

Department of Environmental Protection

Lawton Chiles
Governor

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Virginia B. Wetherell
Secretary

NOTICE OF PERMIT

In the matter of an
Application for Permit by:

DEP File No. 0570008-004-AC
PSD-FL-231
Hillsborough County

Ms. Melody Russo
Environmental Superintendent
Cargill Fertilizer, Inc.
8813 Highway 41 South
Riverview, Florida 33569

Enclosed is Permit Number 057008-004-AC (PSD-FL-231) for an increase in the combined total production rate of the Nos. 3 and 4 phosphoric acid plants from 139 to 170 tons per day at Cargill's facility located in Riverview in Hillsborough County, Florida, issued pursuant to Chapter 403, Florida Statutes (F.S.).

Any party to this Order (permit) has the right to seek judicial review of the permit pursuant to Section 120.68, F.S., by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the Department in the Office of General Counsel, 3900 Commonwealth Boulevard, Mail Station 35, Tallahassee, Florida 32399-3000; and by filing a copy of the Notice of Appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The Notice of Appeal must be filed within 30 days from the date this Notice is filed with the Clerk of the Department.

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION

C. H. Fancy, P.E., Chief
Bureau of Air Regulation
2600 Blair Stone Road
Tallahassee, FL 32399-2400
904-488-1344

Notice of Permit
Cargill Fertilizer, Inc.
Page Two

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this NOTICE OF PERMIT was mailed by certified mail (*) and that all copies were mailed by U.S. mail before the close of business on 8-27-96 to the listed persons.

Ms. Melody Russo, Cargill (*)
Ms. Jewell Harper, EPA
Mr. John Bunyak, NPS
Mr. Bill Thomas, SWD
Mr. Jerry Campbell, EPCHC
Mr. David Buff, P.E., KBN

Clerk Stamp

FILING AND ACKNOWLEDGMENT
FILED, on this date,
pursuant to §120.52(11),
Florida Statutes, with the
designated Department Clerk,
receipt of which is hereby
acknowledged.

Huni Ober 8-27-96
Clerk Date

P 339 251 147

US Postal Service

Receipt for Certified Mail

No Insurance Coverage Provided.

Do not use for international Mail (See reverse)

| | |
|---|----|
| Sent to: <i>Melody Kusso</i> | |
| Street & Number: <i>Cargill</i> | |
| Post Office, State, & ZIP Code: <i>Riverview, FL</i> | |
| Postage | \$ |
| Certified Fee | |
| Special Delivery Fee | |
| Restricted Delivery Fee | |
| Return Receipt Showing to Whom & Date Delivered | |
| Return Receipt Showing to Whom, Date, & Addressee's Address | |
| TOTAL Postage & Fees | \$ |
| Postmark or Date <i>E-27-96</i> | |
| <i>057000E-004-AL</i> | |
| <i>PSD-FL-231</i> | |

PS Form 3800 April 1995

RETURN ADDRESS completed on the reverse side?

SENDER:

- Complete items 1 and/or 2 for additional services.
- Complete items 3, and 4a & b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):

- Addressee's Address
- Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:
Melody Kusso, Encl. Sept
Cargill Fertilizer
8813 Hwy 41 South
Riverview, FL 33569

4a. Article Number
P339 251 147

- 4b. Service Type
- | | |
|---|---|
| <input type="checkbox"/> Registered | <input type="checkbox"/> Insured |
| <input checked="" type="checkbox"/> Certified | <input type="checkbox"/> COD |
| <input type="checkbox"/> Express Mail | <input type="checkbox"/> Return Receipt for Merchandise |

7. Date of Delivery
8/29/96

5. Signature (Addressee)
Melody Kusso

8. Addressee's Address (Only if requested and fee is paid)

6. Signature (Agent)

Thank you for using Return Receipt Service.

3811

Final Determination

Cargill Fertilizer, Inc.
Riverview, Florida
Production Increase to 170 TPH w/ New Scrubber
Nos. 3 & 4 Phosphoric Acid Plants

Permit Number
PSD-FL-231
0570008-004-AC

Florida Department of Environmental Protection
Division of Air Resources Management
Bureau of Air Regulation

August 23, 1996

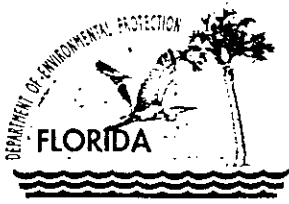
Final Determination
Cargill Fertilizer, Inc.
PSD-FL-231
0570008-004-AC

The Technical Evaluation and Preliminary Determination for a construction permit to increase the production rate of the Nos. 3 and 4 phosphoric acid plants from 139 to 170 tons P₂O₅ per hour and to install a new phosphoric acid filter scrubber at the applicant's facility in Riverview, Hillsborough County, Florida, was distributed on July 11, 1996. The Notice of Intent to Issue was published in The Tampa Tribune on July 21, 1996. Copies of the evaluation were available for public inspection at the Department's offices in Tallahassee and Tampa and the office of the Environmental Protection Commission of Hillsborough County.

No comments were received within the 30 day comment period. However a comment was received on August 22 from KBN who prepared the application for Cargill. They requested inclusion of language to clarify that the emission limits apply to the three reactor and filter scrubbers and not to non-NSPS sources such as fugitive emissions and emissions from tanks and clarifiers. The Department did not agree with the precise language proposed by KBN. However the Department will attach to the permit a letter dated September 15, 1995 which EPA previously sent to the Department defining the issue. KBN and the Department agree with the EPA's letter.

The permit is also being revised at the initiative of the Department to actually incorporate the approved BACT Determination rather than to only state that the permit also constitutes BACT.

The final action of the Department will be to issue the construction permit as proposed but with the clarifications noted.



Department of Environmental Protection

Lawton Chiles
Governor

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Virginia B. Wetherell
Secretary

PERMITTEE:
Cargill Fertilizer, Inc.
8813 Highway 41 South
Riverview, FL 33830

Permit Number: 0570008-004-AC
PSD-FL-231
Expiration Date: Dec. 31, 1997
County: Polk Hillsboro
Latitude/Longitude: 27°51'30"N
82°23'57"W
Project: Production Increase to
170 TPH w/New Scrubber

This permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Chapters 62-4, 62-204, 62-210, 212, 272, 275, 276, 296, and 297, Florida Administrative Code (F.A.C.). The above named permittee is hereby authorized to perform the work or operate the emission unit shown on the application and approved drawings, plans, and other documents attached hereto or on file with the Department of Environmental Protection (Department) and specifically described as follows:

For the increase in production of the Nos. 3 and 4 Phosphoric Acid plants from a total of 139 to 170 tons P₂O₅ per hour along with the construction of a packed scrubber for the No. 3 acid filter.

The facility is located at 8813 Highway 41 South, Riverview, Hillsborough County, Florida. The UTM coordinates are Zone 17: 362.9 km East and 3,082.5 km North.

The source shall be constructed in accordance with the permit application, plans, documents, amendments and drawings, except as otherwise noted in the General and Specific Conditions.

Attachments are listed below:

1. DEP letter dated October 12, 1995.
2. EPCHC letter dated November 2, 1995.
3. KBN letter dated November 13, 1995.
4. DEP letter dated November 28, 1995.
5. Cargill letter dated January 3, 1996.
6. DEP letter dated January 11, 1996.
7. KBN letter dated April 15, 1996.
8. KBN letter dated May 9, 1996.
9. KBN letter dated May 31, 1996.
10. DEP letter dated June 13, 1996.
11. KBN letter dated June 21, 1996.
12. KBN letter dated August 22, 1996.
13. EPA letter dated September 15, 1995.
14. Department BACT Determination.

PERMITTEE:
Cargill Fertilizer, Inc.

Permit Number: 0570008-004-AC
PSD-FL-231
Expiration Date: Dec. 31, 1997

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 403.727, or 403.859 through 403.861, F.S. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.
2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.
3. As provided in Subsections 403.087(6) and 403.722(5), F.S., the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither 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. This permit is not a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.
4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and does not constitute authority for the use 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.
5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.
6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.
7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of

PERMITTEE:
Cargill Fertilizer, Inc.

Permit Number: 0570008-004-AC
PSD-FL-231
Expiration Date: Dec. 31, 1997

GENERAL CONDITIONS:

credentials or other documents as may be required by law and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:

- a. Have access to and copy any records that must be kept under the conditions of the permit;
- b. Inspect the facility, equipment, practices, or operations regulated or required under this permit; and
- c. Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

8. 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 provide the Department with the following information:

- a. a description of and cause of non-compliance; and
- b. the period of noncompliance, including 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 for revocation of this permit.

9. 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 involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by Sections 403.73 and 403.111, F.S. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

10. The permittee agrees to comply with changes in Department rules and F.S. after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.

PERMITTEE:
Cargill Fertilizer, Inc.

Permit Number: 0570008-004-AC
PSD-FL-231
Expiration Date: Dec. 31, 1997

GENERAL CONDITIONS:

11. This permit is transferable only upon Department approval in accordance with Rules 62-4.120 and 62-30.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.

12. This permit or a copy thereof shall be kept at the work site of the permitted activity.

13. This permit also constitutes:

- (X) Determination of Best Available Control Technology (BACT). Attached and incorporated into this permit
- (X) Determination of Prevention of Significant Deterioration (PSD)
- (X) Compliance with New Source Performance Standards (NSPS)

14. The permittee shall comply with the following:

- a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
- b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.
- c. Records of monitoring information shall include:
 - the date, exact place, and time of sampling or measurements;
 - the person responsible for performing the sampling or measurements;
 - the dates analyses were performed;
 - the person responsible for performing the analyses;
 - the analytical techniques or methods used; and
 - the results of such analyses.

PERMITTEE:
Cargill Fertilizer, Inc.

Permit Number: 0570008-004-AC
PSD-FL-231
Expiration Date: Dec. 31, 1997

GENERAL CONDITIONS:

15. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

SPECIFIC CONDITIONS:

1. Unless otherwise indicated, the construction and operation of the subject phosphoric acid production facility shall be in accordance with the capacities and specifications stated in the application.

2. Pursuant to Rule 62-210.200(223), F.A.C., the production rate of the Nos. 3 and 4 Phosphoric Acid Plants combined shall not exceed 170 tons P₂O₅ per hour.

3. Pursuant to Rule 62-210.200(223), F.A.C., the Nos. 3 and 4 Phosphoric Acid Plants may operate up to 8760 hours per year.

4. Pursuant to Rule 62-212.400, F.A.C. and as detailed in the attached BACT Determination, total fluoride emissions from the Nos. 3 and 4 Phosphoric Acid Plant reactor and filter shall not exceed 2.29 lbs/hr and 10.03 TPY.

5. Pursuant to Rule 62-297.310(7)(a)1., F.A.C., and before this construction permit expires, testing for fluorides shall be conducted simultaneously on the three reactor and filter scrubber stacks with the emission unit operating at permitted capacity. Permitted capacity is defined as 90-100 percent of the maximum operating rate allowed by the permit. If it is impracticable to test at permitted capacity, then the emission unit may be tested at less than capacity (i.e., less than 90 percent of maximum operating rate allowed by the permit); in this case, subsequent emission unit operation is limited to 110 percent of the test load until a new test is conducted. Once the emission unit is so limited, then operation at higher capacities is allowed for no more than 15 consecutive days for the purposes of additional compliance testing to regain the permitted capacity in the permit.

6. Pursuant to Rule 62-297.310(7)(a)9., the Department's Southwest District office shall be notified at least 15 days prior to source testing. Pursuant to Rule 62-297.310(8)(a) and (b), written reports of the test results shall be submitted to that office within 45 days of test completion.

PERMITTEE:
Cargill Fertilizer, Inc.

Permit Number: 0570008-004-AC
PSD-FL-231
Expiration Date: Dec. 31, 1997

SPECIFIC CONDITIONS:

7. Pursuant to Rule 62-297.401, F.A.C., the test procedures for fluorides, shall be in accordance with EPA Reference Methods 1, 2, 3, and 13A or 13B, respectively, as published in 40 CFR 60, Appendix A.

8. Pursuant to Rule 62-296.320(2), F.A.C., Objectionable Odor Prohibited, no person shall cause, suffer, allow, or permit the discharge of air pollutants which cause or contribute to an objectionable odor.

9. Pursuant to Rule 62-210.650, F.A.C., Circumvention, no person shall circumvent any air pollution control device, or allow the emission of air pollutants without the applicable air pollution control device operating properly.

10. Pursuant to Rule 62-210.700, Excess Emissions, the Nos. 3 and 4 plants are subject to the following:

a. Rule 62-210.700(1): Excess emissions resulting from startup, shutdown or malfunction of any source shall be permitted providing (1) best operational practices to minimize emissions are adhered to and (2) the duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration.

b. Rule 62-210.700(4): Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during startup, shutdown, or malfunction shall be prohibited.

c. Rule 62-210.700(6): In case of excess emissions resulting from malfunctions, each source shall notify the Department or the appropriate Local Air Program in accordance with Rule 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the Department.

11. Pursuant to Rules 62-210.370(2)(a) and (b), F.A.C., the permittee shall submit an Annual Operating Report to the Department's Southwest District office.

PERMITTEE:
Cargill Fertilizer, Inc.

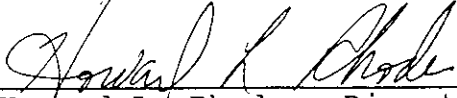
Permit Number: 0570008-004-AC
PSD-FL-231
Expiration Date: Dec. 31, 1997

SPECIFIC CONDITIONS:

12. Pursuant to Rule 62-4.090, F.A.C., the permittee, for good cause, may request that this construction permit be extended. Such a request shall be submitted to the Bureau of Air Regulation prior to 60 days before the expiration of the permit.

13. An application for a Title V operation permit required under Chapter 62-213 F.A.C. must be submitted to the Southwest District office at least 90 days prior to the expiration date of this construction permit. To properly apply for a Title V operation permit, the applicant shall submit the appropriate application form with certification that construction was completed noting any deviations from the conditions in the construction permit, and compliance test reports as required by this permit.

STATE DEPARTMENT OF
ENVIRONMENTAL PROTECTION


Howard L. Rhodes, Director
Division of Air Resources
Management

Best Available Control Technology (BACT) Determination
Cargill Fertilizer, Inc.
Riverview, Hillsborough County, Florida
PSD-FL-231
0570008-004-AC

The applicant proposes to increase phosphoric acid production from 139 tons P₂O₅ per hour (TPH) to 170 TPH for the Nos. 3 and 4 Phosphoric Acid Plants at the applicant's existing phosphate fertilizer facility at 8813 Highway 41 South in Riverview. The modification of the facility, as proposed by the applicant, would result in a significant increase in emissions of gaseous fluorides (SiF₄ and HF). Therefore, the modification is subject to Prevention of Significant Deterioration (PSD) review in accordance with Rule 62-212.400, Florida Administrative Code (F.A.C.). The BACT determination is part of the review required by the same rule.

Date of Receipt of BACT Application: September 26, 1995

BACT Determination Proposed by Applicant:

Emission Limit: 0.016 lb F/ton P₂O₅ input

Control Technology: One existing spray/packed crossflow scrubber and one existing venturi/packed bed scrubber plus a new packed section added to an existing venturi scrubber with demister. All scrubbers using recycled pond water.

BACT Determined by DEP:

Emission Limit: 0.0135 lb F/ton P₂O₅ input

Control Technology: Same as proposed by applicant

BACT Determination Rationale:

In its BACT determination for the Cargill Bartow phosphoric acid plant (PSD-FL-224) issued in 1995, the Department addressed the need for an increase in allowable fluoride emission rates when a phosphoric acid plant increases production (Page 8):

"The Department questions the assumption of direct variability of fluoride emissions with production on a theoretical basis as well. Evolution of gaseous fluorides should not increase proportionately from a liquid-air interface where the liquid bulk throughput goes up but there is not a proportionate increase in the concentration or vapor pressure driving forces or the surface area available for mass transfer. There will be an increase in reactor temperature with higher input rates, but it should not account for a proportionate impact on mass transfer driving forces. The rate of evacuation from the vessel surfaces (air flow rate pulled across the top of

the tank for evacuation) will affect the rate of fluoride evolution due to the saturation of more air with fluoride vapors, however, the air flow will not be increased at the higher production rate. Therefore, there is no apparent theoretical mechanism on which to base the assumption that fluoride emissions will go up in direct proportion to production."

The Bartow project involved adding a new filter to two existing phosphoric acid plants that had been combined to form one large unit, as was done with the Riverview facility in 1991. The Department established a BACT limit of 0.0135 lb F/ton P₂O₅ for the Bartow plant. That limit was weighted based on a combination of new and existing control equipment. Essentially the same process and control equipment and capacity now exists for the Riverview and Bartow plants, justifying the same fluoride emission limit for both.

BACT Determination Procedure:

In accordance with F.A.C. Chapter 62-212, this BACT determination is based on the maximum degree of reduction of each pollutant emitted which the Department, on a case by case basis, taking into account energy, environmental and economic impacts, and other costs, determines is achievable through application of production processes and available methods, systems, and techniques. In addition, Rule 62-212.400(6), F.A.C., states that in making the BACT determination the Department shall give consideration to:

- (a) Any Environmental Protection Agency determination of Best Available Control Technology pursuant to Section 169, and any emission limitation contained in 40 CFR Part 60 (Standards of Performance for New Stationary Sources) or 40 CFR Part 61 (National Emission Standards for Hazardous Air Pollutants).
- (b) All scientific, engineering, and technical material and other information available to the Department.
- (c) The emission limiting standards or BACT determinations of any other state.
- (d) The social and economic impact of the application of such technology.

BACT
Cargill Fertilizer, Inc.
Page Three

The EPA currently stresses that BACT should be determined using the "top-down" approach. The first step in this approach is to determine for the emission source in question the most stringent control available for a similar or identical source or source category. If it is shown that this level of control is technically or economically infeasible for the source, then the next most stringent level of control is determined and similarly evaluated.

This process continues until the BACT level under consideration cannot be eliminated by any substantial or unique technical, environmental, or economic objections.

Conclusion:

The environmental effects from fluoride emissions due to the proposed modification are not expected to have any adverse impact in the vicinity of the applicant's facility. The proposed limit reflects a reduction in allowable emissions. Therefore, it is concluded that the control equipment and emission limit proposed by the Department represents the best available control technology.

BACT Analysis Details Available From:

John Reynolds, Review Engineer
A. A. Linero, P.E., Administrator
New Source Review Section
Bureau of Air Regulation
111 South Magnolia Drive
Tallahassee, Florida 32399-2400

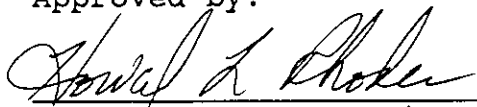
Recommended by:



C. H. Fancy, P.E., Chief
Bureau of Air Regulation

August 26, 1996
Date

Approved by:



Howard L. Rhodes, Director
Division of Air Resources
Management

8 / 26, 1996
Date

ATTACHMENTS AVAILABLE UPON REQUEST



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET, N.E.
ATLANTA, GEORGIA 30365

10/17/95

4APT-AEB

SEP 15 1995

Mr. C. H. Fancy, P.E.
Chief, Bureau of Air Regulation
Florida Department Of Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400

RE: New Source Performance Standards (NSPS)-Subpart T
Phosphate Fertilizer Industry: Wet-Process Phosphoric
Acid Plants

Dear Mr. Fancy:

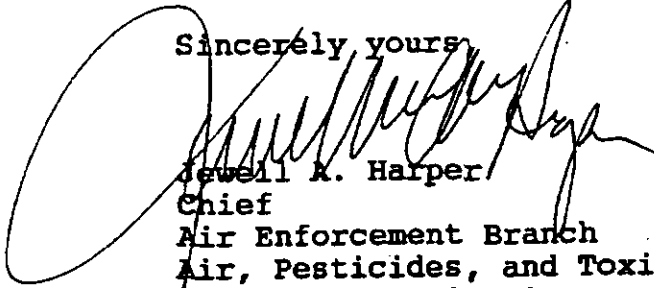
On May 25, 1995, we received a letter from KBN Engineering and Applied Sciences, Inc. (KBN) regarding a determination which we made on August 11, 1988, concerning the New Source Performance Standards (NSPS) for Subpart T - Standards of Performance for the Phosphate Fertilizer Industry: Wet-Process Phosphoric Acid Plants. Our August 11, 1988, letter was sent to the Hillsborough County Environmental Protection Commission in response to a June 16, 1988, letter we had received from them concerning Gardinier, Inc. in Gibsonton, Florida. A copy of this correspondence is enclosed for your review. The letter we have received from KBN relates to the emission sources which are components of an affected facility and requests clarification concerning the determination which was made in reference to Gardinier, Inc. Based on our further review of this issue, we have determined that our August 11, 1988, letter regarding emission sources which are included in an affected facility is partially incorrect. Because of the importance of this issue and its connection to Title V permitting requirements, we are bringing it to your attention.

As stated in the Subpart T regulations at 40 CFR Part 60.200(a), an affected facility includes any combination of reactors, filters, evaporators, and hot wells. Further clarification regarding the sources which are regulated in an affected facility is provided in the Federal Register, Vol. 40, No. 152, August 6, 1975, which states that any sources not listed in the regulation are not components of an affected facility and are not covered by the standard for fluorides. Therefore, sources such as clarifiers, phosphoric acid storage tanks, and evaporator feed tanks are not included in the affected facility and are not subject to the standards for fluorides specified in the Subpart T regulations.

The determination provided in our August 11, 1988, letter that phosphoric acid plant Nos. 3 and 4 at Gardinier are considered to be parts of one affected facility subject to 40 CFR Part 60, Subpart T, remains intact. The definition of an affected facility is any combination of reactors, filters, evaporators, and hot wells. At the Gardinier facility, plant Nos. 3 and 4 are two reactors which utilize common filters, evaporators, and hot wells, and the two plants are considered to be in the same affected facility.

If there are any questions regarding the contents of this letter, please contact Keith Goff of my staff at (404)347-3555, extension 4141.

Sincerely yours,



Jewell A. Harper
Chief
Air Enforcement Branch
Air, Pesticides, and Toxics
Management Division

Attachments

cc: Mr. Iwan Choronenko, Director
Hillsborough County Environmental Protection Commission

Mr. Jerry Campbell
Hillsborough County Environmental Protection Commission

✓ Mr. Dave Buff, P.E.
KBN Engineering and Applied Sciences, Inc.