

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

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



BOB GRAHAM
GOVERNOR
VICTORIA J. TSCHINKEL
SECRETARY

May 11, 1984

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

Mr. Rudy J. Cabina, Vice President
Gardinier, Inc.
P. O. Box 3269
Tampa, Florida

Dear Mr. Cabina:

Attached is one copy of the Technical Evaluation and Preliminary Determination, and proposed permits for the dry rock handling and grinding facilities for your phosphate fertilizer plant that is located in southern Hillsborough County.

Before final action can be taken on your proposed permits, you are required by Florida Administrative Code Rule 17-1.62(3) to publish the attached Notice of Proposed Agency Action in the legal advertising section of a newspaper of general circulation in Hillsborough County no later than fourteen days after receipt of this letter. The department must be provided with proof of publication within seven days of the date the notice is published. Failure to publish the notice may be grounds for denial of the permits.

The Preliminary Determination and proposed permits constitute a proposed action of the department and are subject to administrative hearing under the provisions of Chapter 120, Florida Statutes, if requested within fourteen days from receipt of this letter. Any petition for hearing must comply with the requirements of Florida Administrative Code Rule 28-5.201 and be filed with the Office of General Counsel, Florida Department of Environmental Regulation, Twin Towers Office Building, 2600 Blair Stone Road, Tallahassee, Florida 32301. Failure to file a request for hearing within fourteen days shall constitute a waiver of your right to a hearing. Filing is deemed complete upon receipt by the Office of General Counsel.

Mr. Rudy J. Carbina
May 11, 1984
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Please submit, in writing, any comments which you wish to have considered concerning the department's proposed action to Mr. Bill Thomas of the Bureau of Air Quality Management.

Sincerely,



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

CHF/TH/pa

Attachments

cc: Mr. Dan Williams, DER Southwest District
Mr. Jerry Campbell, Hillsborough County
Environmental Protection Commission

Technical Evaluation
and
Preliminary Determination

Gardinier, Inc.
Hillsborough County

Dry Phosphate Rock Handling Facility

Proposed State Permit Numbers

- AC 29-86615 - Phosphate Rock Unloading Facility
- AC 29-86649 - Nos. 6, 7, 8, and 10 Rock Grinding Mill
- AC 29-86648 - No. 11 KVS Rock Mill
- AC 29-86646 - No. 12 KVS Rock Mill

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

May 11, 1984

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NOTICE OF PROPOSED AGENCY ACTION

The Department of Environmental Regulation gives notice of its intent to issue permits to Gardinier, Inc., to construct a phosphate rock storage and milling facility at its East Tampa plant located six and one-half miles southeast of Tampa on U.S. Highway 41 in Hillsborough County. The facility includes a rock unloading and storage station equipped with bag filter, a group of four phosphate rock mills ducted to a common bag filter, and two additional phosphate rock ball mills, each equipped with a bag filter. The Company plans to operate the dry rock facilities only when one or both of the wet mills are inoperative because of mechanical failure.

Particulate matter emissions from all sources authorized by these permits will be less than 25 TPY. A determination of best available control technology was not required.

A person who is substantially affected by the Department's proposed permitting decision may request a hearing in accordance with Section 120.57, Florida Statutes, and Chapters 17-1 and 28-5, Florida Administrative Code. The request for hearing must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Twin Towers Office Building, Tallahassee, Florida 32301, within fourteen (14) days of publication of this notice. Failure to file a request for hearing within this time period shall constitute a waiver of any right such person may have to request a hearing under Section 120.57, Florida Statutes.

The applications technical evaluation and department intent for the proposed project are available for public inspection during normal business hours at the following locations:

Department of Environmental
Regulation
Southwest District Office
7601 Highway 301 North
Tampa, Florida

Hillsborough County Environmental
Protection Commission
1900 9th Avenue
Tampa, Florida 33605

Department of Environmental
Regulation
Bureau of Air Quality
Management
2600 Blair Stone Road
Tallahassee, Florida 32301

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

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.

I. Project Description

A. Applicant

Gardinier, Inc.
P. O. Box 3269
Tampa, Florida 33601

B. Project and Location

Gardinier, Inc. proposes to reactivate part of their dry phosphate rock facility that was replaced by a wet rock system. Mechanical failures of their wet rock mills will force the Company to place the dry phosphate unloading and grinding equipment back into operation until the problems with the wet rock mills are corrected.

C. Process and Controls

Gardinier, Inc. proposes to use existing equipment that was previously taken out of service to receive dry phosphate rock at their plant, unload and store it in existing silos, and grind it in existing dry rock mills. Water will be added to the dry ground rock and the slurry will be pumped to the existing phosphoric acid plants. Emissions from all reactivated dry rock equipment will be controlled with bag filters or by taking reasonable precautions.

The following dry rock equipment will be reactivated.

1. A 273 TPH phosphate rock unloading facility and two silos (2050 tons capacity each) with emissions controlled by one bag filter.
2. Nos. 6, 7, 8, and 10 phosphate rock grinding mills having a capacity of 168 TPH of rock and the Flex-Kleen Bag Filter that controls them.
3. No. 11 KVS Rock Mill having a capacity of 35 TPH of rock and the bag filter that controls this equipment.
4. No. 12 KVS Rock Mill having a capacity of 60 TPH of rock and the Flex-Kleen bag filter that controls this equipment.

II. Rule Applicability

A. State Regulations

The proposed project, reactivation of existing dry phosphate rock receiving, storage, and grinding equipment, is subject to preconstruction review under the provisions of Chapter 403, FS, and Chapter 17-2, FAC.

The plant site is in an area designated nonattainment for ozone (Rule 17-2.410(1), FAC) and particulate matter (Rule 17-2.410(2), FAC), unclassifiable for sulfur dioxide (Rule 17-2.430(2), FAC), and attainment for the other criteria pollutants (Rule 17-2.420, FAC).

This facility is a major source of particulate matter and sulfur dioxide (Rule 17-2.100(99), FAC) because the emissions of each at these criteria pollutants exceed 100 TPY. The proposed project will increase particulate matter emission by less than 25 TPY, which is less than the significant emission rate listed in Table 500-2. The proposed project will also emit a trace of sulfur dioxide (1 TPY).

The project is exempt from new source review for nonattainment areas because it does not result in a significant net emission increase of particulate matter (less than 25 TPY) or ozone (no emission), Rule 17-2.510(2)(d)4.a, FAC.

The project is subject to Rule 17-2.520, FAC, Sources Not Subject to PSD or Nonattainment Requirements. Emission standards shall be set at the values requested by the applicant which are more restrictive than the ones listed in Rule 17-2.650(2), FAC, (RACT for particulate matter).

B. Federal Regulations

This project is not subject to federal PSD regulations, Section 52.21 of Title 40 of the Code of Federal Regulations (40 CFR 52.21), because it is in a nonattainment area and does not cause a significant net emission increase of any criteria pollutant.

III. Technical Evaluation

A. Rock Unloading and Storage Facilities

Unground dry phosphate rock is brought to the plant in railroad cars and trucks and dumped at an unloading station. The unconfined emissions generated when the dry rock is dumped are captured by a 10,000 ACFM flow which is passed through a Flex-Kleen model 84 bag filter before being discharged to the ambient air. The captured dust is returned to the unloading station.

The phosphate rock is taken by elevator to two phosphate rock storage silos of 2050 tons capacity each. The air displaced by the rock is sent through the bag filter that controls the unloading station before being discharged to the atmosphere.

Previous test data show particulate matter emissions from this system varied from 0.9 to 1.6 lb/hr and visible emissions varied from 0 to 5 percent opacity.

B. No. 6, 7, 8, and 10 Rock Grinding Mills

Up to 168 TPH of unground phosphate rock is transferred from the silos by a covered conveyor belt to the rock milling and classification section of the plant which consist of four rock grinding mills and accessory equipment. The dry ground rock is stored in a product bin. All emissions from the rock milling and classification equipment and the product bin passes through an 18,000 ACFM Flex-Kleen Model 100 bag filter before being discharged to the atmosphere. Make up air is heated with a 0.13 million Btu/hr No. 2 fuel oil or natural gas fired burner to prevent condensation that would plug the filters and make the system inoperative. Emissions from the baghouse vary from 0.5 to 2.2 lb/hr and 0 to 5 percent opacity. Burning the fuel to heat the filter produces 0.2 TPY of sulfur dioxide.

The dry, ground rock is then transferred from the storage bin to a slurry tank where it is mixed with water. The slurry, which has no air emissions, is then transferred to the phosphoric acid plants.

C. No. 11 KVS Rock Mill

Up to 35 TPH unground phosphate rock from the storage silos is transferred by a covered conveyor belt to the No. 11 KVS rock mill. The ground rock in the air stream from the mill is removed by a cyclone and sent to the dry, ground rock storage bin. The contaminated air from this system passes through a 5,000 ACFM Flex-Kleen Model 100 bag filter before being discharged to the atmosphere. The particulate matter emissions from this filter are estimated to be 0.7 lb/hr and 0 to 5 percent opacity.

D. No. 12 KVS Rock Mill

Up to 60 TPH of unground phosphate rock from the storage silos is transferred on a covered conveyor belt to the No. 12 KVS rock mill. Hot air from a 0.45 million Btu per hour No. 2 fuel oil or natural gas fired heater is also added to the mill to eliminate condensation. The ground rock is removed from the air stream by a cyclone and a 8,500 ACFM Flex-Kleen Model No. WUDC-152 bag filter and sent to the dry, ground rock storage bin. The particulate matter emissions from the bag filter have varied from 0.4 to 1.0 lb/hr and 0 to 5 percent opacity. Sulfur dioxide emissions generated by burning the No. 2 fuel oil are estimated to be 0.75 TPY.

IV. Conclusion

Based on a review of the data submitted by Gardinier, Inc. the Department concludes that the Company can reactivate the dry rock handling and milling equipment discussed in this evaluation

in compliance with all applicable air pollution control regulations.

The following table lists the particulate matter emissions that will be allowed for these sources.

Source	PM Emissions		Opacity Percent
	lb/hr	TPY	
Phosphate rock unloading	1.6	7.0	5
Nos. 6, 7, 8, and 10 rock grinding mills	2.2	9.6	5
No. 11 KVS mill	0.7	3.1	5
No. 12 KVS mill	1.0	4.4	5
Total	5.5	24.1	-

The General and Specific Conditions in the proposed permits (attached) will assure compliance of the sources with the regulations.

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

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TALLAHASSEE, FLORIDA 32301-8241



BOB GRAHAM
GOVERNOR

VICTORIA J. TSCHINKEL
SECRETARY

PERMITTEE:
Gardinier, Inc.
P. O. Box 3269
Tampa, Florida 33601

Permit Number: AC 29-86615
Date of Issue:
Expiration Date: December 28, 1984
County: Hillsborough
Latitude/Longitude: 27° 51' 30"N/
82° 23' 15"W
Project: Phosphate Rock
Unloading Facility

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

Construction required to repair the existing 273 TPH phosphate rock
unloading facility which consists of the unloading station and two
2050 ton phosphate rock storage silos and associated material
handling equipment that is controlled by a 12,000 ACFM Flex-Kleen
Model 84-WUDC-128XL bag filters. This equipment is located at U.S.
Highway 41 and Riverview Drive, South Tampa, Hillsborough County.

PERMITTEE:
Gardinier, Inc.

I. D. Number:
Permit Number: AC 29-86615
Date of Issue:
Expiration Date: December 28, 1984

GENERAL CONDITIONS:

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

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

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

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

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

PERMITTEE:
Gardinier, Inc.

I. D. Number:
Permit Number: AC 29-86615
Date of Issue:
Expiration Date: Dec. 28, 1984

GENERAL CONDITIONS:

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

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

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

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

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

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

PERMITTEE:
Gardinier, Inc.

I. D. Number:
Permit Number: AC 29-86615
Date of Issue:
Expiration Date: Dec. 28, 1984

GENERAL CONDITIONS:

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

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

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

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

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

13. This permit also constitutes:

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

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

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

PERMITTEE:
Gardinier, Inc.

I. D. Number:
Permit Number: AC 29-86615
Date of Issue:
Expiration Date: Dec. 28, 1984

GENERAL CONDITIONS:

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

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

SPECIFIC CONDITIONS:

1. The plant shall not process dry phosphate rock if the wet rock mills are operable.
2. The phosphate rock unloading facility shall not unload more than 273 TPH of phosphate rock.
3. Particulate matter emissions from the bag filter serving the unloading station, silos, and elevator shall not exceed 1.6 lb/hr and 7.0 TPY as determined by EPA Method 5 test procedures described in 40 CFR 60, Appendix A, and 5 percent opacity as determined by DER Method 9 described in Chapter 17-2, FAC.

PERMITTEE:
Gardinier, Inc.

I. D. Number:
Permit Number: AC 29-86615
Date of Issue:
Expiration Date: Dec. 28, 1984

SPECIFIC CONDITIONS:

4. Compliance tests shall be conducted within 30 days of placing the unloading system in operation. The tests will be conducted while the system is processing 246 to 273 TPH phosphate rock. The Southwest District Office and Hillsborough County Environmental protection Commission will be notified 10 days before the test. Test results shall be submitted to the County within 15 days after the test.

5. Fugitive and unconfined emissions from all process equipment shall be minimized by application of reasonable precautions. Visible emissions shall not exceed 10 percent opacity from any equipment.

6. A complete application for permit to operate the source shall be submitted to the Hillsborough County Environmental Protection Commission prior to September 28, 1984.

7. Any permit to operate issued for this system shall require routine compliance tests and operation reports as deemed necessary by the State and County regulatory agencies.

Issued this _____ day of _____, 19__

STATE OF FLORIDA DEPARTMENT OF
ENVIRONMENTAL REGULATION

VICTORIA J. TSCHINKEL, Secretary

_____ pages attached.

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

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



BOB GRAHAM
GOVERNOR
VICTORIA J. TSCHINKEL
SECRETARY

PERMITTEE:
Gardinier, Inc.
P. O. Box 3269
Tampa, Florida 33601

Permit Number: AC 29-86646
Date of Issue:
Expiration Date: December 28, 1984
County: Hillsborough
Latitude/Longitude: 27° 51' 30"N/
82° 23' 15"W
Project: No. 12 KVS Rock Mill

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

Construction required to repair the existing No. 12 KVS rock mill system which consist of a 60 TPH ball mill classifier, cyclone, 0.45 million Btu/hr No. 2 fuel oil or natural gas fired air heater, 8500 ACFM Flex-Kleen Model No. WUDC-152 bag filter and associated equipment.

This is equipment located at U.S. Highway 41 and River Drive, South Tampa, Hillsborough County.

PERMITTEE:
Gardinier, Inc.

I. D. Number:
Permit Number: AC 29-86646
Date of Issue:
Expiration Date: December 28, 1984

GENERAL CONDITIONS:

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

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

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

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

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

PERMITTEE:
Gardinier, Inc.

I. D. Number:
Permit Number: AC 29-86646
Date of Issue:
Expiration Date: Dec. 28, 1984

GENERAL CONDITIONS:

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

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

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

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

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

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

PERMITTEE:
Gardinier, Inc.

I. D. Number:
Permit Number: AC 29-86646
Date of Issue:
Expiration Date: Dec. 28, 1984

GENERAL CONDITIONS:

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

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

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

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

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

13. This permit also constitutes:

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

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

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

PERMITTEE:
Gardinier, Inc.

I. D. Number:
Permit Number: AC 29-86646
Date of Issue:
Expiration Date: Dec. 28, 1984

GENERAL CONDITIONS:

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

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

SPECIFIC CONDITIONS:

1. No. 12 KVS rock mill shall not be operated if both wet rock mills are able to operate or a wet rock mill is capable of meeting the plant's ground phosphate rock demand.
2. No. 12 KVS rock mill shall not process more than 60 TPH dry phosphate rock.
3. Particulate matter emissions from the 8500 CFM Flex-Kleen bag filter shall not exceed 1.0 lb/hr and 4.4 TPY as determined by EPA Method 5 as described in 40 CFR 60, Appendix A, and visible emissions shall not exceed 5 percent opacity as determined by DER Method 9 as described in Chapter 17-2, FAC.

PERMITTEE:
Gardinier, Inc.

I. D. Number:
Permit Number: AC 29-86646
Date of Issue:
Expiration Date: Dec. 28, 1984

SPECIFIC CONDITIONS:

4. Compliance tests shall be conducted within 30 days of placing the mills in operation. The tests will be conducted while the mills are grinding 54 to 60 TPH dry phosphate rock. The Southwest District Office and Hillsborough County Environmental Protection Commission shall be notified 10 days prior to the tests. Test results will be submitted to the County within 15 days following the test.
5. Fugitive and unconfined emissions from all process equipment shall be minimized by application of reasonable precautions. Visible emissions shall not exceed 5 percent opacity from any equipment.
6. A complete application for permit to operate this source shall be submitted the Hillsborough County Environmental Protection Commission prior to September 28, 1984.
7. Any permit to operate issued for this system shall require routine compliance tests and operation reports as deemed necessary by the State and County regulatory agencies.

Issued this _____ day of _____, 19__

STATE OF FLORIDA DEPARTMENT OF
ENVIRONMENTAL REGULATIONS

VICTORIA J. TSCHINKEL, SECRETARY

_____ pages attached.

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

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



BOB GRAHAM
GOVERNOR

VICTORIA J. TSCHINKEL
SECRETARY

PERMITTEE:
Gardinier, Inc.
P. O. Box 3269
Tampa, Florida 33601

Permit Number: AC 29-86648
Date of Issue:
Expiration Date: December 28, 1984
County: Hillsborough
Latitude/Longitude: 27° 51' 30"N/
82° 23' 15"W
Project: No. 11 KVS Rock Mill

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

Construction required to repair the existing No. 11 KVS rock mill system which consists of a 35 TPH ball mill, mill classifier, cyclone, a 5300 ACFM, Flex-Kleen Model 100 WRTR 96 XL III bag filter and associated equipment. This is equipment located at U.S. Highway 41 and River Drive, South Tampa, Hillsborough County.

PERMITTEE:
Gardinier, Inc.

I. D. Number:
Permit Number: AC 29-86648
Date of Issue:
Expiration Date: December 28, 1984

GENERAL CONDITIONS:

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

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

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

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

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

PERMITTEE:
Gardinier, Inc.

I. D. Number:
Permit Number: AC 29-86648
Date of Issue:
Expiration Date: Dec. 28, 1984

GENERAL CONDITIONS:

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

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

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

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

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

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

PERMITTEE:
Gardinier, Inc.

I. D. Number:
Permit Number: AC 29-86648
Date of Issue:
Expiration Date: Dec. 28, 1984

GENERAL CONDITIONS:

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

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

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

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

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

13. This permit also constitutes:

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

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

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

PERMITTEE:
Gardinier, Inc.

I. D. Number:
Permit Number: AC 29-86648
Date of Issue:
Expiration Date: Dec. 28, 1984

GENERAL CONDITIONS:

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

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

SPECIFIC CONDITIONS:

1. No. 11 KVS rock mill shall not be operated if both wet rock mills are able to operate or a wet rock mill is capable of meeting the plant's ground phosphate rock demand.
2. No. 11 KVS rock mill shall not process more than 35 TPH dry phosphate rock.
3. Particulate matter emissions from the 5300 ACFM Flex-Kleen bag filter shall not exceed 0.7 lb/hr and 3.1 TPY as determined by EPA Method 5 as described in 40 CFR 60, Appendix A, and visible emissions shall not exceed 5 percent opacity as determined by DER Method 9 as described in Chapter 17-2, FAC.

PERMITTEE:
Gardinier, Inc.

I. D. Number:
Permit Number: AC 29-86648
Date of Issue:
Expiration Date: Dec. 28, 1984

SPECIFIC CONDITIONS:

4. Compliance tests shall be conducted within 30 days of placing the mills in operation. The tests will be conducted while the mills are grinding 31 to 35 TPH rock. The Southwest District Office and Hillsborough County Environmental Protection Commission shall be notified 10 days prior to the tests. Test results will be submitted to the County within 15 days following the test.

5. Fugitive and unconfined emissions from all process equipment shall be minimized by application of reasonable precautions. Visible emissions shall not exceed 5 percent opacity from any equipment.

6. A complete application for permit to operate this source shall be submitted the Hillsborough County Environmental Protection Commission prior to September 28, 1984.

7. Any permit to operate issued for this system shall require routine compliance tests and operation reports as deemed necessary by the State and County regulatory agencies.

Issued this _____ day of _____, 19__

STATE OF FLORIDA DEPARTMENT OF
ENVIRONMENTAL REGULATIONS

VICTORIA J. TSCHINKEL, SECRETARY

_____ pages attached.

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
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GOVERNOR

VICTORIA J. TSCHINKEL
SECRETARY

PERMITTEE:
Gardinier, Inc.
P. O. Box 3269
Tampa, Florida 33601

Permit Number: AC 29-86649
Date of Issue:
Expiration Date: December 28, 1984
County: Hillsborough
Latitude/Longitude: 27° 51' 30"N/
82° 23' 15"W
Project: Nos. 6, 7, 8, and 10
Rock Grinding Facility

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

Construction required to repair the existing 168 TPH rock grinding mill system consisting of Nos. 6, 7, and 8 roll mills and No. 10 ball mill and associated equipment (No. 2 fuel oil or natural gas fired air heater, classifier, four cyclones, and a ground rock storage bin) with emission controlled by an 18,000 ACFM Flex-Kleen Model 100-WRTR-96 bag filter.

This equipment is located at U.S. Highway 41 and River Drive, South Tampa, Hillsborough County.

PERMITTEE:
Gardinier, Inc.

I. D. Number:
Permit Number: AC 29-86649
Date of Issue:
Expiration Date: December 28, 1984

GENERAL CONDITIONS:

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

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

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

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

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

PERMITTEE:
Gardinier, Inc.

I. D. Number:
Permit Number: AC 29-86649
Date of Issue:
Expiration Date: Dec. 28, 1984

GENERAL CONDITIONS:

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

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

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

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

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

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

PERMITTEE:
Gardinier, Inc.

I. D. Number:
Permit Number: AC 29-86649
Date of Issue:
Expiration Date: Dec. 28, 1984

GENERAL CONDITIONS:

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

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

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

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

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

13. This permit also constitutes:

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

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

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

PERMITTEE:
Gardinier, Inc.

I. D. Number:
Permit Number: AC 29-86649
Date of Issue:
Expiration Date: Dec. 28, 1984

GENERAL CONDITIONS:

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

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

SPECIFIC CONDITIONS:

1. Nos. 6, 7, 8, and 10 rock grinding mills shall not be used if both wet rock mills are able to operate or a wet rock mill is capable of meeting the plant's ground phosphate rock demand.
2. Nos. 6, 7, 8, and 10 rock grinding mills shall not process more than a total of 168 TPH dry phosphate rock.
3. The air heater for the No. 10 classifier shall burn No. 2 fuel oil or natural gas only.

PERMITTEE:
Gardinier, Inc.

I. D. Number:
Permit Number: AC 29-86649
Date of Issue:
Expiration Date: Dec. 28, 1984

SPECIFIC CONDITIONS:

4. Particulate matter emissions from the Flex-Kleen bag filter shall not exceed 2.2 lb/hr and 9.6 TPY as determined by EPA Method 5 test procedures described in 40 CFR 60, Appendix A, and 5 percent opacity as determined by DER Method 9 described in Chapter 17-2, FAC.
5. Compliance tests shall be conducted within 30 days of placing the mills in operation. The tests will be conducted while the mills are grinding 151 to 168 TPH of rock. The Southwest District Office and Hillsborough County Environmental Protection Commission shall be notified 10 days prior to the tests. Test results will be submitted to the County within 15 days following the test.
6. Fugitive and unconfined emissions from all process equipment shall be minimized by application of reasonable precautions. Visible emissions shall not exceed 5 percent opacity from any equipment.
7. A complete application for permit to operate this source shall be submitted to the Hillsborough County Environmental Protection Commission prior to September 28, 1984.
8. Any permit to operate issued for this system shall require routine compliance tests and operation reports as deemed necessary by the State and County regulatory agencies.

Issued this _____ day of _____, 19__

STATE OF FLORIDA DEPARTMENT OF
ENVIRONMENTAL REGULATION

VICTORIA J. TSCHINKEL, Secretary

_____ pages attached.