SWD INTERNAL PERMITTING MEMORANDUM
AND TECHNICAL EVALUATION

TO Kelley M. Boatwright
District Air Program Administrator

THRU: Danny Stubbs
Air Permitting Engineer

FROM: Quaid Noor
Air Permitting Engineer

DATE: 05/28/2013

SUBJECT: Draft Construction Permit No: 0570008-077-AC
Facility Name: Mosaic Fertilizer, LLC – Riverview Facility
Facility Type: Phosphate Fertilizer Plant

Application Receipt Date: 04/09/2013 *(Time in House Day 90 is 07/08/2013)*

This is a draft construction permit for a minor revision to Air Construction Permit No. 0570008-064-AC for EU ID No. 007. The revision modifies Specific Condition Nos. A.5 and A.9 to remove references and requirements of revised test protocol (Appendix F) which compares pre and post closed loop system (CLS) emissions. Pre-CLS emissions do not have any relevance as the post-CLS is an EPA mandated resource conservation and recovery act (RCRA) compliance requirement. The facility is required to conduct the compliance testing in accordance with the Appendix D – Common Testing Requirements, which is attached to this permit. So, the revised test protocol and any reference of it in the permit No. 0570008-064-AC became redundant.

The air construction permit No. 0570008-064-AC had the technical evaluation where the baseline actual and projected actual emissions were calculated and shown as below:

Pollutant (EU)	Baseline Actual Emissions (TPY)	Projected Actual Emissions (TPY)	Increase Due to Project = Projected Actual Minus Baseline Actual Emissions (TPY)	PSD Significant Emission Rate (TPY)	PSD Required Y/N
PM (007)	18.19	18.19	0	25	N
PM_{10} (007))	18.19	18.19	0	25	N
F (007)	3.97	3.97	0	3	N

These emissions calculations do not change due to this project.

The expiration date of the permit No. 0570008-064-AC is carried over to this permit No. 0570008-077-AC for consistency purpose.

A pre-draft permit and this memo/technical evaluation were forwarded to the HCEPC and Mosaic on 05/17/2013 to review and provide comments, if any, by 05/23/2013. No comments were received.

This memo serves as the technical evaluation. This project does not increase potential, permitted or actual emissions of any pollutants. The baseline actual emissions and projected actual emissions for this EU 007 is still the same as shown above for the project 0570008-064-AC. Therefore, a full technical evaluation is not necessary.

I recommend that this Draft Notice of Permit package be sent out as attached and submit it for your review and approval. This draft permit will become final should there be no change in it.