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P 265 659 458

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Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

PERMITTEE:

IMC-Agrico Company
South Pierce Facility
Post Office Box 2000
Mulberry, Florida 33860

Authorized Representative:

E. M. Newberg
Vice President, Chemicals-Florida

FID No.	1050055
PSD No.	PSD-FL-235
SIC No.	2874
Project:	Sulfuric Acid Plants 10 & 11
Permit No.	1050055-010-AC
Expires:	June 30, 2000

PROJECT AND LOCATION:

Permit for production increase from 2,700 to 3,000 tons per day per plant from Sulfuric Acid Plants 10 and 11 and associated increases in molten sulfur throughput and storage capacity at the IMC-Agrico South Pierce Facility located on SR 630 approximately eight miles west of Ft. Meade and twelve miles southwest of Bartow in Polk County. UTM coordinates are: Zone 17; 407.5 km E; 3071.4 km N

STATEMENT OF BASIS:

This construction permit is issued under the provisions of Chapter 403 of the Florida Statutes (F.S.), and the Florida Administrative Code (F.A.C.) Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297. The above named permittee is authorized to modify the facility in accordance with the conditions of this permit and as described in the application, approved drawings, plans, and other documents on file with the Department of Environmental Protection (Department) and made a part hereof and specifically described as follows:

Attached appendices and Tables made a part of this permit:

Tables 1-2 a,b,c	Air Pollutant Standards and Terms for Sulfuric Acid Plants and Molten Sulfur Storage Handling System
Appendix BD	BACT Determination
Appendix GC	Construction Permit General Conditions
Appendix CSC-SAP	Emission Unit(s) Common Specific Conditions-Sulfuric Acid Plants

Howard L. Rhodes, Director
Division of Air Resources
Management

AIR CONSTRUCTION PERMIT 1050055-010-AC AND PSD-FL-235

SECTION I. FACILITY INFORMATION

SUBSECTION A. FACILITY DESCRIPTION

This facility includes sulfuric acid plants, phosphoric acid plants, an ammonium phosphate (MAP/DAP) plant, a granular triple superphosphate (GTSP) plant and storage, handling, grinding and shipping facilities for phosphate rock, ammonia, sulfur, and fertilizer products. This modification will increase the sulfuric acid production rate of the facility from 5,400 to 6,000 tons per day (TPD) of 100 percent sulfuric acid. The throughput of the South Pierce molten sulfur handling system will increase proportionately from 650,000 to 725,000 tons per year (TPY).

EMISSION UNITS

ARMS EMISSION UNIT NOS.	EMISSION UNITS DESCRIPTION
004	Sulfuric Acid Plant No. 10
005	Sulfuric Acid Plant No. 11
030-034	Molten Sulfur Storage East Tank Vents 1 to 5
035-039	Molten Sulfur Storage West Tank Vents 1 to 5
040	Molten Sulfur Truck Pit-East Vent with fan
041	Molten Sulfur Truck Pit East Vent w/o fan
042	Molten Sulfur Truck Pit West Vent with fan
043	Molten Sulfur Truck Pit West Vent w/o fan
044	Molten Sulfur Rail Pit North Vent
045	Molten Sulfur Rail Pit South Vent

SUBSECTION B. REGULATORY CLASSIFICATION

This industry is listed in Table 62-212.400-1 of Chapter 62-212, F.A.C., "Major Facility Categories." Therefore, stack and fugitive emissions of over 100 tons per year of carbon monoxide, sulfur dioxide, nitrogen oxides, or particulate matter characterize the installation as a major facility subject to the requirements of Rule 62-212.400, F.A.C. As a facility with sulfuric acid plants, this facility is subject to Rule 62-204.800, F.A.C., which incorporates 40 CFR Subpart H, New Source Performance Standards for Sulfuric Acid Plants. This facility is a Title V source because it emits over 100 tons per year of sulfur dioxide. [Rules 62-210.200 (Title V Source) and 62-213, F.A.C.]

SUBSECTION C. PERMIT SCHEDULE:

- 07-25-97 Notice of Intent published in Lakeland Ledger
- 07-07-97 Issued Notice of Intent to issue Permit
- 04-10-97 Application deemed complete

SUBSECTION D. RELEVANT DOCUMENTS:

The documents listed below are the basis of the permit. They are specifically related to this permitting action. These documents are on file with the Department.

- Application received on 11-20-96
- Department's letters dated 12-18-96 and 03-07-97
- Company letters received 02-05-97 and 04-10-97
- Department of Interior's letter dated 12-24-96

AIR CONSTRUCTION PERMIT 1050055-010-AC AND PSD-FL-235

SECTION II. EMISSION UNIT(S) GENERAL REQUIREMENTS

SUBSECTION A. ADMINISTRATIVE

- A.1 Regulating Agencies: All documents related to applications for permits to operate, reports, tests, minor modifications and notifications shall be submitted to the Florida Department of Environmental Protection (FDEP) Southwest District Air Resource Program Permitting Section located at 3804 Coconut Drive, Tampa, Florida 33619-8218, and phone number (813)744-6100. All applications for permits to construct or modify an emission unit(s) subject to the Prevention of Significant Deterioration (PSD) Review requirements should be submitted to the Bureau of Air Regulation (BAR), Florida Department of Environmental Protection (FDEP) located at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400 and phone number (850)488-1344.
- A.2 General Conditions: The owner and operator is subject to and shall operate under the attached General Permit Conditions G.1 through G.15 listed in *Appendix GC* of this permit. General Permit Conditions are binding and enforceable pursuant to Chapter 403 of the Florida Statutes. [Rule 62-4.160, F.A.C.]
- A.3 Emission Unit(s) Common Specific Conditions: The owner and operator is subject to and shall operate under the attached Emission Unit(s) Common Specific Conditions-Sulfuric Acid Plants listed in *Appendix CSC-SAP* of this permit. The Emission Unit(s) Common Specific Conditions are binding and enforceable pursuant to Chapters 62-204 through 62-297 of the Florida Administrative Code.
- A.4 Terminology: The terms used in this permit have specific meanings as defined in the corresponding chapters of the Florida Administrative Code.
- A.5 Forms and Application Procedures: The permittee shall use the applicable forms listed in Rule 62-210.900, F.A.C. and follow the application procedures in Chapter 62-4, F.A.C. [Rule 62-210.900, F.A.C.]
- A.6 Expiration: This air construction permit shall expire on June 30, 2000. [Rule 62-210.300(1), F.A.C.] The permittee may, for good cause, request that this construction permit be extended. Such a request shall be submitted to the Bureau of Air Regulation prior to 60 days before the expiration of the permit. However, the permittee shall promptly notify the permitting authority office of any delays in completion of the project which would affect the startup day by more than 90 days. [Rule 62-4.090, F.A.C.]
- A.7 Application for Title V Permit: This air construction permit revises specific permit conditions to reflect the current applicable requirements, BACT and new permit emission limits. Stack testing of emissions that are required by this permit shall be performed to determine compliance with all new applicable permitted limits. A revision of the Title V operating permit application or a new application, pursuant to Chapter 62-213 F.A.C., must be submitted to the DEP's District office in Tampa. [Chapter 62-213, F.A.C.]

AIR CONSTRUCTION PERMIT 1050055-010-AC AND PSD-FL-235

SECTION III. EMISSION UNIT(S) SPECIFIC CONDITIONS

SUBSECTION A. EMISSION UNITS

This permit addresses the following emission units.

ARMS EMISSION UNIT NOS.	EMISSION UNITS DESCRIPTION
004	Sulfuric Acid Plant No. 10
005	Sulfuric Acid Plant No. 11
030-034	Molten Sulfur Storage East Tank Vents 1 to 5
035-039	Molten Sulfur Storage West Tank Vents 1 to 5
040	Molten Sulfur Truck Pit-East Vent with fan
041	Molten Sulfur Truck Pit East Vent w/o fan
042	Molten Sulfur Truck Pit West Vent with fan
043	Molten Sulfur Truck Pit West Vent w/o fan
044	Molten Sulfur Rail Pit North Vent
045	Molten Sulfur Rail Pit South Vent

SUBSECTION B. SPECIFIC CONDITIONS:

The following Specific Conditions apply to the following emission unit:

ARMS EMISSION UNIT NO.	EMISSION UNIT DESCRIPTION
004	Sulfuric Acid Plant No. 10

This emission unit shall comply with all applicable requirements of 40 CFR 60, General Provisions, Subpart A.

- B.1 [40 CFR 60.7, Notification and record keeping]
- B.2 [40 CFR 60.8, Performance tests]
- B.3 [40 CFR 60.11, Compliance with standards and maintenance requirements]
- B.4 [40 CFR 60.12, Circumvention]
- B.5 [40 CFR 60.13, Monitoring requirements]
- B.6 [40 CFR 60.19, General notification and reporting requirements]

This emission unit shall comply with all applicable provisions of the 40 CFR 60 New Source Performance Standards for Sulfuric Acid Plants, Subpart H [Rule 62-204.800, F.A.C.].

EMISSION LIMITATIONS

- B.7 The maximum allowable emission rates for the Sulfuric Acid Plant shall not exceed the limits listed in **Table 1-2a. Air Pollutant Standards and Terms** (attached). [Rule 62-210.200, F.A.C. Definitions-Potential to Emit (PTE) and 62-212.400, F.A.C.]
- B.8 In order to minimize excess emissions during startup/shutdown/malfunction this emission unit shall adhere to best operational practices. [Rule 62-210.700, F.A.C. and 40 CFR 60.7]

AIR CONSTRUCTION PERMIT 1050055-010-AC AND PSD-FL-235

SECTION III. EMISSION UNIT(S) SPECIFIC CONDITIONS

OPERATIONAL LIMITATIONS

- B.9 This emission unit is allowed to operate continuously (8760 hours/year) [Rule 62-210.200, F.A.C. Definitions-Potential to emit (PTE).]

PROCESS OPERATING RATES

- B.10 The maximum production rate of the sulfuric acid plant is 3000 TPD of 100% H₂SO₄. [Rule 62-210.200, F.A.C. Definitions-Potential to Emit (PTE).]

MONITORING OF OPERATIONS

- B.11 A continuous monitoring system for the measurement of sulfur dioxide emissions shall be installed, calibrated, operated and maintained as described in 40 CFR 60, Subpart H, Standards of Performance for Sulfuric Acid Plants. [Rule 62-204.800(7), F.A.C.; 40 CFR 60.84.]

TEST METHODS AND PROCEDURES

- B.12 Initial and annual compliance with the allowable emission limiting standards listed in Table 1-2a, Air Pollutant Standards and Terms, shall be determined by using the following reference methods as described in 40 CFR 60, Appendix A (1995, version) and 40 CFR 61 Appendix B (1995, version) adopted by reference in Chapter 62-204, F.A.C.

Method 7E	Determination of Nitrogen Oxides from Stationary Sources.
Method 8	Determination of Sulfur Dioxide and Sulfuric Acid Mist from Stationary Sources.
Method 9	Visual Determination of the Opacity of Emissions from Stationary Sources.

SUBSECTION C. SPECIFIC CONDITIONS:

The following Specific Conditions apply to the following emission unit:

ARMS EMISSION UNIT No.	EMISSION UNIT DESCRIPTION
005	Sulfuric Acid Plant No. 11

This emission unit shall comply with all applicable requirements of 40 CFR 60, General Provisions, Subpart A.

- C.1 [40 CFR 60.7, Notification and record keeping]
C.2 [40 CFR 60.8, Performance tests]
C.3 [40 CFR 60.11, Compliance with standards and maintenance requirements]
C.4 [40 CFR 60.12, Circumvention]
C.5 [40 CFR 60.13, Monitoring requirements]
C.6 [40 CFR 60.19, General notification and reporting requirements]

This emission unit shall comply with all applicable provisions of the 40 CFR 60 New Source Performance Standards for Sulfuric Acid Plants, Subpart H [Rule 62-204.800, F.A.C].

AIR CONSTRUCTION PERMIT 1050055-010-AC AND PSD-FL-235

SECTION III. EMISSION UNIT(S) SPECIFIC CONDITIONS

EMISSION LIMITATIONS

- C.7 The maximum allowable emission rates for the Sulfuric Acid Plant shall not exceed the limits listed in Table 1-2b, Air Pollutant Standards and Terms (attached). [Rule 62-210.200, F.A.C. Definitions-Potential to Emit (PTE) and 62-212.400, F.A.C.]
- C.8 In order to minimize excess emissions during startup/shutdown/malfunction this emission unit shall adhere to best operational practices. [Rule 62-210.700, F.A.C. and 40 CFR 60.7]

OPERATIONAL LIMITATIONS

- C.9 This emission unit is allowed to operate continuously (8760 hours/year) [Rule 62-210.200, F.A.C. Definitions-Potential to emit (PTE).]

PROCESS OPERATING RATES

- C.10 The maximum production rate of the sulfuric acid plant is 3000 TPD of 100% H₂SO₄. [Rule 62-210.200, F.A.C. Definitions-Potential to Emit (PTE).]

MONITORING OF OPERATIONS

- C.11 A continuous monitoring system for the measurement of sulfur dioxide emissions shall be installed, calibrated, operated and maintained as described in 40 CFR 60, Subpart H, Standards of Performance for Sulfuric Acid Plants. [Rule 62-204.800(7), F.A.C.; 40 CFR 60.84.]

TEST METHODS AND PROCEDURES

- C.12 Initial and annual compliance with the allowable emission limiting standards listed in Table 1-2b, Air Pollutant Standards and Terms, shall be determined by using the following reference methods as described in 40 CFR 60, Appendix A (1995, version) and 40 CFR 61 Appendix B (1995, version) adopted by reference in Chapter 62-204, F.A.C.

- Method 7E** Determination of Nitrogen Oxides from Stationary Sources.
- Method 8** Determination of Sulfur Dioxide and Sulfuric Acid Mist from Stationary Sources.
- Method 9** Visual Determination of the Opacity of Emissions from Stationary Sources.

SUBSECTION D. SPECIFIC CONDITIONS: MOLTEN SULFUR STORAGE AND HANDLING SYSTEM

ARMS EMISSION UNIT NOS.	EMISSION UNITS DESCRIPTION
030-034	Molten Sulfur Storage East Tank Vents 1 to 5
035-039	Molten Sulfur Storage West Tank Vents 1 to 5
040	Molten Sulfur Truck Pit-East Vent with fan
041	Molten Sulfur Truck Pit East Vent w/o fan
042	Molten Sulfur Truck Pit West Vent with fan
043	Molten Sulfur Truck Pit West Vent w/o fan
044	Molten Sulfur Rail Pit North Vent
045	Molten Sulfur Rail Pit South Vent

AIR CONSTRUCTION PERMIT 1050055-010-AC AND PSD-FL-235

SECTION III. EMISSION UNIT(S) SPECIFIC CONDITIONS

EMISSION LIMITATIONS

- D.1 Visible emissions (VE) shall not exceed 20% opacity from any source in the Molten Sulfur Storage and Handling System. [Rule 62-296.411, F.A.C.]
- D.2 The permittee shall employ procedures to minimize emissions from the Molten Sulfur Storage and Handling System pursuant to the applicable requirements of Rule 62-296.411, F.A.C. The estimated emission rates for emission inventory and PSD purposes for the units in the Molten Sulfur Storage and Handling System are listed in Table 1-2c. Air Pollutant Standards and Terms (attached).
- D.3 No person shall cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor.

NOTE: An objectionable odor is defined as any odor present in the outdoor atmosphere which by itself or in combination with other odors, is or may be harmful or injurious to human health or welfare, which unreasonably interferes with the comfortable use and enjoyment of life or property, or which creates a nuisance. [F.A.C. 62-210.200(198)]

OPERATIONAL LIMITATIONS

- D.4 The units comprising the Molten Sulfur Storage and Handling system are allowed to operate continuously (8760 hours/year) [Rule 62-210.200, F.A.C. Definitions-Potential to emit (PTE).]

PROCESS OPERATING RATES

- D.5 The maximum molten sulfur throughput rate of the Molten Sulfur Storage and Handling System shall neither exceed 2300 tons per day (TPD), nor 725,000 tons per year (TPY) based on the combined acid production capacity of 6,000 TPD 100% sulfuric acid for the Nos. 10 and 11 sulfuric acid plants. [Rule 62-210.200, F.A.C. Definitions-Potential to Emit (PTE).]
- D.6 The permittee shall employ proper operation and maintenance procedures to control emissions from the Molten Sulfur Storage and Handling System. [Rule 62-296.411, F.A.C.]

TEST METHODS AND PROCEDURES

- D.7 Initial and subsequent compliance with the visible emissions (VE) standard shall be determined by using EPA Method 9 as described in 40 CFR 60, Appendix A (1995, version) adopted by reference in Chapter 62-204, F.A.C. Test run duration shall not be less than 30 minutes. The tests for the vents of the storage tanks and sulfur pits shall be conducted while the tanks and pits are being filled (filling does not have to be continuous during the entire test). Routine VE tests shall be at the frequency specified in any permit to operate this system issued by the Southwest District office in Tampa.
- D.8 Any change in the method of operation, equipment or operating hours shall be submitted to the Department's Southwest District office in Tampa for approval. [Rule 62-4.030, 62-210.300 and 62-4.070(3), F.A.C.]
- D.9 The VE compliance test results shall be filed with the Southwest District office in Tampa as soon as practical but no later than 45 days after test completion. [Rule 62-297.310(8), F.A.C.]

Table 1-2a. Air Pollutant Standards and Terms.

FACILITY ID NUMBER:	1050055
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Permittee:
IMC Agrico Company

DRAFT Permit No.: 1050055-010-AC and PSD-FL-235
South Pierce Facility

Emission Unit 004 - Sulfuric Acid Plant No. 10

E.U. ID#	Description	Pollutant ID	Fuel(s)	Allowable Emissions			
				BASIS	lbs/ton of 100% H ₂ SO ₄	lb/hr	TPY
004	Sulfuric Acid Plant No.10	SO ₂	Sulfur	BACT-NSPS	4.00	500.0	2190.0
004	Sulfuric Acid Plant No.10	NO _x	Sulfur	BACT	0.12	15.0	65.7
004	Sulfuric Acid Plant No.10	SAM	Sulfur	BACT-NSPS	0.15	18.8	82.1
004	Sulfuric Acid Plant No.10	VE	Sulfur	BACT-NSPS	-	10% opacity	

ALLOWABLE OPERATING RATES

		SAP No. 10	
Hours of operation		8760	
Sulfuric Acid Production Rate	TPD	3000	Based on 100% H ₂ SO ₄

Table 1-2b. Air Pollutant Standards and Terms.

FACILITY ID NUMBER:	1050055
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Permittee:

IMC Agrico Company

DRAFT Permit No.: 1050055-010-AC and PSD-FL-235

South Pierce Facility

Emission Unit 005 - Sulfuric Acid Plant No. 11

E.U. ID#	Description	Pollutant ID	Fuel(s)	Allowable Emissions			
				BASIS	lbs/ton of 100% H ₂ SO ₄	lb/hr	TPY
005	Sulfuric Acid Plant No.11	SO ₂	Sulfur	BACT-NSPS	4.00	500.0	2190.0
005	Sulfuric Acid Plant No.11	NO _x	Sulfur	BACT	0.12	15.0	65.7
005	Sulfuric Acid Plant No.11	SAM	Sulfur	BACT-NSPS	0.15	18.8	82.1
005	Sulfuric Acid Plant No.11	VE	Sulfur	BACT-NSPS	-	10% opacity	

<u>ALLOWABLE OPERATING RATES</u>			
SAP No. 11			
Hours of operation		8760	
Sulfuric Acid Production Rate	TPD	3000	Based on 100% H ₂ SO ₄

Table 1-2c. Air Pollutant Standards and Terms.

FACILITY ID NUMBER: 1050055

Permittee:
IMC Agrico Company

DRAFT Permit No.: 1050055-010-AC and PSD-FL-235
South Pierce Facility

For emission inventory and PSD purposes, the estimated maximum emissions from the sources in the molten sulfur storage and handling facility are:

Estimated Emissions

Emission Units 030-034 Molten Sulfur Storage East Tank (Vents 1-5)

	Estimated Emissions				
	PM/PM ₁₀	SP	SO ₂	TRS/H ₂ S	VOC
lb/hr (max)	0.56	0.28	0.72	0.42	0.51
lb/hr (avg)	0.36	0.18	0.46	0.27	0.32
TPY	1.55	0.78	1.99	1.18	1.42

Estimated Emissions

Emission Units 035-039 Molten Sulfur Storage West Tank (Vents 1-5)

	Estimated Emissions				
	PM/PM ₁₀	SP	SO ₂	TRS/H ₂ S	VOC
lb/hr (max)	0.56	0.28	0.72	0.42	0.51
lb/hr (avg)	0.36	0.18	0.46	0.27	0.32
TPY	1.55	0.78	1.99	1.18	1.42

Estimated Emissions

Emission Units 040-043 Molten Sulfur Storage Truck Pits East and West

	Estimated Emissions				
	PM/PM ₁₀	SP	SO ₂	TRS/H ₂ S	VOC
lb/hr (max)	1.02	0.51	1.32	0.78	0.94
TPY	4.51	2.25	5.79	3.41	4.12

Estimated Emissions

Emission Units 044-045 Molten Sulfur Storage Rail Pits North and South

	Estimated Emissions				
	PM/PM ₁₀	SP	SO ₂	TRS/H ₂ S	VOC
lb/hr (max)	0.24	0.12	0.31	0.18	0.22
lb/hr (avg)	0.02	0.01	0.02	0.01	0.02
TPY	0.09	0.04	0.11	0.07	0.08

APPENDIX BD
BEST AVAILABLE CONTROL TECHNOLOGY DETERMINATION (BACT)

IMC-Agrico Company
South Pierce Facility
PSD-FL-235 and 1050055-010-AC
Polk County

The applicant proposes to increase the acid production rate of its two existing double absorption sulfuric acid plants (Nos. 10 and 11) at its South Pierce facility from 2,700 to 3,000 tons per day (TPD) of 100 percent sulfuric acid (H_2SO_4), each. The overall increase in H_2SO_4 production from the facility will be from 5,400 to 6,000 TPD. The South Pierce molten sulfur throughput will increase proportionately from 650,000 to 725,000 tons per year (TPY) through its sulfur handling system. The plants and sulfur handling system are located at IMC-Agrico's South Pierce phosphate chemical fertilizer manufacturing facility approximately eight miles west of Ft. Meade and twelve miles southwest of Bartow on State Road 630 in Polk County, Florida.

The proposed project will increase emissions of sulfur dioxide (SO_2), nitrogen oxides (NO_x) and sulfuric acid mist (SAM) by more than the applicable Prevention of Significant (PSD) significant emission rates. The project is therefore subject to PSD review in accordance with Rule 62-212.400, Florida Administrative Code (F.A.C.). The BACT review is part of the PSD review requirements in accordance with Rule 62-212.410, F.A.C.

Date of Receipt of a BACT Application: November 20, 1996.

Date Application Complete: April 10, 1997.

The BACT determination requested by the applicant:

Control Technology: Double Absorption/Fiber Mist Eliminators

<u>Pollutant</u>	<u>Emission Limits</u>
SO_2	4 lbs/ton of 100% H_2SO_4 produced
Sulfuric Acid Mist	0.15 lb/ton of 100% H_2SO_4 produced
Visible Emissions	10% opacity
NO_x	0.12 lbs/ton of 100% H_2SO_4 produced

BACT Determination Procedure:

In accordance with Rule 62-212.410, F.A.C., Best Available Control Technology, this determination is based on the maximum degree of reduction of each pollutant emitted which the Department, on a case by case basis, taking into account energy, environmental and economic impacts, and other costs, determines is achievable through application of production processes and available methods, systems, and techniques. In addition, the regulations state that in making the BACT determination the Department shall give consideration to:

APPENDIX BD

BEST AVAILABLE CONTROL TECHNOLOGY DETERMINATION (BACT)

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

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

BACT Determined by the Department:

<u>Control Technology:</u>	Double Absorption/Fiber Mist Eliminators
<u>Pollutant:</u>	<u>Emission Limits</u>
SO ₂	500 lbs/hr (4.0 lbs/ton of 100% H ₂ SO ₄ produced)
Sulfuric Acid Mist	18.8 lbs/hr (0.15 lbs/ton of 100% H ₂ SO ₄ produced)
Visible Emissions	10% opacity
NO _x	15 lbs/hr (0.12 lbs/ton of 100% H ₂ SO ₄ produced)

BACT Determination Rationale

The Department's BACT determination is the same as that proposed by the applicant. It is the same as the most recent determinations made for modifications of existing sulfuric acid plants. This level of technology is in accordance with the Standards of Performance for Sulfuric Acid Plants, 40 CFR 60 Subpart H.

The process of making sulfuric acid requires conversion of sulfur dioxide (SO₂) to sulfur trioxide (SO₃) followed by absorption into a stream of sulfuric acid (H₂SO₄). The catalytic oxidation and subsequent double absorption operation is characterized by a conversion efficiency of approximately 99.7 percent. This is considered BACT for SO₂ control and is equivalent to approximately 4 lbs per ton of sulfuric acid produced.

Recovery of sulfuric acid mist is an economic necessity as well as an environmental requirement. High efficiency mist eliminators are considered BACT for sulfuric acid mist. The NSPS of 0.15 lbs per ton of sulfuric acid is considered to represent BACT for existing plants.

APPENDIX BD
BEST AVAILABLE CONTROL TECHNOLOGY DETERMINATION (BACT)

The low NO_x emissions from IMC-Agrico's sulfuric acid plants are the result of the low combustion temperatures in the sulfur burning system. The Department agrees with the applicant that the low-NO_x emitting combustion system inherent for sulfuric acid plants is BACT for NO_x emissions, and that it would not be economically feasible to add retrofit NO_x control technologies. The Department believes that the facility can meet the NO_x emission limit of 0.12 lb/ton of 100% H₂SO₄ produced, as similar facilities in the past have met this emission limit

Conclusion


This BACT determination is consistent with those given in the EPA BACT/LAER Clearinghouse. This level of control insures that emissions will be minimized and there will be no significant deterioration of ambient air quality as discussed in the Technical Evaluation and Preliminary Determination.


Details of the Analysis May be Obtained by Contacting:

Cleve Holladay, Permit Engineer
A. A. Linero, P.E. Administrator
Department of Environmental Protection
Bureau of Air Regulation
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Recommended By:

Approved By:


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


Howard L. Rhodes, Director
Division of Air Resources
Management

9/15/97
Date:

Sept 15, 1997
Date:

APPENDIX GC
GENERAL PERMIT CONDITIONS [F.A.C. 62-4.160]

- G.1 The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.
- G.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 or exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.
- G.3 As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey and vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit is not a waiver 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.
- G.4 This permit conveys no title to land or water, does not constitute State recognition or acknowledgment 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.
- G.5 This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.
- G.6 The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.
- G.7 The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:
- (a) Have access to and copy and records that must be kept under the conditions of the permit;
 - (b) Inspect the facility, equipment, practices, or operations regulated or required under this permit, and,
 - (c) Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

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

- G.8 If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:
- (a) A description of and cause of non-compliance; and
 - (b) The period of noncompliance, including dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

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GENERAL PERMIT CONDITIONS [F.A.C. 62-4.160]

- G.9 In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by Sections 403.73 and 403.111, Florida Statutes. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.
- G.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.
- G.11 This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 62-4.120 and 62-730.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.
- G.12 This permit or a copy thereof shall be kept at the work site of the permitted activity.
- G.13 This permit also constitutes:
- (a) Determination of Best Available Control Technology (X)
 - (b) Determination of Maximum Achievable Control Technology ()
 - (c) Determination of Prevention of Significant Deterioration (X); and
 - (d) Compliance with New Source Performance Standards (X).
- G.14 The permittee shall comply with the following:
- (a) Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
 - (b) The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application or this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.
 - (c) Records of monitoring information shall include:
 - 1. The date, exact place, and time of sampling or measurements;
 - 2. The person responsible for performing the sampling or measurements;
 - 3. The dates analyses were performed;
 - 4. The person responsible for performing the analyses;
 - 5. The analytical techniques or methods used; and
 - 6. The results of such analyses.
- G.15 When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

APPENDIX CSC-SAP

EMISSION UNIT(S) COMMON SPECIFIC CONDITIONS-SULFURIC ACID PLANTS

SUBSECTION 1.0 CONSTRUCTION REQUIREMENTS

- 1.1 Applicable Regulations: Unless otherwise indicated in this permit, the construction and operation of the subject emission unit(s) shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of Chapter 403, F.S and Florida Administrative Code Chapters 62-4, 62-103, 62-204, 62-210, 62-212, 62-213, 62-296, 62-297; and the applicable requirements of the Code of Federal Regulations Section 40, Part 60, adopted by reference in the Florida Administrative Code regulation [Rule 62-204.800 F.A.C.]. Issuance of this permit does not relieve the facility owner or operator from compliance with any applicable federal, state, or local permitting requirements or regulations. [Rule 62-210.300, F.A.C.]

SUBSECTION 2.0 EMISSION LIMITING STANDARDS

- 2.1 General Particulate Emission Limiting Standards. General Visible Emissions Standard: Except for emissions units that are subject to a particulate matter or opacity limit set forth or established by rule and reflected by conditions in this permit, no person shall cause, let, permit, suffer, or allow to be discharged into the atmosphere the emissions of air pollutants from any activity, the density of which is equal to or greater than that designated as Number 1 on the Ringelmann Chart (20% opacity). [Rule 62-296-320(4)(b)1, F.A.C.]
- 2.2 Unconfined Emissions of Particulate Matter [Rule 62-296.320(4)(c), F.A.C.]
- (a) The owner or operators shall not cause, let, permit, suffer or allow the emissions of unconfined particulate matter from any source whatsoever, including, but not limited to, vehicular movement, transportation of materials, construction, alteration, demolition or wrecking, or industrially related activities such as loading, unloading, storing or handling, without taking reasonable precautions to prevent such emission.
 - (b) Any permit issued to a facility with emissions of unconfined particulate matter shall specify the reasonable precautions to be taken by that facility to control the emissions of unconfined particulate matter.
 - (c) Reasonable precautions include the following:
 - Paving and maintenance of roads, parking areas and yards.
 - Application of water or chemicals to control emissions from such activities as demolition of buildings, grading roads, construction, and land clearing.
 - Application of asphalt, water, oil, chemicals or other dust suppressants to unpaved roads, yards, open stock piles and similar activities.
 - Removal of particulate matter from roads and other paved areas under the control of the owner or operator of the facility to prevent reentrainment, and from buildings or work areas to prevent particulate from becoming airborne.

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- Landscaping or planting of vegetation.
- Use of hoods, fans, filters, and similar equipment to contain, capture and/or vent particulate matter.
- Confining abrasive blasting where possible.
- Enclosure or covering of conveyor systems.

NOTE: Facilities that cause frequent, valid complaints may be required by the Permitting Authority to take these or other reasonable precautions. In determining what constitutes reasonable precautions for a particular source, the Department shall consider the cost of the control technique or work practice, the environmental impacts of the technique or practice, and the degree of reduction of emissions expected from a particular technique or practice.

2.3 General Pollutant Emission Limiting Standards: [Rule 62-296.320, F.A.C.]

- (a) The owner or operator shall not store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds or organic solvents without applying known and existing vapor emission control devices or systems.
- (b) No person shall cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor.

NOTE: An objectionable odor is defined as any odor present in the outdoor atmosphere which by itself or in combination with other odors, is or may be harmful or injurious to human health or welfare, which unreasonably interferes with the comfortable use and enjoyment of life or property, or which creates a nuisance. [F.A.C. 62-210.200(198)]

SUBSECTION 3.0 OPERATION AND MAINTENANCE

- 3.1 Changes/Modifications: The owner or operator shall submit to the Department of Environmental Protection, Bureau of Air Regulation and/or the Southwest District office in Tampa, for review any changes in, or modifications to: the method of operation; process or pollution control equipment; increase in hours of operation; equipment capacities; or any change which would result in an increase in potential/actual emissions. Depending on the size and scope of the modification, it may be necessary to submit an application for, and obtain, an air construction permit prior to making the desired change. *Routine maintenance of equipment will not constitute a modification of this permit.* [Rule 62-4.030, 62-210.300 and 62-4.070(3), F.A.C.]
- 3.2 Plant Operation - Problems: If temporarily unable to comply with any of the conditions of the permit due to breakdown of equipment or destruction by fire, wind or other cause, the owner or operator shall notify the Southwest District office in Tampa as soon as possible, but at least within (1) working day, excluding weekends and holidays. The notification shall include: pertinent information as to the cause of the problem; the steps being taken to correct the problem and prevent future recurrence; and where applicable, the owner's intent toward reconstruction of destroyed facilities. Such notification does not release the

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permittee from any liability for failure to comply with the conditions of this permit and the regulations. [Rule 62-4.130, F.A.C.]

- 3.3 Circumvention: The owner or operator shall not circumvent the air pollution control equipment or allow the emission of air pollutants without this equipment operating properly. [Rules 62-210.650, F.A.C.]
- 3.4 Excess Emissions Requirements [Rule 62-210.700, F.A.C.]
- (a) Excess emissions resulting from start-up, shutdown or malfunction of these emissions units shall be permitted providing (1) best operational practices to minimize emissions are adhered to and (2) the duration of excess emissions shall be minimized, but in no case exceed two hours in any 24 hour period unless specifically authorized by the Southwest District office in Tampa office for longer duration. Best operational start-up practices shall be followed as described in the attached Memorandum of Understanding signed in 1989. [Rule 62-210.700(1), F.A.C.]
 - (b) Excess emissions that are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure that may reasonably be prevented during start-up, shutdown, or malfunction shall be prohibited. [Rule 62-210.700(4), F.A.C.]
 - (c) In case of excess emissions resulting from malfunctions, the owner or operator shall notify the Air Pollution Control Section of the Southwest District office in Tampa within one (1) working day of: the nature, extent, and duration of the excess emissions; the cause of the problem; and the corrective actions being taken to prevent recurrence. [Rule 62-210.700(6), F.A.C.]
- 3.5 Operating Procedures: Operating procedures shall include good operating practices and proper training of all operators and supervisors. The good operating practices shall meet the guidelines and procedures as established by the equipment manufacturers. All operators (including supervisors) of air pollution control devices shall be properly trained in plant specific equipment. [Rule 62-4.070(3), F.A.C.]

SUBSECTION 4.0 MONITORING OF OPERATIONS

4.1 Determination of Process Variables

- (a) The permittee shall operate and maintain equipment and/or instruments necessary to determine process variables, such as process weight input or heat input, when such data is needed in conjunction with emissions data to determine the compliance of the emissions unit with applicable emission limiting standards.
- (b) Equipment and/or instruments used to directly or indirectly determine such process variables, including devices such as belt scales, weigh hoppers, flow meters, and tank scales, shall be calibrated and adjusted to indicate the true value of the parameter being measured with sufficient accuracy to allow the applicable process variable to be determined within 10% of its true value. [Rule 62-297.310(5), F.A.C.]

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SUBSECTION 5.0 TEST REQUIREMENTS

- 5.1 Test Performance Within 60 days after achieving the maximum production rate at which these emission units will be operated, but not later than 180 days after initial startup and annually thereafter, the owner or operator of this facility shall conduct performance test(s) pursuant to 40 CFR 60.8, Subpart A, General Provisions and 40 CFR 60, Appendix A. No other test method shall be used unless approval from the Department has been received in writing. Unless otherwise stated in the applicable emission limiting standard rule, testing of emissions shall be conducted with the emission unit(s) operating at permitted capacity pursuant to Rule 62-297.310(2), F.A.C. [Rules 62-204.800, 62-297.310, 62-297.400, 62-297.401, F.A.C.]
- 5.2 Test Procedures shall meet all applicable requirements of the Florida Administrative Code Chapter 62-297. [Rule 62-297.310, F.A.C.]
- 5.3 Test Notification: The owner or operator shall notify the Southwest District office in Tampa in writing at least (30) days (initial) and 15 days (annual) prior to each scheduled compliance test to allow witnessing. The notification shall include the compliance test date, place of such test, the expected test time, the facility contact person for the test, and the person or company conducting the test. The (30) or (15) day notification requirement may be waived at the discretion of the Department. Likewise, if circumstances prevent testing during the test window specified for the emission unit, the owner or operator may request an alternate test date before the expiration of this window. [Rule 62-297.310 and 40 CFR 60.8, F.A.C.]
- 5.4 Special Compliance Tests: When the Department, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in Rule 62-204, 62-210, 62-212, 62-296 and 62-297, F.A.C. or in a permit issued pursuant to those rules is being violated, it may require the owner or operator of the facility to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions units and to provide a report on the results of said tests to the Southwest District office in Tampa. [Rule 62-297.310(7)(b), F.A.C.]
- 5.5 Stack Testing Facilities: The owner or operator shall install stack testing facilities in accordance with Rule 62-297.310(6), F.A.C..
- 5.6 Exceptions and Approval of Alternate Procedures and Requirements: An Alternate Sampling Procedure (ASP) may be requested from the Bureau of Air Monitoring and Mobile Sources of the Florida Department of Environmental Protection in accordance with the procedures specified in Rule 62-297.620, F.A.C.
- 5.7 Operating Rate During Testing: Unless otherwise stated in the applicable emission limiting standard rule, testing of emissions shall be conducted with the emissions unit operation at permitted capacity. Permitted capacity is defined as 90 to 100 percent of the maximum operation rate allowed by the permit. If it is impracticable to test at permitted capacity, an emissions unit may be tested at less than the minimum permitted capacity; in this case, subsequent emissions unit operation is limited to 110 percent of the test load until a new

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test is conducted. Once the unit is so limited, operation at higher capacities is allowed for no more than 15 consecutive days for the purpose of additional compliance testing to regain the authority to operate at the permitted capacity. [Rule 62-297.310(2) and (3)]

SUBSECTION 6.0 REPORTS AND RECORDS

- 6.1 Duration: All reports and records required by this permit shall be kept for at least (5) years from the date the information was recorded. [Rule 62-4.160(14)(b), F.A.C.]
- 6.2 Emission Compliance Stack Test Reports:
- (a) A *test report* indicating the results of the required compliance tests shall be filed with the Southwest District office in Tampa as soon as practical, but no later than 45 days after the last sampling run is completed. [Rule 62-297.310(8), F.A.C.]
 - b) The *test report* shall provide sufficient detail on the tested emission unit and the procedures used to allow the Department to determine if the test was properly conducted and if the test results were properly computed. At a minimum, the test report shall provide the applicable information listed in **Rule 62-297.310(8), F.A.C.**
- 6.3 Excess Emissions Report: If excess emissions occur, the owner or operator shall notify the Air Compliance Section of the Southwest District office in Tampa within (1) working day of: the nature, extent, and duration of the excess emissions; the cause of the excess emissions; and the actions taken to correct the problem. In addition, the Department may request a written summary report of the incident. Pursuant to the New Source Performance Standards, excess emissions shall also be reported in accordance with 40 CFR 60.7, Subpart A. [Rules 62-4.130 and 62-210.700(6), F.A.C.]
- 6.4 Annual Operating Report for Air Pollutant Emitting Facility: Before March 1st of each year, the owner or operator shall submit to the Department this required report [DEP Form No. 62-210.900(5)], which summarizes operations for the previous calendar year. [Rule 62-210.370(3), F.A.C.]

Memorandum

Florida Department of Environmental Protection

TO: Howard L. Rhodes

THRU: Clair Fancy
Al Linero *aa Liner 9/15*

FROM: Cleve Holladay *CH*

DATE: September 15, 1997

SUBJECT: IMC-Agrico Company/South Pierce Facility
Permit No: 1050055-010-AC/PSD-FL-235

Cleve

Attached for your approval and signature is final permit No. 1050055-010-AC (PSD-FL-235) allowing IMC-Agrico Company to increase production at their Sulfuric Acid Plants Nos. 10 and 11 and throughput for their molten sulfur storage and handling system. The permit will allow them to increase the sulfuric acid production of these two double absorption sulfuric acid plants from 2,700 to 3,000 tons per day (TPD) of sulfuric acid, each. The change in the combined total production of 100 percent sulfuric acid by these plants will be from 5,400 to 6,000 TPD. The molten sulfur throughput rate will proportionately increase from 650,000 to 725,000 tons per year (TPY).

Because SO₂, sulfuric acid mist, and contemporaneous NO_x emissions increase by greater than PSD-significant amounts, PSD review was required. For a 10 percent production increase, we did not consider a BACT limit lower than the NSPS values for SO₂.

The projected emissions increases from the project will not result in any predicted violations of any ambient air quality standards or PSD increments.

I recommend your approval and signature.

CHF/ch

Attachments

FINAL DETERMINATION

IMC-Agrico

Permit No. 1050055-010-AC
South Pierce Facility

An Intent to Issue an air construction permit for IMC-Agrico Company's South Pierce Facility located on SR 630 approximately eight miles west of Ft. Meade and twelve miles southwest of Bartow in Polk County, Florida, was distributed on July 8, 1997. The Public Notice of Intent to Issue Air Construction Permit was published in the Lakeland Ledger on July 25, 1997.

Comments were submitted by the applicant's consultant, Koogler & Associates (K&A), in response to the public notice. K&A requested deletion of comments regarding BACT determinations for new or reconstructed sulfuric acid plants. The present project involves a 10 percent production increase and the unit is not a new or reconstructed plant. The Department has removed the references as requested by K&A.

K&A requested removal of comments regarding further evaluation of controls on NO_x if subsequent emissions prove to be higher than estimated. The Department has reasonable assurance that emissions increases will be within the values estimated (54.1 tons per year) by K&A based on compliance data submitted to the Department. The permit includes a compliance emission limit of 0.12 pounds of NO_x per ton of sulfuric acid which is equivalent to total NO_x emissions of 131.4 tons per year. Comments regarding possible Department actions following non-compliance have been deleted. Comments regarding adjustments of emissions rates if they are not accurate have also been removed.

The final action of the Department will be to issue the permit with the changes noted above.

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
NOTICE OF FINAL PERMIT

In the Matter of an
Application for Permit

Mr. E. M. Newberg
IMC-Agrico
Post Office Box 2000
Mulberry, FL 33860

DEP File No. 1050055-010-AC
PSD-FL-235
Polk County

Enclosed is the FINAL Permit Number PSD-FL-235 to increase sulfuric acid production from 2,700 to 3,000 tons per day per plant from Sulfuric Acid Plants 10 and 11 located at the IMC-Agrico South Pierce Facility, Polk County. In addition this permit will allow the increase in molten sulfur throughput from 650,000 to 725,000 tons per year. This permit is issued pursuant to Rule 62-212.400, F.A.C., Prevention of Significant Deterioration, and Chapter 403, Florida Statutes.

Any party to this order (permit) has the right to seek judicial review of the permit pursuant to Section 120.68, F.S., by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the Department in the Legal Office; and by filing a copy of the Notice of Appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The Notice of Appeal must be filed within 30 (thirty) days from the date this Notice is filed with the Clerk of the Department.

Executed in Tallahassee, Florida.



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

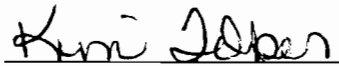
CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this NOTICE OF FINAL PERMIT (including the FINAL permit) was sent by certified mail (*) and copies were mailed by U.S. Mail before the close of business on 9-17-97 to the person(s) listed:

Mr. E.M. Newberg, IMC-Agrico Company *
Mr. John B. Koogler, P.E.
Mr. Brian Beals, EPA
Mr. John Bunyak, NPS
Mr. Roy Harwood, PCNRD
Mr. Bill Thomas, SWD

Clerk Stamp

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



(Clerk)

9-17-97

(Date)