IMC AGRICO

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.

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Significantly, the graphic description of the process presented in the BID also does not identify any off-site distribution facilities. BID at p. 2. EPA has it made clear that sources not listed are not covered by the standard. 40 Fed. Reg. 33152 (August 6, 1975).

The described processes (curing, screening for size separation, and return of oversized and undersized material to the process) all occur at manufacturing locations such as our South Pierce facility. Only after all BID defined processes are complete is the cured GTSP transported to the Big Bend Terminal for distribution.

In other words, the Big Bend Terminal is properly characterized as a "distribution" facility and not a "storage" facility subject to Subpart X.

In addition, the above interpretation is consistent with the purpose of the Subpart X regulations, which is to control major sources of fluoride emissions. As noted in the BID, significant emissions of fluorides are reasonably expected only during the curing stage; they are not expected during the distribution phase and for this reason monitoring is not required.

Based on all the above, it is clear that the NSPS in Subpart X are not applicable to our distribution facilities at the Big Bend Terminal. Consequently, our prior permits correctly omitted any references or requirements based in compliance with these NSPS. Likewise, our renewal permit should not require compliance with , or otherwise refer to, the NSPS in Subpart X.

Usage of Dust Suppressant.

GTSP is coated with dust suppressant in the unloading hopper system to effectively control dust. Typically we apply dust suppressant at a rate of one gallon per ton of GTSP and unload 500,000 tons of GTSP per year. Our annual dust suppressant usage is approximately 500,000 gallons per year. This rate of application is sufficient to effectively control dust and comply with permitted visible emission limits. It is our experience that the application of dust suppressant does not cause objectionable odors and that the process complies with Rule 17-296.320, F. A. C. which states: "The permittee shall not cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor".

Please be advised that Mr. Lee F. Thurner's title is Vice-President, Minerals - Florida. If you have any questions regarding the above, or wish to schedule a meeting to discuss these issues further, please do not hesitate to call me at 813-634-3922, ext. 3616.

Sincerely,

Jeffrey M. Stewart

Jeffrey M. Stewart
Environmental Programs Coordinator

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