May 5, 2011

Fred Ramsey
Eastern Associated Terminals Company, LLC
3701 Causeway Blvd.
Tampa, Fl 33619

Re: Title V Air Operation Permit Renewal
Proposed Permit Project No. 0570014-022-AV

Dear Mr. Ramsey:

One copy of the "PROPOSED Determination" for the renewal of a Title V Air Operation Permit for the fertilizer product (MAP, DAP, GTSP) and phosphate rock material handling facility located at 3701 Causeway Boulevard, Tampa, Hillsborough County, Florida, is enclosed. This letter is only a courtesy to inform you that the DRAFT Permit has become a PROPOSED Permit.

An electronic version of this determination has been posted on the Division of Air Resources Management's world wide web site for the United States Environmental Protection Agency (USEPA) Region 4 office's review. The web site address is:

"http://appprod.dep.state.fl.us/air/emission/apds/default.asp"

Pursuant to Section 403.0872(6), Florida Statutes, if no objection to the PROPOSED Permit is made by the USEPA within 45 days, the PROPOSED Permit will become a FINAL Permit no later than 55 days after the date on which the PROPOSED Permit was mailed (posted) to USEPA. If USEPA has an objection to the PROPOSED Permit, the FINAL Permit will not be issued until the permitting authority receives written notice that the objection is resolved or withdrawn.

If you should have any questions, please contact Lora Webb at 813-627-2600 x1287.

Sincerely,

Richard D. Garrity, Ph.D.
Executive Director

RDG/LAW/law

copy furnished to:
Kenneth Given, P.E. – Air Testing & Consulting, Inc. (via email)
Barbara Friday, BAR [barbara.friday@dep.state.fl.us] (for posting with Region 4 , U.S. EPA)

PROPOSED Determination

Proposed Title V Air Operation Permit Renewal No.: 0570014-022-AV

I. Public Notice.

An "INTENT TO ISSUE AN AIR CONSTRUCTION PERMIT AND A TITLE V AIR OPERATION PERMIT" to Eastern Associated Terminals Company, LLC for their facility located at 3701 Causeway Boulevard, Tampa, Hillsborough County, Fl was clerked on February 24, 2011. The "PUBLIC NOTICE OF INTENT TO ISSUE AN AIR CONSTRUCTION PERMIT AND A TITLE V AIR OPERATION PERMIT" was published in The Tampa Tribune on March 3, 2011. The DRAFT Permits were available for public inspection at the Environmental Protection Commission of Hillsborough County in Tampa. Proof of publication of the "PUBLIC NOTICE OF INTENT TO ISSUE AN AIR CONSTRUCTION PERMIT AND A TITLE V AIR OPERATION PERMIT" was received on March 10, 2011.

II. Public Comment(s).

Comments were received and the DRAFT Permits were changed. The comments were not considered significant enough to re-issue the DRAFT Permits and require another Public Notice. Listed below is each comment and a response to each in the order that the comment was received. The comment(s) will not be restated but are summarized. Where duplicative comments exist, the original response is referenced.

A. E-mail submitted by Kenneth Given, P.E. – Air Testing & Consulting, Inc. on behalf of Eastern Associated Terminals Company, LLC, received March 2, 2011, provided the following comments.

Comment No. 1: Specific Condition No. A.8.A) requires the facility to test the emission units both with the baghouses running and then without the baghouses running. Also, Specific Condition No. A.8.E) says to test with the baghouse running. Since the potential for emissions is greater when the baghouses are not running it would seem that testing without the baghouses running would qualify as testing with the potential for maximum emissions.

Response: The facility operates the emission units in two operational modes – operating with the baghouses operating and operating with the baghouses turned off. A VE test showing that the emission units comply with the 5% opacity standard when the baghouses are turned off does not necessarily provide reasonable assurance that the baghouses associated with the emission units will also comply with the opacity standard when the baghouses are operating. However, since the facility does not handle AFI and has not handled the much dustier product phosphate rock in years, EPC staff is willing to change the testing requirements to require a VE test on both the baghouse and the transfer points only when phosphate rock is handled. Specific Condition Nos. A.8.A) and E) are changed as follows to clarify that testing while handling MAP, DAP, and GTSP can be performed either while the baghouse is operating or while the baghouse is turned off.

From:
A.8. The permittee shall perform the following emissions tests as specified: [Rules 62-297.310(7) and 62-4.070(3), F.A.C. and Permit No. 0570014-015-AC]

A) Test all emission units as follows for visible emissions once per federal fiscal year (October 1 – September 30) in order to demonstrate compliance with the opacity standard specified in Specific Condition No. A.2.:

1) While handling dry phosphate rock.
2) While handling MAP, DAP, or GTSP with the baghouses turned off.
3) If the baghouse(s) has operated during the fiscal year, test the baghouse(s) while handling MAP, DAP, or GTSP.
4) Test the north and south doors of the fertilizer storage building for visible emissions during normal operations.

E) When testing emissions from ship loading, the visible emissions test shall be performed at the baghouse exhaust (EU No. 001) and at the shiphold.

To:
A.8. The permittee shall perform the following emissions tests as specified: [Rules 62-297.310(7) and 62-4.070(3), F.A.C. and Permit No. 0570014-015-AC]

A) Test all emission units as follows for visible emissions once per federal fiscal year (October 1 – September 30) in order to demonstrate compliance with the opacity standard specified in Specific Condition No. A.2.:

1) While handling wet or dry phosphate rock. Test the handling of this material while the baghouses are operating and test the handling of this material while the baghouse are turned off.
2) While handling MAP, DAP, or GTSP. The visible emissions test may be performed while the baghouses are operating or may be performed while the baghouses are turned off.
3) Reserved.
4) Test the north and south doors of the fertilizer storage building for visible emissions during normal operations.

E) When testing emissions from ship loading, the visible emissions test shall be performed at the shiphold. In addition, if the baghouse is in operation during testing, testing shall be performed at the baghouse exhaust (EU No. 001).

Comment No. 2: Specific Condition No. A.8.C) states that Baghouses I, II, III & IV are to be tested once every five years. The condition says to test once per federal fiscal year on one of the baghouses. Eastern assumes that one year in five can be skipped.

Response: Specific Condition No. A.8.C) requires that Baghouses I, II, III, and IV be tested at least once in a five year cycle. Specific Condition No. A.8.C) is changed as follows to clarify that each baghouse should be tested for PM emissions once in a five year period.

From:
A.8.C) Baghouses I, II, III, and IV (EU Nos. 011 – 014) shall be tested for particulate matter emissions. The particulate matter test shall be performed once per federal fiscal year on one of the baghouses. The testing shall be done so that each baghouse is tested at least once during a five year cycle.

To:
A.8.C) Baghouses I, II, III, and IV (EU Nos. 011 – 014) shall be tested for particulate matter emissions prior to renewal of this permit. The particulate matter testing shall be done so that each baghouse is tested at least once during a five year cycle.

III. Conclusion.

The permitting authority hereby issues the PROPOSED Permit, with any changes noted above.