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January 15, 1999

Mr. John Reynolds  
Florida Department of Environmental Protection  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Dear Mr. Reynolds:

Re: Cargill Fertilizer, Inc. - Riverview Facility  
Phosphoric Acid Production Plant, Permit No. 0570008-004-AC

PSD-FI-231

This letter is in response to our conversations on January 7 and January 13, 1999 regarding the above-mentioned plant at Cargill's Riverview facility. The most current permit for the Phosphoric Acid Plant was issued by your office August 1996 and allowed Cargill to increase production to 170 TPH  $P_2O_5$ . Two reactors (Dorrco and Prayon) and three filters (#1, 2, and 3 Filters) along with other equipment make up the Phosphoric Acid Production Plant. Originally, the Prayon reactor fed the #1 filter and the Dorrco reactor feed the #2 filter. The modification for the production increase allowed the Prayon reactor to feed the #3 Filter and the Dorrco reactor to feed the #1 and #2 Filters, as was presented in the latest construction permit application. Cargill would like to correct the construction permit application to allow for the Prayon reactor to resume feeding the #1 Filter.

The emissions from the Phosphoric Acid Plant are controlled by three scrubbers with an emissions limit of 2.29 lb/hr combined. Feeding either the #3 Filter or the #1 Filter from the Prayon reactor will only increase flexibility, and will not effect production. The Phosphoric Acid Plant is operating at maximum production currently, the last compliance test (January 7, 1999) was conducted at 90% of the permitted maximum. The current permit does not restrict flows individually from the reactors to the filters and for this reason Cargill does not feel that this clarification requires a permit modification.



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Cargill plans to operate with this flexibility beginning in March of 1999. If you have any questions or require additional information, please call me at (813) 671-6369 or email me at [kathy\\_edgemon@cargill.com](mailto:kathy_edgemon@cargill.com).

Sincerely,



Kathy Edgemon  
Environmental Engineer

cc: Jellerson  
File P-20-3



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