acid plants
Petroleum refineries
Lime plants
Phosphate rock processing plants
Coke oven batteries
Sulfur recovery plants
Carbon black plants (furnace process)
Primary lead smelters
Fuel conversion plants
Sintering plants
Secondary metal production plants
Chemical process plants
Fossil fuel boilers (or combinations thereof) totaling more than 250 million
BTU/hr heat input
Petroleum storage and transfer units with total storage capacity exceeding
300,000 barrels
Taconite ore processing plants
Glass fiber processing plants
Charcoal production plants

TABLE 3-4
REGULATED AIR POLLUTANTS - SIGNIFICANT EMISSION RATES

PINEY POINT PHOSPHATES, INC.
MANATEE COUNTY, FLORIDA

Pollutant	Significant Emission Rate tons/yr	De minimis Ambient Impacts $\mu\text{g}/\text{m}^3$
CO	100	575 (8-hour)
NOx	40	14 (NO ₂ , Annual)
SO ₂	40	13 (24-hour)
Ozone	40 (VOC)	-
PM (TSP)	25	10 (24-hour)
PM ₁₀	15	10 (24-hour)
TRS (including H ₂ S)	10	0.2 (1-hour)
H ₂ SO ₄ mist	7	-
Fluorides	3	0.25 (24-hour)
Vinyl Chloride	1	15 (24-hour)
	<u>pounds/yr</u>	
Lead	1200	0.1 (Quarterly avg)
Mercury	200	0.25 (24-hour)
Asbestos	14	-
Beryllium	0.8	0.001 (24-hour)

TABLE 3-5
 AMBIENT AIR QUALITY STANDARDS

PINEY POINT PHOSPHATES, INC.
 MANATEE COUNTY, FLORIDA

Pollutant	FDER (State)		USEPA (National)			
			Primary		Secondary	
	$\mu\text{g}/\text{m}^3$	PPM	$\mu\text{g}/\text{m}^3$	PPM	$\mu\text{g}/\text{m}^3$	PPM
SO ₂ , 3-hour 24-hour Annual	1,300	0.5	-	-	1300	0.5
	260	0.1	365	0.14	-	-
	60	0.02	80	0.03	-	-
PM10, 24-hour Annual	150	-	150	-	150	-
	50	-	50	-	50	-
CO, 1-hour 8-hour	40,000	35	40,000	35	-	-
	10,000	9	10,000	9	-	-
Ozone, 1-hour	235	0.12	235	0.12	235	0.12
NO ₂ , Annual	100	0.05	100	-	100	-
Lead, Quarterly	1.5	-	1.5	-	1.5	-

TABLE 3-6

PSD INCREMENTS

PINEY POINT PHOSPHATES, INC.
MANATEE COUNTY, FLORIDA

Pollutant	Allowable PSD Increments (State/National)		
	Class I $\mu\text{g}/\text{m}^3$	Class II $\mu\text{g}/\text{m}^3$	Class III $\mu\text{g}/\text{m}^3$
TSP, Annual	5	19	37
24-hour	10	37	75
SO ₂ , Annual	2	20	40
24-hour	5	91	182
3-hour	25	512	700
NO ₂ , Annual	2.5	25	50

4.0 BEST AVAILABLE CONTROL TECHNOLOGY

Best Available Control Technology (BACT) is required to control air pollutants emitted from newly constructed major sources or from modification to the major emitting facilities if the modification results in significant increase in the emission rate of regulated pollutants (see Table 3-4 for significant emission levels). The proposed project will result in a significant increase in the emissions of sulfur dioxide and nitrogen oxides. A BACT analysis is therefore required for both sulfur dioxide and nitrogen oxides.

4.1 EMISSION STANDARDS

Federal New Source Performance Standards (NSPS) have been promulgated for steam generating units with a heat input capacity of less than 250 MMBtu per hour. These standards, contained in 40CFR60 Subpart Db, became effective on November 25, 1986. Subpart Db specifies emission standards for particulate matter, sulfur dioxide and nitrogen oxides.

The proposed project will comply with the applicable particulate matter and sulfur dioxide emission standards by utilizing distillate fuel oil containing no more than 0.5 percent sulfur. The applicable nitrogen oxides emission standard for this boiler, which has a high heat release rate, is 0.2 pound/MMBtu heat input or 38 pounds per hour (at a heat input rate of 190 MMBtu/hour). The proposed project is subject to a visible emission standard of 20 percent opacity to be determined by a continuous opacity monitor.

The state of Florida emission standards in FAC Rule 17-2.600(6), for steam generators with less than 250 MMBtu per hour heat input, require a BACT determination for particulate matter and sulfur dioxide, and limit visible emissions to 20 percent opacity.

4.2 PREVIOUS BACT DETERMINATIONS

A review of past BACT determinations for sulfur dioxide emissions from fuel oil fired boilers with less than 250 MMBtu per hour heat input indicates the use of low sulfur content fuel oil as BACT. The fuel oil sulfur content limitations have depended largely on the fuel availability and has usually been specified at 0.5 percent. The proposed project will utilize No. 2 fuel oil with a sulfur content not to exceed 0.5 percent. This sulfur content limitation is in line with the FDER BACT determination (in the permit issued August 1992) for the auxiliary boiler.

A review of past BACT determinations for nitrogen oxides emissions from fuel oil fired boilers with less than 250 MMBtu per hour heat input indicates low-NOx burners, flue gas recirculation, and proper operation practices as BACT. A discussion on various nitrogen oxides emission reduction technologies is presented below. These technologies include selective catalytic reduction (SCR), selective non-catalytic reduction (SNCR), flue gas recirculation, and low-NOx burners.

4.3 NITROGEN OXIDES CONTROL TECHNOLOGY

Nitrogen oxides emissions are formed in the combustion process by the oxidation of nitrogen in fuels (fuel NOx) and in combustion air (thermal

NOx). Thermal NOx is formed from the reaction of oxygen and nitrogen in the combustion air at combustion temperatures. Formation of thermal NOx depends on the flame temperature, residence time, combustion pressure, and air-to-fuel ratio in the combustion zone. The design and operation of the combustion system dictates these conditions. Fuel bound NOx is created by the oxidation of the volatilized nitrogen in the fuel. Nitrogen content of the fuel is the primary factor in the formation of fuel NOx.

The emissions of nitrogen oxides can be lowered by lowering combustion temperatures and reducing combustion air. These measures, however, do increase the generation of carbon monoxide. Post combustion controls have been proposed for certain sources where reduction of nitrogen oxides have been demonstrated. The source categories for which the "add-on" controls have been proposed or recommended include municipal waste combustors, industrial and utility boilers, glass furnaces, and gas turbines. The add-on controls used in the above applications typically consist of Selective Catalytic Reduction (SCR) technology or Selective Non-Catalytic Reduction (SNCR) technology.

4.3.1 Selective Catalytic Reduction

SCR uses ammonia to react with the nitrogen oxides present in the flue gas stream in the presence of a catalyst. Ammonia is typically diluted with air to an optimum concentration and introduced into the gas stream. A temperature range between 600 and 750°F is required for the reaction of ammonia and nitrogen oxides and results in the formation of nitrogen and water.

The exit temperature of flue gases from the package boiler of around 300°F is not within the SCR operation range. The installation of the catalyst and ammonia injection system within the boiler is not possible without redesigning and refabricating the boiler. For this reason, SCR is rejected as BACT for the package boiler.

4.3.2 Selective Non-Catalytic Reduction

SNCR technology also uses ammonia or urea injection into the gas stream to control nitrogen oxides. In some systems, the simultaneous injection of hydrogen has also been used to extend the process effectiveness. While no catalyst is required, the effective temperature range necessary for the reaction of the ammonia and nitrogen oxides is significantly higher than that required for SCR. The ammonia is typically diluted with air or steam and introduced at a location that provides optimum reaction temperature and residence time. At temperatures between 1500 and 2200°F, the ammonia reacts with the nitrogen oxides in the gas stream to produce nitrogen and water. However, at temperatures above 2200°F, the ammonia reacts with the oxygen in the gas stream to produce nitrogen oxides.

In large boilers, there is adequate contact within the required temperature range for successful SNCR application. The same conditions are not encountered in the auxiliary package boiler because the compact design. The SNCR system cannot be installed within the boiler without boiler redesign and refabrication. For this reason, SNCR is rejected as BACT for the auxiliary boiler.

4.3.3 Flue Gas Recirculation

Emissions of nitrogen oxides can be reduced by limiting the amount of excess combustion air supplied to the combustion process. The same effect is created by diluting the oxygen rich combustion air with oxygen deficient recirculated flue gas. Based on discussions with the boiler manufacturer, the use of induced flue gas recirculation technology can reduce the nitrogen oxides emissions by up to 30 percent.

The cost of installing an induced flue gas recirculation system on the auxiliary boiler is not expected to exceed \$30,000. The annualized cost for the installation and maintenance of system is not expected to be significant. However, a loss in the efficiency of the boiler, estimated to be about one percent by the manufacturer, will result in an annual fuel cost alone of about \$1100 per ton of nitrogen oxides reduced. Despite these costs the proposed project will utilize the induced flue gas recirculation system.

Additional reduction in the emissions of nitrogen oxides can be achieved by increasing the amount of flue gas recirculated. However, a fan would have to be installed to provide forced recirculation. The manufacturer estimates an additional 10 percent reduction in nitrogen oxides emissions from forced flue gas recirculation at an additional cost in the boiler efficiency of 2 percent.

The installation cost of the forced recirculation system is estimated to be about \$80,000. The additional loss in boiler efficiency will result in

an annual incremental fuel cost of \$9200 per ton of nitrogen oxides reduced. This fuel cost alone far exceeds costs considered reasonable for the control of nitrogen oxides (up to \$4000 per ton of nitrogen oxides reduced). For this reason, forced flue gas recirculation is rejected as BACT.

4.3.4 Low-NOx Burner Technology

The low-NOx burner technology provides reduction of nitrogen oxides by combustion control. This involves optimizing the quantities of combustion air and fuel introduced into the burner. The use of low-NOx burners in steam generating units can result in a reduction in nitrogen oxides emissions of 30 to 40 percent. The package boiler is equipped with a low-NOx burner.

4.4 CONCLUSION

Based upon the analysis presented above, the use of low-NOx burner technology in combination with induced flue gas recirculation resulting in a nitrogen oxides emission rate of 38.0 pounds per hour (0.2 pound per MMBtu), represents BACT for the auxiliary boiler.

5.0 AIR QUALITY REVIEW

The air quality review required of a PSD construction permit application potentially requires both air quality modeling and air quality monitoring. The air quality monitoring is required when the impact of air pollutant emission increases and decreases associated with a proposed project exceed the de minimis impact levels defined by Rule 17-2.500(3)(e)1, FAC or in cases where an applicant wishes to define existing ambient air quality by monitoring rather than by air quality modeling. The air quality modeling is required to provide assurance that the emissions from the proposed project, together with the emissions of all other air pollutants in the project area, will not cause or contribute to a violation of any ambient air quality standard.

5.1 AIR QUALITY MODELING

The ambient air quality impacts resulting from changes in the emissions of sulfur dioxide and nitrogen oxides were evaluated using air dispersion modeling.

The impact analysis of the changes in emissions of sulfur dioxide and nitrogen oxides, for the operation of the new auxiliary boiler in place of the existing auxiliary boiler, was conducted using the EPA approved SCREEN and Industrial Source Complex-Short Term (ISC-ST2), Version 92062, air quality models, and in accordance with the discussion on November 12, 1992, with FDER on the modeling protocol.

The SCREEN model was used to determine downwind distances associated with the maximum predicted impacts and also to determine the Class I area impacts resulting from the proposed project. The ISC-ST2 model was used for determining the Area of Significant Impact (ASI). The modeling was conducted in accordance with guidelines established by EPA and published in the document, Guidelines for Air Quality Modeling (Revised 1990). The meteorological data used with the model were for Tampa, Florida and represent the period 1985 to 1989.

The sulfur dioxide and nitrogen oxides emissions modeled to determine the ASI represent the net increase in emissions of the operation of the new boiler over the existing boiler (see Table 5-1). The ASI modeling included receptors established by the polar grid system extending to 1 kilometer from the plant. Five sets of receptor rings were placed at distances ranging from 460 to 1000 meters from the plant with the receptors placed at 10 degree intervals on each receptor ring. Further downwind receptors were not included as the SCREEN modeling results predicted maximum ambient air quality impacts from the auxiliary boiler at the property boundary. The receptor ring at 460 meters approximately corresponds to the nearest property boundary (see Figure 1-2).

The SCREEN modeling included a single receptor at a distance of 100 kilometers from the facility representing the nearest Class I area (Chassahowitzka National Wildlife Refuge) boundary. A distance of 100 kilometers was input to the SCREEN model rather than the actual distance to the Class I area of 109 kilometers due to the limitations of the model.

However, the modeled distance is acceptable for the analysis as the results would be more conservative (greater predicted impacts). The existing and proposed emission scenarios were modeled individually. The difference in the impacts resulting from the two scenarios represents the net ambient air quality impacts at the nearest Class I area boundary. The modeling results are presented below.

5.2 MODELING RESULTS

The results of the ASI modeling, summarized in Tables 5-2 (for sulfur dioxide impacts) and 5-3 (for nitrogen dioxide impacts), demonstrate that the predicted impacts of the sulfur dioxide and nitrogen oxides emission increases associated with the proposed project are less than both the significant impact level and the de minimis impact level for the respective time periods.

The SCREEN modeling predicted an improvement in the sulfur dioxide and the nitrogen oxides concentrations at the Class I area as a result of the proposed project (see Table 5-4).

The PSD increment and ambient air quality standard analyses were not required as the impacts from the proposed project were predicted to be less than significant. Ambient air monitoring was not required as the predicted impacts from the proposed project were less than de minimis.

TABLE 5-1
 AIR QUALITY MODELING PARAMETERS
 PINEY POINT PHOSPHATES, INC.
 MANATEE COUNTY, FLORIDA

Source	Emission Rate		Stack Parameters			
	SO ₂ (g/s)	NO _x (g/s)	Ht (m)	Dia (m)	Vel (mps)	Temp (°K)
Existing Unit	-11.02	-6.78	9.15	1.21	7.7	558
Proposed Unit	12.08	4.79	8.84	2.28	14.8	427

NOTE:

1. The modeled emission rates represent the net increase in sulfur dioxide and nitrogen oxides from proposed project.
2. The dimensions of the nearest building were included in the model as 25.6 m height, 45.7 m length, and 45.7 m width.

TABLE 5-2

SUMMARY OF SULFUR DIOXIDE IMPACT ANALYSIS

PINEY POINT PHOSPHATES, INC.
MANATEE COUNTY, FLORIDA

METEOROLOGICAL DATA	MAXIMUM SULFUR DIOXIDE IMPACT ($\mu\text{g}/\text{m}^3$) (1)		
	ANNUAL	3-HOUR	24-HOUR
1985	0	23.74 (460m, 160°)	3.96 (460m, 160°)
1986	0	10.55 (460m, 160°)	0.11 (1000m, 360°)
1987	0	2.24 (1000m, 250°)	0.31 (460m, 180°)
1988	0	9.25 (460m, 130°)	0.30 (460m, 210°)
1989	0	1.83 (700m, 350°)	0.06 (1000m, 300°)
De minimis Impact 17-2.500(3)(e)1,FAC	NA	NA	13
Significant Impact 17-2.100,FAC	1	25	5

(1) Highest-high impacts based on the modeling inputs presented in Table 5-1.

TABLE 5-3
 SUMMARY OF NITROGEN OXIDES IMPACT ANALYSIS
 PINEY POINT PHOSPHATES, INC.
 MANATEE COUNTY, FLORIDA

METEOROLOGICAL DATA	MAXIMUM NITROGEN OXIDES IMPACT ($\mu\text{g}/\text{m}^3$) (1)		
	ANNUAL	8-HOUR	24-HOUR
1985	0	0	0
1986	0	0	0
1987	0	0	-0
1988	0	0	0
1989	0	0	0
De minimis Impact 17-2.500(3)(e)1,FAC	14	NA	NA
Significant Impact 17-2.100,FAC	1	NA	NA

(1) Highest-high impacts based on the modeling inputs presented in Table 5-1. The maximum predicted impact is zero because the majority of the predicted impacts are negative, indicating an overall improvement in the ambient air quality as a result of the proposed project.

TABLE 5-4
SUMMARY OF CLASS I AREA IMPACTS
PINEY POINT PHOSPHATES, INC.
MANATEE COUNTY, FLORIDA

	<u>SULFUR DIOXIDE IMPACT ($\mu\text{g}/\text{m}^3$)</u> 1-HR MAXIMUM	<u>NITROGEN OXIDES IMPACT ($\mu\text{g}/\text{m}^3$)</u> 1-HR MAXIMUM
EXISTING	9.0	5.5
PROPOSED	8.6	3.4
NET CHANGE (1)	-0.4	-2.1

(1) As the net 1-hour maximum impacts predicted by the SCREEN modeling are negative, it was not deemed necessary to scale the impacts to other averaging periods for comparison with any standards.

6.0 GOOD ENGINEERING PRACTICE STACK HEIGHT

The criteria for good engineering practice stack height in Rule 17-2.270 states that the height of a stack should not exceed the greater of 65 meters (213) feet or the height of nearby structures plus the lesser of 1.5 times the height or cross-wind width of the nearby structure. This stack height policy is designed to prevent achieving ambient air quality goals solely through the use of excessive stack heights and air dispersion.

The auxiliary boiler stack is less than 213 feet in height above-grade. This satisfies the Good Engineering Practice (GEP) stack height criteria.

7.0 IMPACTS ON SOILS, VEGETATION AND VISIBILITY

7.1 IMPACT ON SOILS AND VEGETATION

The U. S. Environmental Protection Agency was directed by Congress to develop primary and secondary ambient air quality standards. The primary standards were to protect human health and the secondary standards were to:

"... protect the public welfare from any known or anticipated adverse effects of a pollutant."

The public welfare was to include soils, vegetation and visibility-

As a basis for promulgating the air quality standards, EPA undertook studies related to the effects of all major air pollutants and published criteria documents summarizing the results of the studies. The studies included in the criteria documents were related to both acute and chronic effects of air pollutants. Based on the results of these studies, the criteria documents recommended air pollutant concentration limits for various periods of time that would protect against both chronic and acute effects of air pollutants with a reasonable margin of safety.

The air quality modeling that has been conducted as a requirement for the PSD application demonstrates that the levels of sulfur dioxide and nitrogen oxides expected as a result of the proposed project will be below the significant impact levels and the de minimis impact levels. Therefore it can be concluded there will be no adverse effect to the soils or vegetation of the area.

7.2 GROWTH RELATED IMPACTS

An increase in annual operating hours of the auxiliary boiler will require no increase in personnel to operate the boiler. Therefore, no additional growth impacts are expected as a result of the proposed project.

7.3 VISIBILITY IMPACTS

The emissions of particulate matter and nitrogen oxides from the proposed project were evaluated for visibility impacts at the Class I area using the EPA approved VISCREEN model. The results of the Level 1 VISCREEN analysis demonstrate that the proposed project is not expected to cause any impairment to the visibility in the Class I area.

8.0 CONCLUSION

It can be concluded from the information in this report that the proposed increase in the operating hours of the auxiliary boiler at Piney Point Phosphates, as described in this report, will not cause or contribute to a violation of any air quality standard, PSD increment, or any other provision of Chapter 17-2, FAC.

VISCREEN LEVEL-I ANALYSIS

PINEY POINT PHOSPHATES, INC. AUXILIARY BOILER

SUMMARY OF ALL EMISSIONS AND METEOROLOGICAL INPUT

Emissions for Auxiliary Boiler in G /S :
Particulate = 3.400000E-01
NOx = 4.790000
Primary NO2 = 0.000000E+00
Soot = 0.000000E+00
Primary SO4 = 0.000000E+00

Meteorological and Ambient Data for Chass

Wind speed (m/s) = 1.000000
Stability Index = 6
Visual Range (km) = 25.000000
Ozone Conc. (ppm) = 4.000000E-02
Plume Offset Angle= 11.250000 degrees

Distances Between Auxiliary Boiler and Chass

Source-Observer = 109.000000 km
Min. Source-Class I = 109.000000 km
Max. Source-Class I = 123.000000 km

Are these input values ready for execution (y/n)?

OVERALL RESULTS OF PLUME VISIBILITY SCREENING

SOURCE: Auxiliary Boiler
CLASS I AREA: Chass

INSIDE class I area --

Plume delta E DOES NOT EXCEED screening criterion for SKY background
Plume delta E DOES NOT EXCEED screening criterion for TERRAIN background
Plume contrast DOES NOT EXCEED screening criterion for SKY background
Plume contrast DOES NOT EXCEED screening criterion for TERRAIN background

OUTSIDE class I area --

Plume delta E DOES NOT EXCEED screening criterion for SKY background
Plume delta E DOES NOT EXCEED screening criterion for TERRAIN background
Plume contrast DOES NOT EXCEED screening criterion for SKY background
Plume contrast DOES NOT EXCEED screening criterion for TERRAIN background

SCREENING CRITERIA: DELTA E = 2.0
 GREEN CONTRAST = .050

Do you want to see calculated results for lines of
sight with maximum delta E (y/n)?

EMISSION CALCULATIONS

PROPOSED EMISSIONS

Based on AP-42 emission factors for fuel oil combustion (Table 1.3-1).

$$\begin{aligned} \text{PM} &= 1349 \text{ gals/hr} \times 2 \text{ lbs PM/1000 gals} \\ &= 2.7 \text{ lbs/hr} \\ &\quad \times 8760 \text{ hrs/yr} \times \text{ton/2000 lbs} \\ &= 11.8 \text{ tpy} \end{aligned}$$

$$\begin{aligned} \text{SO}_2 &= 1349 \text{ gals/hr} \times 142(0.5) \text{ lbs SO}_2\text{/1000 gals} \\ &= 95.8 \text{ lbs/hr} \\ &\quad \times 8760 \text{ hrs/yr} \times \text{ton/2000 lbs} \\ &= 419.5 \text{ tpy} \end{aligned}$$

$$\begin{aligned} \text{CO} &= 1349 \text{ gals/hr} \times 5 \text{ lbs CO/1000 gals} \\ &= 6.7 \text{ lbs/hr} \\ &\quad \times 8760 \text{ hrs/yr} \times \text{ton/2000 lbs} \\ &= 29.5 \text{ tpy} \end{aligned}$$

$$\begin{aligned} \text{NMHC, VOC} &= 1349 \text{ gals/hr} \times 0.2 \text{ lb NMHC/1000 gals} \\ &= 0.3 \text{ lb/hr} \\ &\quad \times 8760 \text{ hrs/yr} \times \text{ton/2000 lbs} \\ &= 1.2 \text{ tpy} \end{aligned}$$

Based on NSPS,

$$\begin{aligned} \text{NO}_x &= 190 \text{ MMBTU/hr} \times 0.2 \text{ lb/MMBTU} \\ &= 38 \text{ lbs/hr} \\ &\quad \times 8760 \text{ hrs/yr} \times \text{ton/2000 lbs} \\ &= 166.4 \text{ tpy} \end{aligned}$$

ACTUAL EMISSIONS

Based on 1990 and 1991 fuel oil usage and fuel oil sulfur content documented in AORs submitted to FDER and AP-42 emission factors for fuel oil combustion in Table 1.3-1.

1990

Fuel Oil Usage = 250,000 gal

Fuel Oil Sulfur Content = 0.58%

PM = 250,000 gals/yr x 2 lbs/1000 gal x ton/2000 lbs
= 0.25 ton/yr

SO₂ = 250,000 gals/yr x 142(0.58) lbs/1000 gals x ton/2000 lbs
= 10.3 tons/yr

CO = 250,000 gals/yr x 5 lbs/1000 gals x ton/2000 lbs
= 0.63 ton/yr

NMHC, VOC = 250,000 gals/yr x 0.2 lb/1000 gals x ton/2000 lbs
= 0.025 ton/yr

Based on past permit application information,

NOx = 250,000 gals/yr x 80 lbs/1000 gals x ton/2000 lbs
= 10 tons/yr

1991

Fuel Oil Usage = 300,000 gals

Fuel Oil Sulfur Content = 0.9%

PM = 300,000 gals/yr x 2 lbs/1000 gals x ton/2000 lbs
= 0.3 ton/yr

SO₂ = 300,000 gals/yr x 142(0.9) lbs/1000 gals x ton/2000 lbs
= 19.17 tons/yr

CO = 300,000 gals/yr x 5 lbs/1000 gals x ton/2000 lbs
= 0.75 ton/yr

NMHC, VOC = 300,000 gals/yr x 0.2 lb/1000 gals x ton/2000 lbs
= 0.03 ton/yr

Based on past permit application information,

NOx = 300,000 gals/yr x 80 lbs/1000 gals x ton/2000 lbs
= 12 tons/yr

1990-1991 Average Emissions

PM = (0.25 + 0.3)/2 tons/yr = 0.3 tpy
SO₂ = (10.3 + 19.17)/2 tons/yr = 14.7 tpy
CO = (0.63 + 0.75)/2 tons/yr = 0.7 tpy
VOC = (0.025 + 0.03)/2 tons/yr = 0.03 tpy
NOx = (10 + 12)/2 tons/yr = 11 tpy

Actual Hourly Emissions

For particulate matter, sulfur dioxide, carbon monoxide and non-methane hydrocarbons (VOCs), the actual hourly emissions are estimated based on a ratio of the fuel firing rates and the fuel sulfur contents of the existing boiler to the proposed boiler. For nitrogen oxides, the actual hourly emissions are estimated based on information in past permit application submitted to FDER.

$$\begin{aligned} \text{PM} &= (684/1349) \text{ (gals/hr)} \times 2.7 \text{ lbs/hr (proposed)} \\ &= 1.4 \text{ lbs/hr} \end{aligned}$$

$$\begin{aligned} \text{SO}_2 &= (684/1349) \text{ (gals/hr)} \times (0.9/0.5) \text{ (S\%)} \times 95.8 \text{ lbs/hr} \\ &= 87.4 \text{ lbs/hr} \end{aligned}$$

$$\begin{aligned} \text{NO}_x &= 96 \text{ MMBtu/hr} \times 0.56 \text{ lb/MMBtu} \\ &= 53.8 \text{ lbs/hr} \end{aligned}$$

$$\begin{aligned} \text{CO} &= (684/1349) \text{ (gals/hr)} \times 6.7 \text{ lbs/hr} \\ &= 3.4 \text{ lbs/hr} \end{aligned}$$

$$\begin{aligned} \text{VOC} &= (684/1349) \text{ (gals/hr)} \times 0.3 \text{ lb/hr} \\ &= 0.15 \text{ lb/hr} \end{aligned}$$

COST CALCULATIONS FOR BACT DETERMINATION

I. Induced FGR Fuel Cost (@ 1% efficiency loss)

$$\begin{aligned}\text{Cost} &= 1349 \text{ gals/hr} \times 8760 \text{ hrs/yr} \times \$0.65/\text{gal} \times 0.01 \text{ eff. loss} \\ &= \$76,812/\text{yr}\end{aligned}$$

NOx Reduction (@ 30%)

$$\begin{aligned}\text{Uncontrolled NOX} &= 166.4 \text{ tpy} \times 1/(1-0.3) \\ &= 237.7 \text{ tons/yr}\end{aligned}$$

$$\begin{aligned}\text{Reduced} &= 237.7 \text{ tons/yr} \times 0.3 \\ &= 71.3 \text{ tons/yr}\end{aligned}$$

Fuel Cost Per Ton NOx Reduced

$$\begin{aligned}\text{Operation Cost} &= \$76,812/\text{yr} \times \text{yr}/71.3 \text{ tons} \\ &= \$1,077 \text{ per ton NOx removed}\end{aligned}$$

II. Forced FGR Fuel Costs (Incremental @ 2% eff. loss)

$$\begin{aligned}\text{Cost} &= 1349 \text{ gals/yr} \times 8760 \text{ hrs/yr} \times \$0.65/\text{gal} \times 0.02 \text{ eff. loss} \\ &= \$153,624/\text{yr}\end{aligned}$$

Incremental NOx Reduction (@ 10%)

$$\begin{aligned}\text{NOx Reduced} &= 166.4 \text{ tons/yr} \times 0.1 \\ &= 16.6 \text{ tons/yr}\end{aligned}$$

Fuel Cost Per Ton NOx Reduced

$$\begin{aligned}\text{Operation Cost} &= \$153,624/\text{yr} \times \text{yr}/16.6 \text{ tons} \\ &= \$9254/\text{yr}\end{aligned}$$

CLASS I AREA IMPACTS

The following impacts represent the net SO₂ and NO_x impacts at the Class I area based on the SCREEN modeling results.

Sulfur Dioxide Impacts

$$\text{SO}_2 \text{ (Existing)} = 9.0 \mu\text{g}/\text{m}^3$$

$$\text{SO}_2 \text{ (Proposed)} = 8.6 \mu\text{g}/\text{m}^3$$

$$\text{Net Impact} = (8.6 - 9.0) \mu\text{g}/\text{m}^3 = -0.4 \mu\text{g}/\text{m}^3$$

Nitrogen Oxides Impacts

$$\text{NO}_x \text{ (Existing)} = 5.5 \mu\text{g}/\text{m}^3$$

$$\text{NO}_x \text{ (Proposed)} = 3.4 \mu\text{g}/\text{m}^3$$

$$\text{Net Impact} = (3.4 - 5.5) \mu\text{g}/\text{m}^3 = -2.1 \mu\text{g}/\text{m}^3$$

AUXILIARY BOILER OPERATION HISTORY

	1989	1990	1991
Operating Hours	367	875	1,154
Fuel	110,000 gal	250,000 gal	300,000 gal
% S	0.54	0.58	0.9
TPY SO ₂	4.39	10.71	19.94

NOTE: Based on the above data, 1990 and 1991 have been considered representative of normal operation in determining actual emissions.



Florida Department of Environmental Regulation

Southwest District
Lawton Chiles, Governor

4520 Oak Fair Boulevard
813-620-6100

Tampa, Florida 33610-7347
Carol M. Browner, Secretary

PERMITTEE:

Piney Point Phosphates, Inc.
13300 U.S. Highway 41 North
Palmetto, Florida 34221-8662

PERMIT/CERTIFICATION:

Permit No.: AC41-211848
County: Manatee
Expiration Date: 7-14-93
Project: Auxiliary Steam Boiler

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 construction of an auxiliary Nebraska Boiler Company, Type N2S-7-89, Package Watertube Steam Boiler. This auxiliary steam boiler is permitted to operated a maximum of 876 hours per year to provide steam only when the sulfuric acid plant is down and during cold startup. This auxiliary steam boiler is permitted to be fired with only new No. 2 "very low sulfur" distillate fuel oil having a maximum sulfur content not to exceed 0.5% by weight and a nitrogen content not to exceed 0.30% by weight, at a maximum permitted heat input rate of 190 MMBTU/hour.

Location: 13300 U.S. Highway 41 North, Palmetto, Manatee County

UTM: 17-348.5 E 3057.3 N NEDS NO: 0002 Point ID: 11

Replaces Permit No.: A041-156789

PERMITTEE:
Piney Point Phosphates, Inc.

Permit No.: AC41-211848
Project: Auxiliary Steam Boiler

SPECIFIC CONDITIONS:

1. A part of this permit is the attached 15 General Conditions.
2. This auxiliary steam boiler is subject to and shall meet all the applicable requirements and limitations of 40 CFR 60, Subpart Db-Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units, adopted by reference in Rule 17-2.660, F.A.C.
3. This auxiliary steam boiler is permitted to operate a maximum of 876 hours per year, to provide steam when the sulfuric acid plant is down and during cold startup (construction permit application dated 4/9/92).
4. The maximum heat input capacity from fuels combusted in this auxiliary steam boiler shall not exceed 190.0 MMBTU/hour, this is approximately 1,349 gallons/hour of new No. 2 distillate fuel oil (construction permit application dated 4/9/92).
5. Visible emissions from this auxiliary steam boiler shall not be greater than 20% opacity (6-minute average) except for one 6-minute period per hour of not more than 27% opacity, 40 CFR 60.43b(f), and Rule 17-2.660, F.A.C.
6. The permittee shall comply with the requirements of 40 CFR 60.42b(j), which requires combusting "very low sulfur" (0.5% by weight) fuel oil as defined in 40 CFR 60.41b in lieu of complying with the emission limiting standards for Sulfur Dioxide under 40 CFR 60.42b (construction permit application dated 4/9/92).
7. The permittee shall comply with the requirements of 40 CFR 40.44b(j), paragraphs (1), (2), and (3), which requires combusting fuel oil with a nitrogen content of 0.30 percent by weight or less, have an annual capacity factor of 10% or less and have a heat input capacity of 250 MMBTU/hour or less in lieu of complying with the emission limiting standards for Nitrogen Oxides under 40 CFR 40.44b (construction permit application dated 4/9/92).
8. In accordance with Rule 17-2.600(6)(b) & (c), F.A.C., the Best Available Control Technology (BACT) determination issued on June 15, 1992 in accordance with Rule 17-2.630, limits the firing of this auxiliary steam boiler on new No. 2 distillate fuel oil having a sulfur content not to exceed 0.5% by weight. This limitation will control the amount of particulates and sulfur dioxide emissions from this auxiliary steam boiler. New oil means an oil that has been refined from crude oil and has not been used and which may or may not contain additives. The firing of waste or reclaimed oil in this auxiliary steam boiler is prohibited.

PERMITTEE:

Piney Point Phosphates, Inc.

Permit No.: AC41-211848

Project: Auxiliary Steam Boiler

9. Test this auxiliary steam boiler for visible emissions using EPA Method 9 contained in 40 CFR 60, Appendix A and adopted by reference in Rule 17-2.700, F.A.C., within 60 days after achieving the maximum firing rate at which the boiler will be operated but no later than 180 days after initial startup of the boiler. For the purpose of determining initial compliance, the minimum total time of observations shall be 3 hours, 30 6-minute averages, 40 CFR 60.11. The visible emissions compliance tests shall be conducted by a certified observer. Copies of the compliance test data shall be submitted to the Air Sections of the Southwest District Office of the Department and the Manatee County Environmental Action Commission within 45 days of such testing. The minimum requirements for source sampling and reporting, shall be in accordance with the requirements of 40 CFR 60, Appendix A, and Rule 17-2.700, F.A.C.

10. Piney Point Phosphates, Inc. shall submit along with the visible emissions compliance test reports, a complete fuel analysis of the new No. 2 distillate fuel oil fired during the compliance tests proving compliance with the sulfur and nitrogen percent by weight limitations as specified in Specific Conditions No. 6, 7 & 8.

11. Testing of emissions must be conducted while firing the auxiliary steam boiler within 90-100% of the maximum permitted heat input rate of 190.0 MMBTU/hour. Compliance tests submitted at operating rates less than 90% of the maximum permitted rate will automatically constitute an amended permit at the lesser rate until another test showing compliance at a higher rate is submitted. Failure to submit the operating rate and actual operating conditions may invalidate the test (Rule 17-4.070(3), F.A.C.).

12. The Permittee shall notify the Air Sections of the Southwest District Office of the Department and the Manatee County Environmental Action Commission in writing at least 15 days prior to the date on which each compliance test is to begin. The notice shall include, the date, time, and place of each test, and the test contact person who will be responsible for coordinating and having each test conducted (Rule 17-2.700(2)(a)9., F.A.C.).

13. Each time this auxiliary steam boiler is fired, the permittee shall maintain records of the hours of operation, the type and quantity of fuel fired, and calculate the annual capacity factor (40 CFR 60.49b(d) and Rules 17-2.660, and 17-4.070(3), F.A.C.).

14. The permittee shall install, calibrate, maintain and operate a continuous emission monitoring system for opacity, and record the output of the system on a 6-minute average opacity basis (40 CFR 60.48b(a), and Rule 17-2.660, F.A.C.).

PERMITTEE:

Piney Point Phosphates, Inc.

Permit No.: AC41-211848

Project: Auxiliary Steam Boiler

15. In order to document continuing compliance with the percent by weight limitations as specified in Specific Conditions No. 6, 7 & 8, the permittee shall obtain and maintain at the facility fuel oil receipts from the fuel oil supplier which certify that each shipment of fuel oil received for firing in this auxiliary steam boiler meets the definition of new No. 2 distillate fuel oil (40 CFR 60.49.b(r) and Rules 17-2.660, and 17-4.070(3), F.A.C.).

16. All records required by this permit and/or 40 CFR 60.49b shall be retained for a minimum period of 2 years following the date of such records and be made available to the Department upon request (40 CFR 60.49.(o), and Rules 17-2.660, and 17-4.070(3), F.A.C.).

17. The permittee shall submit quarterly reports certifying that only new No. 2 distillate fuel oil with a sulfur content not exceeding 0.5% by weight and a nitrogen content not exceeding 0.30% by weight was fired in this auxiliary steam boiler in the preceding calendar quarter. The total hours of operation during the quarter shall also be included in the report (40 CFR 60.49.b(r) and Rules 17-2.660, and 17-4.070(3), F.A.C.).

18. The permittee shall submit quarterly opacity excess emission reports in accordance with 40 CFR 60.49b(h). If there are no excess emissions during a calendar quarter the permittee shall submit a report stating that no excess emissions occurred during the reporting period (40 CFR 60.49b(h) and Rule 17-2.660, F.A.C.).

19. Issuance of this permit does not relieve the permittee from complying with applicable emission limiting standards or other requirements of Rule 17-2, or any other requirements under federal, state or local law (Rule 17-2.210, F.A.C.).

20. Any change in the method of operation, fuels (percent sulfur and/or nitrogen), or operating hours that affect potential emissions and changes the permitted conditions for this auxiliary steam boiler shall be submitted to the Air Sections of the Southwest District Office of the Department and the Manatee County Environmental Action Commission in the form of an application to construct/modify for review and approval (Rule 17-2.210, F.A.C.).

21. All applicable rules of the Department and design discharge limitations specified in the construction permit application shall be adhered to. The permit holder may also need to comply with county, municipal, federal, or other state regulations prior to construction (Rule 17-4.070(1), F.A.C.)

PERMITTEE:

Piney Point Phosphates, Inc.

Permit No.: AC41-211848


Project: Auxiliary Steam Boiler

22. 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 Subsection 403.061(13), Florida Statutes:

- (A) Annual amount of fuel fired in this boiler.
- (B) Annual Hours of Operation (annual capacity factor).
- (C) Annual emissions for particulates, PM_{10} , carbon monoxide, SO_2 , NO_x , based on fuel fired (provide a copy of the calculation sheet(s) and basis for calculations).
- (D) Any changes in the information contained in the permit application.

23. Two applications for an operating permit shall be submitted to the Air Section of the Southwest District Office of the Department of Environmental Regulation and one copy of the application sent to the Manatee County Environmental Action Commission at least 60 days prior to the expiration date of this construction permit (Rule 17-4.090(1), F.A.C.).

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION


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

4520 Oak Fair Boulevard
Tampa, Florida 33610-7347
(813)620-6100



Florida Department of Environmental Regulation

Southwest District • 4520 Oak Fair Boulevard • Tampa, Florida 33610-7347 • 813-623-5561

Bob Martinez, Governor

Dale Twachtman, Secretary

John Shearer, Assistant Secretary
Richard Garrity, Deputy Assistant Secretary

PERMITTEE:
Royster Phosphates, Inc.
Post Office Box 1329
Palmetto, FL 34220

PERMIT/CERTIFICATION
Permit No.: A041-156789
County: Manatee
Expiration Date: 01/24/94
Project: Auxiliary Boiler

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 a Nebraska Boiler Company Model No. NOS2A67 auxiliary boiler fired with fuel oil No. 4 with sulphur content not exceeding 1.0 wt.%. The unit is rated at 96.2 MMBTU/hour.

Location: U.S. Highway 41 North, Palmetto

UTM: 17-348.5E 3057.3N NEDS NO: 0002 Point ID: 11

Replaces Permit No.: AC41-148295

PERMITTEE:
Royster Phosphates, Inc.

PERMIT NO: AO41-156789
PROJECT: Auxiliary Boiler

SPECIFIC CONDITIONS:

1. A part of this permit is the attached 15 General Conditions.
2. The firing rate of this auxiliary boiler shall not exceed 96.2 MMBTU/hour and the hours of operation shall not exceed 876 hours per year. (BACT determination of Aug. 9, 1988)
3. Pursuant to Subsection 17-2.600(6)(a), F.A.C., visible emissions shall not exceed 20% opacity except for periods up to two minutes in any one hour where opacities up to 40% are allowed.
4. New fuel oil #4, with a sulphur content not exceeding 1.0% by weight, can be used. The term "new" oil means an oil that has been refined from crude oil and has not been used, and which may or may not contain additives. The firing of waste or recycled oil is disallowed. (BACT determination of August 9, 1988).
5. This boiler shall be tested for visible emissions at intervals of 12 months from October 25, 1988. A copy of the test data shall be submitted to this office and the Manatee County Public Health Unit within 45 days of such testing (Subsection 17-2.700(7), F.A.C.). Compliance with Specific Condition No. 4 shall be demonstrated by a certificate of fuel analysis from a fuel oil vendor of the fuel oil used during the compliance test and shall be submitted in conjunction with the test results.
6. Compliance with the emission limitation of Specific Condition No. 3 shall be determined using DER Method No. 9 contained in Section 17-2.700, F.A.C., and be a minimum of 60 minutes.
7. The Manatee County Public Health Unit shall be notified in writing 15 days prior to compliance testing.
8. Compliance testing of this boiler shall be accomplished during a period when it is cycling up to a normal high firing rate, or it is continuously operated at a high firing rate. The permittee shall submit a statement of the operating mode as a part of the compliance test. Failure to submit an operation mode statement or operating at conditions which do not reflect the normal operating conditions may invalidate the data (Section 403.161(1)(c) Florida Statutes).

PERMITTEE:
Royster Phosphates, Inc.

PERMIT NO: AO41-156789
PROJECT: Auxiliary Boiler

9. No objectionable odors will be allowed, as per Subsection 17-2.600(1)(a)2, F.A.C.

10. Submit to the Department, each calendar year, on or before March 1, an emission report for the preceding calendar year containing the following information as per Section 17-4.140, 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.

A copy of this report shall also be submitted to the Manatee County Public Health Unit.

11. Three applications to renew this operating permit shall be submitted to the Department and one copy to the Manatee County Public Health Unit sixty (60) days prior to the expiration date of this permit. (Subsection 17-4.090).

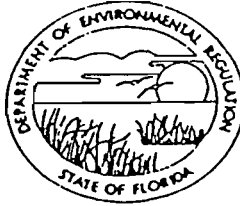
Issued this 24 day of Jan.
1987.

STATE OF FLORIDA DEPARTMENT OF
ENVIRONMENTAL REGULATION


Richard D. Garrity, Ph.D.
Deputy Assistant Secretary

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

Cert Mail
P 168 562 811
2/21/90
SOUTHWEST DISTRICT
4520 OAK FAIR BLVD.
TAMPA, FLORIDA 33610-7347
813-623-5561
Suncom-552-7612



BOB MARTINEZ
GOVERNOR
DALE TWACHTMANN
SECRETARY
DR. RICHARD D. GARRITY
DISTRICT MANAGER

ANNUAL OPERATION REPORT FORM FOR AIR EMISSIONS SOURCES

For each permitted emission point, please submit a separate report for calendar year 1989 prior to March 1st of the following year.

I GENERAL INFORMATION

- Source Name: Royster Phosphates, Inc.
- Permit Number: A041-156789
- Source Address: P.O. Box 1329 Palmetto, FL. 34220
- Description of Source: Auxiliary Boiler

II ACTUAL OPERATING HOURS: 367 hrs/yr days/wk wks/yr

III RAW MATERIAL INPUT PROCESS WEIGHT: (List separately all materials put into process and specify applicable units if other than tons/yr)

Raw Material	Input Process Weight	
No. 4 Fuel Oil	110,000 Gal.	406.7 tons/yr
_____	_____	tons/yr
_____	_____	tons/yr
_____	_____	tons/yr
_____	_____	tons/yr

IV PRODUCT OUTPUT (Specify applicable units)

Steam

V TOTAL FUEL USAGE including standby fuels. If fuel is oil, specify type and sulfur content (e.g., No. 6 oil with 1% S).

_____ 10⁶ cubic feet Natural Gas _____ 10³ Kerosene
110 10³ gallons # 4 Oil, .54 %S _____ tons Coal
_____ 10³ gallons Propane _____ tons Carbonaceous
_____ 10⁶ Black Liquor Solids _____ tons Refuse

Other (Specify type and units) _____

VI EMISSION RATE(S) (tons/yr)

_____ Particulates 4.39 Sulfur Dioxide _____ Total Reduced Sulfur
_____ Nitrogen Oxide _____ Carbon Monoxide _____ Fluoride
_____ Hydrocarbon Other (Specify type and units) _____

VII METHOD OF CALCULATING EMISSION RATES (e.g., use of fuel and materials balance, emission factors drawn from AP 42, etc.)

VE conducted September 1989

Estimated Maximum (110,000 gal) (7.387 #/gal)(.54% S) (64 WS02) x (tons)
32 WS 2000 #
4.39 tons/yr

VIII CERTIFICATION:

I hereby certify that the information given in this report is correct to the best of my knowledge.



SIGNATURE OF OWNER OR AUTHORIZED REPRESENTATIVE

F. Ivan Nance Environmental/Technical Mgr
TYPED NAME AND TITLE

2/21/90

DATE



Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

DER Form #	_____
Form Title	_____
Effective Date	_____
DER Application No.	_____

Printed in the DER.

ANNUAL OPERATION REPORT FORM FOR AIR EMISSIONS SOURCES

For each permitted emission point, please submit a separate report for calendar year 1990 prior to March 1st of the following year.

I GENERAL INFORMATION

- Source Name: ROYSTER PHOSPHATES, INC.
- Permit Number: A041-156789
- Source Address: 13300 U S Highway 41 N
Palmetto, Fl 34221
- Description of Source: Auxiliary Boiler

II ACTUAL OPERATING HOURS: 875 hrs/^{yr}day days/wk wks/yr

III RAW MATERIAL INPUT PROCESS WEIGHT: (List separately all materials put into process and specify applicable units if other than tons/yr)

Raw Material	Input Process Weight	
<u>No. 4 Fuel Oil</u>	<u>923</u>	<u>tons/yr</u>
_____	_____	tons/yr
_____	_____	tons/yr
_____	_____	tons/yr
_____	_____	tons/yr

IV PRODUCT OUTPUT (Specify applicable units)

Steam

TOTAL FUEL USAGE including standby fuels. If fuel is oil, specify type and sulfur content (e.g., No. 6 oil with 1% S).

_____ 10⁶ cubic feet Natural Gas _____ 10³ Kerosene
250 10³ gallons #4 Oil, 0.58 %S _____ tons Coal
_____ 10³ gallons Propane _____ tons Carbonaceous
_____ 10⁶ Black Liquor Solids _____ tons Refuse
Other (Specify type and units) _____

EMISSION RATE(S) (tons/yr)

_____ Particulates 10.7 Sulfur Dioxide _____ Total Reduced Sulfur
_____ Nitrogen Oxide _____ Carbon Monoxide _____ Fluoride
_____ Hydrocarbon Other (Specify type and units) _____

METHOD OF CALCULATING EMISSION RATES (e.g., use of fuel and materials balance, emission factors drawn from AP 42, etc.)

VE conducted September 1990

Estimated Maximum (250,000 gal) (7.387 lb/gal) (.58 % S) ($\frac{64 \text{ W } \text{SO}_2}{32 \text{ WS}}$) ($\frac{\text{Tons}}{2000 \text{ lb}}$)
SO₂ = 10.7 $\frac{\text{Tons}}{\text{Yr.}}$

CERTIFICATION:

I hereby certify that the information given in this report is correct to the best of my knowledge.

SIGNATURE OF OWNER OR AUTHORIZED REPRESENTATIVE

TYPED NAME AND TITLE

DATE



Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

DER Form #	_____
Form Title	_____
Effective Date	_____
DER Application No.	_____

ANNUAL OPERATION REPORT FORM FOR AIR EMISSIONS SOURCES

For each permitted emission point, please submit a separate report for calendar year 1991 prior to March 1st of the following year.

GENERAL INFORMATION

- Source Name: Royster Phosphates, Inc.
- Permit Number: A041-156789
- Source Address: 13300 U S Hwy 41 N
Palmetto, FL 34221
- Description of Source: Auxiliary Boiler

II ACTUAL OPERATING HOURS: 1,154 hrs/^{yr}~~day~~ days/wk wks/yr

III RAW MATERIAL INPUT PROCESS WEIGHT: (List separately all materials put into process and specify applicable units if other than tons/yr)

Raw Material	Input Process Weight	
<u>No. 4 Fuel Oil</u>	<u>1,100</u>	<u>tons/yr</u>
_____	_____	tons/yr
_____	_____	tons/yr
_____	_____	tons/yr
_____	_____	tons/yr

PRODUCT OUTPUT (Specify applicable units)

Steam

TOTAL FUEL USAGE including standby fuels. If fuel is oil, specify type and sulfur content (e.g., No. 6 oil with 1% S).

_____ 10⁶ cubic feet Natural Gas _____ 10³ Kerosene
300 10³ gallons No 4 Oil, 0.9 %S _____ tons Coal
_____ 10³ gallons Propane _____ tons Carbonaceous
_____ 10⁶ Black Liquor Solids _____ tons Refuse

Other (Specify type and units) _____

EMISSION RATE(S) (tons/yr)

_____ Particulates 19.9 Sulfur Dioxide _____ Total Reduced Sulfur
_____ Nitrogen Oxide _____ Carbon Monoxide _____ Fluoride
_____ Hydrocarbon Other (Specify type and units) _____

METHOD OF CALCULATING EMISSION RATES (e.g., use of fuel and materials balance, emission factors drawn from AP 42, etc.)

Visible Emission conducted September 1991

Estimate SO2 maximum (300,000 gal)(7.387 lb/gal)(0.9%S) $\frac{(64W \text{ SO}_2)(\text{Tons})}{32 \text{ WS } 2000 \text{ lb}} = 19.2 \frac{\text{tons}}{\text{Year}}$

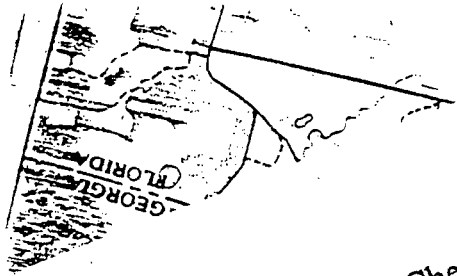
CERTIFICATION:

I hereby certify that the information given in this report is correct to the best of my knowledge.

D. D. Harris
SIGNATURE OF OWNER OR
AUTHORIZED REPRESENTATIVE

Daniel D. Harris/Plant Manager
TYPED NAME AND TITLE

1/13/92
DATE



Check Sheet

Piney Point Phosphates

Company Name:
Permit Number:
PSD Number:
Permit Engineer:

AC 410-2320916
PSMFL-205

Cross References:

-
-
-

Application:

- Initial Application
- Incompleteness Letters
- Responses
- Waiver of Department Action
- Department Response
- Other

Intent:

- Intent to Issue
- Notice of Intent to Issue
- Technical Evaluation
- BACT or LAER Determination
- Unsigned Permit

Correspondence with:

- EPA
- Park Services
- Other
- Proof of Publication
- Petitions - (Related to extensions, hearings, etc.)
- Waiver of Department Action
- Other

Final

Determination:

- Final Determination
- Signed Permit
- BACT or LAER Determination
- Other

Post Permit Correspondence:

- Extensions/Amendments/Modifications
- Other

Is your RETURN ADDRESS completed on the reverse side?

SENDER:

- Complete items 1 and/or 2 for additional services.
- Complete items 3, and 4a & b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):

1. Addressee's Address
2. Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:

Mr. Ivan Nance
 13300 US Hwy 41 N
 Palmetto, FL 34221-8662

5. Signature (Addressee)

6. Signature (Agent)

4a. Article Number
 P230523751

4b. Service Type

Registered Insured

Certified COD

Express Mail Return Receipt for Merchandise

7. Date of Delivery
 4/28/93

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: 1992-323-402

DOMESTIC RETURN RECEIPT

P 230 523 751



Receipt for Certified Mail

No Insurance Coverage Provided
 Do not use for International Mail
 (See Reverse)

Sent to	
I. Nance	
Street and No. 13300 US Hwy 41 N	
P.O., State and ZIP Code Palmetto, FL 34221-8662	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	

PS Form 3800, June 1991

Is your RETURN ADDRESS completed on the reverse side?

SENDER:

- Complete items 1 and/or 2 for additional services.
- Complete items 3, and 4a & b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):

- 1. Addressee's Address
- 2. Restricted Delivery

Consult postmaster for fee.

<p>3. Article Addressed to:</p> <p>Mr. Ivan Nance Environmental Manager Piney Point Phosphate, Inc. 13300 US Highway 41 North Palmetto, FL 34221-8662</p>	<p>4a. Article Number P 230 524 404</p> <p>4b. Service Type <input type="checkbox"/> Registered <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD <input type="checkbox"/> Express Mail <input type="checkbox"/> Return Receipt for Merchandise</p> <p>7. Date of Delivery <i>9/7/93</i></p>
<p>5. Signature (Addressee) <i>Ivan Nance</i></p>	<p>8. Addressee's Address (Only if requested and fee is paid)</p>
<p>6. Signature (Agent) <i>Dianne Bidwell</i></p>	

Thank you for using Return Receipt Service.

P 230 524 404



Receipt for Certified Mail

No Insurance Coverage Provided
 Do not use for International Mail
 (See Reverse)

Sent to Mr. Ivan Nance	
Street and No 13300 US Highway 41 North	
P.O., State and ZIP Code Palmetto, FL 34221-8662	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date <i>Mailed:</i>	

PS Form 3800, June 1991

PS Form 3800, JUNE 1991

P 872 562 510

Receipt for Certified Mail
 No Insurance Coverage Provided
 Do not use for International Mail
 (See Reverse)

Sent to	Mr. Ivan Nance
Street and No.	13300 US Highway 41 North
P.O. State and Zip Code	Palmetto, Florida 34221-8662
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	Mailed: 12/16/93 AC 41-232096

is your RETURN ADDRESS completed on the reverse side?

SENDER:

- Complete items 1 and/or 2 for additional services.
- Complete items 3, and 4a & b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):

- Addressee's Address
- Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:
 Mr. Ivan Nance
 Piney Point Phosphate, Inc.
 13300 US Highway 41 North
 Palmetto, Florida 34221-8662

4a. Article Number
 P 872 562 510

4b. Service Type

<input type="checkbox"/> Registered	<input type="checkbox"/> Insured
<input checked="" type="checkbox"/> Certified	<input type="checkbox"/> COD
<input type="checkbox"/> Express Mail	<input type="checkbox"/> Return Receipt for Merchandise

7. Date of Delivery
 12/20/93

5. Signature (Addressee)

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

6. Signature (Agent)


Thank you for using Return Receipt Service.

Is your RETURN ADDRESS completed on the reverse side?

SENDER:

- Complete items 1 and/or 2 for additional services.
- Complete items 3, and 4a & b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

RECEIVED

JUL 01 1994

Bureau of

I also wish to receive the following services (for an extra fee):

- 1. Addressee's Address
- 2. Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to: **Air Regulation**
 Mr. Ivan Nance
 Piney Point Phosphates, Inc.
 13300 US Highway 41 North
 Palmetto, Florida 34221-3662

4a. Article Number
 P 872 562 717

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

7. Date of Delivery
 6/22/94

5. Signature (Addressee)

6. Signature (Agent)

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

PS Form 3811, December 1991 *U.S.GPO: 1992-323-402

DOMESTIC RETURN RECEIPT

Thank you for using Return Receipt Service.

P 872 562 717



Receipt for Certified Mail

No Insurance Coverage Provided
 Do not use for International Mail
 (See Reverse)

PS Form 3800, JUNE 1991

Sent to Mr. Ivan Nance	
Street and No. 13300 US Highway 41 North	
P.O., State and ZIP Code Palmetto, Florida 34221-86	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date Mailed: 6/20/94 AC 41-232096	



Bradenton Herald

102 MANATEE AVE. WEST, P.O. BOX 921
BRADENTON, FLORIDA 34206
TELEPHONE (813) 748-0411

Bradenton Herald
Published Daily
Bradenton, Manatee, Florida

**STATE OF FLORIDA
COUNTY OF MANATEE:**

Before the undersigned authority personally appeared Jill Rockefeller, who on oath says that she is Legal Advertising Representative of the Bradenton Herald, a daily newspaper published at Bradenton in Manatee County, Florida; that the attached copy of the advertisement, being a Legal Advertisement in the matter of

Notice of Intent to Issue Permit

_____ in the _____ Court,
was published in said newspaper in the issues of

6/24/94

Affiant further says that the said publication is a newspaper published at Bradenton, in said Manatee County, Florida, and that the said newspaper has heretofore been continuously published in said Manatee County, Florida, each day and has been entered as second-class mail matter at the post office in Bradenton, in said Manatee County, Florida, for a period of 1 year next preceding the first publication of the attached copy of advertisement; and affiant further says that she has neither paid nor promised any person, firm or corporation any discount, rebate, commission or refund for the purpose of securing this advertisement for publication in the said newspaper.

Jill Rockefeller
(Signature of Affiant)

Sworn to and subscribed before me this

27 day of June, 1994

Donna Marie Saalfeld
SEAL & Notary Public

RECEIVED

JUL 18 1994

Bureau of
Air Regulation

**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 construction permit (AC 41-232096 to Piney Point Phosphates, Inc., 13300 US Highway 41 North, Palmetto, Florida 34221-8662 to increase the operating hours of a proposed 190 MMBtu/hr process steam boiler from 876 hours to 8780 hours per year. A determination of the Best Available Control Technology (BACT) was required for nitrogen oxides (NOx), particulate matter (PM) and sulfur dioxide (SO2). The PSD increment for nitrogen dioxide consumed by this facility and other sources in the Class II area is 3.02 ug/m3, annual average or 12 percent of the available increment of 25.0 ug/m3. The nitrogen oxide emissions from this project will have no significant impact in the Class I Chas-sahowitzka Wilderness Area. The Department is issuing this intent to issue for the reasons stated in the Technical Evaluation and Preliminary Determination.

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, within 14 days of publication of this notice. Petition 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 warrant 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.

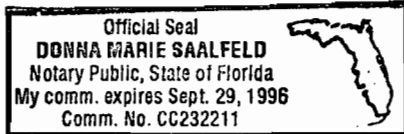
If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this Notice. Persons whose substantial interests will be affected by any decision of the Department with regard 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 publication of this notice 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.

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:
Department of Environmental Protection
Bureau of Air Regulation
111 S. Magnolia Drive, Suite 4
Tallahassee, FL 32301
Department of Environmental Protection
Southwest District
3804 Coconut Palm Drive
Tampa, FL 33619-8218

Manatee County Air Quality Division
202 6th Avenue East
Bradenton, FL 34208

Any person may send written comments on the proposed action to Mr. Preston Lewis at the Department of Environmental Protection, 2600 Blair Stone Road, Tallahassee, Florida, 32399-2400. All comments received within 30 days of the publication of this notice will be considered in the Department's final determination.

Further, a public hearing can be requested by any person(s). Such requests must be submitted within 30 days of this notice.
6/24/94



Personally Known _____ or Produced Identification _____
Type of Identification Produced _____

Is your RETURN ADDRESS completed on the reverse side?

SENDER:

- Complete items 1 and/or 2 for additional services.
- Complete items 3, and 4a & b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):

- 1. Addressee's Address
- 2. Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:

Mr. Ivan Nance
Piney Point PHosphates, Inc.
13300 U.S. Highway 41 North
Palmetto, FL 34221-8662

4a. Article Number
P 751 859 983

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

7. Date of Delivery
9/28/94

5. Signature (Addressee)

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

6. Signature (Agent)

PS Form 3811, December 1991 ☆U.S. GPO: 1992-323-402

DOMESTIC RETURN RECEIPT

Thank you for using Return Receipt Service.

Z 751 859 983



Receipt for Certified Mail

No Insurance Coverage Provided
Do not use for International Mail
(See Reverse)

Sent to Mr. Ivan Nance, Piney Point	
Street and No. Phosphates 13300 U.S. Highway 41 North	
P.O., State and ZIP Code Palmetto, FL 34221-8662	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date Mailed: 9-23-94 Permit: AC 41-232096 PSD-FL-205	

PS Form 3800, March 1993

Is your RETURN ADDRESS completed on the reverse side?

SENDER:

- Complete items 1 and/or 2 for additional services.
- Complete items 3, and 4a & b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):

1. Addressee's Address
2. Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:
Ivan Nance
Corp. Encl. Mgr.
Piney Point Phosphates
13308 U.S. Hwy 41 N
Palmetto, FL 34221

4a. Article Number
2 311 902 935

4b. Service Type

Registered Insured

Certified COD

Express Mail Return Receipt for Merchandise

7. Date of Delivery
4-18-95

5. Signature (Addressee)

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

6. Signature (Agent)
Elijah Johnson Jr.

PS

IN RECEIPT

Thank you for using Return Receipt Service.

Z 311 902 935



Receipt for Certified Mail

No Insurance Coverage Provided
 Do not use for International Mail
 (See Reverse)

PS Form 3800, March 1993

Sent to	<i>Ivan Nance</i>	
Street and No.	<i>Piney Point Phos</i>	
P.O. Box, State and Zip Code	<i>Palmetto, FL</i>	
Postage	\$	
Certified Fee		
Special Delivery Fee		
Restricted Delivery Fee		
Return Receipt Showing to Whom & Date Delivered		
Return Receipt Showing to Whom, Date, and Addressee's Address		
TOTAL Postage & Fees	\$	
Postmark or Date	<i>4-12-95</i>	
<i>AC 41-232096</i>		
<i>PSD-FI-205(A)</i>		

Is your RETURN ADDRESS completed on the reverse side?

SENDER:

- Complete items 1 and/or 2 for additional services.
- Complete items 3, and 4a & b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):

- Addressee's Address
- Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:
*Ivan Dance, ETM
 Piney Point Phosphates
 13300 US Hwy 41 N.
 Palmetto, FL 34221*

4a. Article Number
Z 127 632 516.

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

7. Date of Delivery
9/14/95

5. Signature (Addressee)
[Signature]

6. Signature (Agent)
[Signature]

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**

Z 127 632 516



Receipt for Certified Mail

No Insurance Coverage Provided
 Do not use for International Mail
 (See Reverse)

Sent to <i>Ivan Dance</i>	
Street and No. <i>Piney Point</i>	
City, State, and ZIP Code <i>Palmetto, FL</i>	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date 9-12-95 <i>AC41-173305 9-12-95</i> <i>PSD-FL-144</i>	

PS Form 3800, March 1993

Is your RETURN ADDRESS completed on the reverse side?

SENDER:

- Complete items 1 and/or 2 for additional services.
- Complete items 3, and 4a & b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):

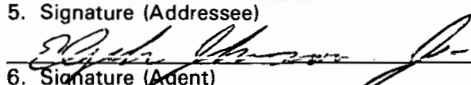
- 1. Addressee's Address
 - 2. Restricted Delivery
- Consult postmaster for fee.

3. Article Addressed to:
 Ivan Nance, CEM
 Piney Point Phos. Inc
 13300 US Hwy 41 North
 Palmetto, FL 34221

4a. Article Number
 Z 127 633 209

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

7. Date of Delivery
 5-20-96

5. Signature (Addressee)


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

6. Signature (Agent)
 Elijah Johnson Jr.

Thank you for using Return Receipt Service.

Z 127 633 209



Receipt for Certified Mail

No Insurance Coverage Provided
 Do not use for International Mail
 (See Reverse)

Sent to Ivan Nance	
Street and No. Piney Point Phos.	
City, State and ZIP Code Palmetto, FL	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	5-15-96
PSD-FI-205A	

PS Form 3800, March 1993

Fold at line over top of envelope to

Is your RETURN ADDRESS completed on the reverse side?

SENDER:

- Complete items 1 and/or 2 for additional services.
- Complete items 3, 4a, and 4b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):

- 1. Addressee's Address
- 2. Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:
 Mr. Ivan Nance, CEM
 Piney Point Phosphates
 13300 US Hwy 41 N.
 Palmetto, FL 34221

4a. Article Number

P 265 659 213

4b. Service Type

- Registered Certified
- Express Mail Insured
- Return Receipt for Merchandise COD

7. Date of Delivery

5-14-97

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

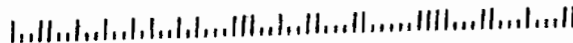
5. Received By: (Print Name)

[Signature]

6. Signature: (Addressee or Agent)

X

PS Form 3811



Thank you for using Return Receipt Service.

P 265 659 213

US Postal Service
Receipt for Certified Mail

No Insurance Coverage Provided.
Do not use for International Mail (See reverse)

Sent to	Ivan Nance
Street & Number	Piney Point
Post Office, State, & ZIP Code	Palmetto, FL
Postage	\$
Certified Fee	
Special Delivery Fee	
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	corrected 5-9-97 page

PS Form 3800, April 1995

Is your RETURN ADDRESS completed on the reverse side?

SENDER:

- Complete items 1 and/or 2 for additional services.
- Complete items 3, 4a, and 4b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):

1. Addressee's Address
2. Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:
*Ivan Nance, CEM
 Piney Point Phosphates
 13300 US Hwy 41 North
 Palmetto, FL 34221*

4a. Article Number
P 265 659 200

4b. Service Type

<input type="checkbox"/> Registered	<input type="checkbox"/> Certified
<input type="checkbox"/> Express Mail	<input type="checkbox"/> Insured
<input type="checkbox"/> Return Receipt for Merchandise	<input type="checkbox"/> COD

7. Date of Delivery

5. Received By: (Print Name)

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

6. Signature: (Addressee or Agent)
X [Signature]

Thank you for using Return Receipt Service.

P 265 659 200

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

Sent to <i>Ivan Nance</i>	
Street & Number <i>Piney Point Phos.</i>	
Post Office, State, & ZIP Code <i>Palmetto, FL</i>	
Postage	\$
Certified Fee	
Special Delivery Fee	
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 <i>4-30-97</i>	
<i>AC41-232096</i>	
<i>PSD-FL-205A</i>	

PS Form 3800, April 1995

PINEY POINT PHOSPHATES, INC.

General Disbursements
13300 U.S. Hwy. 41 N.
Palmetto, FL 34221-8662

9-5-97 \$50.00 FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

REMITTANCE ADVICE

DETACH BEFORE DEPOSITING

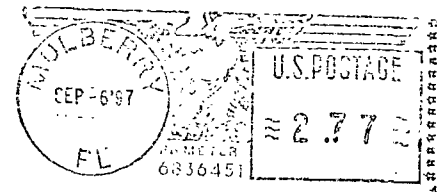
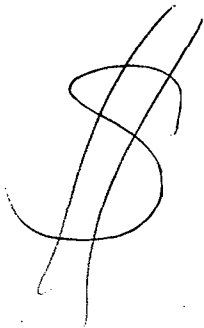
Fold at line over top of envelope to
the right of the return address

CERTIFIED

MULBEE

Z 313 136 301

MAIL



State of Florida
Department of Environmental Protection
Division of Air Resources Management
2600 Blair Stone Road
Tallahassee, FL 32399-2400

32399-2400



Is your RETURN ADDRESS completed on the reverse side?

SENDER: ■ Complete items 1 and/or 2 for additional services. ■ Complete items 3, 4a, and 4b. ■ Print your name and address on the reverse of this form so that we can return this card to you. ■ Attach this form to the front of the mailpiece, or on the back if space does not permit. ■ Write "Return Receipt Requested" on the mailpiece below the article number. ■ The Return Receipt will show to whom the article was delivered and the date delivered.		I also wish to receive the following services (for an extra fee): 1. <input type="checkbox"/> Addressee's Address 2. <input type="checkbox"/> Restricted Delivery Consult postmaster for fee.
3. Article Addressed to: Mr. Ivan Nance, CEM Piney Point Phosphates 13300 US Hwy 41 N. Palmetto, FL 34221	4a. Article Number P 265 659 461	
5. Received By: (Print Name)		4b. Service Type <input type="checkbox"/> Registered <input checked="" type="checkbox"/> Certified <input type="checkbox"/> Express Mail <input type="checkbox"/> Insured <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> COD
6. Signature: (Addressee or Agent) X <i>Susan Speck</i>		7. Date of Delivery 9/25/97
8. Addressee's Address (Only if requested and fee is paid)		8. Addressee's Address (Only if requested and fee is paid)

Thank you for using Return Receipt Service.

PS Form 3811, December 1994 Domestic Return Receipt

P 265 659 461

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

Sent to	<i>Ivan Nance</i>
Street & Number	<i>Piney Point Phos.</i>
Post Office, State, & ZIP Code	<i>Palmetto, FL</i>
Postage	\$
Certified Fee	
Special Delivery Fee	
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	<i>9-23-97</i>
<i>0810002-002 AC</i>	

PS Form 3800, April 1995

Fold at line over top of envelope to

Is your RETURN ADDRESS completed on the reverse side?

SENDER:

- Complete items 1 and/or 2 for additional services.
- Complete items 3, 4a, and 4b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):

1. Addressee's Address
2. Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:
 Mr. Juan Tance, CEM
 Piney Point Phosphates
 13300 US Hwy North
 Palmetto, FL 34221

4a. Article Number
 P 265 659 417

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

7. Date of Delivery
 9/10/98

5. Received By: (Print Name)

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

6. Signature? (Addressee or Agent)
 X Susan Tack

Thank you for using Return Receipt Service.

PS Form 3811, December 1994

102595-97-B-0179

Domestic Return Receipt

P 265 659 417

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

Sent to	Juan Tance
Street & Number	Piney Point
Post Office, State, & ZIP Code	Palmetto FL
Postage	\$
Certified Fee	
Special Delivery Fee	
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	9-10-98

PS Form 3800 April 1995

AC41-232096

Is your RETURN ADDRESS completed on the reverse side?

SENDER:

- Complete items 1 and/or 2 for additional services.
- Complete items 3, 4a, and 4b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):

- 1. Addressee's Address
- 2. Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:
 Mr. Ivan Dance, CEM
 Piney Point Phosphates
 13300 US Hwy North
 Palmetto, FL
 34221

4a. Article Number
 P 265 659 415

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

7. Date of Delivery
 9/10/98

5. Received By: (Print Name)

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

6. Signature: (Addressee or Agent)
 X Susan Iffek

PS Form 3811, December 1994

102595-97-B-0179

Domestic Return Receipt

Thank you for using Return Receipt Service.

P 265 659 415

US Postal Service

Receipt for Certified Mail

No Insurance Coverage Provided.

Do not use for International Mail (See reverse)

Sent to		Ivan Dance	
Street & Number		Piney Point	
Post Office, State, & ZIP Code		Palmetto, FL	
Postage		\$	
Certified Fee			
Special Delivery Fee			
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			9-10-98

PS Form 3800, April 1995