PERMITTING MEMORANDUM
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TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

TO:	Robert Wong District Air Program Administrator
THRU:	Cindy Zhang-Torres, P.E. Manager, Air Permitting
FROM:	Quaid Noor Engineering Specialist IV
DATE:	08/22/2012
SUBJECT:	Draft Notice of Permit Revision Letter – DEP Project No: 1050059-076-AC Facility Name: Mosaic Fertilizer, LLC – New Wales Facility Facility Type: Phosphate Fertilizer Plant Application Receipt Date: 07/05/2012

Construction Permit AC53-40085 for E.U. No. 053 (Phosphoric Acid Clarification and Storage Area) was issued on 5/21/1981. The permittee has requested the Department to revise Specific Condition 4. in Construction Permit AC53-40085 (corresponding to specific condition D.2.b. in the Title V Air Operation Permit 1050059-069-AV) through this construction permit 1050059-076-AC and incorporate the revised Specific Condition in the Title V Air Operation Renewal Permit 1050059-075-AV. The revision to Specific Condition 4. is to revise fluoride emissions limit from "less than 2.32 lbs/hr" to "not to exceed 25 pounds per day (1.04 lbs/hr)". The latter limit has been in the facility's Title V Air Operation Permit for years as a "Not Federally Enforceable" condition, because it was established by an agreement between the permittee and FDEP dated 01/23/1996, and it did not go through a construction permitting action.

Since this is a revision of an emission limit that was established by a construction permit (AC53-40085), a public notice of the permit revision is required to make the new condition federally enforceable.

As was discussed with Cindy Zhang-Torres, P.E., Manager, Air Permitting, the notice of permit revision will be in a "From - To" format to simplify the permit preparation process.

The public notice of the draft construction permit revision (1050059-076-AC) is combined with the public notice of the draft/proposed Title V Air Operation Renewal (1050059-075-AV).

This memo serves as the technical evaluation and preliminary determination for this project as there is no physical or operational change, and potential or actual emissions will not change.

I recommend that this Draft Notice of Permit Revision package be sent out as attached and submit it for your review and approval.