

P16 7682483

RECEIPT FOR CERTIFIED MAIL

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

PS Form 3811, Jan. 1979

**SENDER:** Complete items 1, 2, and 3.  
Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one.)

- Show to whom and date delivered..... c
- Show to whom, date and address of delivery..... c
- RESTRICTED DELIVERY  
Show to whom and date delivered..... c
- RESTRICTED DELIVERY.  
Show to whom, date, and address of delivery. \$ \_\_\_\_\_

(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:  
*H. H. Kitchings  
Mobil Chem. Co.  
1155 Pebbledale Rd.  
Mulberry, FL 33860*

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	7682483	

(Always obtain signature of addressee or agent)

I have received the article described above.  
SIGNATURE  Addressee  Authorized agent

*H. H. Richardson*

DATE OF DELIVERY 3-10-82	POSTMARK
-----------------------------	----------

6. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE: \_\_\_\_\_ CLERK'S INITIALS \_\_\_\_\_

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

PS Form 3800, Apr. 1976

SENT TO  
*H. H. Kitchings*  
STREET AND NO.  
*1155 Pebbledale Rd.*  
P.O., STATE AND ZIP CODE  
*Mulberry, FL 33860*

POSTAGE	\$	
CONSULT POSTMASTER FOR FEES	CERTIFIED FEE	c
	SPECIAL DELIVERY	c
	RESTRICTED DELIVERY	c
	OPTIONAL SERVICES	
	RETURN RECEIPT SERVICE	
	SHOW TO WHOM AND DATE DELIVERED	c
	SHOW TO WHOM, DATE, AND ADDRESS OF DELIVERY	c
	SHOW TO WHOM AND DATE DELIVERED WITH RESTRICTED DELIVERY	c
	SHOW TO WHOM, DATE AND ADDRESS OF DELIVERY WITH RESTRICTED DELIVERY	c
TOTAL POSTAGE AND FEES	\$	
POSTMARK OR DATE		
<i>3/8/82</i>		

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



BOB GRAHAM  
GOVERNOR

Victoria J. Tschinkel  
SECRETARY

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION

March 8, 1982

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

Mr. W. W. Kitchings  
Plant Manager  
Mobil Chemical Co./Electro-Phos Plant  
1155 Pebbledale Road  
Mulberry, Florida 33860

Dear Mr. Kitchings:

Enclosed is Permit Number AC 53-49786, dated March 5, 1982  
to Mobil Chemical Co./Electro-Phos Plant  
issued pursuant to Section 403, Florida Statutes.

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

Sincerely,



Steve Smallwood, P.E.  
Chief  
Bureau of Air Quality Management

SS:pa

cc: G. O. Gudmandsen, Mobil Chemical Co.  
Dan Williams, FDER, Southwest District

Final Determination

Mobil Chemical Company/  
Electro-Phos Plant

Permit Number:

AC 53-49786

Florida Department of Environmental Regulation

Bureau of Air Quality Management

Central Air Permitting

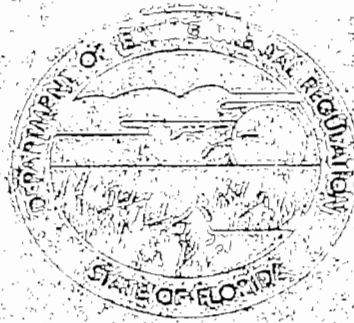
March 3, 1982

Mobil Chemical Company/Electro Phos Plant

The Bureau of Air Quality Management has reviewed the construction permit application from Mobil Chemical to install a new 250 HP boiler, replacing an existing 600 HP boiler. The notice of the Department's proposed action was published in the Lakeland Ledger on January 29, 1982 and the technical package was available for public inspection at the DER Southwest District Office in Tampa, and at the Bureau of Air Quality Management.

No letters or comments were received on the proposed action as a result of the public comment period. Therefore, the construction permit will be issued with the conditions as given in the proposed permit.

BEST AVAILABLE COPY



STATE OF FLORIDA  
DEPARTMENT OF  
ENVIRONMENTAL REGULATION

CONSTRUCTION  
PERMIT

NO. AC 53-49786

MOBIL CHEMICAL CO. / ELECTRO-PHOS PLANT  
POLK COUNTY

DATE OF ISSUANCE

March 5, 1982

DATE OF EXPIRATION

APRIL 30, 1982

Victoria J. Tschinkel

VICTORIA J. TSCHENKEL  
SECRETARY



STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

APPLICANT: Mobil Chemical Co./Electro-Phos Plant  
1155 Pebbledale Road  
Mulberry, Florida 33860

PERMIT/CERTIFICATION  
NO. AC 53-49786

COUNTY: Polk

PROJECT: 250 HP Boiler

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

Construction of 250 HP Boiler to replace an existing 600 HP Boiler (AO 53-29247). Fired by 84 gal/hr No. 6 fuel oil @ 2.4% Sulfur.

Attachment:

1. Application to Construct Air Pollution Sources, DER Form 17-1.122(16).
2. Letter from BAQM to W.W. Kitchings, December 10, 1981.
3. Letter from W. W. Kitchings to BAQM, December 15, 1981.

PERMIT NO.: AC 53-49786

APPLICANT: Mobil Chemical Co./Electro-Phos. Plant

**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 Section 403.161(1), Florida Statutes. Permittee is hereby placed on notice that the department will review this permit periodically and may initiate court 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 indicated in the attached drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit shall constitute grounds for revocation and enforcement action by the department.

3. 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 non-compliance, including exact dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance. The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the department for penalties or revocation of this permit.

4. As provided in subsection 403.087(6), 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.

5. This permit is required to be posted in a conspicuous location at the work site or source during the entire period of construction or operation.

6. 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 Section 403.111, F.S.

7. In the case of an operation permit, 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.

8. 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, except where specifically authorized by an order from the department granting a variance or exception from department rules or state statutes.

9. This permit is not transferable. Upon sale or legal transfer of the property or facility covered by this permit, the permittee shall notify the department within thirty (30) days. The new owner must apply for a permit transfer within thirty (30) days. The permittee shall be liable for any non-compliance of the permitted source until the transferee applies for and receives a transfer of permit.

10. The permittee, by acceptance of this permit, specifically agrees to allow access to permitted source at reasonable times by department personnel presenting credentials for the purposes of inspection and testing to determine compliance with this permit and department rules.

11. This permit does not indicate a waiver of or approval of any other department permit that may be required for other aspects of the total project.

12. This permit conveys no title to land or water, nor constitutes state recognition or acknowledgement of title, and does not constitute authority for the reclamation 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.

13. This permit also constitutes:

- Determination of Best Available Control Technology (BACT)
- Determination of Prevention of Significant Deterioration (PSD)
- Certification of Compliance with State Water Quality Standards (Section 401, PL 92-500)

PERMIT NO.: AC 53-49786

APPLICANT: Mobil Chemical Co/Electro-Phos Plant

SPECIFIC CONDITIONS:

1. The maximum fuel usage of the 250 HP boiler shall be 84 gallons/hour. The maximum sulfur content of the fuel shall not exceed 2.4 percent sulfur by weight.
2. The maximum hours of operation shall be 24 hours per day, 7 days per week and 50 weeks per year, or 8,400 hours per year.
3. Exhaust from the boiler shall not exhibit visible emissions of 20 percent opacity or greater.
4. Prior to issuance of an operating permit for the 250 boiler, the operating permit for the 600 HP boiler (AO 53-29247) shall be discontinued and the operating permit for the 400 HP boiler (AO 53-29248) shall be amended to limit operational hours to 4,032 hours per year.
5. Compliance with Specific Condition #3 shall be determined by EPA Method 9 for visible emissions. At least thirty days notification shall be provided to the DER Southwest District Office in Tampa prior to testing.
6. An annual operating report shall be submitted to the DER Tampa office. This report shall contain fuel sulfur content, fuel usage and hours of operation.
7. Prior to 30 days before the expiration of this permit a complete application for an operating permit and compliance test results shall be submitted to the DER, Southwest District Office. Full operation of the source may then be conducted in compliance with the terms of this permit until expiration or receipt of an operating permit.

Expiration Date: April 30, 1982

Issued this 5 day of March, 1982

\_\_\_\_\_ Pages Attached.

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION

Terry Cole  
Signature

PAGE 3 OF 3



State of Florida  
DEPARTMENT OF ENVIRONMENTAL REGULATION

INTEROFFICE MEMORANDUM

For Routing To District Offices And/Or To Other Than The Addressee		
To: _____	Loctn.: _____	
To: _____	Loctn.: _____	
To: _____	Loctn.: _____	
From: _____	Date: _____	
Reply Optional [ ]	Reply Required [ ]	Info. Only [ ]
Date Due: _____	Date Due: _____	

TO: Victoria J. Tschinkel

FROM: C. H. Fancy *Car H. Fancy*

DATE: March 5, 1982

SUBJ: Approval and Signature of Attached Air  
Construction Permit

RECEIVED

MAR 5 1982

Office of the Secretary

Attached please find one Air Construction Permit for Mobil Chemical Company/Electro-Phos Plant. Day 90, after which the permit would be issued by default is March 21, 1982.

The Bureau recommends your approval and signature.

CHF/bjm

Attachment

Check Sheet

Company Name: MOBIL CHEMICAL

Permit Number: AL 53-49786

PSD Number: \_\_\_\_\_

Permit Engineer: \_\_\_\_\_

**Application:**

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

**Cross References:**

- 
- 
- 

**Intent:**

- Intent to Issue
- Notice of Intent to Issue
- Technical Evaluation
- BACT 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 Determination
- Other

**Post Permit Correspondence:**

- Extensions/Amendments/Modifications
- Other

State of Florida  
DEPARTMENT OF ENVIRONMENTAL REGULATION

INTEROFFICE MEMORANDUM

For Routing To District Offices And/Or To Other Than The Addressee		
To: _____	Loctn.: _____	
To: _____	Loctn.: _____	
To: _____	Loctn.: _____	
From: _____	Date: _____	
Reply Optional [ ]	Reply Required [ ]	Info. Only [ ]
Date Due: _____	Date Due: _____	

TO: Clair Fancy  
THROUGH: Dan Williams *DW*  
FROM: Bill Thomas *BT*  
DATE: September 8, 1983  
SUBJECT: Mobil Electro-Phos Plant  
Air Permits

DER  
SEP 12 1983  
BAQM

The above subject facility is a phosphorus plant which has been shut-down for economic reasons. Operating permits for the furnace and briquetting operation have expired and will be renewed for two years. Mobil is seeking ways to protect operating permits beyond the two year period as indicated in the attached letter.

WHAT?

Mobil's situation is similar to Stauffer Chemical's in Tarpon Springs. I understand that Stauffer will be issued a letter assuring them that they can buy additional time by applying for a construction/modification permit, with no increase in emissions, and avoid a new source review. Mobil should be sent a letter, couched in a similar manner, in response to the attached letter. Mobil's plant is a major source and an application to construct would be processed by CAPS; and the response to their letter should originate in CAPS.

Please let me know if you have questions or we can be of assistance.

WCT/scm

RECEIVED  
SEP 15 1983  
Dep. of Environmental Regulation  
Office of General Counsel

ROUTING AND TRANSMITTAL SLIP

ACTION NO.  
ACTION DUE DATE

1	TO: NAME, OFFICE, LOCATION <i>Clair Family</i>	INITIAL
		DATE
2	<i>DER - Sally</i>	INITIAL
		DATE
3	<i>915 Marti Hall</i>	INITIAL
		DATE
4		INITIAL
		DATE

REMARKS:  
Any comments, advice, on this would be appreciated prior to our answering it.

TALK TO  
CLAIR / NANCY

RECEIVED

SEP 15 1983

Dept. of Environmental Regulation  
Office of General Counsel

*As Amended Copy a fossil fuel steam generator*

FROM: *W. Thomas / pen*  
C. Davis

REVIEW & RETURN
REVIEW & FILE
INITIAL & FORWARD
DISPOSITION
REVIEW & RESPOND
PREPARE RESPONSE
FOR MY SIGNATURE
FOR YOUR SIGNATURE
LET'S DISCUSS
SET UP MEETING
INVESTIGATE & REPT
INITIAL & FORWARD
DISTRIBUTE
CONCURRENCE
FOR PROCESSING
INITIAL & RETURN

DATE: *0-9-83*  
PHONE: *9/15/83*

ROUTING AND TRANSMITTAL SLIP

ACTION NO.  
ACTION DUE DATE

1	TO: NAME, OFFICE, LOCATION <i>Clair Family</i>	INITIAL
		DATE
2	<i>DER</i>	INITIAL
		DATE
3	<i>OCT 12 1983</i>	INITIAL
		DATE
4	<i>BAQM</i>	INITIAL
		DATE

REMARKS:

Sorry. This got temporarily lost in the heap. Neither Nancy nor I understand Stauffer's situation to be as described in A 2. In fact, I had suggested to Dan Williams last winter that, ~~if~~ if Stauffer was still not operating when the newly issued 2 year permit expired, they should thereafter be treated as a new source. See Fla. Admin. Code Rule 17-2.210(2)(c) 1. a.

REVIEW & RETURN
REVIEW & FILE
INITIAL & FORWARD
DISPOSITION
REVIEW & RESPOND
PREPARE RESPONSE
FOR MY SIGNATURE
FOR YOUR SIGNATURE
LET'S DISCUSS
SET UP MEETING
INVESTIGATE & REPT
INITIAL & FORWARD
DISTRIBUTE
CONCURRENCE
FOR PROCESSING
INITIAL & RETURN

FROM: *Marti*  
DATE: *10/12*  
PHONE:

# Mobil Chemical Company

PHOSPHORUS DIVISION

P.O. BOX 26683  
RICHMOND, VIRGINIA 23261  
TELEPHONE (804) 798-4291

August 4, 1983

CABLE ADDRESS:  
MOBIL CHEM-RICHMOND  
TWX (710) 958-4408

FLORIDA DEPARTMENT OF ENVIRONMENTAL  
REGULATIONS

7601 Highway 301 North  
Tampa, FL 33010  
ATTN: Mr. William Thomas

Dear Mr. Thomas:

During our meeting, we discussed our Electro-Phos plant and our desire to maintain the active status of our permits to operate the equipment designed to abate the sources of air pollution within the plant.

As we discussed, the electric furnace and briquetting machinery are being held in a state of readiness and can be brought into production if required.

At our meeting, we reviewed the history of our phosphorus supply requirements and how we came to our current posture.

Briefly, the points we discussed were:

1. Mobil Chemical's Industrial Chemicals Group has, since the mid-1950's, contracted for the partial supply of its basic raw material, elemental phosphorus. These supply contracts have been with phosphorus manufacturerers, who are also competitors of Mobil in the phosphorus derivative business.
2. Early 1970's, Mobil's major phosphorus producing electric furnaces were shut down. The Nichols, Florida, furnace continued to operate, supplying only a small portion of Mobil's phosphorus requirements.
3. During the mid-1970's, because of the then existing economic conditions, phosphorus became in very short supply, and Mobil's phosphorus suppliers either terminated or reduced phosphorus shipments under contract. Fortunately, new arrangements were concluded with Holmes Company (predecessor to Electro-Phos Corp.), Pierce, Florida, for phosphorus supplies.

**D.E.R.**

SEP 6 1983

SOUTHWEST DISTRICT  
TAMPA

4. In 1978, Mobil acquired the Electro-Phos Corporation, Pierce, Florida (from Mitsubishi International Corp.), providing approximately 50% of Mobil's phosphorus requirements. The remainder of Mobil's phosphorus requirements were bought under long-term contract with a U.S. phosphorus producer.
5. In 1983, because of the recessionary economic conditions, worldwide over capacity of phosphorus electric furnace plants, and the high cost of electric power in Florida (approximately 35-40% of the phosphorus costs), Mobil placed in stand-by the Electro-Phos furnace, and contracted for 100% of its phosphorus requirements. Other portions of the operation continue to operate as part of the reclamation activities.
6. The current phosphorus supply contract, nominally for five (5) years ending 1987, is based on phosphorus produced in the Tennessee Valley Authority region, subject to cancellation by the supplier for various causes, i.e.:
  - a. Shutting down of producing facilities for any reason including economics, requiring minimum notice by supplier. Since this contract is directly tied to only one plant, anything which curtails or halts production at this plant curtails the phosphorus supply to Mobil.
  - b. Typical "Force Majeure" clauses.
  - c. Cancellation of contract after three (3) years (1985) with two year's notice.

As we indicated at our meeting, we are trying to maintain our ability to compete in the marketplace, over the long-term, and minimize external influence in our phosphorus derivative business. For this reason, we believe that our furnace facility must be kept ready to start-up with relatively short notice.

We are currently engaged in a program to reclaim the phosphorus from the phosphy water ponds. Ancillary equipment being used in this operation includes the boilers at the facility. Further, the coke dryer and the rock dryer as well as the conveyors and equipment associated with these dryers will be operated in order to reclaim the coke and phosphate rock on site.

Additionally, the plant's wastewater discharge permit will remain active since the phosphy water ponds will continue in existence and the management of these ponds is an on-going requirement.

Mr. William Thomas  
Page Three.  
August 4, 1983

The electric furnace and its associated briquetting machinery are the only processes which are placed in stand-by condition.

We understand that your policy is to renew permits for only two years in the case of inactive facilities. Although our furnace and briquette operations are currently in a stand-by condition, the majority of the sources within the facility remain active, and the DER is currently processing permit renewals for these sources for five-year terms.

Since most of the sources in the facility remain active, we interpret your regulations to allow: (1) the reactivation of the furnace and briquette operations within the facility requiring only a construction/modification permit application not subject to new source review; and, (2) regular five-year permits to be processed for the remaining active sources.

We would appreciate a confirmation on the above. If we can provide additional information, please contact me.

Very truly yours,

MOBIL CHEMICAL COMPANY



Robert D. Stephens, Manager  
Environmental Control

/cm

0093A

# AFFIDAVIT OF PUBLICATION

## THE LEDGER

Lakeland, Polk County, Florida

Case No .....

Attach Notice Here

STATE OF FLORIDA )  
COUNTY OF POLK )

Before the undersigned authority personally appeared Walter Garris, who on oath says that he is Controller of The Ledger, a daily newspaper published at Lakeland in Polk County, Florida; that the attached copy of advertisement, being a.....

..... Notice .....

..... in the matter of .....

..... Proposed Agency Action .....

..... in the .....

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

..... January 29; 1982 .....

Affiant further says that said The Ledger is a newspaper published at Lakeland, in said Polk County, Florida, and that the said newspaper has heretofore been continuously published in said Polk County, Florida, daily, and has been entered as second class matter at the postoffice in Lakeland, in said Polk County, Florida, for a period of one year next preceding the first publication of the attached copy of advertisement; and affiant further says that he 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.

Signed *Walter Garris*  
Controller

Sworn to and subscribed before me this ..... 5th .....  
day of ..... February ..... A.D. 19 82.

(Seal) *Richard Higgin*  
Notary Public  
NOTARY PUBLIC, STATE OF FLORIDA AT LARGE  
MY COMMISSION EXPIRES NOV. 11, 1982  
BONDED THRU GENERAL INS. UNDERWRITERS  
My Commission Expires .....

DER  
FEB 24 1982  
BAQM

NOTICE OF PROPOSED AGENCY ACTION  
The Florida Department of Environmental Regulation (DER) has received an application from and intends to issue a construction permit to Mobil Chemical Company/ElectroPhos Plant for the construction of a 250 HP boiler to be located at 1155 Pebbledale Road in Mulberry, Polk County, Florida. A determination of Best Available Control Technology was not required. Copies of the applications, technical evaluation, and Department Intent are available for inspection at the following offices:  
DER SOUTHWEST DISTRICT  
7601 Highway 301 North  
Tampa, Florida  
DER Bureau of Air Quality Management  
2600 Blair Stone Road  
Tallahassee, Florida 32301  
Comments on this action shall be submitted in writing to Bill Thomas of the Tallahassee office, within 30 days of this notice.  
P-852 - 1-29-1982



State of Florida  
DEPARTMENT OF ENVIRONMENTAL REGULATION

INTEROFFICE MEMORANDUM

For Routing To District Offices And/Or To Other Than The Addressee		
To: _____	Loctn.: _____	
To: _____	Loctn.: _____	
To: _____	Loctn.: _____	
From: _____	Date: _____	
Reply Optional [ ]	Reply Required [ ]	Info. Only [ ]
Date Due: _____	Date Due: _____	

TO: W. W. Kitchings, Mobil Chemical Co./Electro-Phos Plant  
G. O. Gudmandsen, Mobil Chemical Co.  
Dan Williams, FDER Southwest District

FROM: <sup>SP</sup> C. H. Fancy, Deputy Chief, Bureau of Air Quality Management

DATE: January 26, 1982

SUBJ: Preliminary Determination - Mobil Chemical Co./  
Electro-Phos Plant (AC 53-49786)

Attached is one copy of the application, Technical Evaluation and Preliminary Determination, and proposed permit for the subject application to construct a 250 HP boiler to replace an existing 600 HP boiler (AO 53-29247) at Mobil's facility in Mulberry, Polk County, Florida.

Please submit any comments which you wish to have considered concerning this action, in writing, to Bill Thomas of the Bureau of Air Quality Management.

CH/bjm

Proposed Department Action

The Department intends to issue the requested permit to Mobil Chemical Co./Electro-Phos Plant for the construction of a new 250 HP boiler at the applicant's existing facility in Mulberry, Polk County, Florida.

Any person wanting to comment on this action may do so by submitting such comments in writing to:

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

Any comments received within thirty days after publication of this notice will be considered and noted in the Department's final determination.

Any person whose substantial interest would be affected by the issuance or denial of this permit may request an administrative hearing by filing a petition for hearing as set forth in Section 28-5.15 FAC (copy attached). Such petition must be filed within 14 days of the date of this notice with:

Ms. Martha Hall  
Department of Environmental Regulation  
Office of General Counsel  
Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32301

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.

Technical Evaluation

and

Preliminary Determination

Mobil Chemical Company/Electro-Phos Plant  
Polk County

Permit Number:

AC 53-49786

Florida Department of Environmental Regulation

Bureau of Air Quality Management

Central Air Permitting

January 22, 1982

## I. PROJECT DESCRIPTION

### A. Applicant

Mobil Chemical Company/Electro-Phos Plant  
1155 Pebbledale Road  
Mulberry, Florida 33860

### B. Project and Location

The applicant proposes to replace an existing 600 HP auxiliary boiler (AO 53-29247) with a new 250 HP boiler. A 400 HP boiler (AC 53-29248) will then be relegated to auxiliary status, resulting in negligible net emission changes for the facility as a whole.

### C. Process Description and Controls

The proposed boiler will provide a continuous supply of steam necessary for process equipment used in the production of elemental phosphorus from phosphate rock. The extent of pollutant emissions will not be great enough to warrant use of pollution abatement equipment. SO<sub>2</sub> emissions will be limited by using No. 6 fuel oil containing no greater than 2.4% sulfur.

## II. RULE APPLICABILITY

The proposed source will be located in Polk County, which is designated as "unclassifiable" for particulate and "attainment" for all other pollutants. The facility is also located within the range of the Hillsborough County Particulate Non-attainment Area of Influence. Therefore, the proposed source is potentially subject to sections 17-2.500, Florida Administrative Code (FAC) - Prevention of Significant Deterioration (PSD), and 17-2.510, FAC - New Source Review for Nonattainment Areas. Applicability to the PSD rules will be discussed below; however, the proposed action is exempt from the nonattainment rules since it would be in the Area of Influence and amount to a minor modification (see 17-2.510(1)(c)2.b., FAC).

PSD rule applicability is determined by summing up the creditable contemporaneous emissions changes as outlined in 17-2.500(2)(e), FAC, and comparing net increases to Table 500-2, FAC, Significant Emission Rates. A significant increase over these rates would subject the application to PSD review. There has been no new construction resulting in emission increases at the facility beginning with the period five years prior to the date of the receipt of the complete application (December 21, 1976) nor are there projected to be any emission changes before issuance of the new operating permit, except for those resulting from the shutdown of the 600 HP boiler and the operational curtailment of the 400 HP boiler.

The table in Section III summarizes the proposed net emission changes. All pollutants will be decreased slightly, except for carbon monoxide and volatile organics (CO and VOC respectively) which will be increased by negligible amounts. Therefore the application is not subject to the PSD rule.

The proposed action is potentially subject to 17-2.600 (6) FAC, Emission Limiting and Performance Standards - Fossil Fuel Steam Generators Less than 250 MMBTU/hour Heat Input; however, since particulates and SO<sub>2</sub> emissions will be decreasing, Best Available Control<sup>2</sup> Technology (BACT) is not required under this section, although the visible emissions (VE) limit of 20% opacity would come into effect.

Section 17-2.520 FAC, Sources Not Subject to Prevention of Significant Deterioration or Nonattainment Requirements would apply to the proposed permit. However, this section would not provide for additional regulation since it essentially just requires assurance to the Department that ambient standards or maximum allowable increases will not be exceeded, and that attainment schedules are not interfered with. As has been pointed out, emissions will not significantly change and therefore the proposed action will not affect air quality.

### III. SUMMARY OF EMISSIONS AND AIR QUALITY ANALYSIS

All pollutants will result from combustion of No. 6 fuel oil with 2.4% (by weight) sulfur content. All emission calculations were derived from Table 1.3-1 AP-42 (EPA's Compilation of Emission Factors, 3rd Edition) except for the sulfur dioxide figures which were derived assuming that all the sulfur in the fuel is converted to SO<sub>2</sub>.

<u>Pollutant</u>	<u>Source</u>	<u>Existing Emissions (TPY)</u>	<u>Prop. Emissions (TPY)</u>	<u>Net Change (TPY)</u>
TSP	600 HP Boiler	1.8	0.0	-1.8
	400 HP Boiler	15.3	7.3	-8.0
	250 HP Boiler	0.0	9.5	9.5
	Total	<u>17.1</u>	<u>16.8</u>	<u>-0.3</u>
SO <sub>2</sub>	600 HP Boiler	26.7	0.0	-26.7
	400 HP Boiler	222.0	107.2	-114.8
	250 HP Boiler	0.0	139.0	139.0
	Total	<u>248.7</u>	<u>246.2</u>	<u>-2.5</u>
CO	600 HP Boiler	0.3	0.0	-0.3
	400 HP Boiler	2.8	1.4	-1.4
	250 HP Boiler	0.0	4.2	4.2
	Total	<u>3.1</u>	<u>5.6</u>	<u>2.5</u>
VOC	600 HP Boiler	0.1	0.0	-0.1
	400 HP Boiler	0.6	0.3	-0.3
	250 HP Boiler	0.0	0.9	0.9
	Total	<u>0.7</u>	<u>1.2</u>	<u>0.5</u>
NO <sub>x</sub>	600 HP Boiler	2.9	0.0	-2.9
	400 HP Boiler	24.5	11.7	-12.8
	250 HP Boiler	0.0	15.2	15.2
	Total	<u>27.4</u>	<u>26.9</u>	<u>-0.5</u>

Pollutant dispersion modeling is not required in this case since emissions would not be significantly increased for the facility as a whole.

### IV. CONCLUSIONS

The operational conditions and emission limitations proposed by the applicant are such that there will not be any significant emissions increases and therefore no significant effect on air quality. The proposed permit will limit sulfur content of the fuel and operational hours, and will require a discontinuance and curtailment of the 600 and 400 HP boilers respectively to assure adherence to the proposed emission limits.

# Mobil Chemical Company

December 15, 1981

*Bill*

State of Florida  
Department of Environmental Regulation  
C.H. Fancy, P.E.  
Deputy Chief  
Bureau of Air Quality Management  
Twin Towers Office Bldg.  
2600 Blair Stone Road  
Tallahassee, Florida 32301



PHOSPHORUS DIVISION  
ELECTRO-PHOS PLANT

1155 PEBBLEDALE ROAD  
MULBERRY, FLORIDA 33860  
TELEPHONE (813) 288-1405



RE: Application to Construct 250 HP Boiler  
(AC 53-49786)

Dear Sirs:

This letter is to provide the additional information required for further processing of the above referenced Application.

In response to your letter of December 10, 1981 the following questions are addressed:

Question 1 Construction Permit - Section II, Part B - Commencement and completion of construction dates.

We do concur that more realistic construction dates are required for the permit. Therefore we suggest that commencement of construction be revised to read "upon issuance of construction permit" and that completion of construction be changed to read (2) two days from issuance of construction permit. Since this boiler is of the skid-mounted package "fire-tube" variety, this abbreviated construction schedule is viable since only minor service "tie-ins" are required to put this unit on-line.

Question 2 Construction Permit - Section III, Part C

The indicated potential emission of 222 ton/yr. of  $SO_x$  as  $SO_2$  is in error and should be changed to agree with actual emissions of 139 tons per year.

This correlates with the "nameplate maximum fuel input" of 84 gal/hr. and is shown below with No. 6 fuel oil with a specific gravity of 8.208 lbs/gal. and a 2.4% S max. specification.

$$\frac{84 \text{ gal}}{\text{Hr.}} \times \frac{8400 \text{ hr.}}{\text{Yr.}} \times \frac{8.208 \text{ lbs. oil}}{\text{Gal. of oil}} \times \frac{1 \text{ ton}}{2000 \text{ lbs}} \times \frac{.024 \text{ lbs. S}}{\text{lb. oil}} \times \frac{2 \text{ lbs. } SO_2}{\text{lb. S}}$$

= 139 ton/yr.



Question 3 New Source Review and Prevention of Significant Deterioration

We concur that a significant net increase in So<sub>2</sub> emission would occur as a result of increased operating time requested in this permit application, if one does not offset this increase within the facility.

We propose to offset this increase by allowing modifications to the operating conditions of the 400 HP boiler to effect essentially a "zero" change in the facility as a whole. It is our proposal to limit the operation of the 400 HP boiler (Permit No. A0 53-29248) to 24 hrs/day; 7 days/wk; 24 wks/yr, which translates to:

$$\frac{135 \text{ Gallon}}{\text{Hr.}} \times \frac{4032 \text{ Hr.}}{\text{Yr.}} \times \frac{8.208 \text{ lbs.oil}}{\text{Gal. of oil}} \times \frac{1 \text{ Ton}}{2000 \text{ lbs.}} \times \frac{.024 \text{ lbs.S}}{\text{lb. oil}} \times \frac{2 \text{ lbs.So}_2}{\text{lbs.}}$$

= 107.2 ton/yr.

Based on this format, the following actual maximum So<sub>2</sub> emission from this facility would be 246.2 ton/yr.

	Annual So <sub>2</sub> Emission
240 HP boiler	139 ton/yr.
400 HP boiler	107.2 ton/yr.
	<hr/>
	246.2 ton/yr.

Versus a currently permitted 248.7 ton/yr. If the proposed modification to Permit No. A0 53-29248 is acceptable to the Department then NSR and PSD do not apply.

Question 4 Best Available Control Technology

BACT will also not apply since no increase in So<sub>2</sub> emission will result at this facility if the Department modifies the Permit for the existing 400 HP boiler.

We apologize for the confusion over this Permit Application and hope that we have satisfactorily resolved your questions. This boiler "replacement" project is strictly a maintenance of business item and has nothing to do with any plant expansion or an increase in plant capacity. It is extremely important to our operation to maintain a continuous supply of steam, as steam serves as an inert "blanket" to prevent potentially catastrophic explosions in some of our process equipment. Therefore, we request prompt action on approving the Permit Application.

If there are further questions or concerns, please call.

Sincerely,

  
W.W. Kitchings  
Plant Manager

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

December 10, 1981

Mr. W. W. Kitchings  
Plant Manager  
Mobil Chemical Company/Electro-Phos. Plant  
1155 Pebbledale Road  
Mulberry, Florida 33860

Dear Mr. Kitchings:

RE: Application to Construct 250 HP Boiler (AC 53-49786)

Your application to construct the referenced boiler is being processed by the Bureau of Air Quality Management in Tallahassee. After an initial review, it is apparent that we are in need of some additional information to determine exactly what regulations are applicable to the new source.

First, let me point out that the Florida Air Pollution regulations, Chapter 17-2, Florida Administrative Code (FAC), have been revised and reformatted effective November 1, 1981. Therefore, your application, received by DER November 12, would come under the jurisdiction of this new version of the rules. A copy of the newly revised air regulations is enclosed.

The questions to be resolved concerning the completeness of the application are as follows:

1. Section II, Part B - Commencement and completion of construction dates are given as November 1 and November 30, 1981 respectively. Please be aware that a construction permit must first be issued prior to beginning construction of the source. Since it may take up to 90 days to process a complete application, more realistic construction dates are required for this section.

Mr. W. W. Kitchings  
Page Two  
December 10, 1981

2. Section III, Part C - The application indicates a potential emission of 222 tons per year. Please supply the basis for this potential emission of SO<sub>2</sub> and indicate why it differs from actual emissions, as there is no control device proposed to reduce the SO<sub>2</sub> emissions.

3. After comparing the actual emissions from the operating permit of the old 600 HP boiler (AO 53-29247, issued May 22, 1980) to the proposed SO<sub>2</sub> emissions from the new boiler, there would appear to be a significant net increase in SO<sub>2</sub> emissions for the facility as a whole. Such an increase would subject the new source to the New Source Review (NSR) requirements of 17-2.500 FAC, Prevention of Significant Deterioration (PSD), per 17-2.500(2)(f)1. Please refer to 17-2.500(2)(e)FAC, Emissions Increases, for guidance in summation of actual emissions increases (or decreases) and provide the Bureau with the required information (e.g., fuel consumption records) in order that we may determine the creditable emissions changes and thus the rule applicability.

4. Best Available Control Technology will be required if there is a net emissions increase of any pollutant above the significance levels of Table 500-2. If such will be the case, please fill out Section VI of the application and submit it to the Bureau.

In a telephone conversation with Mr. Tom Perry on December 9, 1981, Mr. Perry indicated the intention of relegating the 400 HP boiler at your facility to standby use after installation of the new boiler, in effect decreasing actual emissions from this source. If this is true, a creditable decrease in emissions from this boiler would take effect upon modification to its operating permit (AO 53-29248) to reflect a decrease in hours of operation. This decrease could result in an overall decrease in SO<sub>2</sub> emissions from the facility, or an insignificant increase, which would preclude the necessity for the PSD review mentioned above. Therefore, it is important that you include in your response to this letter calculations or figures which establish the actual emissions of the 400 HP boiler in the past and what is proposed for its standby usage. Modification to the 400 HP boiler operating permit would become a condition of the new boiler's construction permit.

Mr. W. W. Kitchings  
Page Three  
December 10, 1981

Please don't hesitate to call Mr. Tim Powell of my office or myself at (904) 488-1344 if you have further questions.

Sincerely,



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

CF:TP:caa

cc: Tom Perry  
G. O. Gudmendsen  
Dan Williams

DER PERMIT APPLICATION TRACKING SYSTEM MASTER RECORD

FILE#000000049786 COE#  
FILE NAME:MOBIL CHEMICAL CO  
APPL NAME:KITCHINGS  
ADDR:1155 PEBBLEDALE RD  
AGNT NAME:GUDMANDSEN  
ADDR:P O BOX 311

DER PROCESSOR:THOMAS  
DATE FIRST REC: 11/12/81  
APPL PHONE:(813)428-1405  
CITY:MULBERRY  
AGNT PHONE:(813)425-3011  
CITY:NICHOLS

DER OFFICE:TLH  
APPLICATION TYPE:AC  
PROJECT COUNTY:53  
ST:FLZIP:33860  
ST:FLZIP:33863

ADDITIONAL INFO REQ: / / / / / / REC: / / / / / /  
APPL COMPLETE DATE: / / COMMENTS NEC:Y DATE REQ: / / DATE REC: / /  
LETTER OF INTENT NEC:Y DATE WHEN INTENT ISSUED: / / WAIVER DATE: / /

HEARING REQUEST DATES: / / / / / /  
HEARING WITHDRAWN/DENIED/ORDER -- DATES: / / / / / /  
HEARING ORDER OR FINAL ACTION DUE DATE: / / MANUAL TRACKING DESIRED:N

THIS RECORD HAS BEEN SUCCESSFULLY ADDED 11/19/81 10:42:56  
FEE PD DATE#1:11/12/81 \$0020 RECEIPT#00033587 REFUND DATE: / / REFUND \$  
FEE PD DATE#2: / / \$ RECEIPT# REFUND DATE: / / REFUND \$  
APPL:ACTIVE/INACTIVE/DENIED/WITHDRAWN/TRANSFERRED/EXEMPT/ISSUED:AC. DATE:11/12/81

REMARKS: 250 HP BOILER TO REPLACE 600 HP BOILER RESULTING IN REDUCTION OF  
TOTAL EMISSIONS.  
SOURCE LOCATION: 1155 PEBBLEDALE RD, MULBERRY.

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION

No. 33587

RECEIPT FOR APPLICATION FEES AND MISCELLANEOUS REVENUE

Received from Mobil Chemical Co. Date 12 NOV '81  
Address 1155 Pebbledale Road-Mulberry, FL 33860 Dollars \$ 20.00  
Applicant Name & Address W.W. Kitchings (care address)  
Source of Revenue \_\_\_\_\_  
Revenue Code 0101 Application Number ACS3-49786  
By Tim Powell

DEPARTMENT OF ENVIRONMENTAL REGULATION

ROUTING AND TRANSMITTAL SLIP		ACTION NO.	
		ACTION DUE DATE	
1. TO: (NAME, OFFICE, LOCATION)		INITIAL	
		DATE	
2.		INITIAL	
		DATE	
3.		INITIAL	
		DATE	
4.		INITIAL	
		DATE	
REMARKS:  <p style="font-size: 1.5em; font-family: cursive;">New CAPS file: MOBIL CHEMICAL Co / ELECTRO-PHOS PLANT</p>		INFORMATION	
		<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 & REPT	
		<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	
		PHONE	

**Mobil Chemical Company**

September 23, 1981

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

Dear Mr. Hennessey:

Re: Electro-Phos Corporation/Mobil Chemical Company  
Name Change

This letter is a request to change the name on the permits on the attached list from Electro-Phos Corporation to Mobil Chemical Company, Electro-Phos plant. The Electro-Phos Corporation is a wholly owned subsidiary of Mobil Oil Corporation. The Phosphorus Division of Mobil Chemical Company, which is a part of Mobil Oil Corporation, currently has a management services contract with the Electro-Phos Corporation.

Legal changes are being made which will result in the Electro-Phos plant becoming a part of the Phosphorus Division of Mobil Chemical. The name change is the only change involved in the company.

All aspects of the permits on the attached list remain the same as the permit applications stated and will remain in compliance with the current permits issued.

Please advise if there are any questions.

Sincerely,



Robert D. Stephens  
Senior Environmental Engineer

/gjb

Attachment

bcc: ✓ W. W. Kitchings  
W. R. Smithey, Jr.

DEPARTMENT OF ENVIRONMENTAL REGULATION

ROUTING AND TRANSMITTAL SLIP

ACTION NO. 1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30

ACTION DUE DATE NOV 17 1981

BUREAU OF AIR QUALITY MANAGEMENT

INITIAL DATE

INITIAL DATE

INITIAL DATE

INITIAL DATE

1. TO: (NAME, OFFICE, LOCATION)

*Clair Fancy*

2.

*Bureau of Air Quality Management*

3.

4.

*RE: Permit Application for*

REMARKS:

*Mobil Chem. Co. - Electrophos Plt.*

*Attached is an application and fee to construct a replacement boiler at an existing major facility. I believe it comes under CAPS's jurisdiction.*

*If you have any questions give me a call. We retained one copy of the application.*

FROM:

*Don A. Williams*

INFORMATION

REVIEW & RETURN

REVIEW & FILE

INITIAL & FORWARD

DISPOSITION

REVIEW & RESPOND

PREPARE RESPONSE

FOR MY SIGNATURE

FOR YOUR SIGNATURE

LET'S DISCUSS

SET UP MEETING

INVESTIGATE & REPT

INITIAL & FORWARD

DISTRIBUTE

CONCURRENCE

FOR PROCESSING

INITIAL & RETURN

DATE *11-13-81*

PHONE



AC 53-49786  
BAQM-CAPS  
to process permit  
11-13-81  
received Tall  
11-20-81 CB

DER.

NOV 12 1981

SOUTHWEST DISTRICT  
TAMPA



STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION  
APPLICATION TO OPERATE/CONSTRUCT  
AIR POLLUTION SOURCES

SOURCE TYPE: Fossil Fuel Steam Generator  New<sup>1</sup>  Existing<sup>1</sup>  
APPLICATION TYPE:  Construction  Operation  Modification  
COMPANY NAME: Mobil Chemical Co. - Electro-Phos Plant COUNTY: Polk  
Identify the specific emission point source(s) addressed in this application (i.e. Lime Kiln No. 4 with Venturi Scrubber; Peeking Unit No. 2, Gas Fired) Superior Packaged Steam Generator (Type 3N, S/N 7028AA5)  
SOURCE LOCATION: Street 1155 Pebbledale Road City Mulberry  
UTM: East 17-405600 North 3079400  
Latitude      °      '      "N Longitude      °      '      "W  
APPLICANT NAME AND TITLE: W.W. Kitchings, Plant Manager  
APPLICANT ADDRESS: 1155 Pebbledale Road, Mulberry, Fl. 33860

SECTION I: STATEMENTS BY APPLICANT AND ENGINEER

A. APPLICANT

I am the undersigned owner or authorized representative\* of Mobil Chemical Co., Electro-Phos Plant  
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.

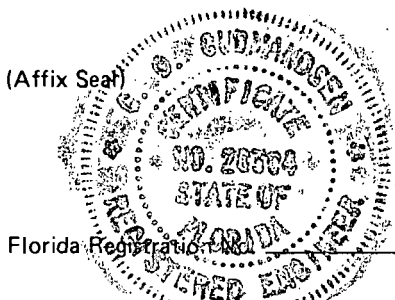
\*Attach letter of authorization

Signed: W.W. Kitchings  
W.W. Kitchings, Plant Manager  
Name and Title (Please Type)  
Date: 10/27/81 Telephone No. 813/428-1405

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 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: G.O. Gudmandsen  
G. O. Gudmandsen  
Name (Please Type)  
Mobil Chemical Co.  
Company Name (Please Type)  
P. O. Box 311, Nichols, FL 33863  
Mailing Address (Please Type)  
Date: 11/6/81 Telephone No. 425-3011



28304

<sup>1</sup>See Section 17-2.02(15) and (22), Florida Administrative Code, (F.A.C.)

**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.

This project is to provide for the installation of a 250 HP boiler to replace an existing 600 HP boiler (Operating Permit # A053-29247). This project will reduce total emissions due to reduced boiler size and will result in full compliance with applicable code.

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

Start of Construction 11/1/81 Completion of Construction 11/30/81

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.)

Not Applicable

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

A053-5124 issued 4/11/77, expired 4/11/80

A053-29247 issued 5/22/80, expires 5/15/85

E. Is this application associated with or part of a Development of Regional Impact (DRI) pursuant to Chapter 380, Florida Statutes, and Chapter 22F-2, Florida Administrative Code?  Yes  No

F. Normal equipment operating time: hrs/day 24; days/wk 7; wks/yr 50; if power plant, hrs/yr \_\_\_\_\_; if seasonal, describe: \_\_\_\_\_

G. If this is a new source or major modification, answer the following questions. (Yes or No)

- |   |            |
|---|------------|
| 1. Is this source in a non-attainment area for a particular pollutant?  | <u>No</u>  |
| a. If yes, has "offset" been applied?   | <u>N/A</u> |
| b. If yes, has "Lowest Achievable Emission Rate" been applied?  | <u>N/A</u> |
| c. If yes, list non-attainment pollutants.  | <u>N/A</u> |
| 2. Does best available control technology (BACT) apply to this source? If yes, see Section VI.  | <u>No</u>  |
| 3. Does the State "Prevention of Significant Deterioration" (PSD) requirements apply to this source? If yes, see Sections VI and VII. | <u>No</u>  |
| 4. Do "Standards of Performance for New Stationary Sources" (NSPS) apply to this source?  | <u>No</u>  |
| 5. Do "National Emission Standards for Hazardous Air Pollutants" (NESHAP) apply to this source?                                       | <u>No</u>  |

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

**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	None	---	7500	Point C
#6 Fuel Oil	Sulfur	2.4	690	Point A

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

1. Total Process Input Rate (lbs/hr): \_\_\_\_\_

2. Product Weight (lbs/hr): \_\_\_\_\_

C. Airborne Contaminants Emitted:

Name of Contaminant	Emission <sup>1</sup>		Allowed Emission <sup>2</sup> Rate per Ch. 17-2, F.A.C.	Allowable <sup>3</sup> Emission lbs/hr	Potential Emission <sup>4</sup>		Relate to Flow Diagram
	Maximum lbs/hr	Actual T/yr			lbs/hr	T/yr	
SO <sub>x</sub> as SO <sub>2</sub>	33.1	139	Opacity per 17-2.04(6)(e)1.b	N/A	33.1	222	Point B

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

Name and Type (Model & Serial No.)	Contaminant	Efficiency	Range of Particles <sup>5</sup> Size Collected (in microns)	Basis for Efficiency (Sec. V, It <sup>5</sup> )
None				

<sup>1</sup>See Section V, Item 2.

<sup>2</sup>Reference applicable emission standards and units (e.g., Section 17-2.05(6) Table II, E. (1), F.A.C. – 0.1 pounds per million BTU heat input)

<sup>3</sup>Calculated from operating rate and applicable standard

<sup>4</sup>Emission, if source operated without control (See Section V, Item 3)

<sup>5</sup>If Applicable

E. Fuels

Type (Be Specific)	Consumption*		Maximum Heat Input (MMBTU/hr)
	avg/hr	max./hr	
#6 Fuel Oil	1.265	2.009	12.66

\*Units Natural Gas, MMCF/hr; Fuel Oils, barrels/hr; Coal, lbs/hr

Fuel Analysis:

Percent Sulfur: 2.4 Percent Ash: 0.03  
 Density: 8.17 lbs/gal Typical Percent Nitrogen: 0.23  
 Heat Capacity: 18,360 BTU/lb 150,000 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 \_\_\_\_\_

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

None

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

Stack Height: 24 ft. Stack Diameter: 2.0 ft.  
 Gas Flow Rate: 4464 ACFM Gas Exit Temperature: 375 °F.  
 Water Vapor Content: 11.38 % Velocity: 23.68 FPS

**SECTION IV: INCINERATOR INFORMATION**

NOT APPLICABLE

Type of Waste	Type O (Plastics)	Type I (Rubbish)	Type II (Refuse)	Type III (Garbage)	Type IV (Pathological)	Type V (Liq & Gas By-prod.)	Type VI (Solid By-prod.)
Lbs/hr Incinerated							

Description of Waste \_\_\_\_\_

Total Weight Incinerated (lbs/hr) \_\_\_\_\_ Design Capacity (lbs/hr) \_\_\_\_\_

Approximate Number of Hours of Operation per day \_\_\_\_\_ days/week \_\_\_\_\_

Manufacturer \_\_\_\_\_

Date Constructed \_\_\_\_\_ Model No. \_\_\_\_\_

	Volume (ft) <sup>3</sup>	Heat Release (BTU/hr)	Fuel		Temperature (°F)
			Type	BTU/hr	
Primary Chamber					
Secondary Chamber					

Stack Height: \_\_\_\_\_ ft. Stack Diameter \_\_\_\_\_ Stack Temp. \_\_\_\_\_

Gas Flow Rate: \_\_\_\_\_ ACFM \_\_\_\_\_ DSCFM\* Velocity \_\_\_\_\_ FPS

\*If 50 or more tons per day design capacity, submit the emissions rate in grains per standard cubic foot dry gas corrected to 50% excess air.

Type of pollution control device:  Cyclone  Wet Scrubber  Afterburner  Other (specify) \_\_\_\_\_

Brief description of operating characteristics of control devices: \_\_\_\_\_

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

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**SECTION V: SUPPLEMENTAL REQUIREMENTS**

Please provide the following supplements where required for this application.

1. Total process input rate and product weight – show derivation.
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, 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 8½" 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 8½" 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 8½" 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. An application fee of \$20, unless exempted by Section 17-4.05(3), F.A.C. 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). None

- |                           |                      |
|---------------------------|----------------------|
| 1. Control Device/System: |                      |
| 2. Operating Principles:  |                      |
| 3. Efficiency: *          | 4. Capital Costs:    |
| 5. Useful Life:           | 6. Operating Costs:  |
| 7. Energy:                | 8. Maintenance Cost: |
| 9. Emissions:             |                      |

Contaminant	Rate or Concentration
_____	_____
_____	_____
_____	_____
_____	_____

\*Explain method of determining D 3 above.

10. Stack Parameters

- a. Height: \_\_\_\_\_ ft.
- b. Diameter: \_\_\_\_\_ ft.
- c. Flow Rate: \_\_\_\_\_ ACFM
- d. Temperature: \_\_\_\_\_ °F
- e. Velocity: \_\_\_\_\_ FPS

E. Describe the control and treatment technology available (As many types as applicable, use additional pages if necessary).

1. N/A

- a. Control Device:
- b. Operating Principles:
  
- c. Efficiency\*:
- d. Capital Cost:
- e. Useful Life:
- f. Operating Cost:
- g. Energy\*:
- 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\*:
- d. Capital Cost:
- e. Useful Life:
- f. Operating Cost:
- g. Energy\*\*:
- h. Maintenance Costs:
- 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:

\*Explain method of determining efficiency.

\*\*Energy to be reported in units of electrical power – KWH design rate.

3.

- a. Control Device:
- b. Operating Principles:
  
- c. Efficiency\*:
- d. Capital Cost:
- e. Life:
- f. Operating Cost:
- g. Energy:
- h. Maintenance Cost:

\*Explain method of determining efficiency above.

- 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\*:
- d. Capital Cost:
- e. Life:
- f. Operating Cost:
- g. Energy:
- 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\*:
- 3. Capital Cost:
- 4. Life:
- 5. Operating Cost:
- 6. Energy:
- 7. Maintenance Cost:
- 8. Manufacturer:
- 9. Other locations where employed on similar processes:

a.

- (1) Company:
- (2) Mailing Address:
- (3) City:
- (4) State:
- (5) Environmental Manager:
- (6) Telephone No.:

\*Explain method of determining efficiency above.

(7) Emissions\*:

Contaminant	Rate or Concentration

(8) Process Rate\*:

b.

- (1) Company:
- (2) Mailing Address:
- (3) City:
- (4) State:

\*Applicant must provide this information when available. Should this information not be available, applicant must state the reason(s) why.



(5) Environmental Manager:

(6) Telephone No.:

(7) Emissions\*:

Contaminant	Rate or Concentration
_____	_____
_____	_____
_____	_____

(8) Process Rate\*:

10. Reason for selection and description of systems:

\*Applicant 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 Not Applicable

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.

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 / / /
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. 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

Table with 2 columns: Pollutant (TSP, SO2) and Emission Rate (grams/sec)

E. Emission Data Used in Modeling

Attach list of emission sources. Emission data required is source name, description on point source (on NEDS point number), UTM coordinates, stack data, allowable emissions, and normal operating time.

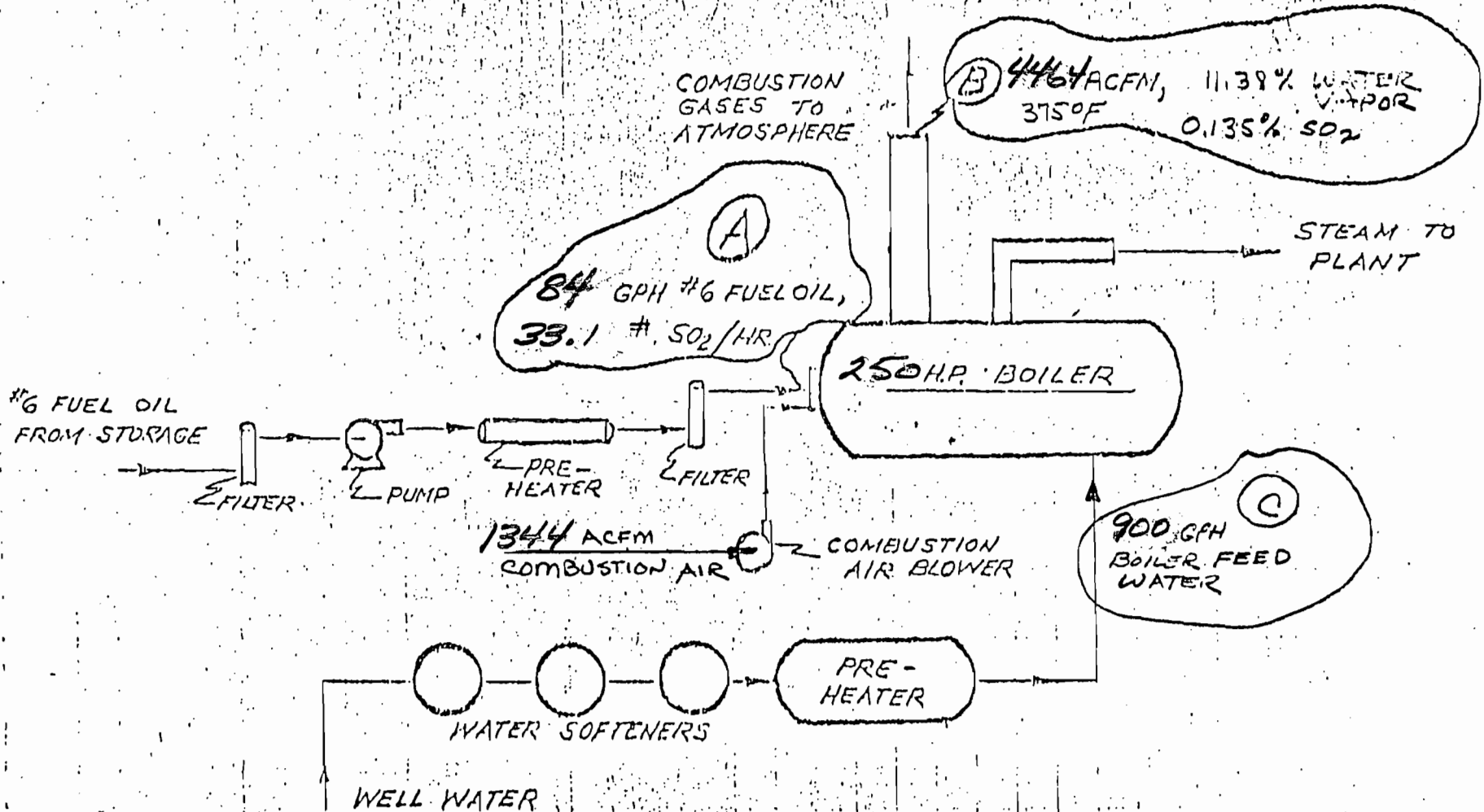
F. Attach all other information supportive to the PSD review.

\*Specify bubbler (B) or continuous (C).

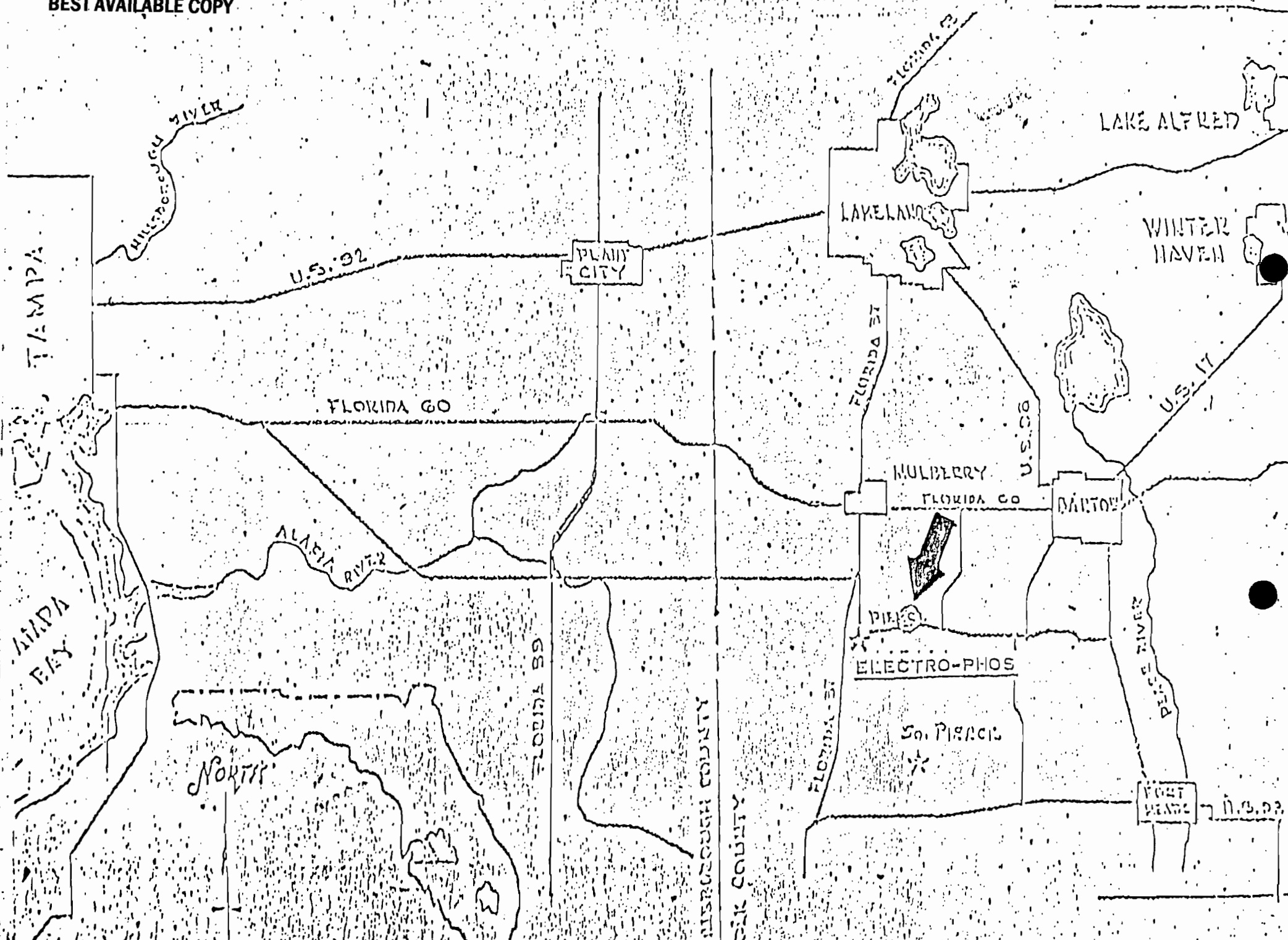
G. Discuss the social and economic impact of the selected technology versus other applicable technologies (i.e., jobs, payroll, production, taxes, energy, etc.). Include assessment of the environmental impact of the sources.

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.

# ELECTRO-PHOS CORP. SCHEMATIC FLOWSHEET 250 H.P. STEAM BOILER



BEST AVAILABLE COPY



3 FURNACE

2 FURNACE

1 FURNACE

WEST CONDENSER AREA

EAST CONDENSER AREA

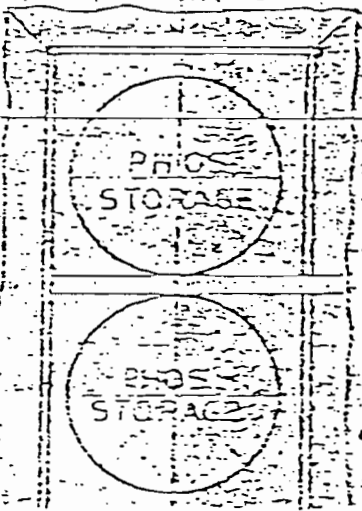
TRANSFORMER AREA

CONDENSER AREA

CONDENSER AREA

COMPRESSOR BLDG

FILTRATION ROOM



STEAM POWER LINES

FUEL OIL STORAGE

STACK

LUNCH ROOM

REST ROOMS & LOCKERS

PHOSPHORUS LOADING STORAGE AREA

PHOSPHORUS TANK

180 T

180 T

165 T

165 T

PHOSPHORUS

SUPPLY BLDG.

TECO METERING STATION

SHOP OFF.

PLANT MAINT. SHOP

EXISTING R.R.

EXISTING TANK

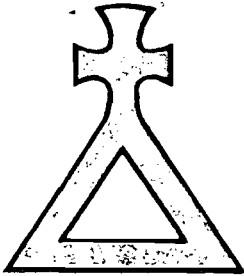
ADMIN OFFICE

OFFICE PARKING

ELECTRO-PHOS CORP. - PIERCE, FLA.

PLOT PLAN

STEAM BOILERS LOCATION



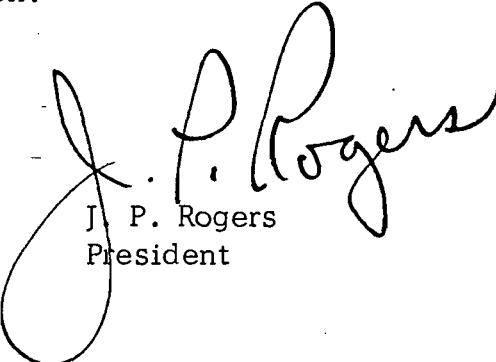
## ELECTRO-PHOS CORPORATION

1155 Pebbledale Rd. • AC 813-428-1405 • Mulberry, Florida 33860

March 19, 1980

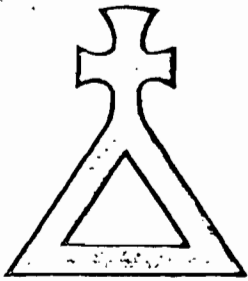
To: State of Florida  
Department of Environmental Regulation

As President of Electro-Phos Corporation, a Florida Corporation, I hereby certify that Wayne W. Kitchings, Plant Manager of Electro-Phos Corporation's facilities at Pierce, Florida, is designated as said Corporation's representative and agent for the purpose of executing, on behalf of the Corporation, any and all documents that might be necessary in order to obtain from the State of Florida, Department of Environmental Regulation, permits for the construction and/or operation of water pollution and air pollution control facilities at our Pierce, Florida, location.

  
J. P. Rogers  
President

jp

cc: S. M. Lane



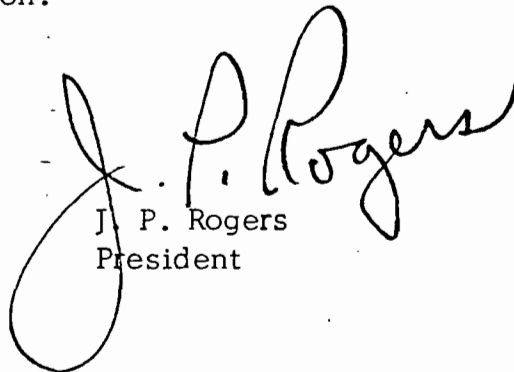
## ELECTRO-PHOS CORPORATION

1155 Pebbledale Rd. • AC 813-428-1405 • Mulberry, Florida 33860

March 19, 1980

To: State of Florida  
Department of Environmental Regulation

As President of Electro-Phos Corporation, a Florida Corporation, I hereby certify that Wayne W. Kitchings, Plant Manager of Electro-Phos Corporation's facilities at Pierce, Florida, is designated as said Corporation's representative and agent for the purpose of executing, on behalf of the Corporation, any and all documents that might be necessary in order to obtain from the State of Florida, Department of Environmental Regulation, permits for the construction and/or operation of water pollution and air pollution control facilities at our Pierce, Florida, location.

  
J. P. Rogers  
President

jp

cc: S. M. Lane