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ENVIRONMENTAL SERVICES

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Mr. Bobby Bull
Florida Department of
Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2400

KA 124-03-07

May 18, 2005

RECEIVED
MAY 20 2005
BUREAU OF AIR REGULATION

Subject: Comments on Draft Permits
Mosaic Phosphates Company – South Pierce Plant
File Nos. 1050055-014-AV and 1050055-015-AC

Dear Mr. Bull:

The following comments and concerns are submitted in response to FDEP's above referenced draft construction and Title V permits:

DRAFT CONSTRUCTION PERMIT

1. Public Notice

Please remove the referenced to MAP/DAP plant from the facility description.

2. Section I, General Information

Please remove the referenced to MAP/DAP plant from the facility description.

3. Section II, Condition 21

This permit needs to reflect 30 days of operation, as previously permitted, to allow for the 15-day notice and the required testing at higher rates.

4. Section III, Facility Description

Please remove the referenced to MAP/DAP plant from the facility description.

DRAFT TITLE V PERMIT

5. Public Notice

Please remove the referenced to MAP/DAP plant from the facility description.

6. Statement of Basis, Paragraph 5

Please remove the referenced to MAP/DAP plant from the facility description.

7. Table of Contents

The list of Insignificant Units (Appendix I-1) needs to be included in the permit.

8. Section I, General Information

- a. Please remove the referenced to MAP/DAP plant from the facility description.
- b. Regarding the reference to 40 CFR 63, Subparts A, AA and BB, please add the qualifier "as applicable" when a provision is not specifically listed.
- c. It is suggested that EU 050, incorrectly listed as unregulated on Page 3, be added to the list of other sulfur system emission units.

9. Section II, General Provisions

- a. Regarding annual testing, it should be clarified that testing may be conducted during the federal fiscal year and any specific dates are for planning purposes only. Alternatively, in view of such a general condition the redundant conditions B11, C7, D7 and E10, can be eliminated.
- b. A general condition may be added for the 15-day notice prior to testing, and eliminate the redundant conditions A8, B10, C6, D6, E9, F8, G6, H6 and J13.
- c. A general condition may be added stating FDEP can require testing if there is reason to believe that an emission standard is being violated, and eliminated the redundant conditions A13, B15, C10, D10, E14, F11, G10, H11 and J14.
- d. A general condition may be added for test report requirements, and eliminate the redundant conditions A17, B22, C19, D13, E19, F14, G13, H13 and J16.

10. Section II, Condition 9

This permit needs to reflect 30 days of operation, as previously permitted, to allow for the 15-day notice and the required testing at higher rates.

11. Section II, Condition 13

This condition should be deleted as it is appropriately presented in the emission unit specific conditions.

12. Section II, Condition 14

It should be clarified, as in the previous permit, that for the purposes of the recording and reporting requirements, monthly reflects beginning of each month and quarterly reflects the beginning of each calendar quarter.

13. Section II, Conditions 15 and 18

For purposes of the annual Statement of Compliance, please clarify what would constitute non-compliance relative to CAM and MACT requirements, specifically addressing excursions, exceedance and their respective corrective actions.

14. Section III, Subsection A.

The boiler has not yet been reconstructed, as allowed by the construction permit. Accordingly, it should be clarified that the NSPS related provisions, reflected in the rule applicability as well as in several specific conditions, are applicable only upon completion of boiler reconstruction.

15. Section III, Specific Condition A4

This condition should be deleted as it is not applicable to the boiler.

16. Section III, Specific Condition B14

This condition should allow for calculations using an electronic data system. The conversion factor can thus be calculated with each reading. This approach was originally included in the regulation as a means of interpreting strip charts, etc.

17. Section III, Subsection C.

Please add a note to indicate that the Subpart T, BACT determination and the Subpart AA emission limitations are the same.

18. Section III, Subsection C, Description

The description should reflect that there are two packed bed, cross-flow scrubbers.

19. Section III, Specific Conditions C11, C12, C13

- a. These conditions may need to be revised in consideration of MACT requirements, if MACT is applicable.
- b. In C11, it should be clarified that electronic media recording is also allowed, in addition to strip charts, etc.

20. Section III, Specific Condition C16

The monitoring device accuracy should reflect ± 10 percent, to be consistent with 62-297.310(5)(b), FAC.

21. Section III, Specific Condition C20

Please identify what FDEP considers as reasonable precautions to minimize and control the generation of fugitive fluoride emissions.

22. Section III, Specific Condition D11

This condition may need to be deleted or revised in consideration of the CAM requirements.

23. Section III, Specific Condition E17

- a. This condition may need to be revised in consideration of MACT requirements, if MACT is applicable.
- b. It should be clarified that electronic media recording is also allowed, in addition to strip charts, etc.

24. Section III, Specific Conditions F12, F13

- a. These conditions may need to be revised in consideration of MACT requirements, if MACT is applicable.
- b. In F13, it should be clarified that electronic media recording is also allowed, in addition to strip charts, etc.

25. Section III, Subsection H, Description

- a. The reference to rail unloading and the railcar unloading pit should be deleted.

b. It is suggested that EU 050, which is part of the molten sulfur system, be included in this section and Subsection J should be deleted.

c. Also, it is requested that truck unloading into the transfer pit (EU 050) be allowed in case the normal truck unloading stations cannot be used for any reason.

26. Section III, Specific Condition H3

The reference to rail pit should be deleted.

27. Section III, Specific Condition H8

This condition should be deleted as it no longer applies.

28. Section III, Specific Condition H9

The test duration should reflect 30 minutes, as indicated in Specific Condition H10.

29. Section III, Subsection J

EU 050 should be transferred to Subsection H; and, Subsection J should be deleted.

30. CAM Plan

Based on clarifications received from FDEP staff last week, the applicability of the CAM plan has been closely re-evaluated. Based on the re-evaluation, this facility is not subject to CAM requirements. This determination mirrors FDEP's recent final determination for a similar facility with almost identical applicability criteria.

a. The No. 2 Ball Mill Grinding System utilizes a bag collector that is used for material recovery. All the material collected in the bag collector is returned to the process. As there is no dedicated (or designated) particulate matter emission control equipment, CAM requirements do not apply.

b. The GTSP Production Plant utilizes cyclones that collect particulate matter and return the collected material to the process. The plant, subject to a fluoride emissions standard, utilizes wet scrubbers to control fluoride emissions. As there is no dedicated (or designated) particulate matter emission control equipment, CAM requirements do not apply.

c. As the GTSP East Storage Building is subject to a fluoride emissions standard, it utilizes wet scrubbers to control fluoride emissions. As there is no dedicated (or designated) particulate matter emission control equipment, CAM requirements do not apply.

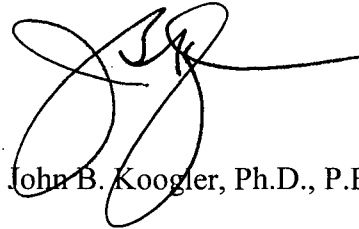
Mr. Bobby Bull
Florida Department of
Environmental Protection

May 18, 2005

If you have any additional questions, please call Pradeep Raval.

Very truly yours,

KOOGLER & ASSOCIATES

A handwritten signature in black ink, consisting of a large, stylized 'J' and 'K' intertwined, with a horizontal line extending to the right.

John B. Koogler, Ph.D., P.E.

JBK:par
Encl.

C: J. Golwitzer, Mosaic
C. D. Turley, Mosaic