

P 702 177 477

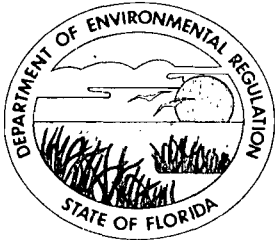
RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED
NOT FOR INTERNATIONAL MAIL

(See Reverse)

Sent to Mr. John G. Cladakis, Consoli-	
Street and No. P.O. Box 908	dated Minera.
P.O., State and ZIP Code Palmetto, FL 34220	
Postage	S
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt showing to whom and Date Delivered	
Return Receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	S
Postmark or Date Mailed: 8-12-88 Permit: AC 41-148295	

PS Form 3800, June 1985



Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION
NOTICE OF PERMIT

Mr. John G. Cladakis
Senior Vice President/Operations Mgr.
Consolidated Minerals, Inc.
P. O. Box 908
Palmetto, Florida 34220

August 11, 1988

Enclosed is permit No. AC 41-148295 to install a replacement boiler at your facility located in Manatee County, Florida. This permit is issued pursuant to Section 403, Florida Statutes.

Any Party to this 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 permit is filed with the Clerk of the Department.

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION

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

Copy furnished to:

W. Thomas, SW District
R. Mayko, CMI
D. Haley, Haley and Assoc.

CERTIFICATE OF SERVICE

The undersigned duly designated deputy clerk hereby certifies that this NOTICE OF PERMIT and all copies were mailed before the close of business on August 12, 1988

FILING AND ACKNOWLEDGEMENT
FILED, on this date, pursuant to
§120.52(9), Florida Statutes, with
the designated Department Clerk,
receipt of which is hereby
acknowledged.

Matthew J. Wise August 12, 1988
Clerk Date

Final Determination

Consolidated Minerals, Inc.
Palmetto, Manatee County, Florida

Installation of Replacement Boiler
State Permit No. AC 41-148295

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

August 9, 1988

Final Determination

The Bureau of Air Quality Management completed its review of the applicant's proposed project on May 16, 1988. Public notice of the Department's Intent to Issue a permit for the proposed construction was published in the Bradenton Herald on June 22, 1988. Copies of the Technical Evaluation and Preliminary Determination were available for public inspection at the Department's offices in Tampa and Tallahassee.

Comments were submitted by the DER Southwest District Office and the applicant on June 24, 1988. The comments and responses are below:

District Comment No. 1: The permit should state the make and the model number of the new boiler.

Response: This information is not required on the application form (DER Form 17-1.202(1)) and therefore is not required for issuing the construction permit. Model numbers are required on the application form only for control devices and incinerators as indicated in Sections III and IV of the application.

District Comment No. 2: The permit should state that the 20% opacity limit is set pursuant to a BACT determination.

Response: FAC Rule 17-2.600(6)(a) limits visible emissions from boilers to 20% opacity. Therefore, the opacity limit is not set pursuant to a BACT determination.

District Comment No. 3: The permit should state that the boiler "shall not exceed a maximum heat input of 96.2 MMBtu/hr."

Response: The phrases "shall be allowed to operate at" shall be changed to "shall not exceed."

District Comment No. 4: The permit should state that the compliance test shall be conducted within 30 days after the boiler is placed in operation and the test report submitted within 45 days of testing. The certification of completion requirement (Rule 17-4.220) should be restated in the permit.

Response: The suggested change was made. The rules set no specific time for completion of the compliance test and submission of results following startup. In response to the second point, requirements for certification of completion are stated in Rule 17-4.220 and need not be restated in the permit.

District Comment No. 5: The permit should require the permittee to notify the DER district office and the Manatee County Public Health Unit (MCPHU) 5 days prior to startup.

Response: The suggested change was made.

District Comment No. 6: The permit should require the permittee to submit an application for an operating permit to the district office and the MCPHU 60 days prior to the expiration date of the construction permit.

Response: The suggested change was made.

District Comment No. 7: The permit should state that the 1.0% sulfur limitation is pursuant to a BACT determination of a certain date.

Response: A reference to the BACT determination was made.

District Comment No. 8: The permit expiration date should be extended to December 31, 1988.

Response: The expiration date has been extended.

District Comment No. 9: The MCPHU should be notified instead of the Department for the 15 day prior notification of compliance testing.

Response: This change has been made.

District Comment No. 10: A copy of the evaluation and proposal should have been sent to the MCPHU.

Response: A copy of the final permit shall be sent to the MCPHU.

Applicant's Comment: The fuel designated in the proposed permit should be changed to No. 4 fuel oil.

Response: This change has been included.

Conclusion: The permit should be issued as modified above.



Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary

PERMITTEE:
Consolidated Minerals, Inc.
P. O. Box 908
Palmetto, Florida 34220

Permit Number: AC 41-148295
Expiration Date: December 31, 1988
County: Manatee
Latitude/Longitude: 27° 37' 58"N
82° 32' 08"W
Project: Replacement Boiler

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code (FAC) Rules 17-2 and 17-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the Department and made a part hereof and specifically described as follows:

For the installation of a replacement boiler to generate auxiliary steam. This project will be located at the CMI facility in Palmetto, Manatee County, Florida. The UTM coordinates of this site are Zone 17, 348.5 km E and 3057.3 km N.

Construction shall be in accordance with the attached permit application, plans, documents, and drawings except as noted in the General and Specific Conditions of this permit.

Attachments:

1. Application to Construct Air Pollution Sources, DER Form 17-1.202(1) received April 18, 1988.
2. DER District Office letter dated June 24, 1988.
3. CMI letter dated June 21, 1988.

PERMITTEE:
Consolidated Minerals, Inc.

Permit Number: AC 41-148295
Expiration Date: December 31, 1988

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth herein are "Permit Conditions" and as such are binding upon the permittee and enforceable pursuant to the authority of Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is hereby placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of the "Permit Conditions" by the permittee, its agents, employees, servants or representatives.

2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.

3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Nor does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit does not constitute a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.

4. This permit conveys no title to land or water, does not constitute state recognition or acknowledgement of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the state. Only the Trustees of the Internal Improvement Trust Fund may express state opinion as to title.

5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, plant or aquatic life or property and penalties therefore caused by the construction or operation of this permitted source, nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.

PERMITTEE:
Consolidated Minerals, Inc.

Permit Number: AC 41-148295
Expiration Date: December 31, 1988

GENERAL CONDITIONS:

6. The permittee shall at all times properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.

7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law, access to the premises, at reasonable times, where the permitted activity is located or conducted for the purpose of:

- a. Having access to and copying any records that must be kept under the conditions of the permit;
- b. Inspecting the facility, equipment, practices, or operations regulated or required under this permit; and
- c. Sampling or monitoring any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately notify and provide the Department with the following information:

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

PERMITTEE:
Consolidated Minerals, Inc.

Permit Number: AC 41-148295
Expiration Date: December 31, 1988

GENERAL CONDITIONS:

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source, which are submitted to the Department, may be used by the Department as evidence in any enforcement case arising under the Florida Statutes or Department rules, except where such use is proscribed by Sections 403.73 and 403.111, Florida Statutes.

10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.

11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 17-4.12 and 17-30.30, as applicable. The permittee shall be liable for any noncompliance of the permitted activity until the transfer is approved by the Department.

12. This permit is required to be kept at the work site of the permitted activity during the entire period of construction or operation.

13. This permit also constitutes:

- (x) Determination of Best Available Control Technology (BACT)
- () Determination of Prevention of Significant Deterioration (PSD)
- () Compliance with New Source Performance Standards

14. The permittee shall comply with the following monitoring and record keeping requirements:

- a. Upon request, the permittee shall furnish all records and plans required under Department rules. The retention period for all records will be extended automatically, unless otherwise stipulated by the Department, during the course of any unresolved enforcement action.

PERMITTEE:
Consolidated Minerals, Inc.

Permit Number: AC 41-148295
Expiration Date: December 31, 1988

GENERAL CONDITIONS:

- b. The permittee shall retain at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation), copies of all reports required by this permit, and records of all data used to complete the application for this permit. The time period of retention shall be at least three years from the date of the sample, measurement, report or application unless otherwise specified by Department rule.
- c. Records of monitoring information shall include:
- the date, exact place, and time of sampling or measurements;
 - the person responsible for performing the sampling or measurements;
 - the date(s) analyses were performed;
 - the person responsible for performing the analyses;
 - the analytical techniques or methods used; and
 - the results of such analyses.

15. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be submitted or corrected promptly.

SPECIFIC CONDITIONS:

1. The construction and operation of this source shall be in accordance with the capacities and specifications stated in the application.
2. Visible emissions shall not be greater than 20% opacity and compliance shall be demonstrated at 90-100% of permitted capacity using DER Method 9 in accordance with FAC Rule 17-2.700.

PERMITTEE:
Consolidated Minerals, Inc.

Permit Number: AC 41-148295
Expiration Date: December 31, 1988

SPECIFIC CONDITIONS:

3. The new auxiliary boiler shall not exceed a maximum of 96.2 MMBtu/hr for up to 876 hours per year on No. 4 or lighter fuel oil.

4. The sulfur content of the fuel oil shall not exceed 1.0 percent by weight as outlined in the BACT determination. The sulfur analysis of the oil used shall be recorded for each day of operation and these records shall be kept for a minimum of two years for regulatory agency inspection. The appropriate ASTM method shall be used to determine the fuel oil sulfur content.


5. The compliance test shall be conducted within 30 days after operation begins and the results reported to the Department and the Manatee County Public Health Unit (MCPHU) before this construction permit expires. The MCPHU shall be notified at least 15 days in advance of the test and the Department and MCPHU notified at least 5 days prior to the boiler being placed in operation.

6. The existing No. 2 auxiliary boiler will permanently cease operation prior to issuance of an operating permit for the new boiler.

7. An application for a permit to operate this equipment shall be submitted to the Department's Southwest District office and the MCPHU at least 60 days prior to the expiration date of this permit or within 45 days of testing, whichever occurs first.

Issued this 9 day of August,
1988.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION


Dale Twachtmann, Secretary

Best Available Control Technology (BACT) Determination
Consolidated Minerals, Inc.
Manatee County

The applicant plans to install a replacement auxiliary steam boiler at their facility in Palmetto, Florida. The boiler will fire only No. 4 or lighter fuel oil for up to 876 hours per year.

This BACT determination is required for the source as set forth in the Florida Administrative Code Rule 17-2.600(6) - Emission Limiting and Performance Standards.

BACT Determination Requested by the Applicant:

The applicant requested that No. 4 or lighter fuel oil with a maximum sulfur content of 1.0 percent be considered as best available control technology.

BACT Determination by DER:

Particulate and sulfur dioxide emissions from the boilers will be limited by use of No. 4 or lighter fuel oil having a sulfur content not to exceed 1.0 percent by weight.

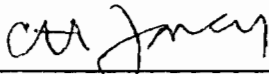
BACT Determination Rationale:

Sulfur in fuel is a primary air pollution concern. Most of the sulfur becomes SO₂ when the fuel is burned. Emissions from fuel burning are related to the sulfur content of the fuel. A limitation placed on fuel oil sulfur content is deemed as BACT for this application.

Details of the Analysis May be Obtained by Contacting:

Barry Andrews, P.E., BACT Coordinator
Department of Environmental Regulation
Bureau of Air Quality Management
2600 Blainstone Road
Tallahassee, Florida 32399-2400

Recommended by:




C. H. Fancy, P.E.
Deputy Bureau Chief, BAQM

August 8, 1988
Date

Consolidated Minerals, Inc.
Page Two

Approved by:



Dale Twachtmann, Secretary

August 9 1988

Date



State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

For Routing To Other Than The Addressee	
To: <u>Clair</u>	Location: _____
To: _____	Location: _____
To: _____	Location: _____
From: _____	Date: _____

Interoffice Memorandum


TO: Dale Twachtmann
FROM: Steve Smallwood
SUBJ: Approval of Construction Permit No. AC 41-148295
and BACT Determination, Consolidated Minerals, Inc.
DATE: August 9, 1988

Attached for your approval and signature is a permit and BACT determination prepared by Central Air Permitting for the above mentioned company to install a replacement boiler.

Comments were received during the public notice period.

Day 90, after which this permit will be issued by default, is August 11, 1988.

I recommend your approval and signature.

SS/ks 

attachments

OHE- Thank you. I have scribble up for signature in the interceded time. But please note the following.

- (1) In specific condition 1 I would prefer we specifically state the max capacity and operating time instead of referring to the application.
- (2) Condition #4 I would prefer saying as specified in the BACT determination
- (3) The BACT determination you sign should be seal by you.
- (4) We should avoid having Dale Approval block on a separate piece of paper (see BACT)


8-9-88

Check Sheet

Company Name: Royster Company
Permit Number: AC 41-148295
PSD Number: _____
Permit Engineer: _____

Application:

- Initial Application
- Incompleteness Letters
- Responses
- Waiver of Department Action
- Department Response
- Other

Cross References:

- Consolidated Minerals
- 4641-086160
-

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 *Transfer*

SENDER: Complete items 1 and 2 when additional services are desired, and complete items 3 and 4.
Put your address in the "RETURN TO" Space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.

1. Show to whom delivered, date, and addressee's address. 2. Restricted Delivery
↑(Extra charge)↑ ↑(Extra charge)↑

3. Article Addressed to: Mr. Gary L. Dahms Vice President & General Manager Post Office Box 1329 Palmetto, Florida 34220	4. Article Number P 274 007 444 Type of Service: <input type="checkbox"/> Registered <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD <input type="checkbox"/> Express Mail
Always obtain signature of addressee or agent and DATE DELIVERED.	
5. Signature - Addressee X <i>Dawn Owen</i> 6. Signature - Agent X 7. Date of Delivery	8. Addressee's Address (ONLY if requested and fee paid) <div style="text-align: center;">  </div>

PS Form 3811, Mar. 1987

* U.S.G.P.O. 1987-178-268

DOMESTIC RETURN RECEIPT

P 274 007 444

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED
NOT FOR INTERNATIONAL MAIL

(See Reverse)

* U.S.G.P.O. 1985-480-794

PS Form 3800, June 1985

Sent to	
Mr. Gary L. Dahms	
Street and No.	
P.O. Box 1329	
P.O., State and ZIP Code	
Palmetto, FL 34220	
Postage	S
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt showing to whom and Date Delivered	
Return Receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	S

Postmark or Date

Permit: AC 41-148295

Mailed: 8-30-88



Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary

August 26, 1988

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Gary L. Dahms, Vice President
and General Manager
Post Office Box 1329
Palmetto, Florida 34220

Dear Mr. Dahms:

The Department received your application for transfer of the construction permit referenced below. The request is acceptable and the following shall be changed:

Project: AC 41-148295


From: Consolidated Minerals, Inc.
To: Royster Phosphates, Inc.

Attachment to be Incorporated:

Application dated June 29, 1988, requesting a change in the name of the permittee.

This letter must be attached to your construction permit AC 41-148295 and shall become a part of that permit.

Sincerely,


Dale Twachtmann
Secretary

DT/ks

cc: W. Thomas, SW District
B. Galloway

BEST AVAILABLE COPY

PM
8-14-88
Palmetto, FL

Royster Phosphates, Inc.

P. O. Box 1329
Palmetto, Florida 34220

file copy

RECEIVED

AUG 22 1988

August 17, 1988

DER-BAQM

Mr. C. H. Fancy
Deputy Chief
Bureau of Air Quality Management
Florida Department of Environmental Regulation
2600 Blair Stone Rd.
Tallahassee, Fl 32399-2400

Re: Permit AC4-148295

Dear Mr. Fancy:

Please find attached a department form to transfer the above referenced permit. The original request was submitted to the Southwest District.

Should you require further information please contact our office.

Very truly yours,

ROYSTER PHOSPHATES, INC.


F. Ivan Nance
Environmental/Technical Manager

FIN/dam:

Attachment

cc: File

copied: John Reynolds
CHF/BT



STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

RECEIVED

AUG 22 1988

EXISTING OPERATING PERMIT A041-20100
APPLICATION FOR TRANSFER OF PERMIT
APPLICATION

Permit No. AC41-148295 Date Issued 24 JUNE 84 Date Expires 15 JUNE 87

DER-BAOM

NOTIFICATION OF SALE OR LEGAL TRANSFER

Source Name: AUXILIARY BOILER County: MANATEE
Source Location: U.S. HIGHWAY 41, PINEY POINT, MANATEE City: PALMETTO (N. W. WEST)
Permittee Name: CONSOLIDATED MINERALS, INC. Title: ENVIRONMENTAL CONSULTANT
Mailing Address: P.O. BOX 908 PALMETTO, FL. 33561

The undersigned hereby notifies the department of the sale or legal transfer of this pollution source. He further agrees to assign his rights as permittee to the applicant in the event the department agrees to the transfer of permit.

Sworn to and subscribed before me at Hillsborough - Florida County, 29th day of June 19 88
Betty Jo Mott Notary Public
Signature of Permittee: James V. Gallaway
Title: Environmental Consultant
Date: June 29, 1988

My Commission Expires: Notary Public, State of Florida at Large
My Commission Expires March 24, 1991

REQUEST FOR TRANSFER OF PERMIT

Source Name: AUXILIARY BOILER
Applicant Name: Gary L. Dahms Title: Vice Pres. & General Mgr.
Mailing Address: P. O. Box 1329
Palmetto, Florida 34220 Telephone: (813) 722-4555
area
Project Engineer: Name: Gary L. Dahms
Mailing Address: P. O. Box 1329
Palmetto, Florida 34220 Telephone: (813) 722-4555
area

The undersigned hereby notifies the department of his having acquired title to this pollution source. He further states that he has examined the application and documents submitted by the current permittee the basis on which Permit No. AC41-148295 was issued by the department, and states that they accurately and completely describe the permitted activity or project. He further states that he is familiar with the permit, agrees to comply with its terms and conditions, and agrees to assume the rights and liabilities contained therein. He also agrees to promptly notify the department of any future change in ownership of, or responsibility for, the permitted activity or project.

Sworn to and subscribed before me at Polk - Florida County, 29th day of June 19 88
Steven M. Budget Notary Public
Signature of Applicant: Gary L. Dahms
Title: Vice President and General Manager
Date: June 29, 1988

My Commission Expires: _____
*Attach letter of authorization if other than owner or corporate officer.



State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

For Routing To Other Than The Addressee	
To: _____	Location: _____
To: _____	Location: _____
To: _____	Location: _____
From: _____	Date: _____

Interoffice Memorandum

RECEIVED

AUG 25 1988

TO: Dale Twachtmann
FROM: Steve Smallwood *SS*
SUBJ: Change in Ownership of Permitted Facility
DATE: August 24, 1988

Office of the Secretary

Attached for your approval and signature is a letter changing the name of the permittee for construction permit No. AC 41-148295. The subject facility was sold by Consolidated Minerals to Royster Phosphates.

I recommend your approval and signature.

SS/JR/s

attachment

RECEIVED
AUG 26 1988
DER-BAQM

PM
8-14-88
Palmetto, FL

Royster Phosphates, Inc.

file copy

P. O. Box 1329
Palmetto, Florida 34220

RECEIVED

AUG 22 1988

August 17, 1988

DER-BAQM

Mr. C. H. Fancy
Deputy Chief
Bureau of Air Quality Management
Florida Department of Environmental Regulation
2600 Blair Stone Rd.
Tallahassee, Fl 32399-2400

Re: Permit AC4+148295

Dear Mr. Fancy:

Please find attached a department form to transfer the above referenced permit. The original request was submitted to the Southwest District.

Should you require further information please contact our office.

Very truly yours,

ROYSTER PHOSPHATES, INC.


F. Ivan Nance
Environmental/Technical Manager

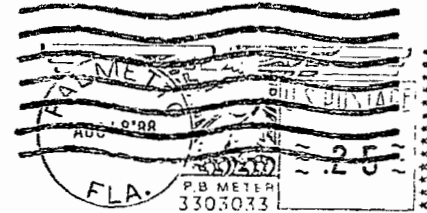
FIN/dam

Attachment

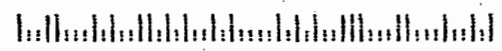
cc: File

copied: John Reynolds
CHF/BT

Mr. F. Ivan Nance, Environmental/Technical Manager
Royster Phosphates, Inc.
P. O. Box 1329
Palmetto, Fl. 34221



Mr. H. C. Fancy
Deputy Chief
Bureau of Air Quality Management
Florida Department of Environmental Regulation
2600 Blair Stone Rd.
Tallahassee, Fl 32399-2400



AC41-148295



STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

RECEIVED

AUG 22 1988

EXISTING OPERATING PERMIT A041-80160
APPLICATION FOR TRANSFER OF PERMIT
APPLICATION

Permit No. AC41-148295 Date Issued 24 JUNE 84 Date Expires 15 JUNE 89

DER-BAQM

NOTIFICATION OF SALE OR LEGAL TRANSFER

Source Name: AUXILIARY BOILER County: MANATEE
Source Location: U.S. HIGHWAY 41, PINEY POINT, MANATEE City: PALMETTO (NEAREST)
Permittee Name: CONSOLIDATED MINERALS, INC. Title: ENVIRONMENTAL CONSULTANT
Mailing Address: P.O. BOX 908 PALMETTO, FL. 33561

The undersigned hereby notifies the department of the sale or legal transfer of this pollution source. He further agrees to assign his rights as permittee to the applicant in the event the department agrees to the transfer of permit.

Sworn to and subscribed before me at _____
County, Hillsborough - Florida
this 29th day of June 19 88
Betty Jo Mott Notary Public
Signature of Permittee: [Signature]
Title: Environmental Consultant
Date: June 29, 1988
My Commission Expires: Notary Public, State of Florida at Large
My Commission Expires March 24, 1991

REQUEST FOR TRANSFER OF PERMIT

Source Name: AUXILIARY BOILER
Applicant Name: Gary L. Dahms Title: Vice Pres. & General Mgr.
Mailing Address: P. O. Box 1329
Palmetto, Florida 34220 Telephone: (813) 722-4555
area
Project Engineer: Name: Gary L. Dahms
Mailing Address: P. O. Box 1329
Palmetto, Florida 34220 Telephone: (813) 722-4555
area

The undersigned hereby notifies the department of his having acquired title to this pollution source. He further states that he has examined the application and documents submitted by the current permittee the basis on which Permit No. AC41-148295 was issued by the department, and states that they accurately and completely describe the permitted activity or project. He further states that he is familiar with the permit, agrees to comply with its terms and conditions, and agrees to assume the rights and liabilities contained therein. He also agrees to promptly notify the department of any future change in ownership of, or responsibility for, the permitted activity or project.

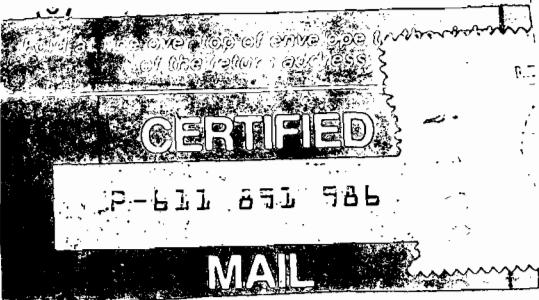
Sworn to and subscribed before me at _____
County, Polk - Florida
this 29th day of June 19 88
Susan M. Knight Notary Public
Signature of Applicant: [Signature]
Title: Vice President and General Manager
Date: June 29, 1988
My Commission Expires: _____

*Attach letter of authorization if other than owner or corporate officer.

PM 6-24-88
Palmetto, FL
CMI CONSOLIDATED MINERALS, INC.

file copy

A SUBSIDIARY OF FCS ENERGY, INC.
P.O. BOX 908 • PALMETTO, FLORIDA 34220



RECEIVED
JUN 28 1988
DER-BAQM

June 24, 1988

Mr. Bill Thomas
Bureau of Air Quality Management
Department of Environmental Regulation
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Re: D.E.R. File No. AC 41-148295

Dear Mr. Thomas:

Pursuant to Section 403.815, F.S. and D.E.R. Rule 17-130.150 FAC, you will find attached to this letter proof of publication and the publication, both originals concerning the intent to issue a construction permit for an auxillary boiler.

If there are any questions concerning this letter, please contact me.

Sincerely,

Robert E. Mayko

Robert E. Mayko, P.E.
Technical/Environmental Manager

Enclosure

cc: R. T. Van Arsdall

CERTIFIED MAIL - RETURN RECEIPT REQUESTED
ARTICLE # P-611-891-986

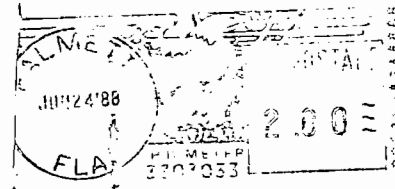
REM/cjn

*copied: John Reynolds } 6-24-88
Bill Thomas, SW Dist }*

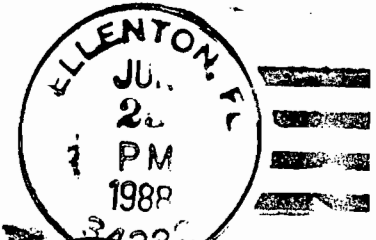
CMI CONSOLIDATED MINERALS, INC.

A SUBSIDIARY OF FCS ENERGY, INC.

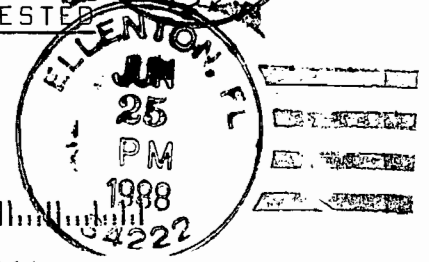
P.O. BOX 908 • PALMETTO, FLORIDA 34220



Mr. Bill Thomas
Bureau of Air Quality Management
Department of Environmental Regulation
2600 Blair Stone Road
Tallahassee, Florida 32399-2400



CERTIFIED MAIL - RETURN RECEIPT REQUESTED





The Bradenton Herald

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

**PUBLISHED DAILY
BRADENTON, MANATEE COUNTY, FLORIDA**

**STATE OF FLORIDA
COUNTY OF MANATEE:**

Before the undersigned authority personally appeared Sandy Riley, who on oath says that she is the Legal Advertising Clerk and the official representative of the Publisher of The Bradenton Herald, a daily newspaper published at Bradenton in Manatee County, Florida, with the express, limited authority to execute this affidavit for the purpose of establishing proof of publication of the public or legal notice and advertisement in the form attached hereto; that the attached copy of advertisement, being a legal advertisement in the matter of
DER-Consolidated Minerals

_____ in the _____ Court,
was published in said newspaper in the issues of _____
6/22/88

Affiant further says that the said The Bradenton Herald is a newspaper published at Bradenton, in said Manatee County, Florida, and that the said newspaper has heretofore been continuously published in said Bradenton, 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 one year next preceding the first publication of the attached copy of advertisement; and the 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.

Sandy Riley

Sworn to and subscribed before me this

22nd day of June

A.D. 19 89
Travis Tucker

(SEAL) Notary Public

Notary Public, State of Florida at Large
My Commission Expires May 30, 1991

State of Florida Department of Environmental Regulation Notice of Intent

The Department of Environmental Regulation hereby gives notice of its intent to issue a permit to Consolidated Minerals, Inc. to install a replacement boiler at their facility in Palmetto, Florida. The new boiler will replace the existing No. 2 Auxiliary Boiler and will be operated less than 900 hours per year. A determination of best available control technology (BACT) was required under Florida Administrative Code, Rule 17-2.600(6). The Department is issuing this intent to issue for the reasons stated in the Technical Evaluation and Preliminary Determination.

Person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative determination (hearing) in accordance with Section 120.57, Florida Statutes. The petition must conform to the requirements of Chapters 17-103 and 28-5, Florida Administrative Code, and must be filed (received) in the Department's Office of General Counsel, 2600 Blair Stone Road, Twin Towers Office Building, Tallahassee, Florida 32399-2400, within fourteen (14) days of publication of this notice. Failure to file a request for hearing within this time period constitutes a waiver of any right such person has to request an administrative determination (hearing) under Section 120.57, Florida Statutes.

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 proposed agency action. Therefore, persons who may not wish to file a petition may wish to intervene in the proceeding. A petition for intervention must be filed pursuant to Rule 28-5.207, Florida Administrative Code, at least five (5) days before the final hearing and be filed with the hearing officer if one has been assigned at the Division of Administrative Hearings, Department of Administration, 2009 Apalachee Parkway, Tallahassee, Florida 32301.

If no hearing officer has been assigned, the petition is to be filed with the Department's Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400. Failure to petition to intervene within the allowed time frame constitutes a waiver of any right such person has to request a hearing under section 120.57, Florida Statutes.

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 Dept. of Environmental Regulation, Bureau of Air Quality Management, 2600 Blair Stone Rd., Tallahassee, Florida 32399-2400
Dept of Environmental Regulation, SW District, 4520 Oak Fair Blvd, Tampa, Florida 33610-7347.

Any person may send written comments on the proposed action to Mr. Bill Thomas at the Department's Tallahassee address. All comments mailed within 14 days of the publication of this notice will be considered in the Department's final determination.
6/22/88



file copy



State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

Interoffice Memorandum

FOR ROUTING TO OTHER THAN THE ADDRESSEE	
TO: _____	LOCTN: _____
TO: _____	LOCTN: _____
TO: _____	LOCTN: _____
FROM: _____	DATE: _____

TO: Clair Fancy
 FROM: Bill Thomas *WTT*
 DATE: June 24, 1988
 SUBJECT: Comments regarding AC41-148295 for Consolidated Minerals, Inc.

RECEIVED

JUN 27 1988

DER-BAQM

On June 21, 1988, I received the Technical Evaluation and Preliminary Determination you sent regarding CMI's application to install a replacement boiler at their Palmetto facility. After reviewing the information, I have the following comments:

1. The project description on page 1 of the proposed permit should include the make and model number of the boiler. For example - For the construction of a Nebraska Boiler Co. Model No. NOSA67 boiler to replace in kind an old boiler (A041-86160). The boiler provides auxillary steam primarily when the sulfuric acid plant is shut down or started up.
2. Specific Condition No. 2 should reference that the 20% opacity is set pursuant to a BACT determination dated _____.
3. Specific Condition No. 3 should state the boiler "shall not exceed a maximum heat input of 96.2 MMBTU/hr."
4. Add the following specific condition: The boiler shall be tested for visible emissions within 30 days after it is placed in operation. The test report shall be submitted within 45 days of testing to the Department's Southwest District Office in conjunction with a Certificate of Completion of Construction DER Form 17-1.202(3). In order to document compliance with the fuel oil's sulfur limitation, attach to the visible emissions test report either of the following:
 - A) A Certificate of Fuel Oil Analysis from the vendor of the fuel oil that was used during the visible emissions compliance test.
 - B) A Certificate of Fuel Oil Analysis for a fuel oil sample taken from the fuel oil used during the compliance test.
5. Add the following specific condition: The Department's Southwest District Office and the Manatee County Public Health Unit shall be notified 5 days prior to the boiler being placed in operation.

DEPARTMENT OF ENVIRONMENTAL REGULATION

ROUTING AND TRANSMITTAL SLIP		ACTION NO
		ACTION DUE DATE
1. TO: (NAME, OFFICE, LOCATION)		Initial
<i>Clare Farny</i>		Date
2.		Initial
<i>BAQM</i>		Date
3.		Initial
<i>Twin Towers</i>		Date
4.		Initial
		Date
REMARKS:		INFORMATION
<div style="font-size: 2em; font-weight: bold; margin-bottom: 10px;">RECEIVED</div> <div style="font-size: 1.2em; margin-bottom: 10px;">JUN 27 1988</div> <div style="font-size: 1.2em;">DER-BAQM</div>		<input type="checkbox"/> Review & Return
		<input type="checkbox"/> Review & File
		<input type="checkbox"/> Initial & Forward
		DISPOSITION
		<input type="checkbox"/> Review & Respond
		<input type="checkbox"/> Prepare Response
		<input type="checkbox"/> For My Signature
		<input type="checkbox"/> For Your Signature
		<input type="checkbox"/> Let's Discuss
		<input type="checkbox"/> Set Up Meeting
		<input type="checkbox"/> Investigate & Report
		<input type="checkbox"/> Initial & Forward
		<input type="checkbox"/> Distribute
		<input type="checkbox"/> Concurrence
		<input type="checkbox"/> For Processing
<input type="checkbox"/> Initial & Return		
FROM:	DATE	
<i>Bill Thomas</i>	<i>6-27-88</i>	
	PHONE	

MEMORANDUM
Clair Fancy
June 24, 1988
Page Two

6. Add the following specific condition: An application to operate this source shall be submitted to the Department's Southwest District Office at least 60 days prior to the expiration date of this permit or within 45 days of testing, whichever occurs first. An application should also be sent to the Manatee County Public Health Unit within the same time period.
7. Specific Condition No. 4 should reference that the 1.0% sulfur limitation is set pursuant to a BACT determination date ____.
8. Suggest the expiration date of the permit be changed to December 31, 1988.
9. In Specific Condition No. 5, have the permittee notify the Manatee County Public Health Unit instead of the Department for the 15 day prior notification of compliance testing.
10. A copy of the evaluation and proposal should also have been sent to the Manatee County Public Health Unit. A copy has been provided through this office.

WCT/jms

cc: MCPHU

John Reynolds } 6-27-88
CHF/BT

PM
6-22-88
Palmetto, FL

CMI CONSOLIDATED MINERALS, INC.

A SUBSIDIARY OF FCS ENERGY, INC.
P.O. BOX 908 • PALMETTO, FLORIDA 34220

file copy

June 21, 1988

Mr. Bill Thomas
Bureau of Air Quality Management
Department of Environmental Regulation
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

RECEIVED

JUN 24 1988

DER-BAQM

Dear Mr. Thomas:

In reference to the proposed permit, AC41-148295 for the installation of a replacement boiler, Consolidated Minerals, Inc., submits the following comment:

-CMI desires to burn multiple fuels, #4 fuel oil or lighter with a sulfur analysis not to exceed 1.0 percent by weight.

The change from #3 fuel oil to #4 is the result of a misconception of the applicable fuel oil number that is interchangeable with the term "vulcan" fuel oil. The boiler will be fired with #4 fuel oil (vulcan) or lighter fuel oil with a maximum sulfur content of 1.0 percent. The current boiler operating permit is based on #4 fuel oil or lighter fuel. There is no change in the fuels to be used from what was burned to what will be burned.

Your consideration of this comment to be included in the permit will be appreciated.

Sincerely,
CONSOLIDATED MINERALS, INC.

Robert E. Mayko

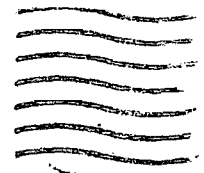
Robert E. Mayko, P. E.
Technical/Environmental Mgr.

REM/dam

cc: R. T. Van Arsdall

*copied: John Reynolds
Bill Thomas, SW Dist. }
CHF/BT*

Mr. R. E. Mayko, P. E.
CMI CONSOLIDATED MINERALS, INC.
A SUBSIDIARY OF FCS ENERGY, INC.
P.O. BOX 908 • PALMETTO, FLORIDA 34220



Mr. Bill Thomas
Bureau of Air Quality Management
Department of Environmental Regulation
2600 Blair Stone Road
Tallahassee, Florida 32399-2400



PM 6-16-88
Palmetto, FL
CMI CONSOLIDATED MINERALS, INC.

file copy

A SUBSIDIARY OF FCS ENERGY, INC.
P.O. BOX 908 • PALMETTO, FLORIDA 34220

RECEIVED

June 16, 1988

JUN 20 1988

Department of Environmental Regulation
Bureau of Air Quality Management
2600 Blair Stone Road
Tallahassee, Florida 32399
Attn: Mr. Bill Thomas

DER-BAQM

Dear Mr. Thomas:

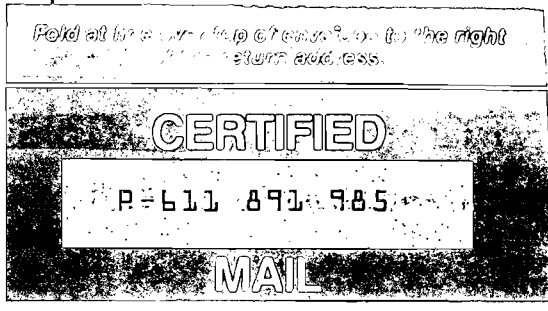
As requested by John Reynolds (DER), the original signed, stamped P. E. certification page for the replacement-in-kind boiler construction permit is enclosed.

If additional information is required, please contact the undersigned.

Sincerely,
CONSOLIDATED MINERALS, INC.

Robert E. Mayko

Robert E. Mayko
Technical/Environmental Manager



REM/dam

Enclosure

cc: R. T. Van Arsdall

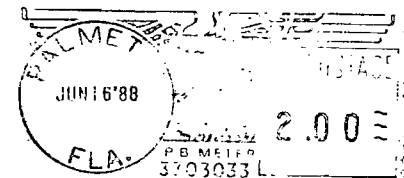
Sent Certified Mail - Return Receipt Requested
Article # P-611 891 985

*copied: John Reynolds
E. Salomon, SW Dist } 6-20-88
CHF/BT*

CMI Robert E. Mayko, P. E.
CONSOLIDATED MINERALS, INC.

A SUBSIDIARY OF FCS ENERGY, INC.

P.O. BOX 908 • PALMETTO, FLORIDA 34220



Mr. Bill Thomas
Department of Environmental Regulation
Bureau of Air Quality Management
2600 Blair Stone Road
Tallahassee, Florida 32399

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

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



BOB GRAHAM
GOVERNOR

VICTORIA J. TSCHINKEL
SECRETARY

APPLICATION TO OPERATE/CONSTRUCT AIR POLLUTION SOURCES

SOURCE TYPE: Auxiliary Boiler [] New¹ [X] Existing See attached
APPLICATION TYPE: [X] Construction [] Operation [] Modification letter for
COMPANY NAME: Consolidated Minerals, Inc. COUNTY: Manatee explanation.

Identify the specific emission point source(s) addressed in this application (i.e. Line
Kiln No. 4 with Venturi Scrubber; Peaking Unit No. 2, Gas Fired) Auxiliary Boiler

SOURCE LOCATION: Street U S Highway 41 City Palmetto

UTM: East 17 - 348.5 North 3057.3

Latitude 27 ° 37 ' 58 "N Longitude 82 ° 32 ' 08 "W

APPLICANT NAME AND TITLE: Mr. John G. Cladakis Senior Vice President/Operations Manager

APPLICANT ADDRESS: P. O. Box 908 Palmetto, Florida 34220

SECTION I: STATEMENTS BY APPLICANT AND ENGINEER

A. APPLICANT

I am the undersigned owner or authorized representative* of Consolidated Minerals, 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 permitted
establishment.

*Attach letter of authorization

Signed: John G. Cladakis
John G. Cladakis
Senior Vice President/Operations Manager
Name and Title (Please Type)

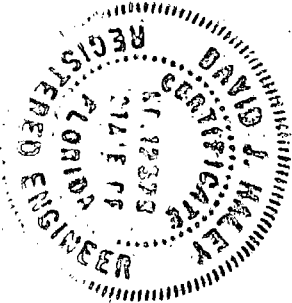
Date: 4/5/88 Telephone No. (813) 722-4555

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

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 David J. Haley

David J. Haley, P.E.
Name (Please Type)

Haley and Associates
Company Name (Please Type)

1001 Third Ave W., Bradenton, FL 34205
Mailing Address (Please Type)

Florida Registration No. 12578 Date: 6-14-88 Telephone No. 813/747-0092

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.

Replacement in kind of an existing boiler. Existing boiler is not economically repairable. Source performance will remain the same. Project will result in full compliance with required visual emissions test.

B. Schedule of project covered in this application (Construction Permit Application Only)

Start of Construction immediately Completion of Construction one month

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.)

N/A No pollution control equipment is proposed.
Control is by use of low Sulfur fuel oil.

D. Indicate any previous DER permits, orders and notices associated with the emission point, including permit issuance and expiration dates.

#2 Auxiliary boiler A041-86160 Expires 6/15/89



CONSOLIDATED MINERALS, INC.

2327 016866

83-84
263

P.O. BOX 300
LEESBURG, FLORIDA 32749-0300

CHECK DATE NUMB
4/08/88 659

PAY TWO HUNDRED FIFTY AND 00/100 DOLLARS

34 DE150

CHECK AMOUNT
*****250.00

TO
THE
ORDER
OF

DEPARTMENT OF ENVIRONMENTAL
TWIN TOWERS OFFICE BLDG
2600 BLAIR STONE ROAD
TALLAHASSEE FL 32301

CONSOLIDATED MINERALS, INC.

Wm Neil Daniel

kind of our #2 Auxiliary Boiler, A041-86160 (permit number).

The existing boiler, used sporadically during the year (when the Sulfuric Acid Plant shuts down for maintenance repairs and during subsequent start-ups or for other operational reasons) has been found to be uneconomical to repair. A new, duplicate boiler has been ordered as a direct replacement. The new boiler is manufactured by the Nebraska Boiler Company, rated at 350psig, 75,000lb/hr. steam output, serial number 02375, model number NOS2A67, built 1988. It will be fired with a commercial distillate No. 3 fuel oil with 1% maximum sulfur content. 1031

The new boiler will operate/function identically to the unit it is replacing. The level of contaminant emissions will not change as the low sulfur fuel burned will remain the same. The heat rate of the new boiler is the same as the old boiler. Boiler operating time depends on the performance of the Sulfuric Acid Plant. Anticipated yearly boiler operating time is 525 hours with a maximum operating time of 876 hours. All calculations are based on these hours of operation. Actual hours could be less than or greater than those hours stated above.

Allowed emission rates are derived from the following sources:

- SO₂ - 1.1 lb/MMBTU - per Manatee County code
- PARTICULATES - 6.96lb/hr. - is requested to exempt the facility from section 17-2.650(2), F.A.C. (as stated on existing permit)
- SMOKE - no visible emissions (5% max opacity), 20% is permissible for not more than three minutes in anyone hour (as stated on existing permit)
- NO₂ - not required per existing permit and FAC 17-2.650(2)(c)2.

Emission factors for calculations are from table 1.3-1, Emission Factors for Fuel Oil Combustion - Emissions Factor Rating: A for an industrial boiler burning a distillate oil (lb./1,000gal.). Sulfur trioxide, carbon monoxide and hydrocarbons pollutant emissions were not calculated as the possible amounts are extremely low. The daily emissions of SO₂ from the Complex will not be increased

Potential

100% Firing Rate
10 % yearly operating time

$$684 \frac{\text{Gal}}{\text{hr}} \times 22 \frac{\text{lb}}{1000 \text{ Gal}} \times 876 \frac{\text{hr}}{\text{yr}} = 13,182 \text{ lb/yr}$$

$$13,182 \frac{\text{lb}}{\text{yr}} \times \frac{\text{ton}}{2000 \text{ lb}} = 6.6 \text{ t/yr}$$

CALCULATIONS

Section III B.

Water Input (Max)

$$162 \text{ GPM} \times \frac{60 \text{ M}}{\text{hr}} \times 8.34 \frac{\text{lb}}{\text{Gal}} = 81,000 \text{ lb/hr}$$

#3 Fuel Oil Input (Max)

$$684 \frac{\text{Gal}}{\text{hr}} \times 7.286 \frac{\text{lb}}{\text{Gal}} = 4,984 \text{ lb/hr}$$

Section III C.

SO2 Emission

Maximum - Estimated yearly operating time - 525 hrs

Estimated average firing rate - 70% of Max, 479 G/hr

.7% Sulfur in Fuel - Typical Analysis

Emission Factor - 142 S (S - % Sulfur)
Table 1.3 - 1

$$\frac{479 \text{ Gal}}{\text{hr}} \times \frac{142 \text{ lb}}{1000 \text{ Gal}} \times .7 = 47.6 \text{ lbs/hr}$$

Actual

$$47.6 \frac{\text{lbs}}{\text{hr}} \times 525 \frac{\text{hr}}{\text{yr}} \times \frac{1 \text{ ton}}{2000 \text{ lb}} = 12.5 \frac{\text{ton}}{\text{yr}}$$

Allowance Emission

1.1 lb/MMBtu (Manatee County Code)

$$1.1 \frac{\text{lb}}{\text{MMBtu}} \times 4983 \frac{\text{lb}}{\text{hr}} \times 19300 \frac{\text{Btu}}{\text{lb}} = 105.6 \text{ lb/hr}$$

Potential Emission

$$\begin{aligned} & 684 \frac{\text{gal}}{\text{hr}} \times 876 \text{ hr} \times 1 \times \frac{142}{1000} = 85,200 \text{ lb/yr} \\ & 85,200 \frac{\text{lb}}{\text{yr}} \div \frac{2000 \text{ lb}}{\text{ton}} = 42.6 \text{ tons/yr} \end{aligned}$$

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

B. Meteorological Data Used for Air Quality Modeling

1. _____ Year(s) of data from _____ / _____ / _____ to _____ / _____ / _____ N/A
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) _____

C. Computer Models Used

1. _____ Modified? If yes, attach description.

2. _____ Modified? If yes, attach description.

3. _____ N/A 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.

D. Applicants Maximum Allowable Emission Data

Pollutant	Emission Rate	N/A
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.

(5) Environmental Manager:

(6) Telephone No.: N/A

(7) Emissions:¹

Contaminant

Rate or Concentration

Contaminant	Rate or Concentration

(8) Process Rate:¹

b. (1) Company:

(2) Mailing Address:

(3) City: N/A (4) State:

(5) Environmental Manager:

(6) Telephone No.:

(7) Emissions:¹

Contaminant

Rate or Concentration

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

A. Company Monitored Data

N/A

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).

- 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: N/A
- 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: N/A
- 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: N/A
- 8. Manufacturer:
- 9. Other locations where employed on similar processes:
- a. (1) Company:
- (2) Mailing Address:
- (3) City:
- (4) State:

Explain method of determining efficiency.

Energy to be reported in units of electrical power - KWH design rate.

5. Useful Life:

6. Operating Costs:

7. Energy:

8. Maintenance Cost:

9. Emissions:

Contaminant	Rate or Concentration

10. Stack Parameters

- a. Height: ft.
- b. Diameter: ft.
- c. Flow Rate: N/A 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 N/A
- 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: N/A
- 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.

- 9. The appropriate application fee in accordance with Rule 17-4.05. The check should be made payable to the Department of Environmental Regulation.
- 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

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
N/A	

D. Describe the existing control and treatment technology (if any).

- | | |
|---------------------------|--------------------------|
| 1. Control Device/System: | 2. Operating Principles: |
| 3. Efficiency:* | 4. Capital Costs: |

N/A

*Explain method of determining

Brief description of operating characteristics of control devices: _____

N/A

Ultimate disposal of any effluent other than that emitted from the stack (scrubber water, ash, etc.):

N/A

NOTE: Items 2, 3, 4, 6, 7, 8, and 10 in Section V must be included where applicable.

SECTION V: SUPPLEMENTAL REQUIREMENTS

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. 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.
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.

H. Emission Stack Geometry and Flow Characteristics (Provide data for each stack):

Stack Height: 30 ft. Stack Diameter: 4 ft.
 Gas Flow Rate: 19084 ACFM DSCFM Gas Exit Temperature: 545 °F.
 Water Vapor Content: 12.3 % Velocity: 25.3 FPS

SECTION IV: INCINERATOR INFORMATION

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)		N/A					

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	N/A				
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) _____

J. Control Devices: (See Section V, Item 4)

Name and Type (Model & Serial No.)	Contaminant	Efficiency	Range of Particles Size Collected (in microns) (If applicable)	Basis for Efficiency (Section V Item 5)
N/A				

E. Fuels

Type (Be Specific)	Consumption*		Maximum Heat Input (MMBTU/hr)
	avg/hr	max./hr	
Commercial Distillate	479 Gal/hr	684 Gal/hr	96
No. 3 Fuel Oil			

*Units: Natural Gas--MMCF/hr; Fuel Oils--gallons/hr; Coal, wood, refuse, other--lbs/hr.

Fuel Analysis:

Percent Sulfur: 1.0% Max Percent Ash: .02
 Density: 7.286 lbs/gal Typical Percent Nitrogen: N/A
 Heat Capacity: 19,300 BTU/lb 140,620 BTU/gal
 Other Fuel Contaminants (which may cause air pollution): None

F. If applicable, indicate the percent of fuel used for space heating.

Annual Average N/A Maximum N/A

G. Indicate liquid or solid wastes generated and method of disposal.

N/A

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	N/A	N/A	81,000 Max	N/A
No. 3 Fuel Oil	Sulfur	1% Max	4,983	N/A

B. Process Rate, if applicable: (See Section V, Item 1)

1. Total Process Input Rate (lbs/hr): Feedwater - 81,000 # Water at Max Rate
2. Product Weight (lbs/hr): Steam - 75,000 lb/hr

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 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	T/yr	
SO ₂ *	47.6	12.5	1.1 lb MMBtu ¹	105.6	85,200	42.6	N/A
Particulates *	.96	.25	6.96lb/hr ²	6.96	1,198	.6	N/A
Smoke	-	-	20% Opacity ³	3 min/hr	-	-	N/A
Nitrogen Oxides * (as NO ₂)	10.5	2.76	N/R ⁴	N/R	13,182	6.6	N/A

* See attached Calculation Sheet

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).

1 - Per Manatee County Code

2 - To exempt Facility From Section 17-2.650(2)F.A

3 - Per Existing Permit

4 - Not required per Existing Permit

E. Requested permitted equipment operating time: hrs/day ; days/wk ; wks/yr ;
 if power plant, hrs/yr ; if seasonal, describe: Occasional - no schedule-
operates at irregular intervals, and at varying rates up to full capacity. Used
when the Sulfuric Acid Plant is shutdown or during start up of that plant.

F. If this is a new source or major modification, answer the following questions.
 (Yes or No) (Replacement in kind)

- | | |
|---|------------|
| 1. Is this source in a non-attainment area for a particular pollutant? | <u>N/A</u> |
| a. If yes, has "offset" been applied? | <u>"</u> |
| b. If yes, has "Lowest Achievable Emission Rate" been applied? | <u>"</u> |
| c. If yes, list non-attainment pollutants. | <u>"</u> |
| 2. Does best available control technology (BACT) apply to this source?
If yes, see Section VI. | <u>"</u> |
| 3. Does the State "Prevention of Significant Deterioration" (PSD)
requirement apply to this source? If yes, see Sections VI and VII. | <u>"</u> |
| 4. Do "Standards of Performance for New Stationary Sources" (NSPS)
apply to this source? | <u>"</u> |
| 5. Do "National Emission Standards for Hazardous Air Pollutants"
(NESHAP) apply to this source? | <u>"</u> |
| H. Do "Reasonably Available Control Technology" (RACT) requirements apply
to this source? | <u>"</u> |
| a. If yes, for what pollutants? | <u>"</u> |
| b. If yes, in addition to the information required in this form,
any information requested in Rule 17-2.650 must be submitted. | |

Attach all supportive information related to any answer of "Yes". Attach any justifi-
 cation for any answer of "No" that might be considered questionable.

Replacement in kind - Boiler rating (steam production)
 Same as Existing - Low Sulfur fuel (1% Max) will continue to be used.

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 _____

*Not required
Pollution control is by
use of low Sulfur Fuel

Name (Please Type)

Company Name (Please Type)

Mailing Address (Please Type)

Florida Registration No. _____ Date: _____ Telephone No. _____

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.

Replacement in kind of an existing boiler. Existing boiler is not economically
repairable. Source performance will remain the same. Project will result in
full compliance with required visual emissions test.

- B. Schedule of project covered in this application (Construction Permit Application Only)

Start of Construction immediately Completion of Construction one month

- 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.)

N/A No pollution control equipment is proposed.
Control is by use of low Sulfur fuel oil.

- D. Indicate any previous DER permits, orders and notices associated with the emission point, including permit issuance and expiration dates.

#2 Auxiliary boiler A041-86160 Expires 6/15/89

AC 41-148295
\$250.00
V# 016866
Receipt# 117540

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION
RECEIVED

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



APR 18 1988

BOB GRAHAM
GOVERNOR
VICTORIA J. TSCHINKEL
SECRETARY

DER-BAQM

APPLICATION TO OPERATE/CONSTRUCT AIR POLLUTION SOURCES

SOURCE TYPE: Auxiliary Boiler [] New¹ [X] Existing¹ See attached letter for explanation.
APPLICATION TYPE: [X] Construction [] Operation [] Modification
COMPANY NAME: Consolidated Minerals, Inc. COUNTY: Manatee

Identify the specific emission point source(s) addressed in this application (i.e. Line Kiln No. 4 with Venturi Scrubber; Peaking Unit No. 2, Gas Fired) Auxiliary Boiler

SOURCE LOCATION: Street U S Highway 41 city Palmetto
UTM: East 17 - 348.5 North 3057.3
Latitude 27 ° 37 ' 58 " N Longitude 82 ° 32 ' 08 " W

APPLICANT NAME AND TITLE: Mr. John G. Cladakis Senior Vice President/Operations Manager
APPLICANT ADDRESS: P. O. Box 908 Palmetto, Florida 34220

SECTION I: STATEMENTS BY APPLICANT AND ENGINEER

A. APPLICANT

I am the undersigned owner or authorized representative* of Consolidated Minerals, 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 permitted establishment.

*Attach letter of authorization

Signed: John G. Cladakis
John G. Cladakis
Senior Vice President/Operations Manager
Name and Title (Please Type)
Date: 4/5/88 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

See Florida Administrative Code Rule 17-2.100(57) and (104)

Mr. Clair Fancy
D.E.R.

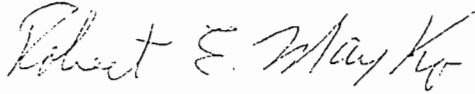
-2-

April 4, 1988

by the use of the replacement in kind boiler as it will operate while the Sulfuric Plant is shut down. The operation of the boiler will be in compliance with the rules of FAC 17-2 and the Manatee County Code.

Your consideration of this application will be appreciated. If additional information is required please contact the undersigned.

Sincerely,



Robert E. Mayko, P.E.
Technical/Environmental Manager

Attachments: Application to Construct
Site Location

Enclosures: Check to Department of Environmental Regulations
Check to Manatee County

cc: Addressee - Four (4) copies each of attachments
John G. Cladakis - C.M.I.
W. L. Priesmeyer - M.D.P.C.
W. Thomas, D.E.R., Tampa - One (1) copy each with attachment

REM/cjn

CMI CONSOLIDATED MINERALS, INC.

A SUBSIDIARY OF FCS ENERGY, INC.

P.O. BOX 908 • PALMETTO, FLORIDA 34220

April 4, 1988

Department of Environmental Regulation
Bureau of Air Quality
2600 Blair Stone Road - Room 338
Tallahassee, Florida 32399
Attn: Mr. Clair Fancy

RECEIVED

APR 18 1988

DER-BAQM

Dear Mr. Fancy:

The attached application is being submitted for the replacement in kind of our #2 Auxiliary Boiler, A041-86160 (permit number).

The existing boiler, used sporadically during the year (when the Sulfuric Acid Plant shuts down for maintenance repairs and during subsequent start-ups or for other operational reasons) has been found to be uneconomical to repair. A new, duplicate boiler has been ordered as a direct replacement. The new boiler is manufactured by the Nebraska Boiler Company, rated at 350psig, 75,000lb/hr. steam output, serial number 02375, model number NOS2A67, built 1988. It will be fired with a commercial distillate No. 3 fuel oil with 1% maximum sulfur content.

The new boiler will operate/function identically to the unit it is replacing. The level of contaminant emissions will not change as the low sulfur fuel burned will remain the same. The heat rate of the new boiler is the same as the old boiler. Boiler operating time depends on the performance of the Sulfuric Acid Plant. Anticipated yearly boiler operating time is 525 hours with a maximum operating time of 876 hours. All calculations are based on these hours of operation. Actual hours could be less than or greater than those hours stated above.

Allowed emission rates are derived from the following sources:

SO₂ - 1.1 lb/MMBTU - per Manatee County code

PARTICULATES - 6.96lb/hr. - is requested to exempt the facility from section 17-2.650(2), F.A.C. (as stated on existing permit)

SMOKE - no visible emissions (5% max opacity), 20% is permissible for not more than three minutes in anyone hour (as stated on existing permit)

NO₂ - not required per existing permit and FAC 17-2.650(2)(c)2.

Emission factors for calculations are from table 1.3-1, Emission Factors for Fuel Oil Combustion - Emissions Factor Rating: A for an industrial boiler burning a distillate oil (lb./1,000gal.). Sulfur trioxide, carbon monoxide and hydrocarbons pollutant emissions were not calculated as the possible amounts are extremely low. The daily emissions of SO₂ from the Complex will not be increased

SENDER: Complete items 1 and 2 when additional services are desired, and complete items 3 and 4.
 Put your address in the "RETURN TO" Space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.

1. Show to whom delivered, date, and addressee's address. 2. Restricted Delivery
 †(Extra charge)† †(Extra charge)†

3. Article Addressed to: Mr. John G. Cladakis Senior Vice Pres./Operations Mgr. Consolidated Minerals, Inc. Post Office Box 908 Palmetto, FL 34220	4. Article Number P 778 940 854 Type of Service: <input type="checkbox"/> Registered <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD <input type="checkbox"/> Express Mail Always obtain signature of addressee or agent and <u>DATE DELIVERED</u> .
5. Signature - Addressee X	8. Addressee's Address (ONLY if requested and fee paid)
6. Signature - Agent X <i>D.A. Martin</i>	
7. Date of Delivery JUN 20 1988	

PS Form 3811, Mar. 1987

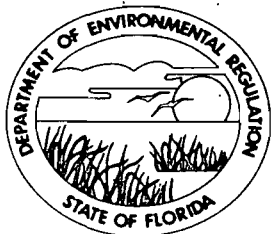
★ U.S.G.P.O. 1987-178-268

DOMESTIC RETURN RECEIPT

P 778 940 854
RECEIPT FOR CERTIFIED MAIL
 NO INSURANCE COVERAGE PROVIDED
 NOT FOR INTERNATIONAL MAIL
 (See Reverse)

Sent to Mr. John G. Cladakis	
Street and No. Consolidated Minerals, P. O. Box 908	
P.O., State and ZIP Code Palmetto, FL 34220	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt showing to whom and Date Delivered	
Return Receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	\$
Postmark or Date Mailed: 6-17-88 Permit: AC 41-148295	

PS Form 3800, June 1985



Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary

June 17, 1988

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

Mr. John G. Cladakis
Senior Vice President/Operations Mgr.
Consolidated Minerals, Inc.
Post Office Box 908
Palmetto, Florida 34220

Dear Mr. Cladakis:

Attached is one copy of the Technical Evaluation and Preliminary Determination and proposed permit for CMI to install a replacement boiler at your Palmetto facility.

Please submit any written comments you wish to have considered concerning the Department's proposed action to Mr. Bill Thomas of the Bureau of Air Quality Management.

Sincerely,

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

CHF/jr

Attachments

cc: W. Thomas, SW District
R. Mayko, CMI

BEFORE THE STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

In the Matter of
Application for Permit by:

Consolidated Minerals, Inc.
Post Office Box 908
Palmetto, Florida 34220

DER File No. AC 41-148295

INTENT TO ISSUE

The Department of Environmental Regulation hereby gives notice of its intent to issue a permit (copy attached) for the proposed project as detailed in the application specified above. The Department is issuing this Intent to Issue for the reasons stated in the attached Technical Evaluation and Preliminary Determination.

The applicant, Consolidated Minerals, Inc., applied on April 18, 1988, to the Department of Environmental Regulation for a permit to install a replacement boiler at their facility in Palmetto, Manatee County, Florida.

The Department has permitting jurisdiction under Chapter 403, Florida Statutes, and Florida Administrative Code Rules 17-2 and 17-4. The project is not exempt from permitting procedures. The Department has determined that an air construction permit is needed for the proposed work.

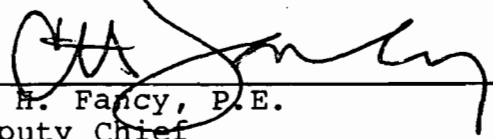
Pursuant to Section 403.815, F.S. and DER Rule 17-103.150, FAC, you (the applicant) are required to publish at your own expense the enclosed Notice of Proposed Agency Action on permit applications. The notice must be published one time only in a section of a major local newspaper of general circulation in the county in which the project is located and within thirty (30) days from receipt of this intent. Proof of publication must be provided to the Department within seven days of publication of the notice. Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permits.

The Department will issue the permits with the attached conditions unless 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. Petitions must comply with the requirement of Florida Administrative Code Rules 17-103.155 and 28-5.201 (copy enclosed) and be filed with (received by) the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400. Petitions filed by the permit applicant must be filed within fourteen (14) days of receipt of this intent. Petitions filed by other persons must be filed within fourteen (14) days of publication of the public notice or within fourteen (14) days of receipt of this intent, whichever first occurs. 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, concerning the subject permit application. Petitions which are not filed in accordance with the above provisions will be dismissed.

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION



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

Copies furnished to:

W. Thomas, Southwest District
R. Mayko

CERTIFICATE OF SERVICE

The undersigned duly designated deputy clerk hereby certifies that this NOTICE OF INTENT TO ISSUE and all copies were mailed before the close of business on 6-17-88.

FILING AND ACKNOWLEDGEMENT
FILED, on this date, pursuant to
§120.52(9), Florida Statutes, with
the designated Department Clerk,
receipt of which is hereby
acknowledged.

Matthew Wise 6-17-88
Clerk Date

RULES OF THE ADMINISTRATIVE COMMISSION
MODEL RULES OF PROCEDURE
CHAPTER 28-5
DECISIONS DETERMINING SUBSTANTIAL INTERESTS

28-5.15 Requests for Formal and Informal Proceedings

- (1) Requests for proceedings shall be made by petition to the agency involved. Each petition shall be printed, typewritten or otherwise duplicated in legible form on white paper of standard legal size. Unless printed, the impression shall be on one side of the paper only and lines shall be double spaced and indented.
- (2) All petitions filed under these rules should contain:
 - (a) The name and address of each agency affected and each agency's file or identification number, if known;
 - (b) The name and address of the petitioner or petitioners;
 - (c) All disputed issues of material fact. If there are none, the petition must so indicate;
 - (d) A concise statement of the ultimate facts alleged, and the rules, regulations and constitutional provisions which entitle the petitioner to relief;
 - (e) A statement summarizing any informal action taken to resolve the issues, and the results of that action;
 - (f) A demand for the relief to which the petitioner deems himself entitled; and
 - (g) Such other information which the petitioner contends is material.

State of Florida
Department of Environmental Regulation
Notice of Intent

The Department of Environmental Regulation hereby gives notice of its intent to issue a permit to Consolidated Minerals, Inc. to install a replacement boiler at their facility in Palmetto, Florida. The new boiler will replace the existing No. 2 Auxiliary Boiler and will be operated less than 900 hours per year. A determination of best available control technology (BACT) was required under Florida Administrative Code, Rule 17-2.600(6). The Department is issuing this Intent to Issue for the reasons stated in the Technical Evaluation and Preliminary Determination.

Persons whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative determination (hearing) in accordance with Section 120.57, Florida Statutes. The petition must conform to the requirements of Chapters 17-103 and 28-5, Florida Administrative Code, and must be filed (received) in the Department's Office of General Counsel, 2600 Blair Stone Road, Twin Towers Office Building, Tallahassee, Florida 32399-2400, within fourteen (14) days of publication of this notice. Failure to file a petition within this time period constitutes a waiver of any right such person has to request an administrative determination (hearing) under Section 120.57, Florida Statutes.

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 proposed agency action. Therefore, persons who may not wish to file a petition may wish to intervene in the proceeding. A petition for intervention must be filed pursuant to Rule 28-5.207, Florida Administrative Code, at least five (5) days before the final hearing and be filed with the hearing officer if one has been assigned at the Division of Administrative Hearings, Department of Administration, 2009 Apalachee Parkway, Tallahassee, Florida 32301. If no hearing officer has been assigned, the petition is to be filed with the Department's Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400. Failure to petition to intervene within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, Florida Statutes.

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:

Dept. of Environmental Regulation
Bureau of Air Quality Management
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Dept. of Environmental Regulation
Southwest District
4520 Oak Fair Boulevard
Tampa, Florida 33610-7347

Any person may send written comments on the proposed action to Mr. Bill Thomas at the Department's Tallahassee address. All comments mailed within 14 days of the publication of this notice will be considered in the Department's final determination.

Technical Evaluation
and
Preliminary Determination

Consolidated Minerals, Inc.
Manatee County
Palmetto, Florida

Installation of Replacement Boiler
Proposed State Permit No. AC 41-148295

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

June 17, 1988

I. Application

A. Consolidated Minerals, Inc.
Post Office Box 908
Palmetto, Florida 34220

B. Request

The Department received an application on April 18, 1988, for a permit to install a replacement boiler at the applicant's facility in Palmetto, Florida. The application was deemed complete on May 16, 1988.

C. Location/Classification

The applicant's phosphate fertilizer manufacturing facility (SIC Code 2874) is located off U.S. Highway 41 in Palmetto. Latitude and longitude are 27°37'58" N and 82°32'08" W, respectively. The UTM coordinates of the site are: Zone 17, 348.5 km E and 3057.3 km N.

II. Project Description/Emissions

Auxiliary boiler No. 2 will be replaced by a new boiler of the same design and capacity and fired by the same low sulfur fuel oil. The new boiler will be used only during periods when makeup steam is required. Anticipated maximum operating time is 876 hours per year. There will be no increase in emissions as a result of the boiler replacement.

III. Rule Applicability

The construction permit application is subject to review under Chapter 403, Florida Statutes and Florida Administrative Code (FAC) 17-2 and 17-4. The facility is located in an area classified as attainment for regulated air pollutants. Applicable rules are FAC Rule 17-2.520, Sources Not Subject to Prevention of Significant Deterioration or Nonattainment Requirements, and FAC Rule 17-2.600(6), Fossil Fuel Steam Generators with less than 250 million Btu per hour heat input.

IV. Conclusion

The proposed project will not cause any change in emission levels and the permit application should be approved.



Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Bob Martinez, Governor

Dale Twachtman, Secretary

John Shearer, Assistant Secretary

PERMITTEE:
Consolidated Minerals, Inc.
P. O. Box 908
Palmetto, Florida 34220

Permit Number: AC 41-148295
Expiration Date: September 30, 1988
County: Manatee
Latitude/Longitude: 27° 37' 58"N
82° 32' 08"W
Project: Replacement Boiler

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code (FAC) Rules 17-2 and 17-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the Department and made a part hereof and specifically described as follows:

For the installation of a replacement boiler to generate auxiliary steam. This project will be located at the CMI facility in Palmetto, Manatee County, Florida. The UTM coordinates of this site are Zone 17, 348.5 km E and 3057.3 km N.

Construction shall be in accordance with the attached permit application, plans, documents, and drawings except as noted in the General and Specific Conditions of this permit.

Attachments:

1. Application to Construct Air Pollution Sources, DER Form 17-1.202(1) received April 18, 1988.

PERMITTEE:
Consolidated Minerals, Inc.

Permit Number: AC 41-148295
Expiration Date: Sept. 30, 1988

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth herein are "Permit Conditions" and as such are binding upon the permittee and enforceable pursuant to the authority of Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is hereby placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of the "Permit Conditions" by the permittee, its agents, employees, servants or representatives.

2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.

3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Nor does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit does not constitute a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.

4. This permit conveys no title to land or water, does not constitute state recognition or acknowledgement of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the state. Only the Trustees of the Internal Improvement Trust Fund may express state opinion as to title.

5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, plant or aquatic life or property and penalties therefore caused by the construction or operation of this permitted source, nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.

PERMITTEE:
Consolidated Minerals, Inc.

Permit Number: AC 41-148295
Expiration Date: Sept. 30, 1988

GENERAL CONDITIONS:

6. The permittee shall at all times properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.

7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law, access to the premises, at reasonable times, where the permitted activity is located or conducted for the purpose of:

- a. Having access to and copying any records that must be kept under the conditions of the permit;
- b. Inspecting the facility, equipment, practices, or operations regulated or required under this permit; and
- c. Sampling or monitoring any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately notify and provide the Department with the following information:

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

PERMITTEE:
Consolidated Minerals, Inc.

Permit Number: AC 41-148295
Expiration Date: Sept. 30, 1988

GENERAL CONDITIONS:

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source, which are submitted to the Department, may be used by the Department as evidence in any enforcement case arising under the Florida Statutes or Department rules, except where such use is proscribed by Sections 403.73 and 403.111, Florida Statutes.

10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.

11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 17-4.12 and 17-30.30, as applicable. The permittee shall be liable for any noncompliance of the permitted activity until the transfer is approved by the Department.

12. This permit is required to be kept at the work site of the permitted activity during the entire period of construction or operation.

13. This permit also constitutes:

- (x) Determination of Best Available Control Technology (BACT)
- () Determination of Prevention of Significant Deterioration (PSD)
- () Compliance with New Source Performance Standards

14. The permittee shall comply with the following monitoring and record keeping requirements:

- a. Upon request, the permittee shall furnish all records and plans required under Department rules. The retention period for all records will be extended automatically, unless otherwise stipulated by the Department, during the course of any unresolved enforcement action.

PERMITTEE:
Consolidated Minerals, Inc.

Permit Number: AC 41-148295
Expiration Date: Sept. 30, 1988

GENERAL CONDITIONS:

- b. The permittee shall retain at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation), copies of all reports required by this permit, and records of all data used to complete the application for this permit. The time period of retention shall be at least three years from the date of the sample, measurement, report or application unless otherwise specified by Department rule.
- c. Records of monitoring information shall include:
 - the date, exact place, and time of sampling or measurements;
 - the person responsible for performing the sampling or measurements;
 - the date(s) analyses were performed;
 - the person responsible for performing the analyses;
 - the analytical techniques or methods used; and
 - the results of such analyses.

15. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be submitted or corrected promptly.

SPECIFIC CONDITIONS:

- 1. The construction and operation of this source shall be in accordance with the capacities and specifications stated in the application.
- 2. Visible emissions shall not be greater than 20% opacity and compliance shall be demonstrated at 90-100% of permitted capacity using DER Method 9 in accordance with FAC Rule 17-2.700.

PERMITTEE:
Consolidated Minerals, Inc.

Permit Number: AC 41-148295
Expiration Date: Sept. 30, 1988

SPECIFIC CONDITIONS:

3. The new auxiliary boiler shall be allowed to operate at 96.2 MMBtu/hr for up to 876 hours per year on No. 3 fuel oil.

4. The sulfur content of the No. 3 fuel oil shall not exceed 1.0 percent by weight. The sulfur analysis of the oil used shall be recorded for each day of operation and these records shall be kept for a minimum of two years for regulatory agency inspection. The appropriate ASTM method shall be used to determine the fuel oil sulfur content.

5. The compliance test shall be conducted and the results reported to the Department before this construction permit expires. The Department shall be notified at least 15 days in advance of the test.

6. The existing No. 2 auxiliary boiler will permanently cease operation prior to the startup of the new boiler.

Issued this _____ day of _____,
1988.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION

Dale Twachtman, Secretary

Best Available Control Technology (BACT) Determination
Consolidated Minerals, Inc.
Manatee County

The applicant plans to install a replacement auxiliary steam boiler at their facility in Palmetto, Florida. The boiler will fire only No. 3 fuel oil for up to 876 hours per year.

This BACT determination is required for the source as set forth in the Florida Administrative Code Rule 17-2.600(6) - Emission Limiting and Performance Standards.

BACT Determination Requested by the Applicant:

The applicant requested that No. 3 fuel oil with a maximum content of 1.0 percent be considered as best available control technology.

BACT Determination by DER:

Particulate and sulfur dioxide emissions from the boilers will be limited by use of No. 3 fuel oil having a sulfur content not to exceed 1.0 percent by weight.

BACT Determination Rationale:

Sulfur in fuel is a primary air pollution concern. Most of the sulfur becomes SO₂ when the fuel is burned. Emissions from fuel burning are related to the sulfur content of the fuel. A limitation placed on fuel oil sulfur content is deemed as BACT for this application.

Details of the Analysis May be Obtained by Contacting:

Barry Andrews, P.E., BACT Coordinator
Department of Environmental Regulation
Bureau of Air Quality Management
2600 Blainstone Road
Tallahassee, Florida 32399-2400

Recommended by:

C. H. Fancy, P.E.
Deputy Bureau Chief, BAQM

Date 1988

Consolidated Minerals, Inc.
Page Two

Approved by:

Dale Twachtmann, Secretary

 1988
Date

ATTACHMENT 1

Available Upon Request.

CMI CONSOLIDATED MINERALS, INC.

A SUBSIDIARY OF FCS ENERGY, INC.

P.O. BOX 908 • PALMETTO, FLORIDA 34220

RECEIVED

JUN 16 1988

DER-BAQM

June 14, 1988

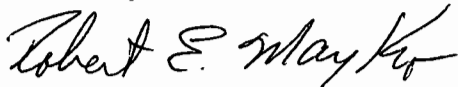
Department of Environmental Regulation
Bureau of Air Quality Management
2600 Blair Stone Road
Tallahassee, Florida 32399
Attn: Mr. Bill Thomas

Dear Mr. Thomas:

As requested by John Reynolds (D.E.R.), I have obtained the P.E. certification for the construction permit application that has been submitted and reviewed by your office. The application is for a replacement-in-kind boiler. Enclosed are four complete copies of the construction permit application.

If additional information is required, please contact the undersigned.

Sincerely,



Robert E. Mayko, P.E.
Technical/Environmental Manager

Enclosures

cc: R. T. Van Arsdall
REM/cjn

Copied: John Reynolds

CHF/ST

Bill Thomas. EW Dist

} 6.16.88

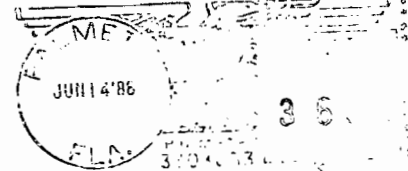
CERTIFIED MAIL - RETURN RECEIPT REQUESTED
P-611-891-984

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

CERTIFIED

P-611 851-784

MAIL



CMI CONSOLIDATED MINERALS, INC.

A SUBSIDIARY OF FCS ENERGY, INC.

P.O. BOX 908 • PALMETTO, FLORIDA 34220

Department of Environmental Regulation
Bureau of Air Quality Management
2600 Blair Stone Road
Tallahassee, Florida 32399
Attn: Mr. Bill Thomas

RETURN REQUESTED
PP-3

CLASS MAIL

CMI CONSOLIDATED MINERALS, INC.

A SUBSIDIARY OF FCS ENERGY, INC.

P.O. BOX 908 • PALMETTO, FLORIDA 34220

April 4, 1988

Department of Environmental Regulation
Bureau of Air Quality
2600 Blair Stone Road - Room 338
Tallahassee, Florida 32399
Attn: Mr. Clair Fancy

RECEIVED

JUN 16 1988

DER-BAQM

Dear Mr. Fancy:

The attached application is being submitted for the replacement in kind of our #2 Auxiliary Boiler, A041-86160 (permit number).

The existing boiler, used sporadically during the year (when the Sulfuric Acid Plant shuts down for maintenance repairs and during subsequent start-ups or for other operational reasons) has been found to be uneconomical to repair. A new, duplicate boiler has been ordered as a direct replacement. The new boiler is manufactured by the Nebraska Boiler Company, rated at 350psig, 75,000lb/hr. steam output, serial number 02375, model number NOS2A67, built 1988. It will be fired with a commercial distillate No. 3 fuel oil with 1% maximum sulfur content.

The new boiler will operate/function identically to the unit it is replacing. The level of contaminant emissions will not change as the low sulfur fuel burned will remain the same. The heat rate of the new boiler is the same as the old boiler. Boiler operating time depends on the performance of the Sulfuric Acid Plant. Anticipated yearly boiler operating time is 525 hours with a maximum operating time of 876 hours. All calculations are based on these hours of operation. Actual hours could be less than or greater than those hours stated above.

Allowed emission rates are derived from the following sources:

SO₂ - 1.1 lb/MMBTU - per Manatee County code

PARTICULATES - 6.96lb/hr. - is requested to exempt the facility from section 17-2.650(2); F.A.C. (as stated on existing permit)

SMOKE - no visible emissions (5% max opacity), 20% is permissible for not more than three minutes in anyone hour (as stated on existing permit)

NO₂ - not required per existing permit and FAC 17-2.650(2)(c)2.

Emission factors for calculations are from table 1.3-1, Emission Factors for Fuel Oil Combustion - Emissions Factor Rating: A for an industrial boiler burning a distillate oil (lb./1,000gal.). Sulfur trioxide, carbon monoxide and hydrocarbons pollutant emissions were not calculated as the possible amounts are extremely low. The daily emissions of SO₂ from the Complex will not be increased

Mr. Clair Fancy
D.E.R.

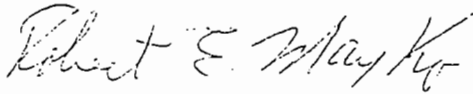
-2-

April 4, 1988

by the use of the replacement in kind boiler as it will operate while the Sulfuric Plant is shut down. The operation of the boiler will be in compliance with the rules of FAC 17-2 and the Manatee County Code.

Your consideration of this application will be appreciated. If additional information is required please contact the undersigned.

Sincerely,



Robert E. Mayko, P.E.
Technical/Environmental Manager

Attachments: Application to Construct
Site Location

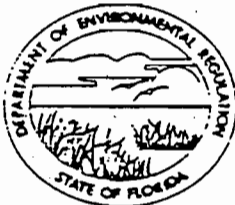
Enclosures: Check to Department of Environmental Regulations
Check to Manatee County

cc: Addressee - Four (4) copies each of attachments
John G. Cladakis - C.M.I.
W. L. Priesmeyer - M.D.P.C.
W. Thomas, D.E.R., Tampa - One (1) copy each with attachment

REM/cjn

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

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



BOB GRAHAM
GOVERNOR

VICTORIA J. TSCHINKEL
SECRETARY

APPLICATION TO OPERATE/CONSTRUCT AIR POLLUTION SOURCES

SOURCE TYPE: Auxiliary Boiler [] New¹ [X] Existing¹ See attached
APPLICATION TYPE: [X] Construction [] Operation [] Modification letter for
COMPANY NAME: Consolidated Minerals, Inc. COUNTY: Manatee explanation.

Identify the specific emission point source(s) addressed in this application (i.e. Line
Kiln No. 4 with Venturi Scrubber; Peaking Unit No. 2, Gas Fired) Auxiliary Boiler

SOURCE LOCATION: Street U S Highway 41 City Palmetto
UTM: East 17 - 348.5 North 3057.3
Latitude 27 ° 37 ' 58 "N Longitude 82 ° 32 ' 08 "W

APPLICANT NAME AND TITLE: Mr. John G. Cladakis Senior Vice President/Operations Manager
APPLICANT ADDRESS: P. O. Box 908 Palmetto, Florida 34220

SECTION I: STATEMENTS BY APPLICANT AND ENGINEER

A. APPLICANT

I am the undersigned owner or authorized representative* of Consolidated Minerals, 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 permitted
establishment.

*Attach letter of authorization

Signed: John G. Cladakis
John G. Cladakis
Senior Vice President/Operations Manager
Name and Title (Please Type)

Date: 4/5/88 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

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 David J. Haley

David J. Haley, P.E.
Name (Please Type)

Haley and Associates
Company Name (Please Type)

1001 Third Ave W., Bradenton, FL 34205
Mailing Address (Please Type)

Florida Registration No. 12578 Date: 6-14-88 Telephone No. 813/747-0092

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.

Replacement in kind of an existing boiler. Existing boiler is not economically repairable. Source performance will remain the same. Project will result in full compliance with required visual emissions test.

B. Schedule of project covered in this application (Construction Permit Application Only)
Start of Construction immediately Completion of Construction one month

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.)

N/A No pollution control equipment is proposed.
Control is by use of low Sulfur fuel oil.

D. Indicate any previous DER permits, orders and notices associated with the emission point, including permit issuance and expiration dates.
#2 Auxiliary boiler A041-86160 Expires 6/15/89

E. Requested permitted equipment operating time: hrs/day ; days/wk ; wks/yr ;
if power plant, hrs/yr ; if seasonal, describe: Occasional - no schedule-
operates at irregular intervals, and at varying rates up to full capacity. Used
when the Sulfuric Acid Plant is shutdown or during start up of that plant.

F. If this is a new source or major modification, answer the following questions.
(Yes or No) (Replacement in kind)

1. Is this source in a non-attainment area for a particular pollutant? N/A
 - a. If yes, has "offset" been applied? "
 - b. If yes, has "Lowest Achievable Emission Rate" been applied? "
 - c. If yes, list non-attainment pollutants. "
2. Does best available control technology (BACT) apply to this source?
If yes, see Section VI. "
3. Does the State "Prevention of Significant Deterioration" (PSD)
requirement apply to this source? If yes, see Sections VI and VII. "
4. Do "Standards of Performance for New Stationary Sources" (NSPS)
apply to this source? "
5. Do "National Emission Standards for Hazardous Air Pollutants"
(NESHAP) apply to this source? "
- H. Do "Reasonably Available Control Technology" (RACT) requirements apply
to this source? "
 - a. If yes, for what pollutants? "
 - b. If yes, in addition to the information required in this form,
any information requested in Rule 17-2.650 must be submitted.

Attach all supportive information related to any answer of "Yes". Attach any justifi-
cation for any answer of "No" that might be considered questionable.

Replacement in kind - Boiler rating (steam production)
Same as Existing - Low Sulfur fuel (1% Max) will continue to be used.

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	N/A	N/A	81,000 Max	N/A
No. 3 Fuel Oil	Sulfur	1% Max	4,983	N/A

B. Process Rate, if applicable: (See Section V, Item 1)

- Total Process Input Rate (lbs/hr): Feedwater - 81,000 # Water at Max Rate.
- Product Weight (lbs/hr): Steam - 75,000 lb/hr

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 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	T/yr	
SO ₂ *	47.6	12.5	1.1 lb MMBtu ¹	105.6	85,200	42.6	N/A
Particulates *	.96	.25	6.96lb/hr ²	6.96	1,198	.6	N/A
Smoke	-	-	20% Opacity ³	3 min/hr	-	-	N/A
Nitrogen Oxides* (as NO ₂)	10.5	2.76	N/R ⁴	N/R	13,182	6.6	N/A

* See attached Calculation Sheet

¹ See Section V, item 2.

² Reference 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)

³ Calculated from operating rate and applicable standard.

⁴ Emission, if source operated without control (See Section V, Item 3).

1 - Per Manatee County Code

2 - To exempt Facility From Section 17-2.650(2)F.

3 - Per Existing Permit

4 - Not required per Existing Permit

J. Control Devices: (See Section V, Item 4)

Name and Type (Model & Serial No.)	Contaminant	Efficiency	Range of Particles Size Collected (in microns) (If applicable)	Basis for Efficiency (Section V Item 5)
N/A				

E. Fuels

Type (Be Specific)	Consumption*		Maximum Heat Input (MMBTU/hr)
	avg/hr	max./hr	
Commercial Distillate	479 Gal/hr	684 Gal/hr	96
No. 3 Fuel Oil			

*Units: Natural Gas--MMCF/hr; Fuel Oils--gallons/hr; Coal, wood, refuse, other--lbs/hr.

Fuel Analysis:

Percent Sulfur: 1.0% Max Percent Ash: .02
 Density: 7.286 lbs/gal Typical Percent Nitrogen: N/A
 Heat Capacity: 19,300 BTU/lb 140,620 BTU/gal
 Other Fuel Contaminants (which may cause air pollution): None

F. If applicable, indicate the percent of fuel used for space heating.

Annual Average N/A Maximum N/A

G. Indicate liquid or solid wastes generated and method of disposal.

N/A

H. Emission Stack Geometry and Flow Characteristics (Provide data for each stack):

Stack Height: 30 ft. Stack Diameter: 4 ft.
 Gas Flow Rate: 19084 ACFM DSCFM Gas Exit Temperature: 545 °F.
 Water Vapor Content: 12.3 % Velocity: 25.3 FPS

SECTION IV: INCINERATOR INFORMATION

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)		N/A					

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	N/A				
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: _____

N/A

Ultimate disposal of any effluent other than that emitted from the stack (scrubber water, ash, etc.):

N/A

NOTE: Items 2, 3, 4, 6, 7, 8, and 10 in Section V must be included where applicable.

SECTION V: SUPPLEMENTAL REQUIREMENTS

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. 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.
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.
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

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

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

Contaminant	Rate or Concentration

C. What emission levels do you propose as best available control technology?

Contaminant

Rate or Concentration

Contaminant	Rate or Concentration
N/A	

D. Describe the existing control and treatment technology (if any).

1. Control Device/System:

2. Operating Principles:

3. Efficiency: *

N/A

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:

N/A

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

N/A

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:

N/A

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:

N/A

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:

N/A

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:

N/A

8. Manufacturer:

9. Other locations where employed on similar processes:

a. (1) Company:

(2) Mailing Address:

(3) City:

(4) State:

Explain method of determining efficiency.

Energy to be reported in units of electrical power - KWH design rate.

(5) Environmental Manager:

(6) Telephone No.: N/A

(7) Emissions:¹

Contaminant	Rate or Concentration

(8) Process Rate:¹

b. (1) Company:

(2) Mailing Address:

(3) City: N/A (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

A. Company Monitored Data

N/A

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

B. Meteorological Data Used for Air Quality Modeling

- 1. Year(s) of data from _____ / _____ / _____ to _____ / _____ / _____ N/A
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) _____

C. Computer Models Used

- 1. _____ Modified? If yes, attach description.
- 2. _____ Modified? If yes, attach description.
- 3. _____ N/A 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.

D. 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.

CALCULATIONS

Section III B.

Water Input (Max)

$$162 \frac{\text{GPM}}{\text{hr}} \times \frac{60 \text{ M}}{\text{hr}} \times 8.34 \frac{\text{lb}}{\text{Gal}} = 81,000 \text{ lb/hr}$$

#3 Fuel Oil Input (Max)

$$684 \frac{\text{Gal}}{\text{hr}} \times 7.286 \frac{\text{lb}}{\text{Gal}} = 4,984 \text{ lb/hr}$$

Section III C.

S02 Emission

Maximum - Estimated yearly operating time - 525 hrs

Estimated average firing rate - 70% of Max, 479 G/hr

.7% Sulfur in Fuel - Typical Analysis

Emission Factor - 142 S (S - % Sulfur)
Table 1.3 - 1

$$\frac{479 \text{ Gal}}{\text{hr}} \times \frac{142 \text{ lb}}{1000 \text{ Gal}} \times .7 = 47.6 \text{ lbs/hr}$$

Actual

$$47.6 \frac{\text{lbs}}{\text{hr}} \times 525 \frac{\text{hr}}{\text{yr}} \times \frac{1 \text{ ton}}{2000 \text{ lb}} = 12.5 \frac{\text{ton}}{\text{yr}}$$

Allowance Emission

1.1 lb/MMBtu (Manatee County Code)

$$1.1 \frac{\text{lb}}{\text{MMBtu}} \times 4983 \frac{\text{lb}}{\text{hr}} \times 19300 \frac{\text{Btu}}{\text{lb}} = 105.6 \text{ lb/hr}$$

Potential Emission

$$\begin{aligned} & 684 \frac{\text{gal}}{\text{hr}} \times 876 \text{ hr} \times 1 \times \frac{142}{1000 \text{ Gal}} = 85,200 \text{ lb/yr} \\ & 85,200 \frac{\text{lb}}{\text{yr}} \div \frac{2000 \text{ lb}}{\text{ton}} = 42.6 \text{ tons/yr} \end{aligned}$$

Calculations
-page 2-

Particulates

Emission

Emission Factor - 2 lb/1000Gal
Table 1.3-1 70% firing rate

Maximum

$$2 \frac{\text{lb}}{1000 \text{ Gal}} \times 684 \frac{\text{Gal}}{\text{hr}} \times .7 = .96 \text{ lb/hr}$$

Actual

$$.96 \frac{\text{lb}}{\text{hr}} \times 525 \frac{\text{hr}}{\text{yr}} \times \frac{\text{ton}}{2000 \text{ lb}} = .25 \text{ ton/yr}$$

Allowable

6.96 lb/hr to Exempt Facility From
Section 17-2.650 (2), F. A. C.

Potential

Emission Factor - 2 lb/1000 Gal
100% firing rate

$$2 \frac{\text{lb}}{1000 \text{ Gal}} \times 684 \frac{\text{Gal}}{\text{hr}} \times 876 \frac{\text{hr}}{\text{yr}} = 1,198 \text{ lb/yr}$$

$$1198 \frac{\text{lb}}{\text{yr}} \times \frac{\text{ton}}{2000 \text{ lb}} = .6 \text{ ton/yr}$$

Smoke

No visible emissions (5% max opacity) except an opacity of 20% is
permissible for not more than three minutes in any one hour.
(Per existing permit)

Nitrogen Oxides

Emissions

Emission Factor 22 lb/1000 Gal

Maximum

Table 1.3 - 1

$$479 \frac{\text{Gal}}{\text{hr}} \times 22 \frac{\text{lb}}{1000 \text{ Gal}} = 10.5 \frac{\text{lb}}{\text{hr}}$$

Actual

$$10.5 \frac{\text{lb}}{\text{hr}} \times 525 \frac{\text{hr}}{\text{yr}} \times \frac{\text{ton}}{2000 \text{ lb}} = 2.76 \frac{\text{ton}}{\text{yr}}$$

Calculations

-page 3-

Potential

100% Firing Rate
10 % yearly operating time

$$684 \frac{\text{Gal}}{\text{hr}} \times 22 \frac{\text{lb}}{1000 \text{ Gal}} \times 876 \frac{\text{hr}}{\text{yr}} = 13,182 \text{ lb/yr}$$

$$13,182 \frac{\text{lb}}{\text{yr}} \times \frac{\text{ton}}{2000 \text{ lb}} = 6.6 \text{ t/yr}$$

