TECHNICAL EVALUATION

AND

PRELIMINARY DETERMINATION

FOR

CSX Transportation, Inc.

Hillsborough County

DRAFT Federally Enforceable State Operating Permit

Application Number

0570033-016-AF

Environmental Protection Commission of

Hillsborough County

Tampa, FL

December 24, 2014

Project Description

A. Applicant: Richard K. Nath
Manager Environmental Programs
CSX Transportation, Inc.
500 Water Street, J-275
Jacksonville, FL 32202

B. Engineer: William F. Karl, P.E.
Environmental Consulting & Technology, Inc.
3701 Northwest 98th Street
Gainesville, FL 32606

P.E. No.: 67498

C. Project and Location:

This project consists of issuing the initial FESOP permit for the combined CSX's Rockport and Newport facilities under one Synthetic non-Title V air permit. Also, this permit authorizes the facility to handle pelletized synthetic gypsum fertilizer as an additional fertilizer material. This material will be unloaded at the Rockport Terminals' Bottom Railcar Dumper #2.

The project has been assigned NEDS Source Classification Code Nos. 3-05-101-97, 3-05-104-97, and 3-05-105-97 Industrial Processes, Mineral Products, Bulk Material Handling Operation, Fertilizer and 3-05-019-03 Industrial Processes, Mineral Products, Phosphate Rock, Transfer/Storage. The Standard Industrial Code for the project is No. 4491, Marine Cargo Handling. The project is located at 3701 Causeway Blvd., Tampa, FL 33619. UTM Coordinates of the facility location are 17-361.0 E and 3089.0 N.

D. Process and Controls:

The operations at the CSX Rockport facility involve a phosphate fertilizer materials (DAP, MAP, GTSP, synthetic gypsum) railcar unloading, handling, storage, and ship loading operation. Railcars containing oiled phosphate fertilizer materials are unloaded into the receiving pits at either Rotary Railcar Dumper #1 and/or Bottom Railcar Dumper #2, which are then conveyed either to the Storage Building or directly to shiploading through the use of a belt conveyor system with multiple transfer points, all of which are enclosed, except for Belt #9. When the phosphate materials are reclaimed from the Storage Building for export, they are re-oiled prior to leaving the building, belt conveyed, and loaded into ships using a telescoping chute. Particulate matter emissions from this material handling operation are controlled by the use of enclosures and oil coating prior to receipt, and prior to export of the material into ships.

Similar to the CSX Rockport facility, the CSX Newport facility receives bulk fertilizer materials and wet phosphate rock by railcar, which is transferred by conveyor belts either to the storage building or the outdoor storage area. The MAP, DAP, and GTSP are stored inside of the storage building and the wet phosphate rock may be stored outdoors. From the storage building or outdoor storage area, the materials are reclaimed by the stacker reclaimer

units (two (2) indoor units and one (1) outdoor unit) and then loaded into marine vessels for shipment offsite.

Particulate matter emissions from phosphate fertilizer handling are minimized by coating the MAP, DAP, and GTSP material with oil prior to receipt and prior to outbound shipment and/or the utilization of nine (9) baghouses, used as necessary to meet the opacity standards. Particulate matter emissions from wet phosphate rock handling are minimized by using water or dust suppressant, and/or five (5) baghouses as necessary to meet the opacity standards. The facility may handle MAP, DAP, GTSP, and wet phosphate rock while the baghouses are turned off as long as the applicable opacity standards are not exceeded.

During the processing of this application, the facility requested authorization to use a desktop moisture balance instrument to measure the moisture content of the wet phosphate rock on the storage pile. Currently, CSX sends out a sample of wet phosphate rock to a third party laboratory for analysis and this process can be time consuming. In order to cut down on the turnaround time, CSX is proposing to use a desktop moisture balance instrument manufactured by CSC Scientific (Model #26900EMB) to measure the moisture content of the wet phosphate rock on site. After discussing this proposal with the Air Compliance Section and the EPC lab, it was determined that this device uses the same basic concepts as common lab techniques to measure the moisture content of material by weighing the sample before and after heating and calculating the moisture content based on the weight reduction. Based on our review of this proposal, this device can be accepted as an alternative to sending out the samples to third party labs to comply with the ASTM-D2216 requirements. However, an initial and annual concurrent testing of a sample with this device and a third party lab is required to ensure accuracy of the device's readings (this is also recommended in the device's manual to establish a benchmark with an accuracy of +/- 0.2%).

Also, CSX submitted a request to authorize the handling and storing of pelletized synthetic gypsum fertilizer through the Rockport terminal. The synthetic gypsum fertilizer, identified as the trade name SUL4R-PLUS, consists primarily of calcium sulfate and is delivered to CSX in the same physical state as the MAP, DAP and GTSP, i.e. solid pellets. The synthetic gypsum will be coated with a non-hazardous dust suppressant coating in an identical manner as the MAP, DAP and GTSP are coated prior to receipt and unloading at Rockport Terminal. The synthetic gypsum will be transported to CSX via covered hopper railcars and will be unloaded at the Bottom Railcar Dumper #2 (Emissions Unit #003). After unloading, the synthetic gypsum will be transferred via existing covered conveyors either to the storage building or directly to ship loading. CSX does have the capability of applying additional non-hazardous dust suppressant coating to the product, if required, while receiving the material and while reclaiming from the storage building and prior to ship loading. CSX will utilize all existing equipment to handle and store the synthetic gypsum and no new equipment will be required. CSX is not asking for any hourly or annual throughput increase.

In addition, during this permitting review, it was determined that EU#112 (C3 to Wet Phosphate Rock Stacker Transfer Point) and EU#113 (Wet Phosphate Rock Loadout/Reclaim) at the Newport Terminal can be combined into one emission unit. The most recent VE test was performed on 8/27/14 at a process rate of 1500 TPH and it demonstrated compliance with the 5% opacity standard. This VE test did not include EU #112, however, in a letter dated November 19, 2014, ECT Inc., who performed the VE test, explained that it was reasonable to perform the VE test for EU #s112 and 113 simultaneously

due to the way the two emission units are defined and located. After further discussion with the Air Compliance Section, it was determined that the two EUs can be combined under one emission unit. Therefore, EU #113, Wet Phosphate Rock Stacking Operation, now consists of the following transfer points: C3 to wet phosphate rock chute transfer point, the chute to the ground (storage pile) transfer point, stacker operation to spread the wet phosphate on the storage pile. The PTE calculations will remain the same since the emissions associated with EU112 are now included in EU113. All other emission units' VE tests have been performed within last year and all demonstrated compliance with the opacity limits.

The combined CSX Rockport/Newport Terminals have a PM Potential to Emit (PTE) of 92.2 tons per year, making the facility a non-Title V source. The facility-wide PTE is based on limitations on the material throughput of 3,600,000 tons per year for MAP/DAP/GTSP and a wet phosphate rock throughput limitation of 3,000,000 tons per year with a minimum moisture content of 2.5%, and emission factors from AP-42 Chapter 13.2.4. Dry phosphate rock will no longer be handled at the facility.

The baghouses at the Newport facility will still be in place and will be limited to 1,800 hours per year. They will continue to be maintained in accordance with the updated Operation and Maintenance (O&M) Plan for Particulate Control, in the event the baghouses are needed to comply with the opacity standards. The updated O&M plan, which was reviewed and approved by the Air Compliance Section, reduces the frequency of maintenance checks on the baghouses. The Compliance Assurance Monitoring (CAM) Plan is no longer required as the facility is no longer classified as a major source of particulate matter. However, the O&M Plan in the permit, as required under Rule 62-296.700, F.A.C., will cover the operation and maintenance of the baghouses at the Newport facility. Testing for particulate matter emissions will be required for the larger baghouses (A, I, II, III, IV) prior to obtaining a renewed operation permit, pursuant to Rule 62-297.310(7)(a)3., F.A.C. It should be noted that Baghouse D, which is associated with EU #104 (C9 to C4 Transfer Point or C4 to C4A Transfer Point or C10 to C4A Transfer Point) at the Newport Terminal, vents inside an enclosed building at C4 to C9 transfer point. Based on the facility's request, the PM emissions from this baghouse have been removed from the PTE calculations.

This facility is subject to Rule 62-296.711, F.A.C., Reasonably Available Control Technology (RACT) Particulate Matter for Material Handling, Sizing, Screening, Crushing, and Grinding. The facility is also subject to Chapter 1-3.52, Rules of the EPC. Based on the Air Construction permit application received March 20, 2014, this facility is not a major source of hazardous air pollutants (HAP).

E. Application Information:

Received on: October 24, 2014
Information Requested: n/a
Application Complete: November 12, 2014

II. Rule Applicability

This project is subject to the preconstruction review requirements of Chapter 403, Florida Statutes, Chapters, 62-204, 62-210, 62-212, 62-296, and 62-297, Florida Administrative Code (F.A.C.) and Chapter 1-3 of the Rules of the Environmental Protection Commission of Hillsborough County.

This project is not subject to the requirements of Rule 62-212.400, Prevention of Significant Deterioration, F.A.C. or Rule 62-212.500, New Source Review for Nonattainment Areas, F.A.C., since the facility is a Synthetic non-Title V source of air pollution.

This project is subject to the requirements of Rule 62-212.300, Sources Not Subject to Prevention of Significant Deterioration or Nonattainment Requirements, F.A.C., since it is a source of air pollution requiring a permit under this rule.

This project is not subject to the requirements of Rule 62-213, Operation Permits for Major Sources of Air Pollution, F.A.C., since the facility is a Synthetic non-Title V Source by state definition.

This project is subject to the requirements of Rule 62-296.320, General Pollutant Emission Limiting Standards, F.A.C., since the facility is a potential source of particulate matter, visible emissions, and a potential source of odors.

This project is not subject to the requirements of Rules 62-296.401 through 62-296.417, Specific Emission Limiting and Performance Standards, F.A.C., since there is no applicable source specific category in these rules.

This project is not subject to the requirements of Rule 62-296.500, Reasonably Available Control Technology for VOC and NOx Emitting Facilities, F.A.C., since there is no applicable source specific category in this rule.

This project is not subject to the requirements of Rule 62-296.600, Reasonably Available Control Technology – Lead, F.A.C., since there is no applicable source category in this rule.

This project is subject to the requirements of Rule 62-296.700, Reasonably Available Control Technology Particulate Matter, F.A.C., specifically, Rule 62-296.711, F.A.C., Reasonably Available Control Technology (RACT) Particulate Matter for Material Handling, Sizing, Screening, Crushing, and Grinding.

This project is not subject to the requirements of Rule 62-204.800, Federal Regulations Adopted by Reference, F.A.C., since there is no applicable source category in this rule.

This project is subject to the requirements of Chapter 84-446, Laws of Florida and Chapter 1-3, Rules of the Environmental Protection Commission of Hillsborough County.

III. Summary of Emissions

The facility-wide PM PTE emissions were estimated at 92.2 tons per year. This was based on the emissions from the Rockport facility using EPA's AP-42 continuous drop equation, and the emissions from the Newport facility using EPA's AP-42 continuous drop equation on the wet phosphate rock and the baghouses' grain loading exhaust when handling fertilizer material. Emissions from the baghouses are the worst case scenario when compared to the use of the continuous drop equation for the handling of the fertilizer material. Details of these calculations are shown below.

Rockport Facility

Path 2 (Worst case scenario) **Emissions from Handling DAP, MAP and GTSP at Rockport**	EU	Emission Factor[1] (lbs/ton)	Oil Coating Control Efficiency[2]	Enclosure Control Efficiency[3,4]	Annual Throughput (ton/yr)	PM PTE (ton/yr)
Railcar Dumper No. 2	003	0.0269	80%	80%	3,600,000	1.94
Transfer Point @ #3A belt to #4A belt or #6 belt	004	0.0269	80%	90%	3,600,000	0.97
Transfer Point @ #4A belt to #5 belt	005	0.0269	80%	90%	3,600,000	0.97
Transfer Point @ #5 & #7 belts to #8 belt	002	0.0269	80%	80%	3,600,000	1.94
Transfer Point @ #8 belt to #9 belt	009	0.0269	80%	80%	3,600,000	1.94
Transfer Point @ #9 belt to #10 belt	012	0.0269	80%	80%	3,600,000	1.94
Shiploading/shiphold	010	0.0269	80%	80%	3,600,000	1.94
Rockport Terminal Total						**11.6**

[1]Emission Factor based on continuous drop equation (AP-42 Chapter 13.2.4) at 0.7% moisture.
[2]80% Control Efficiency applied for Dust Suppressant (Coating Oil).
[3]80% Control Efficiency applied for enclosed transfer points comes from DOE, Table 4-2 (Range 70-90%).
[4]90% Control Efficiency applied for transfer points in an enclosed building.

Newport Facility

Emissions from Wet Phosphate Rock Handling at Newport	EU	Emission Factor[1] (lbs/ton)	Dust Suppressant Control Efficiency[2]	Enclosure Control Efficiency[3,4,5]	Annual Throughput (ton/yr)	PM PTE (ton/yr)
Railcar Dumper	100	0.00452	0%	70%	3,000,000	2.03
C2 to C3	101	0.00452	0%	90%	3,000,000	0.68
Wet Phosphate Rock Stacking Operation (C3 to Wet Stacker Belt)	113	0.00452	0%	0%	3,000,000	6.78
Wet Phosphate Rock Stacking Operation (Stacker Loadout to the Storage Pile)	113	0.00452	0%	0%	3,000,000	6.78
Wet Stacker Belt to C3	114	0.00452	0%	0%	3,000,000	6.78
C3 to C4	115	0.00452	0%	0%	3,000,000	6.78
C4 to C4A	104	0.00452	0%	90%	3,000,000	0.68
C4A to C5	105	0.00452	0%	90%	3,000,000	0.68
C5 to C6	106	0.00452	0%	70%	3,000,000	2.03
Shiploading/shiphold	107	0.00452	0%	70%	3,000,000	2.03
Newport Phosphate Rock Total						**35.3**

[1]Emission Factor based on continuous drop equation (AP-42 Chapter 13.2.4) at 0.7% moisture.
[2]No Control Efficiency applied for dust suppressant as moisture is already accounted for in the continuous drop equation.
[3]70% Control Efficiency applied for partially enclosed transfer points comes from DOE, Table 4-2 (Range 70-90%).
[4]90% Control Efficiency applied for transfer points in an enclosed building.

Emissions for Handling DAP, MAP and GTSP at Newport	EU	Emission Factor[1] (lbs/ton)	Coating Oil Control Efficiency[2]	Partial Enclosure Control Efficiency[3,4]	Annual Throughput (ton/yr)	PM PTE (ton/yr)
Path 1						
Railcar Dumper	100	0.0269	80%	80%	1,800,000	0.97
C2 to C7	101	0.0269	80%	90%	1,800,000	0.48
C7 to C9	102	0.0269	80%	80%	1,800,000	0.97
C9 to C4	104	0.0269	80%	90%	1,800,000	0.48
C4 to C4A	104	0.0269	80%	90%	1,800,000	0.48
C4A to C5	105	0.0269	80%	90%	1,800,000	0.48
C5 to C6	106	0.0269	80%	80%	1,800,000	0.97
Shiploading/Shiphold	107	0.0269	80%	80%	1,800,000	0.97
Path 2						
Railcar Dumper	100	0.0269	80%	80%	1,800,000	0.97
C2 to C7	101	0.0269	80%	90%	1,800,000	0.48
C7 to C8	102	0.0269	80%	80%	1,800,000	0.97
C8 to C10	103	0.0269	80%	80%	1,800,000	0.97
C10 to C4A	104	0.0269	80%	90%	1,800,000	0.48
C4A to C5	105	0.0269	80%	90%	1,800,000	0.48
C5 to C6	106	0.0269	80%	80%	1,800,000	0.97
Shiploading/Shiphold	107	0.0269	80%	80%	1,800,000	0.97
Newport MAP/DAP/GTSP Total						**12.1**

[1]Emission Factor based on continuous drop equation (AP-42 Chapter 13.2.4) at 0.7% moisture.
[2]80% Control Efficiency applied for Dust Suppressant (Coating Oil).
[3]80% Control Efficiency applied for enclosed transfer points comes from DOE, Table 4-2 (Range 70-90%).
[4]90% Control Efficiency applied for transfer points in an enclosed building.

Since CSX elected to keep the baghouses at the Newport Terminal, the facility-wide PTE was determined based on the operation of these baghouses, which will be limited to 1,800 hours/year. This scenario is considered to be worst-case, when compared to the use of the continuous drop equation (without the operation of the baghouses) when handling fertilizer material (MAP/DAP/GTSP). The PM emissions with the baghouse scenario are shown below:

Baghouse ID	**EU**	**Air Flow Rate (DSCFM)**	**PM grain loading (gr/dscf)**	**PM lbs/hr**	**hrs/yr**	**PM TPY**
A	100	154,670	0.01	13.26	1,800	11.93
B	102	9,563	0.02	1.64	1,800	1.48

G	106	4,050	0.03	1.04	1,800	0.94
H	107	46,800	0.02	8.02	1,800	7.22
I	108	77,818	0.01	6.67	1,800	6.00
II	109	78,329	0.01	6.71	1,800	6.04
III	110	78,667	0.01	6.74	1,800	6.07
IV	111	73,205	0.01	6.27	1,800	5.65
					Newport Baghouse Total	**45.3**

The facility-wide total PTE for PM emissions is estimated at 92.2 tons/yr, for both terminals combined.

Inventory of Title III pollutants is estimated to be less than 10 TPY individually and less than 25 TPY collectively.

IV. Conclusions:

The emission limits proposed by the applicant will meet all of the requirements of Chapters 62-204, 62-210, 62-212, 62-296, and 62-297, F.A.C., and Chapter 1-3, Rules of the Commission.

The General and Specific Conditions listed in the proposed permit (attached) will assure compliance with all the applicable requirements of Chapters 62-204, 62-210, 62-212, 62-296, and 62-297, F.A.C.

V. Proposed Agency Action:

Pursuant to Section 403.087, Florida Statutes and Rule 62-4.070, Florida Administrative Code the Environmental Protection Commission of Hillsborough County hereby gives notice of its intent to issue a permit to operate the aforementioned air pollution source in accordance with the draft permit and its conditions as stipulated (see attached).

COMMISSION

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Water Management Sam Elrabi, P.E.
Wetlands Management Scott Emery, Ph.D.

CERTIFIED MAIL

In the Matter of an
Application for Permit by:

File No.: 0570033-016-AF
County: Hillsborough

Richard K. Nath
Manager Environmental Programs
CSX Transportation, Inc.
500 Water Street, J-275
Jacksonville, FL 32202 /

INTENT TO ISSUE

The Environmental Protection Commission of Hillsborough County (EPC), as delegated by the Florida Department of Environmental Protection (DEP) gives notice of its intent to issue a Federally Enforceable State Operating Permit (DRAFT copy attached) for the proposed project as detailed in the application specified above, for the reasons stated below.

The applicant, CSX Transportation, Inc., applied on October 24, 2014 to the permitting authority for a Synthetic non-Title V Federally Enforceable State Operating Permit for the CSX's Rockport and -Newport Terminals at 3701 Causeway Boulevard, Tampa, Hillsborough County. This initial FESOP permit combines the CSX Rockport and Newport terminals into one permitted facility, and establishes the combined facility as a Synthetic non-Title V source, based on emission factors from AP-42, and by limiting the material throughput, and the hours of operation of the baghouses. In addition, the facility will be authorized to handle and store pelletized synthetic gypsum fertilizer at the Rockport Terminal.

The EPC has permitting jurisdiction under Chapter 403 Florida Statutes (F.S.) and Florida Administrative Code (F.A.C.) Chapters 62-4 and 62-210. The project is not exempt from permitting procedures. The EPC has determined that an air pollution construction permit is required to commence or continue operations at the described facility.

The EPC intends to issue this permit based on the belief that reasonable assurances have been provided to indicate that operation of the source will comply with the appropriate provisions of Florida Administrative Code (F.A.C.) Chapters 62-204 through 62-297 and 62-4.

Pursuant to Section 403.815 and 403.0872, F.S. and Rules 62-103.150 and 62-210.350(3), F.A.C., you (the applicant) are required to publish at your own expense the enclosed Notice of Intent to Issue Permit. The notice shall be published one time as soon as possible, in the legal advertisement section of a newspaper of general circulation in the area affected. For the purpose of

this rule, "publication in a newspaper of general circulation in the area affected" means publication in a newspaper meeting the requirements of Sections 50.011 and 50.031, F.S., in the county where the activity is to take place. Where there is more than one newspaper of general circulation in the county, the newspaper used must be one with significant circulation in the area that may be affected by the permit. If you are uncertain that a newspaper meets these requirements, please contact the EPC at the address or telephone number listed below. **The applicant shall provide proof of publication to the EPC, Air Permitting Section, at 3629 Queen Palm Dr., Tampa, Florida 33619 (Phone (813)627-2600 - FAX (813)627-2660) within 7 (seven) days of publication.** Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permit pursuant to Rule 62-103.150(6), F.A.C.

The EPC will issue the final permit with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to Section 120.569 and 120.57 F.S. before the deadline for filing a petition. The procedures for petitioning for a hearing are set forth below.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed (received) in the Legal Department of the EPC at 3629 Queen Palm Dr., Tampa, Florida 33619, Phone 813-627-2600, Fax 813-627-2602. Petitions filed by the permit applicant or any of the parties listed below must be filed within 14 (fourteen) days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S. must be filed within 14 (fourteen) days of publication of the public notice or within 14 (fourteen) days of receipt of this notice of intent, whichever occurs first. Under Section 120.60(3), however, any person who asked the EPC for notice of agency action may file a petition within 14 (fourteen) days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S.; or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the EPC's action is based must contain the following information:

(a) The name and address of each agency affected and each agency's file or identification number if known;
(b) The name, address, and telephone number of the petitioner and the name, address, and telephone number of each petitioner's representative, if any, which shall be the address for service purposes during the course of the proceedings; and an explanation of how the petitioner's substantial interests will be affected by the EPC's determination;
(c) A statement of how and when the petitioner received notice of the EPC action;
(d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate;

(e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the EPC's proposed action;
(f) A statement of specific rules or statutes that the petitioner contends requires reversal or modification of the EPC's proposed action, including an explanation of how the alleged facts relate to the specific rules or statutes; and
(g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the EPC to take with respect to the EPC's proposed action.

A petition that does not dispute the material facts upon which the EPC's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the EPC's final action may be different from the position taken by it in this notice of intent. Persons whose substantial interests will be affected by any such final decision of the EPC on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation under section 120.573, F.S. is not available in this proceeding.

This action is final and effective on the date filed with the Clerk of the EPC unless a petition is filed in accordance with above. Upon the timely filing of a petition, this order will not be effective until further order of the EPC.

In addition to the above, a person subject to regulation has a right to apply to the Department of Environmental Protection for a variance from or waiver of the requirements of particular rules, on certain conditions, under Section 120.542, F.S. The relief provided by this state statute applies only to state rules, not statutes, and not to any federal regulatory requirements. Applying for a variance or waiver does not substitute or extend the time for filing a petition for an administrative hearing or exercising any other right that a person may have in relation to the action proposed in this notice of intent.

The application for a variance or waiver is made by filing a petition with the Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, FL 32399-3000. The petition must specify the following information:

(a) The name, address, and telephone number of the petitioner,
(b) The name, address, and telephone number of the attorney or qualified representative of the petitioner, if any,
(c) Each rule or portion of a rule from which a variance or waiver is requested,
(d) The citation to the statute underlying (implemented by) the rule identified in (c) above,
(e) The type of action requested,
(f) The specific facts that would justify a variance or waiver for the petitioner,
(g) The reason by the variance or waiver would serve the purposes of the underlying statute

(implemented by the rule), and

(h) A statement whether the variance or waiver is permanent or temporary and, if temporary, a statement of the dates showing the duration of the variance or waiver requested.

The Department will grant a variance or waiver when the petition demonstrates both that the application of the rule would create a substantial hardship or violate principles of fairness, as each of the those terms is defined in Section 120.542(2), F.S., and that the purpose of the underlying statute will be or has been achieved by other means by the petitioner.

Persons subject to regulation pursuant to any federally delegated or approved air program should be aware that Florida is specifically not authorized to issue variances or waivers from any requirements of any such federally delegated or approved program. The requirements of the program remain fully enforceable by the Administrator of United States Environmental Protection Agency and by any person under the Clean Air Act unless and until the Administrator separately approves any variance or waiver in accordance with the procedures of the federal program.

Any person listed below may request to obtain additional information, a copy of the application (except for information entitled to confidential treatment pursuant to Section 403.111, F.S.), all relevant supporting materials, and all other materials available to the EPC that are relevant to the permit decision. Interested persons may contact Diana M. Lee, P.E., at the above address or call (813)627-2600, for additional information.

Any party to this order has the right to seek judicial review of it under Section 120.68 of the Florida Statues, by filing a notice of appeal under rule 9.110 of the Florida rules of Appellate Procedure with the EPC's Legal Office at 3629 Queen Palm Dr., Tampa, Florida 33619 and with the clerk of the Department of Environmental Protection in the Office of General Counsel, Mail Station 35, 3900 Commonwealth Boulevard, Tallahassee, Florida 32399-3000, and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate district court of appeal. The notice must be filed within thirty days after this order is filed with the clerk of the Department.

Executed in Tampa, Florida

ENVIRONMENTAL PROTECTION COMMISSION
OF HILLSBOROUGH COUNTY

Richard D. Garrity, Ph.D.
Executive Director

cc: Florida Department of Environmental Protection, Southwest District (via e-mail)
William F. Karl, P.E., Environmental Consulting & Technology, Inc. (via e-mail)

CERTIFICATE OF SERVICE

The undersigned duly designated clerk hereby certifies that this INTENT TO ISSUE and all copies were mailed before the close of business on December 24, 14 to the listed persons.

FILING AND ACKNOWLEDGEMENT
FILED, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated clerk, receipt of which is hereby acknowledged.

Mad Lein Mishler 12/24/14

Clerk Date

ENVIRONMENTAL PROTECTION COMMISSION
OF HILLSBOROUGH COUNTY
PUBLIC NOTICE OF INTENT TO ISSUE PERMIT

The Environmental Protection Commission of Hillsborough County (EPC), as delegated by the Florida Department of Environmental Protection (DEP) gives notice of its intent to issue an air pollution permit, Permit No. 0570033-016-AF, to CSX Transportation, Inc. This permit combine the operation of the CSX Rockport and Newport Terminals located at 3701 Causeway Boulevard, Tampa, Hillsborough County, into one permitted source. This permit also authorizes the handling and storage of pelletized synthetic gypsum fertilizer at the Rockport Terminal and establishes the combined facility as a Synthetic non-Title V source. CSX is located at 3701 Causeway Boulevard, Tampa, Hillsborough County.

A Best Available Control Technology (BACT) determination was not required.

The EPC will issue the Final permit with the conditions of the DRAFT permit unless a timely petition for an administrative hearing is filed pursuant to Sections 120.569 and 120.57, F.S. before the deadline for filing a petition. The procedures for petitioning for hearing are set forth below.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed (received) in the Legal Department of the EPC at 3629 Queen Palm Dr., Tampa, Florida 33619, Phone 813-627-2600, Fax 813-627-2602. Petitions filed by the permit applicant or any of the parties listed below must be filed within 14 (fourteen) days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S. must be filed within 14 (fourteen) days of publication of the public notice or within 14 (fourteen) days of receipt of this notice of intent, whichever occurs first. Under Section 120.60(3), however, any person who asked the EPC for notice of agency action may file a petition within 14 (fourteen) days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205 of the F.A.C.

A petition that disputes the material facts on which the EPC's action is based must contain the following information:

(a) The name and address of each agency affected and each agency's file or identification number if known;
(b) The name, address, and telephone number of the petitioner, and the name, address, and telephone number of each petitioner's representative, if any, which shall be the address for service purposes during the course of the proceedings; and an explanation of how the petitioner's substantial interests will be affected by the agency determination;
(c) A statement of how and when petitioner received notice of the EPC action;
(d) A statement of all disputed issues of material fact. If there are none, the petition must so

indicate;

(e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the EPC proposed action;

(f) A statement of specific rules or statutes that the petitioner contends requires reversal or modification of the EPC's proposed action, including an explanation of how the alleged facts relate to the specific rules or statutes; and

(g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the EPC to take with respect to the EPC's proposed action.

A petition that does not dispute the material facts upon which the EPC's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above as required by Rule 28-106.301.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the EPC's final action may be different from the position taken by it in this notice of intent. Persons whose substantial interests will be affected by any such final decision of the EPC on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation under section 120.573, F.S. is not available in this proceeding.

This action is final and effective on the date filed with the Clerk of the EPC unless a petition is filed in accordance with above. Upon the timely filing of a petition this order will not be effective until further order of the EPC.

Any party to this order has the right to seek judicial review of it under Section 120.68 of the Florida Statues, by filing a notice of appeal under rule 9.110 of the Florida rules of Appellate Procedure with the EPC's Legal Office at 3629 Queen Palm Dr., Tampa, Florida 33619 and with the clerk of the Department of Environmental Protection in the Office of General Counsel, Mail Station 35, 3900 Commonwealth Boulevard, Tallahassee, Florida 32399-3000, and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate district court of appeal. The notice must be filed within thirty days after this order is filed with the clerk of the Department.

The complete project file is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at the Environmental Protection Commission of Hillsborough County, 3629 Queen Palm Dr., Tampa, FL 33619. The complete project file includes the proposed Permit, the application, and the information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact Diana M. Lee, P.E., at the above address, or call (813)627-2600, for additional information. Any written comments filed shall be available for public inspection. If written comments received result in a significant change in the proposed agency action, the EPC shall revise the proposed permit and require, if applicable, another Public Notice.

COMMISSION

Kevin Beckner
Victor D. Crist
Ken Hagan
Al Higginbotham
Lesley "Les" Miller, Jr.
Sandra L. Murman
Stacy White

EXECUTIVE DIRECTOR
Richard D. Garrity, Ph.D.

DIVISION DIRECTORS

Legal & Admin. — Richard Tschantz, Esq.
Air Management — Jerry Campbell, P.E.
Waste Management — Hooshang Boostani, P.E.
Water Management — Sam Elrabi, P.E.
Wetlands Management — Scott Emery, Ph.D.

ENVIRONMENTAL PROTECTION COMMISSION OF
HILLSBOROUGH COUNTY, as Delegated by

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

NOTICE OF PERMIT

Richard K. Nath
Manager Environmental Programs
CSX Transportation, Inc.
500 Water Street, J-275
Jacksonville, FL 32202 /

Dear Mr. Nath: Re: Hillsborough County - AP

Enclosed is DRAFT Permit No. 0570033-016-AF for the combined CSX Rockport and Newport Terminals as one Synthetic non-Title V source of air pollution, issued pursuant to Section 403.087, Florida Statutes.

Any party to this order (permit) has the right to seek judicial review of the permit pursuant to Section 120.68, Florida Statutes, by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the EPC in the Legal Department at 3629 Queen Palm Drive, Tampa, FL 33619; and by filing a copy of the Notice of Appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The Notice of Appeal must be filed within 30 days from the date this Notice is filed with the clerk of the EPC.

Executed in Tampa, Florida.

Sincerely,

Richard D. Garrity, Ph.D.
Executive Director

cc: FDEP, Southwest District (via e-mail)
William F. Karl, P.E. – Environmental Consulting and Technology, Inc. (via e-mail)

CERTIFICATE OF SERVICE

This is to certify that this NOTICE OF PERMIT and all copies were mailed before the close of business on _____ to the listed persons.

Clerk Stamp
FILED, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated clerk, receipt of which is hereby acknowledged.

_____ _____
Clerk Date

COMMISSION

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Wetlands Management Scott Emery, Ph.D.

PERMITTEE:
Richard K. Nath
Manager Environmental Programs
CSX Transportation, Inc.
500 Water Street, J-275
Jacksonville, FL 32202

PERMIT/CERTIFICATION
Permit No.: 0570033-016-AF
County: Hillsborough
Expiration Date: DRAFT
Project: Initial FESOP for Combined Facilities

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Rules 62-204, 62-210, 62-212, 62-296, 62-297, and 62-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents, attached hereto or on file with the EPC and made a part hereof and specifically described as follows:

This air permit combines the CSX Rockport and CSX Newport facilities into one permitted source, and establishes the combined CSX Rockport/Newport Terminal facility as a Synthetic non-Title V source. The process description for each facility is described below.

Rockport Terminal

The operation at the CSXT Rockport Terminal involves a phosphate fertilizer materials (DAP, MAP, GTSP, synthetic gypsum [SUL4R-PLUS]) railcar unloading, handling, storage, and ship loading operation. Railcars containing oiled phosphate fertilizer materials are unloaded into the receiving pits at either Rotary Railcar Dumper #1 and/or Bottom Dumper Railcar #2. Both of these dumpers are housed inside a partially enclosed building. The material is then conveyed to the Storage Building or directly to shiploading through the use of a belt conveyor system with multiple transfer points, all of which are enclosed, except for Belt #9. The operation inside of the Storage Building involves two (2) stacker/reclaimer units and a chokefeeder. When the phosphate materials are reclaimed from the Storage Building for export, they are re-oiled prior to leaving the building, belt conveyed, and loaded into ships using a telescoping chute. The emission units associated with this operation are described in more detail, as follows:

Emission Unit Nos. 001 and 003 Railcar Unloading

Oiled phosphate fertilizer materials (MAP, DAP, GTSP, synthetic gypsum) are delivered to the facility by railcar. The railcars are emptied by Rotary Dumper #1 and Bottom Dumper #2. The rotary dumper attach to the railcars and invert them while the bottom dumper opens the slide gates located on the bottom of the railcars. Both dumpers direct the materials to either of two below-grade receiving pits. The dumpers are contained within partially enclosed buildings, which have plastic curtains that hang at the ends of the building to further enclose the operation. The material from Railcar Dumper #1 is transferred by two feeder belts, Conveyor Belt #1 and #2, to covered Conveyor Belt #3. The material from Railcar Dumper #2 is transferred by two feeder belts, Conveyor Belt #1A and #2A, to covered Conveyor Belt #3A. Particulate matter emissions from

railcar unloading operations are controlled by oil applied to the product prior to receipt and the railcar dumper partial enclosures.

Emission Unit Nos. 004-007, and 013 Conveyor Transfer Points and Storage Building
From covered Conveyor Belt #3, the material can be transferred to covered Conveyor Belt #5 or covered Conveyor Belt #4. If the material is transferred to covered Conveyor Belt No. 5, the material is directed to the North side of the storage building. The Belt #3 to Belt #5 transfer point (EU 006) is housed within an enclosure. If the material is transferred to covered Conveyor Belt #4, the material can be diverted to covered Conveyor Belt #6. The Belt #4 to Belt #6 transfer point (EU 007) is housed within an enclosure. From covered Conveyor Belt #6, the material is directed to the South side of the storage building. A radial stacker/reclaimer located on Conveyor Belt #6 stacks the material onto storage piles inside the storage building.

From covered Conveyor Belt #3A, the material can be transferred to covered Conveyor Belt #4A or covered Conveyor Belt #6. The covered Belt #3A to Belt #4A or Belt #6 transfer point (EU 004) is housed within an enclosure. If the material is transferred to covered Conveyor Belt #6, the material is directed to the South side of the storage building. If the material is diverted to covered Conveyor Belt #4A, the material is then transferred to covered Conveyor Belt #5. The Belt #4A to Belt #5 transfer point (EU 005) is housed within an enclosure. From covered Conveyor Belt #5, the material is directed to the North side of the storage building. A radial stacker/reclaimer located on Conveyor Belt #5 stacks the material onto storage piles inside the storage building.

Emission Unit Nos. 002, 008, and 009 Storage Building and Conveyor Transfer Points
When material is ready to be loaded into a ship, the material is reclaimed from the storage piles via either of two (2) stacker reclaimers located on Conveyor Belt #5 and Conveyor Belt #6. A front-end loader is used to assist with the loading of the materials into the stacker/reclaimers. Conveyor Belt #5 conveys material from the North side of the storage building to enclosed Conveyor Belt #8. Also, material from is conveyed from the South side of the storage building via Conveyor Belt #6 to covered Conveyor Belt #7. From covered Conveyor Belt #7 the material is transferred to covered Conveyor Belt #8. The Belt #5 or #7 to Belt #8 transfer point (EU 002) and the Belt #6 to Belt #7 transfer point (EU 008) are each housed within a partial enclosure. Oil coating is re-applied to the fertilizer material prior to the material leaving the storage building via Conveyor Belt #5 and #6.

From covered Conveyor Belt #8 the material is transferred to open Conveyor Belt #9. The Belt #8 to Belt #9 transfer point (EU 009) is housed within a partial enclosure. The majority of Conveyor Belt #9 is open and equipped with wind guards to allow for the ship loader to move along the dockside.

Particulate matter emissions from the storage building are controlled by keeping the exterior doors closed as necessary during stacker/reclaimer operation.

Emission Unit Nos. 010 and 012 Conveyor Transfer Point and Shiploading
Material is conveyed from open Conveyor Belt #9 to the covered shiploading Conveyor Belt #10.

The Belt #9 to Belt #10 transfer point (EU 012) is contained within a partial enclosure. The covered shiploading Conveyor Belt #10 directs the material to a telescoping shiploading spout. The ship loader (gantry) is able to move along the dockside and deposit materials throughout the shipholds. The Conveyor Belt #10 to Shiploading spout/Shiphold (EU 010) are contained within partial enclosures.

Particulate matter emissions from the this Terminal are minimized by coating the MAP, DAP, GTSP, and pelletized synthetic gypsum material with a dust suppressant and the use of partial enclosures.

Newport Terminal

The operation at the CSXT Newport Terminal consists of a phosphate fertilizer materials (MAP, DAP, GTSP) and wet phosphate rock railcar unloading, handling, storage, and ship loading operation. Bulk fertilizer materials (MAP, DAP, GTSP) and wet phosphate rock are received by railcar and transferred either to the storage building or the outdoor storage area (wet phosphate rock only) using a combination of partially covered and/or open conveyor belts that have multiple transfer points. The transfer points for the handling of MAP, DAP, and GTSP are partially enclosed, while the transfer points for the handling of wet phosphate rock are partially enclosed or open transfer points. The storage building is divided into two sides, and has eight (8) bins on each side. From the storage building or outdoor storage area, the materials are reclaimed by the stacker reclaimer units (two (2) indoor units and one (1) outdoor unit) and then loaded into marine vessels for shipment offsite. This facility is permitted to handle MAP, DAP, GTSP, and wet phosphate rock. MAP, DAP, and GTSP are stored inside of the storage building. Wet phosphate rock can be stored outdoors.

Particulate matter emissions from phosphate fertilizer handling are minimized by the use of enclosures and coating the MAP, DAP, and GTSP material with oil prior to receipt and prior to outbound shipment and/or the utilization of nine (9) baghouses, used as necessary to meet the opacity standards. Particulate matter emissions from wet phosphate rock handling are minimized by using water or dust suppressant, and/or five (5) baghouses as necessary to meet the opacity standards. The facility may handle MAP, DAP, GTSP, and wet phosphate rock while the baghouses are turned off as long as the applicable opacity standards are not exceeded. The emission units associated with this operation are described below.

Emission Unit No. 100, Railcar Unloading

Material (MAP, DAP, GTSP and wet phosphate rock) is delivered to the facility by railcar. The cars are emptied by a rotary dumper which attaches to the railcars and inverts them. The dumper is contained within a partially enclosed building, which has plastic curtains that hang at the ends of the building to further enclose the operation. Particulate matter emissions from railcar unloading are controlled by dust suppressant applied to the product prior to receipt and the railcar dumper partial enclosure. A 154,670 DSCFM Micro-Pulsaire, Model 2G-8, baghouse (Baghouse A) can be placed into operation, if necessary.

Emission Unit Nos. 101-103, and 108-111 Conveyor Transfer Points and Storage Building
Enclosed Conveyor Belt No. 2 (C2) conveys material from the railcar dumper building to either enclosed Conveyor Belt No. 7 (C7) or open Conveyor Belt No. 3 (C3). If material is directed to C7, the transfer point from C2 to C7 is enclosed within the building. C7 then conveys material to either enclosed Conveyor Belt No. 9 (C9) or to enclosed Conveyor Belt No. 8 (C8). If material is conveyed to C9, C9 conveys the material into the southeast side of the storage building. If material is directed to C8, C8 conveys material to enclosed Conveyor Belt No. 10 (C10), which then conveys the material into the southwest side of the storage building. Both sides of the storage building have conveyors (C9 to Storage Pile & C10 to Storage Pile) which feed radial stacker-reclaimers, which stack the material onto storage piles inside of the storage building. A front-end loader is used to load material onto the stacker-reclaimer when material is ready to be loaded into a ship.

Conveyor C3 is used to convey only wet phosphate rock. C3 conveys material to a radial stacker-reclaimer which stacks the material onto open storage piles. The stacker-reclaimer conveys material to C3 which transfers to Conveyor Belt No. 4 (C4) when it is ready to be loaded into a ship.

Particulate matter emissions from the C2 to C7 transfer point and the C7 to C8 or C9 transfer point may be controlled by a 9,563 DSCFM Mikro-Pulsaire, Model No. 1F-2, baghouse (Baghouse B). However, when this baghouse is not operating, the emissions from the C2 to C7 transfer point are controlled by an enclosure.

Particulate matter emissions from the C8 to C10 transfer point may be controlled by a 4,500 ACFM Mikro-Pulsaire, Model No. 64S-8-20, baghouse, if necessary, which is vented inside of the storage building. However, when this baghouse is not operating, the emissions from the C8 to C10 transfer point are controlled by an enclosure.

Emissions from the storage building may be controlled by four (4) identical 79,000 ACFM American Air Filter Ameripulse 10-312 baghouses (Baghouses I-IV), if necessary. Two of the baghouses are located on the south side of the storage building and two are located on the north side of the building. In addition, the baghouses on the south side of the storage building have an elevator associated with them. Material collected by these baghouses is returned to the storage building using the elevator. The elevator may be controlled by a 270 DSCFM Flex Kleen, Model No. 84-CT-8, baghouse, if necessary. This baghouse vents indoors.

Emission Unit No. 104 Conveyor Transfer Point
When material is ready to be loaded into a ship, C9 conveys material from the southeast side of the storage building to enclosed Conveyor No. 4 (C4). The C9 to C4 transfer point is enclosed within a building. C4 then conveys material to Conveyor Belt No. 4A (C4A). Particulate matter emissions from the C9 to C4 transfer point may be controlled by a 4,050 DSCFM Mikro-Pulsaire, Model No. 64S-8-20, baghouse, which vents inside of the building.

In addition, when material is ready to be loaded into a ship, Conveyor No. 10 (C10) conveys material from the northwest side of the storage building to C4A. The C4 to C4A transfer point and the C10 to C4A transfer points are enclosed within a building. Particulate matter emissions from

the C4 to C4A transfer point and the C10 to C4A transfer point are controlled by two identical 4,500 ACFM Mikro-Pulsaire, Model No. 64S-8-20, baghouses, which vent inside of the building.

Emission Unit Nos. 105-107 C5 to C6 Transfer Point and Shiploading

Material is conveyed from C4A to Conveyor Belt No. 5 (C5). This transfer point is enclosed within the same building as transfer points C4 to C4A and C10 to C4A. C5 conveys material to enclosed Conveyor Belt No. 6 (C6), which loads the ship using a ship loading spout. C5 has side skirts only to allow the ship loader (gantry) to move and deposit materials throughout the shipholds.

Particulate matter emissions from the C5 to C6 transfer point may be controlled by a 4,050 DSCFM Mikro-Pulsaire, Model No. 64S-8-20, baghouse (Baghouse G), if necessary. Particulate matter emissions from the ship loading spout (EU No. 107) may be controlled by a 46,800 DSCFM Haven, Alpha Mark 1 Size 30, baghouse (Baghouse H), if necessary.

Emission Unit Nos. 113-115 Wet Phosphate Handling

Conveyor Belt 3 (C3) conveys the wet phosphate rock to a chute, where it is dumped onto the storage pile, and the stacker then spreads the product out on the pile (EU113). This emission unit contains the following transfer points: C3 to wet phosphate rock chute, chute to ground (storage pile), stacker operation (spreading of the wet phosphate rock on the storage pile). When the wet phosphate rock product is ready to be loaded onto a ship, the stacker will reclaim the product from the storage pile and transfer to C3 (EU 114). Product is then conveyed from C3 to Conveyor Belt 4 (C4) (EU 115). The particulate matter emissions from wet phosphate rock handling operation are controlled by maintaining the moisture content of the product above 2.5 percent.

Particulate matter emissions from the this Terminal are minimized by coating the MAP, DAP, and GTSP material with a dust suppressant and/or the utilization of nine (9) baghouses. The facility may handle MAP, DAP, GTSP, and wet phosphate rock while the baghouses are turned off as long as the applicable opacity standard is not exceeded.

Rockport Terminal

EU ID No.	Emission Unit Description
001	Railcar Dumper #1
002	Transfer Belt #5 or #7 to Belt #8
003	Railcar Dumper #2
004	Transfer Belt #3A to Belt #4A or #6
005	Transfer Belt #4A to Belt #5
006	Transfer Belt #3 to Belt #5
007	Transfer Belt #4 to Belt #6
008	Transfer Belt #6 to Belt #7
009	Transfer Belt #8 to Belt #9

010	Shiploading/shiphold
012	Transfer Belt #9 to Belt #10
013	Transfer Belt #3 to Belt #4

Newport Terminal

EU ID No.	Baghouse Designation	Emission Unit Description
100	A	Railcar Unloading
101	n/a	C2 to C3 or C7 Transfer Point
102	B	C7 to C8 or C9 Transfer Point
103	n/a	C8 to C10 Transfer Point
104	n/a	C9 to C4 Transfer Point or C4 to C4A Transfer Point or C10 to C4A Transfer Point
105	n/a	C4A to C5 Transfer Point
106	G	C5 to C6 Transfer Point
107	H	Shiploading
108	I	Storage Building Baghouse #1, SE or C9 or C10 to Storage Pile
109	II	Storage Building Baghouse #2, SW or Storage Pile to C9 or C10
110	III	Storage Building Baghouse #3, NW or C9 or C10 to Storage Pile
111	IV	Storage Building Baghouse #4, NE or Storage Pile to C9 or C10
113	n/a	Wet Phosphate Rock Stacking Operation
114	n/a	Wet Phosphate Rock Pile Reclaim to C3 Transfer Point
115	n/a	C3 to C4 Transfer Point

Location: 3701 Causeway Boulevard, Tampa

UTM: 17-361.0 E 3089.0 N NEDS NO: 0033

References Permit No.: 0570033-015-AC

Replaces Permit Nos.: 0570033-014-AF
0570014-022-AV

SPECIFIC CONDITIONS:

Facility-wide Conditions

1. A part of this permit is the attached General Conditions. [Rule 62-4.160, F.A.C.]

2. All applicable rules of the Environmental Protection Commission of Hillsborough County including design discharge limitations specified in the application shall be adhered to. The permit holder may also need to comply with county, municipal, federal, or other state regulations prior to construction. [Rule 62-4.070(7), F.A.C.]

3. Issuance of this permit does not relieve the permittee from complying with applicable emission limiting standards or other requirements of Chapters 62-204, 62-210, 62-212, 62-296 and 62-297, F.A.C., or any other requirements under federal, state, or local law. [Rule 62-210.300, F.A.C.]

4. General Pollutant Emission Limiting Standards. Objectionable Odor Prohibited. No person shall cause, suffer, allow, or permit the discharge of air pollutants which cause or contribute to an objectionable odor. [Rule 62-296.320(2), F.A.C.]

5. General Particulate Emission Limiting Standards. General Visible Emissions Standard. Except for emissions units that are subject to a particulate matter or opacity limit set forth or established by rule and reflected by conditions in this permit, no person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity, the density of which is equal to or greater than that designated as Number 1 on the Ringelmann Chart (20 percent opacity). EPA Method 9 is the method of compliance pursuant to Chapter 62-297, F.A.C. [Rules 62-296.320(4)(b)1. and 4., F.A.C.]

6. General Pollutant Emission Limiting Standards. Volatile Organic Compounds (VOC) Emissions or Organic Solvents (OS) Emissions. The permittee shall allow no person to store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds (VOC) or organic solvents (OS) without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department or its delegated agent, the Environmental Protection Commission of Hillsborough County. Nothing was deemed necessary and ordered at this time. [Rule 62-296.320(1), F.A.C.]

7. Emissions of Unconfined Particulate Matter. All reasonable precautions shall be taken to prevent and control generation of unconfined emissions of particulate matter in accordance with the provision in Rule 62-296.320, F.A.C. These provisions are applicable to any source, including, but not limited to, vehicular movement, transportation of materials, construction, alterations, demolition or wrecking, or industrial related activities such as loading, unloading, storing and handling. Reasonable precautions shall include, but not limited to the following: [Rules 62-296.320(4)(c)2. and 62-4.070(3), F.A.C., and Air Construction Permit Application received March 20, 2014]

SPECIFIC CONDITIONS:

A) Ensure all building doors are closed, if necessary, while processing material.
B) On a daily basis, check for equipment leaks and immediately repair any leaks found.
C) Use tarps, covers, or shields at the shiphold as necessary.
D) Vacuum or clean paved roads to prevent dusting as necessary.
E) Apply water to unpaved roads to prevent dusting as necessary.
F) Limit vehicular speed to 15 MPH or less. Post signs as necessary.
G) Transfer points - inspection doors shall remain closed during operations.
H) Conveyor belts - covers shall always be in place during operations.
I) On a daily basis, spillage shall be cleaned up immediately and placed in a container or building.
J) When disposing of spilled product, the material drop height (payloader to dump truck) shall be minimized at all times.
K) Apply water or non-hazardous dust suppressant to outdoor storage piles of material as necessary to prevent wind erosion and minimize unconfined emissions.
L) The outdoor storage pile height shall not exceed the height that the water/dust suppressant application equipment is capable of reaching. The water/dust suppressant application equipment shall be capable of reaching the top of the outdoor storage piles to prevent wind erosion.
M) Planting of vegetation on unpaved areas.

8. The permittee shall provide timely notification to the Environmental Protection Commission of Hillsborough County prior to implementing any changes that may result in a modification to this permit pursuant to Rule 62-210.200(185), F.A.C. The changes do not include normal maintenance, but may include, and are not limited to, the following, and may also require prior authorization before implementation: [Rules 62-210.300 and 62-4.070(3), F.A.C.]

A) Alteration or replacement of any equipment or major component of such equipment.
B) Installation or addition of any equipment which is a source of air pollution.
C) The handling of any material not authorized by this permit, including but not limited to, dry phosphate rock.

9. Prior to performing any emissions testing, the permittee shall install, operate, and maintain equipment or instruments necessary to determine process variables, such as process weight input, when such data is needed in conjunction with emissions data to determine the compliance of the emissions unit with applicable emission limiting standards. Equipment or instruments used to directly or indirectly determine process variables, including devices such as belt scales, weight hoppers, and flow meters shall be calibrated and adjusted to indicate the true value of the parameter being measured with sufficient accuracy to allow the applicable process variable determined within 10% of its true value. [Rule 62-297.310(5)(a) and (b), F.A.C.]

SPECIFIC CONDITIONS:

10. The permittee shall submit all compliance related notifications and reports required of this permit to the Environmental Protection Commission of Hillsborough County at:

Environmental Protection Commission
Air Management Division
3629 Queen Palm Drive
Tampa, FL 33619
Telephone: (813)627-2600 Fax: (813)627-2660

11. Submit to the Environmental Protection Commission of Hillsborough County each calendar year on or before April 1, completed DEP Form 62-210.900(5), "Annual Operating Report for Air Pollutant Emitting Facility", for the preceding calendar year. When calculating actual particulate matter emissions, the calculation methodology and control efficiencies listed in the Technical Evaluation and Preliminary Determination to this permit shall be used. [Rules 62-210.370(3)(a)3. and (3)(c), F.A.C.]

12. When the Environmental Protection Commission of Hillsborough County (EPC) after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in Rules 62-204, 62-210, 62-212, 62-296, or 62-297, F.A.C., or in a permit issued pursuant to those rules is being violated, it may require the owner or operator of the source to conduct compliance tests with the particulate emission standards which identify the nature and quantity of pollutant emissions from the source and to provide a report on the results of said tests to the EPC. [Rule 62-297.310(7)(b), F.A.C.]

13. The permittee shall retain records of all monitoring data and support information for a period of at least three (3) years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit. [Rule 62-4.160, F.A.C.]

14. Prior to sixty days before the expiration of this operating permit, the permittee shall apply for a renewal of the permit using the current version of the permit renewal application form. A renewal application shall be timely and sufficient. If the application is submitted prior to sixty days before the expiration of the permit, it will be considered timely and sufficient. If the renewal application is submitted at a later date, it will not be considered timely and sufficient unless it is submitted and made complete prior to the expiration of the operation permit. When the application for renewal is timely and sufficient, the existing permit shall remain in effect until the renewal application has been finally acted upon by the EPC or, if there is court review of the final agency action, until a later date is required by Section 120.60, Florida Statutes. [Rule 62-4.090, F.A.C.]

SPECIFIC CONDITIONS:

The following specific conditions apply to the emissions units (EU Nos. 100 thru 115) at the Newport Terminal:

A.1. As requested by the permittee, and in order limit the potential-to-emit and ensure compliance with the opacity standards specified in A.2. below, the following limitations shall apply: [Rules 62-4.070(3) and 62-210.200(PTE), F.A.C., Permit No. 0570033-015-AC, and FESOP Application Received on 10/22/14]

A) The permittee shall handle only the following materials and shall not exceed the following maximum hourly transfer rates.

1. Wet Phosphate Rock: 2,800 tons/hour
2. MAP/DAP/GTSP: 2,000 tons/hour

B) The maximum annual material throughput (received and shipped) shall not exceed the following per any twelve consecutive month period:

1. Wet Phosphate Rock: 3,000,000 tons
2. MAP/DAP/GTSP: 3,600,000 tons

C) When wet phosphate rock is handled, the moisture content of the wet rock shall be a minimum of 2.5%.

D) The hours of operation for the Newport facility are not limited (8,760 hours/year), except for the time that the baghouses are in operation. The hours of operation of the baghouses are limited to 1,800 hours per 12-consecutive month period.

A.2. The permittee shall not cause, permit, or allow any visible emissions (five percent opacity) from any emissions unit, transfer point, storage building, or shiphold at this facility except at the point where material is being discharged to the hold of a ship from a conveyor system. When the conveyor and/or hatch covering is moved, an opacity of 10 percent will be allowed. [Rule 62-296.711(2)(a), F.A.C.]

A.3. In order to ensure compliance with the opacity standards specified in A.2. above, the following limitations and restrictions shall apply: [Rule 62-4.070(3), F.A.C.]

A) All doors, windows, and other openings in the material storage building and transfer point enclosure(s) shall be kept closed, if necessary, while material is being processed.

B) During the operation of the stacker/reclaimer(s) inside the storage building, no emissions shall be vented to the exterior of the storage building except those passing through the building baghouses, if the operation of the baghouses is necessary to meet the opacity standard.

C) All dust laden exhaust from each emission unit shall be vented to the respective baghouse(s), except as specified in Specific Condition No. A.4.

SPECIFIC CONDITIONS:

A.4. The permittee is authorized to handle MAP, DAP, GTSP, and wet phosphate rock while the baghouses are turned off provided the following requirements are satisfied: [Rules 62-4.070(3), 62-210.200, 62-210.300(2)(a), F.A.C., and FESOP Application Received on 10/22/14]

A) Visible emissions from the material handling and storage operation shall not exceed 5% opacity as specified in Specific Condition No. A.2.
B) The MAP, DAP, and GTSP shall be sufficiently coated with a non-hazardous oil or dust suppressant in sufficient quantity to ensure compliance with the opacity standard specified in Specific Condition No. A.2.
C) The wet phosphate rock shall maintain a minimum moisture content of 2.5%, as determined by ASTM-D2216 or desktop moisture balance device. If the latter is chosen, then an initial and annual concurrent testing of a sample with the moisture reader device and a third party lab, performing ASTM Test Method D2216, is required to ensure accuracy of the moisture reader device's readings. Initial and annual concurrent on-site test and lab results shall be submitted to the EPC within 45 days of testing.
D) Water or non-hazardous dust suppressant shall be applied as necessary to meet the opacity standard. Sample the moisture content of the phosphate rock prior to each shiploading operation, and apply water or dust suppressant as needed prior to ship loading. Moisture content records of the train shipment analyses and outbound shipment analyses shall be kept on-site and be available for inspection upon request.
E) The permittee shall operate the baghouse when visible emissions from an emission unit or transfer point are greater than the opacity standard specified in Specific Condition No. A.2.
F) A documented training program shall be instituted to instruct employees in the opacity requirements and reasonable precautions.
G) The permittee shall perform daily instantaneous visible emissions observations on the railcar unloading and ship loading operations. One reading shall be performed during the railcar unloading operation, and one reading shall be performed on the ship loading operations. The visible emissions observations shall be performed once a day at the point of highest opacity while the emission units and transfer points are handling material. The permittee shall maintain an emissions reading log. The log shall contain the material handled, results of each instantaneous visible emissions reading, and any actions taken by the permittee to correct conditions the cause of excess emissions. If visible emissions are observed, the permittee shall timely act to remedy and correct the condition causing the excess emissions. If timely corrective measures are not available, the permittee shall cease unloading or loading operations until the source of the excess emissions is corrected.

A.5. In order to limit the potential-to-emit for particulate matter, the maximum allowable and potential particulate matter emissions from each emission unit equipped with a baghouse, and the

SPECIFIC CONDITIONS:

hours of operation for each baghouse, shall not exceed the following per any twelve consecutive month period: [Rules 62-210.200, 62-296.711(2)(b), and 62-4.070(3), F.A.C.]

A)

EU ID No.	Baghouse ID	Air Flow Rate (DSCFM)	grain loading (gr/dscf)	PM lbs/hr	hrs/yr	PM TPY
100	A	154,670	0.01	13.26	1,800	11.93
102	B	9,563	0.02	1.64	1,800	1.48
106	G	4,050	0.03	1.04	1,800	0.94
107	H	46,800	0.02	8.02	1,800	7.22
108	I	77,818	0.01	6.67	1,800	6.00
109	II	78,329	0.01	6.71	1,800	6.04
110	III	78,667	0.01	6.74	1,800	6.07
111	IV	73,205	0.01	6.27	1,800	5.65

B) The hours of operation listed above apply only when the baghouse fans are in operation.

A.6. In order to ensure compliance with the allowable particulate matter emissions specified in Specific Condition No. A.5. above, the permittee shall install, operate and maintain the following devices on each baghouse: [Rule 62-4.070(3), F.A.C.]

A) A device capable of monitoring the pressure differential across the baghouse. The monitoring device shall be maintained in working order and shall be calibrated and adjusted to allow the pressure drop to be determined within 10% of its true value.
B) A time elapsed meter on each baghouse. As an alternative to installing an elapsed time meter, the permittee may keep a manual log of the start and stop times of each baghouse and calculation of time elapsed.

A.7. The permittee shall maintain compliance with the requirements of the attached Operation and Maintenance Plan (Appendix A) associated with the operation of the baghouses. [Rules 62-296.700(6) and 62-4.070(3), F.A.C.]

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.]

A) Test all emission units as follows for visible emissions, at the point of highest opacity, during the handling of wet phosphate rock and the handling of MAP/DAP/GTSP, once per federal fiscal year (October 1 – September 30), as follows:

SPECIFIC CONDITIONS:

1) While handling wet phosphate rock, testing shall be representative of normal operations for the most recent twelve month period. For EU #113, testing shall be performed at the highest point of opacity while wet phosphate is transferred from C3 to the storage pile through the transfer points, including C3 to wet phosphate rock chute, the chute to the ground (storage pile), stacker operation (spreading of the wet phosphate on the storage pile). If the baghouses have been operated within the previous 12-month period, the test shall be performed while the baghouses are turned on.
2) While handling MAP, DAP, or GTSP. Testing shall be representative of normal operations for the most recent twelve month period. If the baghouses have been operated within the previous 12-month period, the test shall be performed while the baghouses are turned on.
3) Test the north and south doors of the fertilizer storage building for visible emissions during normal operations.

B) Test the exhaust of Baghouse A (EU No. 100) for particulate matter emissions during railcar unloading operations at least ninety (90) days prior to the operation permit expiration date.
C) Test the exhaust of Baghouses I, II, III, and IV (EU Nos. 108-111) for particulate matter emissions during the storage building operations at least ninety (90) days prior to the operation permit expiration date.
D) 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 also be performed at the baghouse exhaust (EU No. 107).

A.9. Compliance with the emission limitations specified in Specific Condition Nos. A.2. and A.5. shall be determined using EPA Methods 1, 2, 4, 5, and 9 contained in 40 CFR 60, Appendix A and adopted by reference in Rule 62-297, F.A.C. The EPA Method 9 test shall be at least thirty (30) minutes in duration and shall be conducted concurrently with the Method 5 test, if a Method 5 test is required. The minimum requirements for stack sampling facilities, source sampling, and reporting shall be in accordance with Rule 62-297, F.A.C. and 40 CFR 60, Appendix A. [Rules 62-296.711(3) and 62-4.070(3), F.A.C.]

A.10. Testing of emissions shall be conducted with the source operating at capacity. Capacity is defined as 90-100% of the material handling rates specified in Specific Condition No. A.1. If it is impracticable to test at capacity, then the source may be tested at less than capacity; in this case subsequent source operation is limited to 110% of the test load until a new test is conducted. Once the unit is so limited, then operation at higher capacities is allowed for no more than fifteen days for purposes of additional compliance testing to regain the rated capacity in the permit, with prior notification to the EPC. Failure to submit the input rates, including the type of material being

SPECIFIC CONDITIONS:

handled during the compliance test, information on whether or not the baghouse was in operation, the pressure drop across each baghouse, the hourly processing rate, and actual operating conditions may invalidate the test. [Rules 62-4.070(3) and 62-297.310(2)(b), F.A.C.]

A.11. The permittee shall notify the Air Compliance Section of the Environmental Protection Commission of Hillsborough County at least 15 days prior to the date on which each formal compliance test is to begin of the date, time, and place of each such test, and the contact person who will be responsible for coordinating and having such test conducted. [Rules 62-297.310(7)(a)9., F.A.C.]

A.12. The permittee shall file a report with the Environmental Protection Commission of Hillsborough County on the results of each compliance test as soon as practical but no later than 45 days after the last sampling run of each test is completed. The test report shall provide sufficient detail on the emissions unit tested and the test procedures used to allow the Environmental Protection Commission of Hillsborough County to determine if the test was properly conducted.[Rule 62-297.310(8), F.A.C.]

A.13. In order to demonstrate compliance with Specific Condition Nos. A.1. and A.5., the permittee shall develop and maintain a monthly recordkeeping system. The records shall be maintained onsite for three (3) years and shall be made available upon request to any local, state, or federal air pollution agency. The records shall include, but not limited to, the following: [Rule 62-4.070(3), F.A.C. and Permit No. 0570033-015-AC]

A) Month/Year
B) Amount and type of material received (tons).
C) Amount and type of material loaded into ships (tons).
D) Hours of operation for each baghouse
E) Rolling twelve month total of B), C), and D) above.
F) Records as required by the O&M Plan specified in Specific Condition No. A.7.
G) Records as specified in Specific Condition No. A.4.E)

SPECIFIC CONDITIONS:

The following specific conditions apply to the emission units (EU Nos. 001 thru 013) at the Rockport Terminal:

B.1. Visible emissions from any emission unit, including the storage building, at this facility shall not exceed 5% opacity, except at the shiphold. A 10% opacity limit shall apply when the material is being discharged to the hold of a ship from the conveyor system. [Rule 62-296.711(2)(a), F.A.C.]

B.2. As requested by the permittee, in order to limit the potential-to-emit, and ensure compliance with Specific Condition No. B.1., the following restrictions shall apply: [Rules 62-210.200(PTE) and 62-4.070(3), F.A.C., Permit No. 0570033-015-AC, and FESOP Application Received on 10/22/14]

A) The permittee is authorized to handle/store oiled MAP, DAP, GTSP, and pelletized synthetic gypsum at a maximum transfer rate of 2,000 TPH at each transfer point.

B) The maximum throughput for handing phosphate fertilizer materials (MAP, DAP, GTSP, and pelletized synthetic gypsum) shall not exceed 3,600,000 tons in any twelve consecutive month period.

C) The MAP, DAP, GTSP, and pelletized synthetic gypsum product shall be sufficiently coated with a non-hazardous coating oil in order to meet the opacity limits as specified in Specific Condition No. B.1.

D) Hours of operation are not restricted.

E) The permittee shall perform daily instantaneous visible emissions observations on the railcar unloading and ship loading operations. One reading shall be performed during the railcar unloading operation, and one reading shall be performed on the ship loading operations. The visible emissions observations shall be performed once a day at the point of highest opacity while the emission units and transfer points are handling material. The permittee shall maintain an emissions reading log. The log shall contain the material handled, results of each instantaneous visible emissions reading, and any actions taken by the permittee to correct conditions causing the excess emissions. If visible emissions are observed, the permittee shall timely act to remedy and correct the condition causing the excess emissions. If timely corrective measures are not available, the permittee shall cease unloading or loading operations until the source of the excess emissions is corrected.

B.3. In order to ensure compliance with the emission limitations in Specific Condition No. B.1., the following testing conditions and terms shall apply: [Rules 62-210.200(PTE) and 62-4.070(3), F.A.C., Permit No. 0570033-015-AC, and FESOP Application Received on 10/22/14]

A) Test each emission unit (EU) for visible emissions between October 1 and September

SPECIFIC CONDITIONS:

30 (once per federal fiscal year).

B) Testing of emissions should be performed at the point of highest opacity at each emission source.

C) The permittee shall test Bottom Railcar Dumper #2 for visible emission the first time material is handled through the modified dumper.

D) Visible emission testing shall be performed the first time that pelletized synthetic gypsum is handled through the facility.

B.4. Compliance with the emission limitations of Specific Condition No. B.1. shall be determined using EPA Method 9 contained in 40 CFR 60, Appendix A and adopted by reference in Rule 62-297, F.A.C. The EPA Method 9 test shall be at least thirty (30) minutes in duration. The minimum requirements for source sampling and reporting shall be in accordance with Rule 62-297, F.A.C. and 40 CFR 60, Appendix A.

B.5. Testing of emissions shall be conducted with the source operating at capacity. Capacity is defined as 90-100% of rated capacity of the material handling rates specified in Specific Condition No. B.2.A). If it is impracticable to test at capacity, then the source may be tested at less than capacity; in this case subsequent source operation is limited to 110% of the test load until a new test is conducted. Once the unit is so limited, then operation at higher capacities is allowed for no more than fifteen days for purposes of additional compliance testing to regain the rated capacity in the permit, with prior notification to the EPC. In any case the material handling rates shall not exceed the maximum limits described in Specific Condition No. B.2.A). Failure to submit the input rates and actual operating conditions may invalidate the test. [Rules 62-4.070(3) and 62-297.310, F.A.C.]

B.6. The permittee shall notify the Air Compliance Section of the Environmental Protection Commission of Hillsborough County at least 15 days prior to the date on which each formal compliance test is to begin of the date, time, and place of each such test, and the contact person who will be responsible for coordinating and having such test conducted. [Rule 62-297.310(7)(a)9., F.A.C]

B.7. The permittee shall submit two copies of test data to the Air Compliance Section of the Environmental Protection Commission of Hillsborough County within 45 days of such testing. Testing procedures shall be consistent with the requirements of 40 CFR 60, Appendix A and Rule 62-297, F.A.C.

B.8. In order to demonstrate compliance with Specific Condition No. B.2., the permittee shall maintain records of operation for the previous three (3) years. The records shall be made available to the Environmental Protection Commission of Hillsborough County, state, or federal air pollution agency upon request. The records shall include, but are not limited to the following: [Rule 62-

SPECIFIC CONDITIONS:

4.160(14)(b), F.A.C., and Permit No. 0570033-015-AC]

A) Month/Year
B) Amount and type of material received (tons).
C) Amount and type of material loaded into ships (tons).
D) A rolling total of the throughput for each twelve month period (B) and C) above).

ENVIRONMENTAL PROTECTION COMMISSION
OF HILLSBOROUGH COUNTY

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Richard D. Garrity, Ph.D.
Executive Director