

TO: TERRY COLE  
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PLEASE REPLY TO: Lakeland, Florida  
January 11, 1980

CABLE ADDRESS  
HND KNIGHT  
TELEX 5-2630

RECEIVED

JAN 14 1980

JAKE 1:15:00

Office of the Secretary

Jacob D. Varn, Secretary  
Department of Environmental  
Regulation  
Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32301

RE: Mobil Chemical Company - Construction  
Permit Application No. AC24802

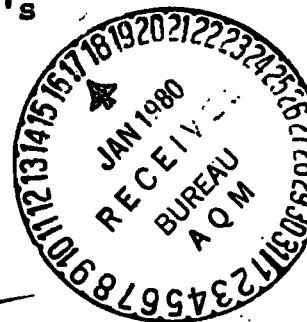
Dear Jake:

As attorney for Mobil Chemical Company (Mobil), we are authorized to state that Mobil hereby waives the 90-day approval or denial provision set forth in Section 120.60(2), Florida Statutes, as it applies to the above-referenced permit. This waiver is voluntarily granted by Mobil in order to provide an opportunity for the Department to evaluate additional information to be provided by Mobil. This waiver is limited to a 30-day period, and it is Mobil's understanding that the above-referenced permit application will be approved or denied by no later than February 15, 1980.

Sincerely,

HOLLAND & KNIGHT

*Robert L. Rhodes, Jr.*  
Robert L. Rhodes, Jr.



RLRJr/rm

- cc: Mr. John Svec
- Mr. G. O. Gudmandsen
- Mr. J. W. McAdams
- Mr. Samuel M. Lane
- Mr. Paul F. Cash
- Walter R. Lanferman, Esquire

DIV. ENVIRONMENTAL PERMITTING

JAN 15 1980

RECEIVED

DEPARTMENT OF ENVIRONMENTAL REGULATION

<b>ROUTING AND TRANSMITTAL SLIP</b>		ACTION NO.
		ACTION DUE DATE
1. TO: (NAME, OFFICE, LOCATION)		INITIAL
<del>Suzanne Walker</del>		DATE
2.		INITIAL
<del>Bill Thomas BACM</del>		DATE
3. File Mobil		INITIAL
		DATE
4.		INITIAL
		DATE
REMARKS:  <p style="text-align: center;">DIV. ENVIRONMENTAL PERMITTING JAN 19 1980</p>  <p style="text-align: right;"><i>[Signature]</i></p>	<b>INFORMATION</b>	
	REVIEW & RETURN	
	REVIEW & FILE	
	INITIAL & FORWARD	
	DISPOSITION	
	REVIEW & RESPOND	
	PREPARE RESPONSE	
	FOR MY SIGNATURE	
	FOR YOUR SIGNATURE	
	LET'S DISCUSS	
	SET UP MEETING	
	INVESTIGATE & REPT	
	INITIAL & FORWARD	
	DISTRIBUTE	
	CONCURRENCE	
FOR PROCESSING		
INITIAL & RETURN		
FROM: <i>[Signature]</i>	DATE	
	PHONE	

In the folder labeled as follows there are documents, listed below, which were not reproduced in this electronic file. That folder can be found in one of the file drawers labeled Supplementary Documents Drawer. Folders in that drawer are arranged alphabetically, then by permit number.

**Folder Name:** Mobile Chemical Company

**Permit(s) Numbered:**

			General
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Period during  
which document  
was received:

Detailed Description

	1.	36"×24" BLUEPRINT: GENERAL ARRANGEMENT FIRST INCREMENT (DRAWING NUMBER: 67610-02)
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# Mobil Chemical Company

PHOSPHORUS DIVISION

P.O. BOX 311  
NICHOLS, FLORIDA 33863  
TELEPHONE (813) 425-3011

August 5, 1980

Mr. Tommie A. Gibbs,  
Chief Air Facilities Branch  
U.S. Environmental Protection Agency  
Region IV  
345 Courtland Street, N.E.  
Atlanta, Georgia 30308



Re: Air Emission Permitting Requirements for Mobil Chemical's Proposed Port Manatee (Florida) Phosphate Rock Port Facility

Dear Mr. Gibbs:

On June 4, 1980, I met with Kent Williams and other members of your staff to discuss possible Prevention of Significant Deterioration (PSD) permitting requirements for a new phosphate rock port facility proposed for development at Port Manatee, Florida. (A representative from our environmental consultant, Dames & Moore, was also present at this meeting.) At the time of our meeting we did not have sufficient design information to provide an estimate of the emissions which will result from the project. We now have this information, and it appears that a federal PSD permit will not be required after all. The purpose of this letter is to present additional pertinent information on the project, and to request an official determination from EPA as to whether or not a PSD permit will be required.

As described during our meeting on June 4, the proposed port facility will handle dry phosphate rock transported in by rail and out by freighter. The facility will consist of a rotary railcar unloader, a covered storage building, a shiploader, and covered conveyors between the railcar unloader and the storage building and between the storage building and the shiploader. Additional information on the project and on methods for controlling emissions is attached.

The port facility is being designed to handle an ultimate capacity of 8,000,000 tons of dry phosphate rock per year

DEPARTMENT OF ENVIRONMENTAL REGULATION

ROUTING AND TRANSMITTAL SLIP		ACTION NO.
		ACTION DUE DATE
1. TO: (NAME, OFFICE, LOCATION) KAHEL <del>STARNES</del>	INITIAL DATE	
2. BLOMMEL THOMAS	INITIAL DATE	
3. BARKER GEORGE	INITIAL DATE	
4.	INITIAL DATE	
<p>REMARKS:</p> <p>Mark _____</p> <p>Note - if nothing yet we had better establish a file for this. This should go to John Z.</p>	<p>DISPOSITION</p> <p>REVIEW &amp; RETURN</p> <p>REVIEW &amp; FILE</p> <p>INITIAL &amp; FORWARD</p> <hr/> <p>DISPOSITION</p> <p>REVIEW &amp; RESPONSE</p> <p>PREPARE RESPONSE</p> <p>FOR MY SIGNATURE</p> <p>FOR YOUR SIGNATURE</p> <p>LET'S DISCUSS</p> <p>SET UP MEETING</p> <p>INVESTIGATE &amp; REPORT</p> <p>INITIAL &amp; FORWARD</p> <p>DISTRIBUTE</p> <p>CONCURRENCE</p> <p>FOR PROCESSING</p> <p>INITIAL &amp; RETURN</p>	
	<p>FROM: STEVE SMALLWOOD</p>	<p>DATE</p> <p>PHONE</p>

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U.S. Environmental Protection Agency  
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(ton/yr) at an instantaneous unloading/loading rate of 3,000 tons per hour (ton/h). At this hourly rate, the port facility would be in operation approximately 2,670 hours per year (8,000,000 ton/yr ÷ 3,000 ton/h).

The only emissions of consequence resulting from operation of the proposed facility will be particulate matter emitted at a few specific points described in the attachment. The boilers of the phosphate rock freighters used to ship rock out of the port (freighters which are not owned by Mobil Chemical) will not operate while at berth and will therefore not be a significant stationary emission source associated with the project. Fugitive dust emissions will be well controlled as discussed in the attachment. Based on a rock shipment capacity of 8,000,000 ton/yr, the controlled emissions are estimated to be 62 ton/yr. (See Attachment A for emission rate calculations.)

We emphasize the word "controlled" because we are advised by our environmental consultant that decisions on whether or not a new project represents a major emission source are based now on controlled emissions rather than on potential emissions in the absence of controls. As we understand it, this decision process results from the administrative stay issued on February 5, 1980, which exempts from federal PSD review any project which would not be considered a major source according to the definition in the PSD regulation revisions proposed on September 5, 1979. We further understand that these revisions, when promulgated on or about July 28, 1980, will not change the proposed definition of a major source - a source with controlled emissions of 100 tons per year or more of a regulated pollutant if in one of 28 listed source categories, or a source with controlled emissions of 250 tons per year or more if not in a listed category.

One of the listed categories is "phosphate rock processing." We do not think that the proposed port facility fits into this category because it is simply a transfer station. Dry phosphate rock is transported in by rail and shipped out by freighter. No rock processing is involved. We therefore feel that federal PSD review of this project is not required because the annual particulate emissions from the proposed project at its ultimate capacity of 8,000,000 tons of rock per year will be less than 100 tons.

We wish also to point out that, regardless of any decision on federal permitting requirements, this project will definitely

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U.S. Environmental Protection Agency  
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require permits from the Florida Department of Environmental Regulation (DER). Permit applications sent to DER will be based on the emission rates and annual rock throughput quantities described in this letter. In addition, accompanying the DER permit applications will be an analysis to show compliance with Florida BACT and PSD regulations. We will be pleased to send you copies of applications and reports submitted to DER, and copies of permits issued by DER, should you wish verification of project emission limits at a later date.

We now request that you review the information in this letter and send to us an official determination on whether or not federal PSD review is needed. As you can appreciate, we would like to have this opinion as soon as possible. If we can be of any further assistance in helping you reach a decision, please call.

Sincerely,



Robert D. Stephens  
Environmental Engineer  
South Fort Meade

RDS/ec

Attachment

cc: Mr. Steve Smallwood, ✓  
Fla. Dept. of Env. Reg.

AIR QUALITY ASPECTS  
OF MOBIL CHEMICAL  
COMPANY'S PROPOSED  
PHOSPHATE ROCK PORT FACILITY  
AT PORT MANATEE, FLORIDA

PROJECT DESCRIPTION

Mobil Chemical Company is planning to develop a port facility for shipment of dry phosphate rock. This facility will be located at Port Manatee, Florida, in northern Manatee County (see Figure 1 and Figure 2). Dry phosphate rock will be transported to the port facility by rail where it will be unloaded, conveyed to a storage building, and then conveyed to a ship-loader for loading into freighters. A preliminary layout of the proposed facility is shown in Figure 3. The facility is being designed for an ultimate dry rock handling capacity of 8,000,000 tons per year.

EXISTING AIR QUALITY CONDITIONS

The only emissions of consequence from the proposed facility will be particulate matter emissions. Port Manatee is located in an area which is currently designated as in attainment with particulate matter ambient air quality standards. This condition of attainment has been verified during the past year by measurement results from three monitors operated for the Port Authority in the immediate vicinity of the Port. The nearest designated particulate nonattainment area is located in Hillsborough County, approximately 25 km from Mobil Chemical's proposed facility. The nearest Prevention of Significant Deterioration Class I area is the Chassahowitzka National Wilderness Area located about 110 km to the north.

AIR EMISSION SOURCES AND CONTROLS

Dry phosphate rock will arrive at the port facility by rail and unloaded using a rotary railcar dumper. The dumper area will be enclosed, and dust laden air will be drawn through a baghouse at a flow rate of 100,000 actual cubic feet per minute (acfm). (This emission point is designated as No. 101 in Table 1.)

Unloaded rock will then be conveyed to the storage building over a moving conveyor belt with one transfer station. Fugitive dust control will be achieved by total enclosure of the conveyor line. Control of emissions at the transfer station will be achieved through use of a baghouse with a flow rate of 15,000 acfm (Emission Point No. 102).

Dry rock storage will be within a totally enclosed building. Operating inside the building will be two stacker/reclaimer units. Each stacker/reclaimer will be equipped with a 30,000 acfm baghouse to minimize dust generation at the point of pickup



and discharge. Exterior to the building will be a 100,000 acfm baghouse to control emissions to the atmosphere (Emission Point No. 103). The entire building will be under negative pressure and will be vented through the exterior baghouse. Maintaining a negative pressure and using a double-door entrance mechanism will virtually eliminate any fugitive dust emissions associated with rock storage.

Rock is transferred from the storage building to the shiploader over a conveyor system with two transfer stations. The conveyor lines will be totally enclosed to control fugitive emissions, and transfer station emissions will be controlled by two baghouses having a flow rate of 15,000 acfm each (Emission Points No. 104 and 105).

The final point on the rock transfer circuit is the ship loading area. A traveling shiploader will transfer rock from the conveyor to the holds of a freighter at berth. The shiploader will be equipped with a telescoping chute for accurate rock delivery. Most of the hold hatch area will be covered by a tarpaulin to minimize fugitive dust losses, and air escaping through the small opening required for loading will be drawn through a baghouse on the shiploader with a flow rate of 50,000 (Emission Point No. 106).

All of the baghouses used for point source dust control are expected to achieve a collection efficiency of 99.8 percent based on a maximum inlet particulate loading of 10 grains per dry standard cubic foot (gr/dscf). The resultant outlet loading will be 0.02 gr/dscf ( $2.9 \times 10^{-6}$  lb/dscf).

At an annual throughput capacity of 8,000,000 tons of rock per year and an instantaneous handling rate of 3,000 tons per hour, the proposed port facility will be in operation 2,667 hours per year. Operation will therefore be intermittent but is expected to be fairly evenly distributed throughout the year.

Table 1 presents a summary of emission source data with particulate emission rates expressed on both a pounds per hour (lb/h) and tons per year (ton/yr) basis. The ton/yr figures are based on a design throughput capacity of 8,000,000 rock tons per year, and can be obtained from the hourly emission rates using the operating factor of 2,667 hours per year.

Emissions from the storage building should be no greater than those from the rotary railcar dumper since the same size baghouse will be used in both cases and the inlet particulate loading on the storage building baghouse will be no greater than that on the railcar dumper baghouse. In fact, emissions from the storage building are likely to be even less than those from the railcar dumper because baghouses on the two stacker/reclaimer units inside the storage building should act to reduce the dust loading on the exterior baghouse and therefore to reduce emissions.

TABLE 1  
EMISSION SOURCE SUMMARY

Emission Point	Particulate Emission Rate <sup>a</sup>		Stack Height (ft)	Stack Diameter (ft)	Exit Velocity (ft/s)	Exit Flow Rate (acfm)	Exit Temperature (°F) <sup>b</sup>
	Tb/h	ton/yr					
101	16.0	21.3	125	7.14	41.6	100000	105
102	2.3	3.1	65	2.75	42.1	15000	105
103	16.0 <sup>c</sup>	21.3	125	7.14	41.6	100000	105
104	2.3	3.1	65	2.75	42.1	15000	105
105	2.3	3.1	65	2.75	42.1	15000	105
106	7.7	10.3	75	5.0	42.4	50000	105
TOTAL	46.6	62.2					

<sup>a</sup> Annual emission rates are based on an operating schedule of 2667 hours per year.

<sup>b</sup> Exit temperatures will be slightly above ambient due to air compression in baghouse fans and heat transfer from the warm rock.

<sup>c</sup> Actual emissions from the storage building are likely to be less than this. See discussion in text.

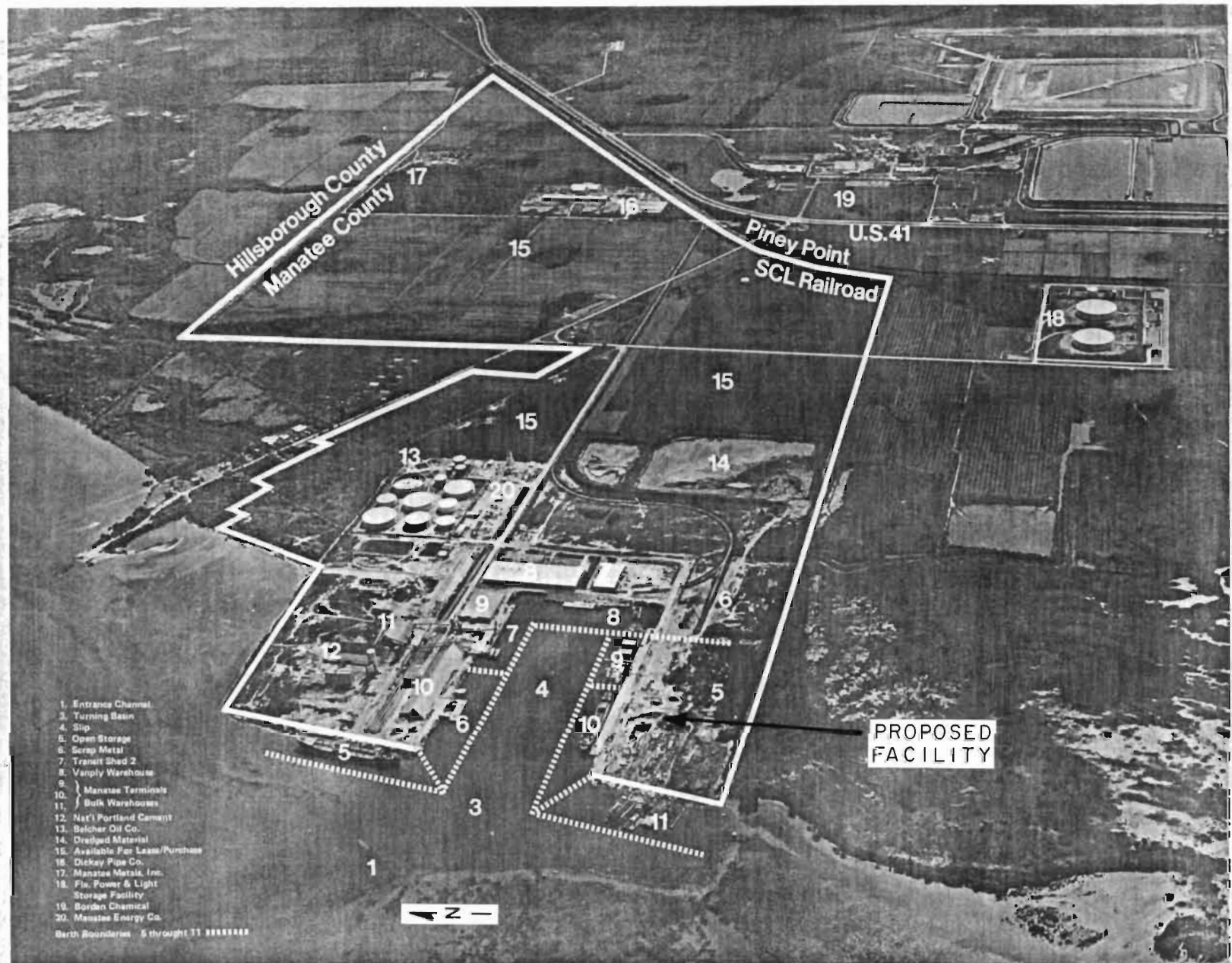


Figure 2. Location of Mobil Chemical's Proposed Port Facility - Local Scale.

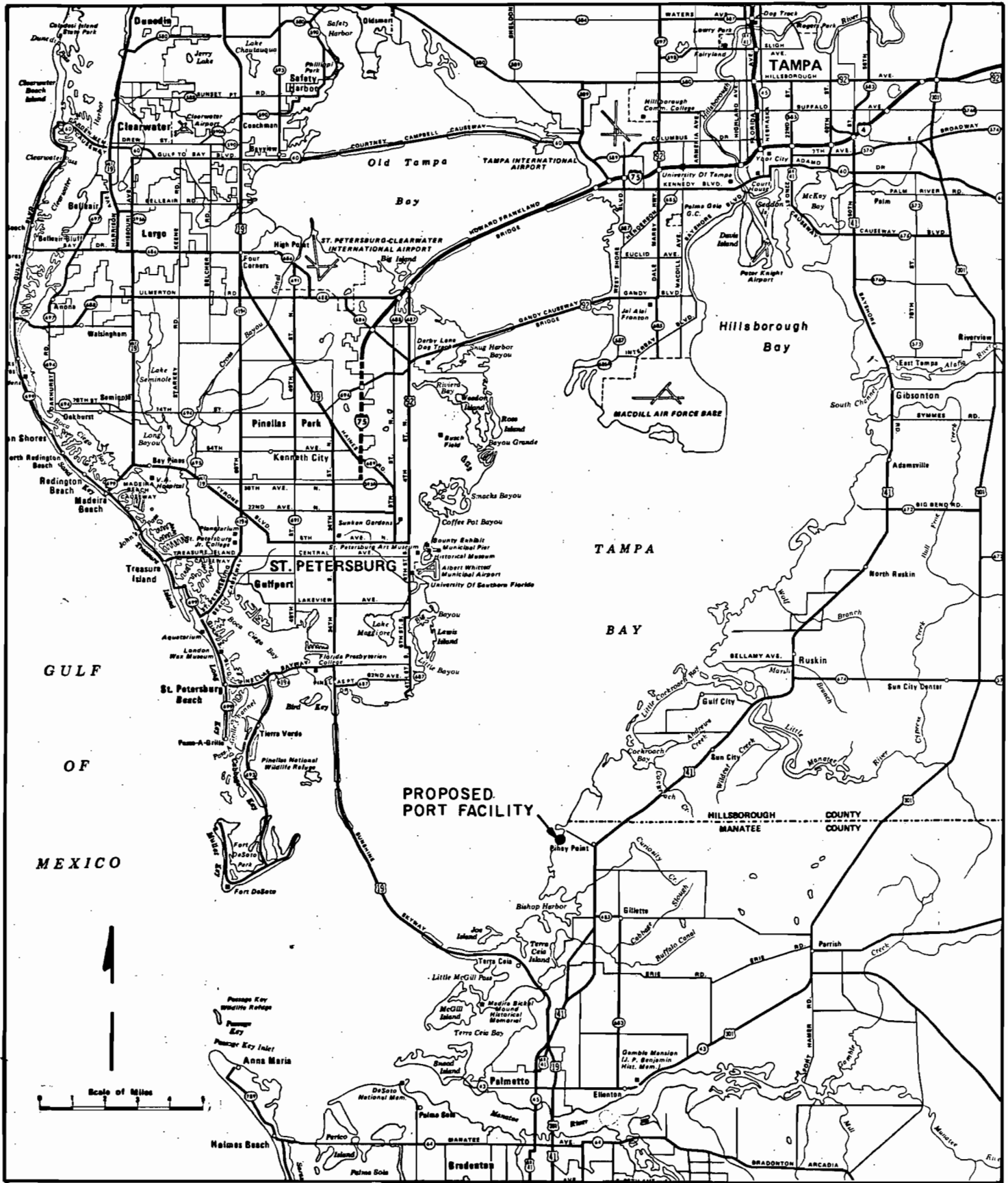


Figure 1. Location of Mobil Chemical's Proposed Port Facility - Regional Scale.