

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

MEMORANDUM

TO: David Puchaty, Southwest District
Roger Stewart, Hillsborough Co. E.P.C.

FROM: Steve Smallwood *[Signature]*
Bureau of Air Quality Management

DATE: October 26, 1979

SUBJ: Proposed Department Action on International Minerals
and Chemical Corporation's Application to construct
an Animal Feed Ingredient Truck Unloading, Storage and
Transfer Facility at Port Sutton, Hillsborough County,
Florida.

Attached is one copy of the proposed Construction Permit
for International Minerals and Chemical Corporation of Tampa,
Florida, and one copy of the Department's Technical Evaluation
and Preliminary Determination.

Pursuant to 17-2.091 and CFR 51.18 this information is to
be maintained on file by your office for public review for 30
days following public notice.

Comments are to be submitted in writing to Mr. John Svec
of this office.

cc: Bill Townsend
Jim Estler

SS:caa

ATTACHMENT

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



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STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

MEMORANDUM

TO: Colin A. Campbell, V.P. Fla. Minerals, Opn.
Charles David Turley, Engineer, Fla. Minerals Opn.

FROM: Steve Smallwood, *JS*
Bureau of Air Quality Management

DATE: October 26, 1979

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ATTACHMENT

SS:caa

Technical Evaluation and
Preliminary Determination

International Minerals & Chemical Corporation

Port Sutton Terminal

Animal Feed Ingredient Truck Unloading, Storage
and Transfer System

Construction Permit

Application Number AC 22822

Florida Department of Environmental Regulation

Bureau of Air Quality Management

Tallahassee, Florida

October 26, 1979

I. PROPOSED DEPARTMENT ACTION:

The Department intends to issue the requested construction permit to International Minerals & Chemicals Corporation to construct a new truck unloading, storage and transfer system for Animal Feed Ingredient at the Port Sutton Terminal Tampa, Florida, subject to public comment received as a result of this notice.

Any person wishing to file comments on this proposed action, may do so by submitting such comments in writing to:

John Svec
Florida Department of Environmental
Regulation
Bureau of Air Quality Management
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32301

Any comments received that are postmarked within thirty days after the public notice will be considered and noted in the Department's final determination.

Any person whose substantial interests would be affected by the issuance or denial of this permit may request an administrative hearing by filing a petition for hearing in accordance with the provisions of Chapter 28-5, specifically as set forth in Section 28-5.15 (copy attached). Such petition must be filed within 14 days of the date of this notice. Such petition is to be filed with:

Mary Clark
Office of General Council
Florida Department of Environmental
Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32301

II. SUMMARY OF EMISSION AND AIR QUALITY ANALYSIS:

- a. The proposed location, Port Sutton, is in that part of Hillsborough County, Florida which is classified as "nonattainment" for the criteria pollutants, particulate and ozone. Hillsborough County is classified as "attainment" for the remaining criteria pollutants. Particulate emissions will be emitted from the proposed system.
- b. The significant sources of particulate emissions at this system are:
 - Truck unloading station (maximum estimated uncontrolled emissions of 2.57 tons per year).

- Storage silos (estimated particulate emissions of 0.6 tons per year).
- Silo transfer conveying system to shiploader (maximum uncontrolled emissions of 2.57 tons per year).

III. SYNOPSIS OF APPLICATION:

a. Name and Address of Applicant

International Minerals & Chemical Corporation
P. O. Box 867
Bartow, Florida 33830

b. Description of project and emission controls

This project involves the proposed construction of a truck unloading station, of three storage silos and of a transfer system for Animal Feed Ingredient (AFI) at IMC's Port Sutton facility in Hillsborough County (figure 1). The AFI are phosphate chemicals which are granulated and screened.

In the truck unloading station (see figures 2-4) the discharge hopper under the trucks will be covered with hatches to be opened only under specific truck discharge doors. A choked discharge will be used from the truck hopper to a covered conveyor feeding the bucket elevator. The storage silos will be sealed at the points of transfer. The use of sealed and covered conveying devices is made to prevent contamination of the AFI; also they will serve as dust control measures. A Mikro-Pulsair bag collector, Style B, model 495-8-20 or equivalent will be installed on the middle silo and vent the three silos via interconnections. Particulate collected by the baghouse will be discharged directly back into the storage silo. Transfer of AFI to the existing shiploading conveying system is by a covered conveyor, located in a tunnel at the bottom of the silos, which is loaded by a hopper at the silo bottom.

c. Proposed process rates and emission rates:

The current level of storage and transfer of AFI is 70,000 tons per year. This level requires operating 833 hours per year. Gradual increases in AFI shipments are expected through the next years. Forecasts indicate AFI shipments up to a maximum of 300,000 tons per year are conceivable. This level would require operating 2,500 hours per year. All particulate emission estimates are based on the maximum throughput.

No justified emission factor which can be applied to the transfer and handling of a granulated and screened Animal Feed Ingredient product is known. A worst case condition was assumed. An emission factor of 3.3 grains per cubic foot in a vented situation was selected. This factor was based on sampling a ground phosphate rock rail car loading system with dust control. When this emission factor is applied to the volume displaced in the silo filling operation, the potential particulate emissions are calculated to be 2.056 pounds per hour or 2.57 tons per year. Using the vendor's guarantee for the baghouse emissions, not to exceed .02 grains/cubic foot, actual emissions from the baghouse are calculated to be 0.5 pounds per hour or 0.6 tons per year. Similar emission rates as developed above can be applied to the truck unloading and silo storage transfer to shiploading systems.

IV. RULE APPLICABILITY

The proposed project is located in the Hillsborough County particulate nonattainment area. Since potential emissions are below 15 tons per year, the project is not subject to the state nonattainment rule. See Finding on this page.

Although the facility is a major emitting facility for particulate, the potential emissions for this modification are 2.57 tons per year. Since 15 tons per year potential emissions is considered de minimus and exempts a source from the requirements of the nonattainment rule, it is the Department's policy to exempt this modification from the requirements of the state Prevention of Significant Deterioration rule.

The project is subject to 17-4.23 which requires the use of the best and latest technology on new sources; and to 17-4.07 which among other things requires the applicant to affirmatively provide the Department with reasonable assurance that the project will not cause violations of the ambient air quality standards. 17-4.07 also authorizes the Department to impose reasonable permit conditions necessary to prevent air pollution.

Definition 17-2.02(8) states in no case shall allowable emissions be greater than potential emissions. Since the potential emissions of the proposed project will be less than the allowable emissions set forth in the process weight table of 17-2.05, the process weight table does not apply to this project.

V. FINDING

1. Based on data received with the application, the total maximum emissions for this project are projected to be equal to or less than 6.2 pounds per hour or 7.7 tons per year for all transfer points. Projected actual (allowable) emissions are projected to be less than 1-2 tons per year due to installing a baghouse on the storage silo and the use of sealed and covered conveying system.

2. The proposed facility is a major emitting facility since it has uncontrolled emissions in excess of 250 tons per year.
3. No ambient monitoring or modeling is required to provide reasonable assurance that ambient standards will not be violated. Section 17-2.17(3) Table II exempts the project from the permitting requirements of the nonattainment rule.
4. The installation of a Mikro-Pulsaire Bag Collector, Style B, Model 495-8-20 or equivalent on the storage silos is a reasonable requirement to minimize the emission of particulate matter in accordance with the best and latest technology provision of 17-4.23.
5. The use of the bag house with induced air flow along with the covered and sealed conveying system will provide sufficient control to minimize the emission of fugitive particulate from this project.
6. The Mikro-Pulsaire Bag Collector, Style B, Model 495-8-20 has been used on other similar operations and can be expected to remove 80-99% of the particulate emissions.
7. Construction will commence and be completed within a reasonable time based on the projections included in the application.
8. Construction will reasonably conform to the plans submitted.
9. The applicant will submit periodic reports on construction progress.
10. The actual particulate emissions from the bag collector's emission point will be verified by a test using standard test methods prior to issuance of an operating permit. As part of the operating permit periodic tests on the bag collector air filter outlet should be required. Tests do not need to be required for the other emission points except for specific tests requested by the Department based on a reasonable belief that the emission limit for an uncontrolled emission point is being violated.
11. Upon obtaining an operating permit, the applicant should submit periodic reports on the actual operation of the source.

VI. PROPOSED ALLOWABLE EMISSIONS AND PERMIT CONDITIONS

See Draft Permits

Attachment: Rule 28-5

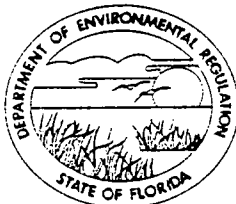
October 10, 1979

RULES OF THE ADMINISTRATIVE COMMISSION
MODEL RULES OF PROCEDURE
CHAPTER 28-5
DECISIONS DETERMINING SUBSTANTIAL INTERESTS

28-5.15 Requests for Formal and Informal Proceedings

- (1) Requests for proceedings shall be made by petition to the agency involved. Each petition shall be printed typewritten or otherwise duplicated in legible form on white paper of standard legal size. Unless printed, the impression shall be on one side of the paper only and lines shall be double spaced and indented.
- (2) All petitions filed under these rules should contain:
 - (a) The name and address of each agency affected and each agency's file or identification number, if known;
 - (b) The name and address of the petitioner or petitioners;
 - (c) All disputed issues of material fact. If there are none, the petition must so indicate;
 - (d) A concise statement of the ultimate facts alleged, and the rules, regulations and constitutional provisions which entitle the petitioner to relief;
 - (e) A statement summarizing any informal action taken to resolve the issues, and the results of that action;
 - (f) A demand for the relief to which the petitioner deems himself entitled; and
 - (g) Such other information which the petitioner contends is material.

2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301



BOB GRAHAM
GOVERNOR

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STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

APPLICANT: International Minerals & Chemical
Corporation
P. O. Box 867
Bartow, Florida 33830

PERMIT/CERTIFICATION
NO. AC 22822

COUNTY: Hillsborough

PROJECT: Animal Feed Ingredient Truck unloading,
Storage and transfer system

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Chapter 17-2, Florida Administrative Code. The above named applicant, hereinafter called Permittee, is hereby authorized to perform the work or operate the facility shown on the approved drawing(s), plans, documents, and specifications attached hereto and made a part hereof and specifically described as follows:

For the construction of a truck unloading station, of three storage silos and of a transfer conveyor system for Animal Feed Ingredient. Particulates are to be trapped by a Mikro-Pulsaire Bag Collector, Style B, Model 495-8-20 or equivalent. The source is to be located at IMC's Port Sutton Terminal Tampa, Florida. The universal transverse mercator and latitude, longitude coordinates are: UTM Zone 17, 360.1 E, 3087.5 N and 27° 52' 09" N by 82° 25' 13" W, respectively.

Construction shall be in accordance with the attacher permit application and attached plans, documents, and drawings except as otherwise noted on page 3, "Specific Conditions".

Attachments are as follows:

1. "Application to Operate/Construct Air Pollution Sources", DER Form 12-1 (Jan. 78).
2. Letter of Incompleteness, from FDER to IMC
3. Response to Letter of Incompleteness, from IMC to FDER.

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth herein are "Permit Conditions", and as such are binding upon the permittee and enforceable pursuant to the authority of Section 403.161(1), Florida Statutes. Permittee is hereby placed

PERMIT NO.: AC - 22822

APPLICANT: International Minerals & Chemical Corporation
P. O. Box 867
Bartow, Florida 33830

on notice that the department will review this permit periodically and may initiate court action for any violation of the "Permit Conditions" by the permittee, its agents, employees, servants or representatives.

2. This permit is valid only for the specific processes and operations indicated in the attached drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit shall constitute grounds for revocation and enforcement action by the department.

3. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately notify and provide the department with the following information: (a) a description of and cause of non-compliance; and (b) the period of non-compliance, including exact dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance. The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the department for penalties or revocation of this permit.

4. As provided in subsection 403.087(6), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Nor does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations.

5. This permit is required to be posted in a conspicuous location at the work site or source during the entire period of construction or operation.

6. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source, which are submitted to the department, may be used by the department as evidence in any enforcement case arising under the Florida Statutes or department rules, except where such use is proscribed by Section 403.111, F.S.

7. In the case of an operation permit, permittee agrees to comply with changes in department rules and Florida Statutes after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by Florida Statutes or department rules.

8. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, plant, or aquatic life or property and penalties therefore caused by the construction or operation of this permitted source, nor does it allow the permittee to cause pollution in contravention of Florida Statutes and department rules, except where specifically authorized by an order from the department granting a variance or exception from department rules or state statutes.

9. This permit is not transferable. Upon sale or legal transfer of the property or facility covered by this permit, the permittee shall notify the department within thirty (30) days. The new owner must apply for a permit transfer within thirty (30) days. The permittee shall be liable for any non-compliance of the permitted source until the transferee applies for and receives a transfer of permit.

10. The permittee, by acceptance of this permit, specifically agrees to allow access to permitted source at reasonable times by department personnel presenting credentials for the purposes of inspection and testing to determine compliance with this permit and department rules.

11. This permit does not indicate a waiver of or approval of any other department permit that may be required for other aspects of the total project.

12. This permit conveys no title to land or water, nor constitutes state recognition or acknowledgement of title, and does not constitute authority for the reclamation of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the state. Only the Trustees of the Internal Improvement Trust Fund may express state opinion as to title.

13. This permit also constitutes:

- ☐ Determination of Best Available Control Technology (BACT)
- ☐ Determination of Prevention of Significant Deterioration (PSD)
- ☐ Certification of Compliance with State Water Quality Standards (Section 401, PL 92-500)

SPECIFIC CONDITIONS:

PERMIT NO.: AC 22822
APPLICANT: International Minerals & Chemical Corporation
P. O. Box 867
Bartow, Florida 33830

Specific Conditions

1. The maximum allowable particulate emissions from the truck unloading station shall be 2.06 pounds per hour and 2.57 tons per year; 0.5 pound per hour and 0.6 ton per year from the stack of the baghouse^② which vents the storage silos and 2.06 pounds per hour and 2.57 tons per year from the storage silo transfer points to the conveying system^③; for a maximum allowable particulate emission of 4.62 pounds per hour and 5.74 tons per year from the Animal Feed Ingredient truck unloading station, storage silos and transfer system.
2. The hours of operation shall be restricted to a total of 2,500 hours per year.
3. The maximum allowable raw material inputs shall be 120 tons per hour of Animal Feed Ingredient, for a total of 300,000 tons per year of Animal Feed Ingredient.
4. During the construction phase, quarterly reports on construction progress, commencing 3 months after initiation of construction, shall be submitted to the Bureau of Air Quality Management. The operating permit shall require maintenance of records indicating operation hours, raw material input to storage silos and raw material output to shiploading system and shall be submitted annually in accordance with 17-4.14.
5. Emission tests for particulates and visible emissions shall be conducted for the bag collector emission point in accordance with Methods 1 through 5, 40 CFR 60, Appendix A and Method 9, 40 CFR 60 Appendix A, respectively. Emission tests for visible emissions shall be likewise conducted for the truck unloading station and the storage silo transfer to conveying system emission points. The results shall be submitted to the Bureau of Air Quality Management for determination of compliance with applicable state rules regarding visible and particulate emission and the conditions of this permit.
6. The permits for the existing transfer system to the ship loading AO29 - 6716 and AO29-4548 shall be modified to correspond with the limitations for Animal Feed Ingredient contained in this permit.

PERMIT NO.: AC 22822
APPLICANT: International Minerals and Chemical Corporation
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Bartow, Florida 33830

7. Operation, except for the testing period to determine compliance with Section 403, FS, FAC shall not commence prior to the issuance of a valid operation permit. A pretest meeting with the Bureau of Air Quality Management to determine the acceptability of test methods as well as a 30 day notice prior to testing shall be provided by the applicant.

Expiration Date: October 31, 1979

Issued this _____ day of _____, 19 _____.

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

No. 344188

RECEIPT FOR CERTIFIED MAIL—30¢ (plus postage)

SENT TO CHARLES D. TORLEY		POSTMARK OR DATE
STREET AND NO. P.O. Box 867		
P.O., STATE AND ZIP CODE IMC CORP. BARTON, FL. 33830		
OPTIONAL SERVICES FOR ADDITIONAL FEES		
RETURN RECEIPT SERVICES	1. Shows to whom and date delivered 15¢	
	With delivery to addressee only 65¢	
	2. Shows to whom, date and where delivered .. 35¢	
	With delivery to addressee only 85¢	
DELIVER TO ADDRESSEE ONLY 50¢		
SPECIAL DELIVERY (extra fee required)		

PS Form 3800 NO INSURANCE COVERAGE PROVIDED— (See other side)
 Apr. 1971 NOT FOR INTERNATIONAL MAIL ☆ GPO : 1972 O - 460-743

No. 344189

RECEIPT FOR CERTIFIED MAIL—30¢ (plus postage)

SENT TO S.W. DISTRICT / DAVE FUCHS		POSTMARK OR DATE
STREET AND NO. 7601 Hwy 301 N.		
P.O., STATE AND ZIP CODE TAMPA, FL. 33610		
OPTIONAL SERVICES FOR ADDITIONAL FEES		
RETURN RECEIPT SERVICES	1. Shows to whom and date delivered 15¢	
	With delivery to addressee only 65¢	
	2. Shows to whom, date and where delivered .. 35¢	
	With delivery to addressee only 85¢	
DELIVER TO ADDRESSEE ONLY 50¢		
SPECIAL DELIVERY (extra fee required)		

PS Form 3800 NO INSURANCE COVERAGE PROVIDED— (See other side)
 Apr. 1971 NOT FOR INTERNATIONAL MAIL ☆ GPO : 1972 O - 460-743

No. 344191

RECEIPT FOR CERTIFIED MAIL—30¢ (plus postage)

SENT TO COLIN A. CAMPBELL		POSTMARK OR DATE
STREET AND NO. P.O. Box 867		
P.O., STATE AND ZIP CODE BARTON, FL. 33830		
OPTIONAL SERVICES FOR ADDITIONAL FEES		
RETURN RECEIPT SERVICES	1. Shows to whom and date delivered 15¢	
	With delivery to addressee only 65¢	
	2. Shows to whom, date and where delivered .. 35¢	
	With delivery to addressee only 85¢	
DELIVER TO ADDRESSEE ONLY 50¢		
SPECIAL DELIVERY (extra fee required)		

PS Form 3800 NO INSURANCE COVERAGE PROVIDED— (See other side)
 Apr. 1971 NOT FOR INTERNATIONAL MAIL ☆ GPO : 1972 O - 460-743

No. 344190

RECEIPT FOR CERTIFIED MAIL—30¢ (plus postage)

SENT TO ROGER STEWART		POSTMARK OR DATE
STREET AND NO. KEFC 900 9TH AVE.		
P.O., STATE AND ZIP CODE TAMPA, FL. 33605		
OPTIONAL SERVICES FOR ADDITIONAL FEES		
RETURN RECEIPT SERVICES	1. Shows to whom and date delivered 15¢	
	With delivery to addressee only 65¢	
	2. Shows to whom, date and where delivered .. 35¢	
	With delivery to addressee only 85¢	
DELIVER TO ADDRESSEE ONLY 50¢		
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