

6/28 al

Pls research
& draft a

Florida Department of
Environmental Protection

Memorandum

Response. As to is
an NSPS applicability
EPA input is needed

Clay

RECEIVED

JUN 26 1995

Bureau of
Air Regulation

TO: Clair Fancy

FROM: Michael Hewett *mt*

DATE: June 23, 1995

SUBJ: IMC-Agrico Company; Big Bend Terminal; Applicability of Subpart X

I was recently contacted by Larry Sellers concerning the renewal of Air Permit AO29-161400, for IMC-Agrico. This is apparently the second or third time the permit has been renewed and Subpart X has never been applied before. However, this time, Hillsborough County EPC is considering applying the EPA standards.

It is IMC-Agrico's contention that, even though the intent of Subpart X is not clear, EPA's background information document states that the Subpart X standards should only be applied to **initial** storage of granular triple super phosphate.

Mr. Sellers has already contacted the EPA in an effort to obtain clarification on the subject. He would also like the Department to interpret the applicability of Subpart X. I am completely unfamiliar with the subject material and I know we have permitting engineers that have dealt with phosphate storage facilities before. If you think a response is warranted, could you have someone in your section look at the information attached and give an opinion on the subject?

Thank you.

Attachment

Law Offices

HOLLAND & KNIGHT

315 South Calhoun Street
P.O. Drawer 810 (ZIP 32302-0810)
Tallahassee, Florida 32301

904-224-7000
FAX 904-224-8832

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FACSIMILE

TO:

MIKE HEWITT	DEP
NAME	COMPANY/FIRM
TALLAHASSEE	FL
CITY	STATE
922-6979	488-0114
FAX NUMBER	TELEPHONE NUMBER

If you did not receive all of the pages or find that they are illegible, please call

(904) 425-5645

FROM:

LARRY SELLERS	425-5671
NAME	TELEPHONE NUMBER

8
TOTAL NUMBER OF PAGES

MESSAGE:

CONFIDENTIALITY NOTE:

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FOR THE RECORD:

DATE: **6/21/95**

URGENCY: SUPER RUSH RUSH REGULAR

FAXED BY: _____ AMOUNT: _____

FILE #: **21000-131** CLIENT NAME: **IMC**

CONFIRMED: YES NO NAME: _____ TIME: _____

Law Offices

HOLLAND & KNIGHT

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VIA TELECOPY

MEMORANDUM -- June 21, 1995

TO: Mike Hewitt
Department of Environmental Protection

FROM: Lawrence E. Sellers, Jr.

RE: IMC-Agrico Company; Big Bend Terminal;
Renewal of Air Permit AO29-161400;
Applicability of Subpart X.

A question has arisen regarding the applicability of Subpart X to IMC-Agrico Company's distribution facility at the Big Bend Terminal in Hillsborough County, Florida.

Enclosed is a copy of a letter dated July 20, 1994, from IMC-Agrico Company to the Environmental Protection Commission of Hillsborough County. This letter explains why the new source performance standards in Subpart X are not applicable to these distribution facilities.

Also enclosed is a copy of a letter dated August 22, 1994, from IMC-Agrico Company to Mr. David McNeal at Region IV. This letter transmits the pages from the background information document that are referenced in the July 20 letter to the County.

Please give me a call at 425-5671 after you have had the opportunity to review these materials.

LES/kfs
Enclosures

cc: J. M. Stewart, IMC-Agrico Company
(w/enclosures)

TAL-65270



Via Hand Delivery

July-20, 1994

Mr. Ben Kalra
Air Permit Engineer
Environmental Protection Commission of Hillsborough County
1410 North 21st Street
Tampa, Florida 33605

RE: Big Bend Terminal, Renewal of Air Permit AO29-161400, FDEP File No. AO29-252389

Dear Mr. Kalra:

As you know, we have submitted an application for the renewal of the referenced air permit. This permit authorizes certain activities at our Big Bend Terminal. On June 20, we received your letter dated June 17 requesting certain additional information regarding this application. The purpose of this correspondence is to respond to that request.

Applicability of Subpart X.

You first asked that we confirm the applicability of the new source performance standards (NSPS) in 40 CFR, Part 60, Subpart X, Standards of Performance for the Phosphate Fertilizer Industry: Granular Triple Super Phosphate (GTSP) Storage Facilities. You correctly note that no prior permit for this facility has ever referred to, or required compliance with, these NSPS.

No prior permit has required compliance with these NSPS because these provisions do not apply to the subject distribution facilities.

Subpart X applies only to GTSP "storage facilities." EPA's background information document (BID) explains the development of Subpart X, and it makes clear that the term "storage facility" includes only the initial storage location (which is usually adjacent to the manufacturing process), where emissions of fluorides are expected due to the curing process:

The proposed standard would limit emissions of fluorides from the storage building, which is the affected facility. Major sources includes but are not limited to the product pile, transfer conveyors and elevators, screens, and mills. The standards apply at the point(s) where emissions are discharged from the air pollution control system or from the affected facility if no air pollution system is utilized.

Bid at p. 61.

The description of the process also makes clear that EPA intended the NSPS to apply only to storage facilities associated with a manufacturing operation:

After manufacture, GTSP is moved to a storage building where it remains until the reaction is completed or the product is "cured." *** The GTSP is distributed to a predetermined area in the building by conveyors. After 3 to 5 days, during which fluorides evolve from the storage pile, the product is considered cured and ready for shipping. Front-end loaders move the GTSP to elevators or hoppers where it is conveyed to screens for size separation. Oversize material is rejected, pulverized, and returned to the screen. Undersized material is returned to the GTSP production plant. Material within specification is shipped as product.

BID at pp. 61-63.

ma/c:\wpwin\bbsddd.wp

Via Fax - 1-404-347-3059

August 22, 1994

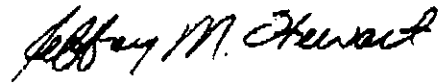
Mr. David McNeal
United States Environmental Protection Agency
Region IV

RE: NSPS (Subpart X) Applicability to GTSP Distribution Facilities
Background Information Document (BID) Pages

Dear Mr. McNeal:

Attached are copies of pages from the BID (EPA-450/2-74-019a) that are referenced in our letter to the Environmental Protection Commission of Hillsborough County dated July 20, 1994, faxed to you last week.

If you have any questions or need additional information, please do not hesitate to call me at 813-634-3922, ext. 3616.



Jeffrey M. Stewart
Environmental Programs Coordinator

cc: w/o attachment
J. N. Allen, Jr.
L. Sellers, Holland & Knight (Fax)
G. G. Williams

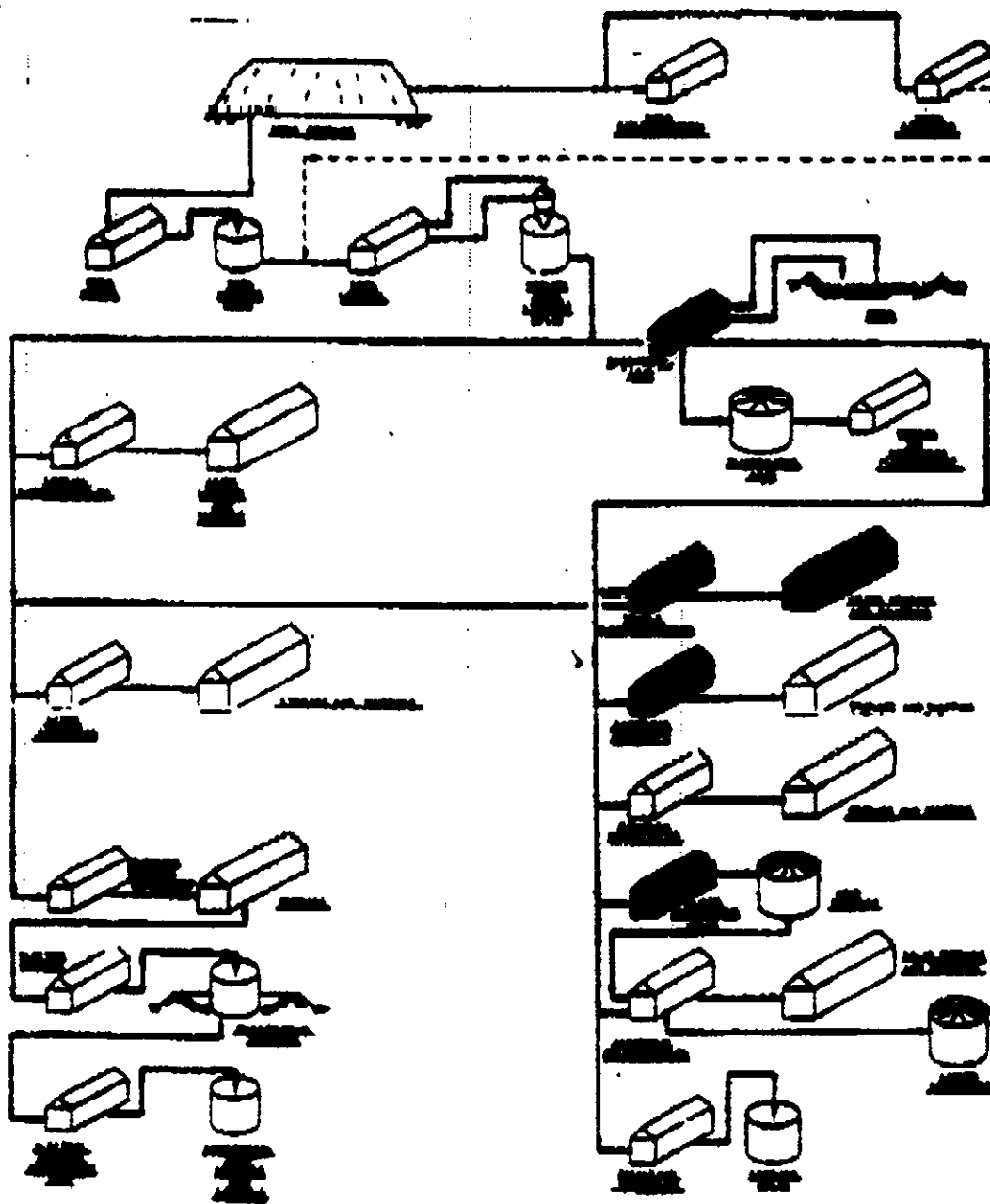


FIGURE 1
PHOSPHATE ROCK PROCESSING FACILITY

GRANULAR TRIPLE SUPERPHOSPHATE STORAGE**SUMMARY OF PROPOSED STANDARDS**

Standards of performance are being proposed for new granular triple superphosphate (GTSP) storage facilities. The proposed standard would limit emissions of fluorides from the storage building, which is the affected facility. Major sources include but are not limited to the product pile, transfer conveyors and elevators, screens, and mills. The standards apply at the point(s) where emissions are discharged from the air pollution control system or from the affected facility if no air pollution control system is utilized.

The proposed standards would limit emissions to the atmosphere as follows:

Total Fluorides

No more than 0.25 gram total fluoride per hour per metric ton of P_2O_5 in storage (5×10^{-4} pound per hour per ton).

Visible Emissions

Visible emissions shall be less than 20 percent opacity.

DESCRIPTION OF PROCESS

After manufacture, GTSP is moved to a storage building where it remains until the reaction is completed or the product is "cured." Figure 17 illustrates the activities in the storage building. The GTSP is distributed

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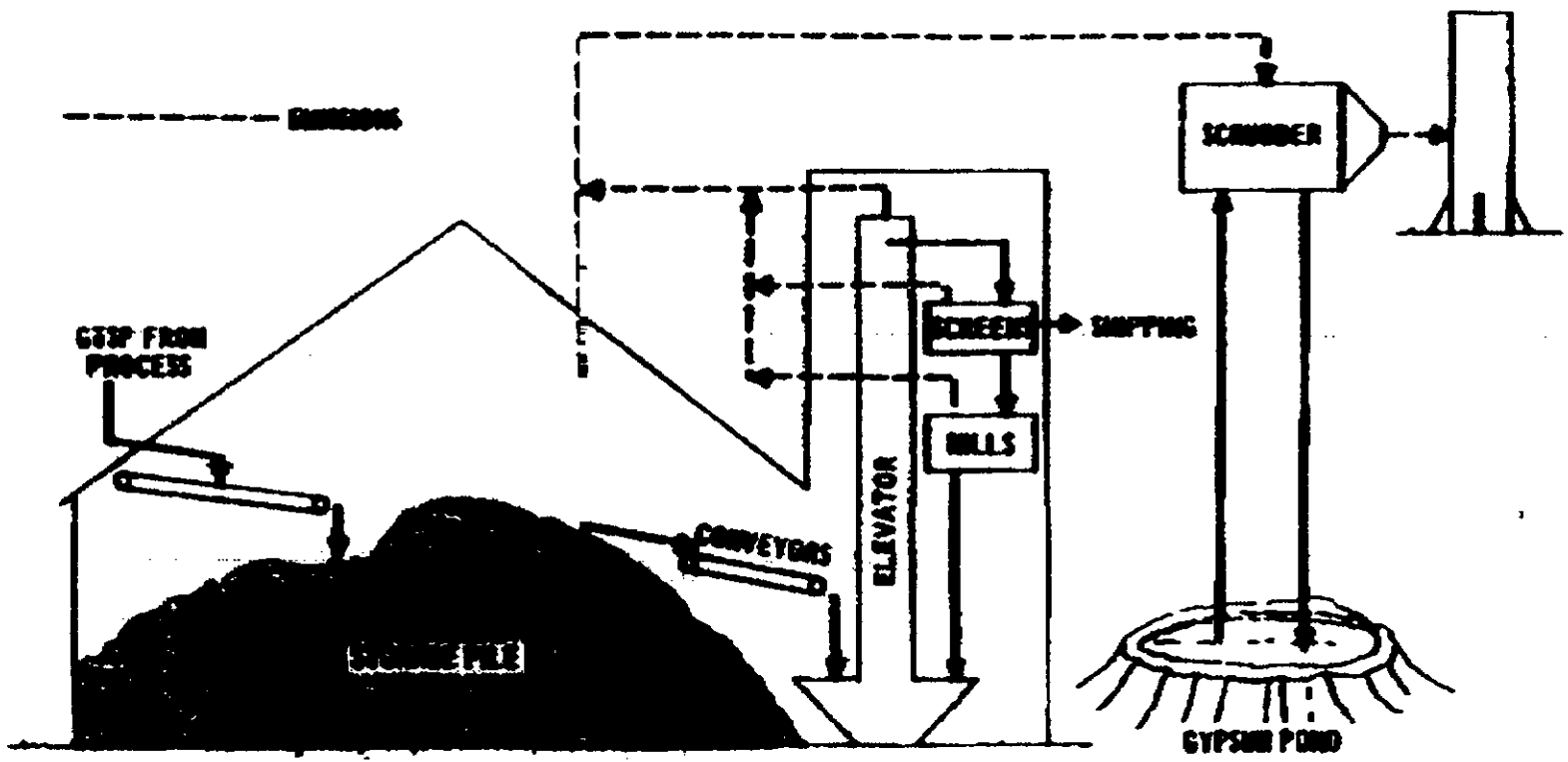


Figure 17. GRANULAR TRIPLE SUPERPHOSPHATE STORAGE

to a predetermined area in the building by conveyors. After 3 to 5 days, during which fluorides evolve from the storage pile, the product is considered cured and ready for shipping. Front-end loaders move the GTSP to elevators or hoppers where it is conveyed to screens for size separation. Oversize material is rejected, pulverized, and returned to the screen. Undersize material is returned to the GTSP production plant. Material within specification is shipped as product.

EMISSIONS AND METHODS OF CONTROL

Emissions from GTSP storage are limited to fluorides and particulates. The fluorides are emitted both in the gaseous form and as a constituent of the particulate emissions. Emissions of gaseous and solid particulate fluorides are greater during periods when the GTSP product is being rearranged rather than when it is in piles where it has lain undisturbed.

Some poorly controlled GTSP storage facilities can release as much as 15×10^{-4} pound of fluoride per hour per ton of P_2O_5 in storage. Such a storage facility with 1,500 tons of P_2O_5 could emit 58 pounds of fluoride each day of storage. Well-controlled GTSP storage facilities can restrict fluoride emissions to less than 5×10^{-4} pound fluoride per hour per ton of P_2O_5 stored (see Figure 18). A well-controlled 1,500-ton P_2O_5 storage facility achieving 5×10^{-4} pound of fluoride per hour per ton of P_2O_5 stored would emit about 18 pounds of fluoride each day of storage.