SWD INTERNAL PERMITTING MEMORANDUM

TO: Steve Morgan
Air and Solid Waste Permitting Manager

THRU: Quaid Noor
Air Permitting Engineering Specialist IV

FROM: Danny Stubbs
Air Permitting Engineering Specialist IV

DATE: 9/12/2014

SUBJECT: Draft Construction Permit No: 1050059-091-AC
Mosaic Fertilizer, LLC – New Wales Facility

Application Receipt Date: 8/19/2014 *(Time In-House Day 90 is 11/17/2014)*

Application Document Date: 9/9/2014

EU ID Nos. To Be Linked To This Project When Final is issued: 091

This project was submitted as an EPSAP application on 8/19/2014 and it initially contained every emissions units at the facility. When the application was converted to a PDF version, it resulted in a very large document that was a total 910 pages. Since the only information that was really applicable for this project was information related to the new concrete batch plant, I made a request to the applicant to resubmit the application with only the new concrete batch plant emissions unit. The applicant submitted a revised EPSAP application on 9/9/2014.

This project will add a temporary concrete batch plant to the Mosaic New Wales facility that will be used to remediate a geological anomaly in the facility's closed gypsum stack area. The concrete batch plant will include several engines that will not be subject to the RICE rules (40 CFR 60, subpart IIII and 40 CFR 63, Subpart ZZZZ) provided they follow the requirements outlined in the permit. Additionally, fuel usage is limited in the permit and as a result, the PSD pollutant of concern in this emissions unit (NOx) is also limited to a rate that is below the PSD significant emissions rates.

On September 8, 2014 I received review comments from Mr. Amaury Betancourt regarding the facility and based on his full compliance inspection of the facility from earlier this year, the facility is in compliance.

I recommend issuance of this draft permit.