TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301

BOB GRAHAM
GOVERNOR

JACOB D. VARN
SECRETARY

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

August 28, 1979

CERTIFIED MAIL

Mr. Colin A. Campbell
Vice-President and General
Manager Fla. Mineral Opns.
International Minerals & Chemical
Corp.
Post Office Box 867
Bartow, Florida 33830

Dear Mr. Campbell:

We have received and reviewed for completeness the application which you filed with the Hillsborough County Environmental Protection Commission on August 9, 1979.

Your application has been found to be incomplete in several respects.

Even though you filed on an obsolete application form, we will process the application provided that the additional information, requested on the new application form (copy attached) is submitted.

The applicable rule on the date you filed your application is the nonattainment rule that became effective on July 19, 1979 (17-2.17, 17-2.18, 17-2.19, 17-2.20 and 17-2.21). To determine if the source is exempt from the requirements of the nonattainment rule, the increase of the potential emissions of the facility needs to be calculated. If the potential emissions are less than the limits in 17-2.17(3)(a) Table II; Emission Cutoff Levels, the source is exempt from the requirements of 17-2.17(4) through (7) (i.e., LAER, statewide compliance, offsets, series of modifications). If the increase in potential emissions is greater than the limits in Table II, the aggregate increase in allowable emissions from modifications to the facility since December 21, 1976 must be calculated. If the increase in aggregate allowable emissions is greater than or equal to the limits in Table II, the application is subject to the requirements of 17-2.17(5). Also, the fugitive particulate would need to be quantified and permitted according to the requirements of 17-2.17(5) through (7). Otherwise the fugitive particulate emissions are to be controlled according to 17-2.05(3).

Your facility is also subject to the PSD requirements of 17-2.04(6) unless information is submitted showing that the "potential to emit" of the entire facility is less than 250 tons per year. Section 17-2.04(6)(c) requires BACT to be employed to a source if emissions are increased. This requires that a BACT application be submitted with the application. Modeling is required if allowable emissions exceed five pounds per hour or fifteen tons per year. The modeling must demonstrate with reasonable assurance that the applicable PSD increment is not exceeded by the proposed source or the entire facility and that the ambient air quality standard is not violated by the facility.

In addition to the information needed to answer the above general questions, specific answers to various technical questions are needed in order to fully evaluate your application. These items are set forth in the attached report, Completeness Report for Animal Feed Ingredient Storage and Transfer System to IMC's Port Sutton Terminal Application No. 22822.

It may be in your interest to meet with or contact the individuals within the Bureau of Air Quality Management who have the responsibility of reviewing, processing and recommending the issuance or denial of construction permits. We will be glad to assist you in filing a complete application and to work with you in expediting the application processing procedure.

For your information, a copy of 17-2 FAC as it existed prior to March, 1979 and a copy of the nonattainment rule effective July 19, 1979 are attached.

Should you have any questions, please contact me at (904) 488-1344.

Sincerely,

Steve Smallwood, P.E.
Bureau of Air Quality
Management

ATTACHMENTS

cc: D. Puchaty
R. Garrett
J. Griffiths
R. Cunningham
C. Turley

SS:caa

Completeness Report for
Animal Feed Ingredient Storage and Transfer System
to IMC's Port Sutton Terminal
Application No. 22822

Determination of Applicable Rules

Due to the location of the facility in the Hillsborough County particulate nonattainment area, evaluation is conducted under the requirements of 17-2.17, 17-2.18, 17-2.19, 17-2.20 and 17-2.21.

To determine the specific requirements of the nonattainment rule, the increase in potential emissions (see definition 17-2.02 (90) must be calculated.

For the storage silo, an emission factor for uncontrolled emission during transfer must be presented along with the control efficiency of the proposed baghouse. Also the increase in potential emissions resulting from the conveying from the silos to the ship-loader and from the shiploading operation need to be included. To be exempt from the nonattainment rule requirements in 17-2.17 (4) through (7), the potential emissions calculated above must be under 15 tons per year. Otherwise, to be exempt from section 17-2.17(5) the allowable particulate emissions increase could not exceed 1,000 pounds per day or 50 tons per year. This increase in allowable emissions must include the total of all modifications made to the facility since December 21, 1976 (see 17-2.17(7)(b)).

The methodology of fugitive particulate control must be explained. The quantification of fugitive particulate emissions must be included in the application and permitted in accordance with the requirements of Section 17-2.17(5) through (7) if the allowable emissions exceed the levels indicated above.

Failure to qualify for the above exemptions would subject the source to the full requirements of the nonattainment rule (LAER, Statewide compliance, emission offsets).

If the facility is a major emitting facility for particulate emissions, the application is also subject the the PSD requirements of 17-2.04(6). Unless information is provided indicating the aggregate potential for all sources in the facility is below 250 tons per year, it will be assumed the facility is a major emitting facility. If it is a major emitting facility, BACT is required to control emissions from the source. If the source has allowable emissions greater than five pounds per hour or fifteen tons per year, the modeling requirements of 17-2.04(6) must be included with the application. In the modeling, it must be demonstrated with reasonable assurance that the proposed source does not violate the applicable PSD increment or ambient air quality standard. It must also be demonstrated for the entire facility that the PSD increments or ambient air quality standards are not exceeded.

Technical Discrepancies

1. Provide longitude and latitude of emission point.

2. State proposed start-up date of the proposed source.

3. Specify what limitations of operating hours, if any, are requested.

4. Submit and justify an emission factor for the transfer and conveying of the Animal Feed Ingredient. This is needed to calculate potential emissions.

5. Provide the control efficieny of the baghouse. The emission rate provided in 4 and the efficiency must be used to calculate the allowable emissions.

6. Describe the fugitive emissions controls that are employed during truck unloading and quantify, if necessary, these emissions as best able to.

7. Describe the fugitive particulate controls employed during transfer to the silos. How are these emissions drawn through the baghouse?

8. Explain the methodology of delivering the collected particulate in the baghouse to the silo and how fugitive particulate emissions are controlled.

9. Clarify if the stack height is above grade, or explain the derivation of the 97 feet.

10. Emissions generated during the transfer from storage to ship-loading are not quantified.

    a) Is conveyor system also covered?

    b) Quantify increase of emissions made at transfer points.

    c) Detail fugitive particulate control and quantify emissions generated.

    d) Describe shiploading operation and likewise detail the fugitive particulate controls and quantify the emissions (both transfer and fugitive).

11. Provide specifications or literature on baghouse (i.e., air/cloth ration, rated capacity, type material used in bags, type weave used in bags, number of bags in baghouse, dimensions of baghouse, etc).

12. Other applicants have stated that the high humidity conditions in the storage silos of phosphate products requires high energy scrubbers for efficient control of emissions. Will high humidity conditions adversely effect the operation of

the baghouse (bags binding or plugging) or is this product sufficiently different than the other phosphate products to prevent this effect?