

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
NOTICE OF FINAL PERMIT

In the Matter of an
Application for Permit


Ms. Melody Russo
Cargill Fertilizer, Incorporated
8813 Highway 41 South
Riverview, Florida 33569

DEP File No. 0570008-013-AC
PSD-FL-234

Enclosed is the FINAL Permit Number PSD-FL-234. This permit is issued for the construction of a second animal feed ingredient plant and to revise permitted emission limits for the existing animal feed ingredient plant. This permit is issued pursuant to Section 403, Florida Statutes.

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 Legal Office; 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 (thirty) days from the date this Notice is filed with the Clerk of the Department.

Executed in Tallahassee, Florida.


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

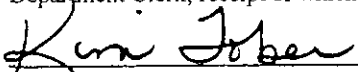
CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this NOTICE OF FINAL PERMIT (including the FINAL permit) was sent by certified mail (*) and copies were mailed by U.S. Mail before the close of business on 6-12-97 to the person(s) listed:

Ms. Melody Russo, Cargill Fertilizer, Inc. *
Mr. David Buff, P.E., Golder Associates
Mr. Brian Beals, EPA
Mr. John Bunyak, NPS
Mr. Bill Thomas, SWD
Mr. Jerry Campbell, HCEPC

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date,
pursuant to §120.52(7), Florida Statutes, with the designated
Department Clerk, receipt of which is hereby acknowledged.


(Clerk) 6-12-97 (Date)

P 265 659 224

US Postal Service

Receipt for Certified Mail

No Insurance Coverage Provided.

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PS Form 3800, April 1995

| | |
|---|----|
| Sender | |
| Melody Russo | |
| Street & Number | |
| Cansler Fcrt. | |
| Post Office, State & ZIP Code | |
| Riverview, FL | |
| 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 | |
| 6-12-97 | |
| 0570008-013-AC | |
| P50-FL-234 | |

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SENDER:

- Complete items 1 and/or 2 for additional services.
- Complete items 3, 4a, and 4b.
- 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 Russo.
 Cansler Fcrt.
 8613 Hwy 41 South
 Riverview, FL 33569

4a. Article Number
 P 265 659 224

4b. Service Type
 Registered Certified
 Express Mail Insured
 Return Receipt for Merchandise COD

7. Date of Delivery
 6-11-97

5. Received By: (Print Name)
 Genevieve FRANKLIN

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

6. Signature: (Addressee or Agent)
 Genevieve Franklin

Thank you for using Return Receipt Service.

FINAL DETERMINATION

Cargill Fertilizer, Incorporated

Permit No. 0570008-013-AC, PSD-FL-234

Animal Feed Ingredient Plants

An Intent to Issue an air construction permit for Cargill Fertilizer, Inc., Animal Feed Ingredient Plants located in Riverview, Hillsborough county, Florida was distributed on May 15, 1997. The Notice of Intent was published in the Tampa Tribune on May 22, 1997. Copies of the draft construction permit were available for public inspection at the Department offices in Tampa and Tallahassee.

No comments were submitted by the National Park Service or the U.S. Environmental Protection Agency. Comments were submitted by the applicant concerning the Technical Evaluation and Preliminary Determination (TEPD), draft permit conditions, and Best Available Control Technology (BACT). The Department's responses are as follows:

TEPD: The Department concurs with the comments submitted by the applicant.

Draft Permit: The Department concurs with the comments submitted by the applicant except the request to delete the lb/ton limit for fluorides for both animal feed ingredient plants. The Department understands that the primary emission limit is 7.70 lb per batch, and if the facility is able to comply with that emission limit, then the lb/ton emission limit will always be complied with.

BACT: The Department responses are same as above for the Draft Permit.

The applicant requested that the final permit be issued prior to the expiration of the 30 day comment period in order to facilitate construction of the new animal feed ingredient plant. Cargill has agreed that the Department can amend the permit in consideration of comments received by June 22, 1997.

The final action of the Department will be to issue the permit as noted above.



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.,
Riverview Plant
8813 Highway 41 South
Riverview, Florida 33569**

| | |
|--------------------|-------------------|
| FID No.: | 0570008 |
| PSD No. | PSD-FL-234 |
| Permit No.: | 0570008-013-AC |
| SIC No. | 2874 |
| Expires: | December 31, 2000 |

Authorized Representative:
Melody Russo, Environmental Superintendent

LOCATED AT:

Cargill Fertilizer, Inc., Riverview Plant, Hillsborough County
Project: Fertilizer Manufacturing Facility
Animal Feed Ingredient Plants No. 1 & 2

UTM: Zone 17 ; 362.9 km E ; 3082.5 km N

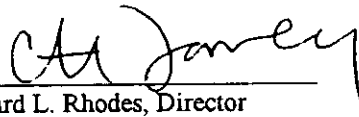
STATEMENT OF BASIS:

This construction permit is issued under the provisions of Chapter 403 of the Florida Statutes (F.S.), and the Florida Administrative Code (F.A.C.) Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297. The above named permittee is authorized to modify the facility in accordance with the conditions of this permit and as described in the application, approved drawings, plans, and other documents on file with the Department of Environmental Protection (Department).

Attached appendices made a part of this permit:

Table 1-1
Table 2-1
Appendix BD
Appendix GC

Air Pollutants Standards and Term
Compliance Requirements
BACT Determination
Construction Permit General Conditions

for 
Howard L. Rhodes, Director
Division of Air Resources
Management

AIR CONSTRUCTION PERMIT 057008-013-AC

SECTION I. FACILITY INFORMATION

SUBSECTION A. FACILITY DESCRIPTION

This installation comprises an existing fertilizer manufacturing facility consisting of phosphoric acid plants, sulfuric acid plants, mono-ammonium phosphate plant, di-ammonium phosphate plant, animal feed ingredient (AFI) plant No. 1, etc. This project involves the addition of a second animal feed plant similar to the existing plant. The new plant will be designated as AFI Plant No. 2.

EMISSION UNITS

This permit addresses the following emission units:

| EMISSIONS UNIT NO. | EMISSIONS UNIT DESCRIPTION |
|--------------------|--------------------------------------|
| 078 | Common Stack Animal Feed Plant No. 1 |
| 079 | Diatomaceous Earth Silo |
| 080 | Limestone Silo |
| 081 | Animal Feed Plant Loadout System |
| 103 | Common Stack Animal Feed Plant No. 2 |

SUBSECTION B. REGULATORY CLASSIFICATION

This industry is listed in Table 62-212.400-1 of Chapter 62-212, F.A.C., "Major Facility Categories." Therefore, stack and fugitive emissions of over 100 tons per year of carbon monoxide, sulfur dioxide, nitrogen oxides, or particulate matter characterize the installation as a major facility subject to the requirements of Rule 62-204.800, F.A.C. This facility is a Title V source because it is in the list of the 28 Major Facility Categories Table 212.400-1, F.A.C.

SUBSECTION C. PERMIT SCHEDULE:

- (DATE) Petition for an administrative hearing
- 05-27-97 Received proof of publication in (DATE) issue of Newspaper
- 05-15-97 Issued second Notice of Intent to issue Permit
- 10-10-96 Issued Notice of Intent to issue Permit
- 08-16-96 Application deemed complete

AIR CONSTRUCTION PERMIT 057008-013-AC

SECTION II. EMISSION UNIT(S) COMMON SPECIFIC CONDITIONS

1.0 ADMINISTRATIVE

- 1.1 Regulating Agencies: All applications for permits to operate, reports, tests, minor modifications and notifications shall be submitted to the Hillsborough County Environmental Protection Commission (HCEPC) located at 1410 North 21 Street, Tampa, Florida 33605 and phone number (813) 272-5530. All applications for permits to construct or modify an emission unit(s) subject to the Prevention of Significant Deterioration requirements should be submitted to the Bureau of Air Regulation (BAR), Florida Department of Environmental Protection (FDEP) located at 2600 Blairstone Road, Tallahassee, Florida 32399-2400 and phone number (904) 488-1344. Please note that permitting activities are conducted by the FDEP while the HCEPC has delegated authority for compliance issues.
- 1.2 General Conditions: The owner and operators shall be aware of, and operate under, the attached General Permit Conditions G.1 through G.15 listed in *Appendix GC* of this permit. General Permit Conditions are binding and enforceable pursuant to Chapter 403 of the Florida Statutes. [Rule 62-4.160, F.A.C.]
- 1.3 Terminology: The terms used in this permit have specific meanings as defined in the corresponding chapter of the Florida Administrative Code.
- 1.4 Forms and Application Procedures: The permittee shall use the applicable forms listed in Rule 62-210.900, F.A.C. and follow the application procedures in Chapter 62-4, F.A.C. [Rule 62-210.900, F.A.C.]
- 1.5 Expiration: This air construction permit shall expire on December 31, 2000. [Rule 62-210.300(1), F.A.C.]
- 1.6 Application for Title V Permit: This air construction permit revises specific permit conditions to reflect the current applicable requirements and new BACT limits. Emissions stack testing that is required by this permit shall be performed to show compliance with all new applicable BACT limits. Therefore, the air operation permit will be issued based on this revised permit. [Rule 62-210.300(2), F.A.C.] A revision of the Title V operating permit application pursuant to Chapter 62-213 F.A.C. shall be submitted to the DEP District office in Tampa.
- 1.7 Applicable Regulations: This facility is subject to the following regulations: Florida Administrative Code Chapters 62-4; 62-103; 62-204, 62-210, 62-212, 62-296 and 62-297. Issuance of this permit does not relieve the facility owner or operator from compliance with any applicable federal, state, or local permitting requirements or regulations. [Rule 62-210.300, F.A.C.]

2.0 EMISSION LIMITING STANDARDS

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SECTION II. EMISSION UNIT(S) COMMON SPECIFIC CONDITIONS

2.1 General Visible Emissions Standard: [Rule 62-296.320(4)(b), F.A.C.] Unless otherwise specified by rule or permit, no person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity, the density of which is equal to or greater than 20% opacity.

- Visible emissions of all minor sources controlled by baghouses indicating no visible emissions (5% opacity) may be submitted in lieu of a particulate stack test.

2.2 Unconfined Emissions of Particulate Matter [Rule 62-296.320(4)(c), F.A.C.]

- (a) The owner or operators shall not cause, let, permit, suffer or allow the emissions of unconfined particulate matter from any source whatsoever, including, but not limited to, vehicular movement, transportation of materials, construction, alteration, demolition or wrecking, or industrially related activities such as loading, unloading, storing or handling, without taking reasonable precautions to prevent such emission.
- (b) Reasonable precautions include the following:
- Paving and maintenance of roads, parking areas and yards.
 - Application of water chemicals to control emissions from such activities as demolition of buildings, grading roads, construction and land clearing.
 - Application of asphalt, water, oil, chemicals or other dust suppressants to unpaved roads, yards, open stock piles and similar activities.
 - Removal of particulate matter from roads and other paved areas under the control of the owner or operator of the facility to prevent reentrainment, and from buildings or work areas to prevent particulate from becoming airborne.
 - Landscaping or planting of vegetation.
 - Use of hoods, fans, filters, and similar equipment to contain, capture and/or vent particulate matter.
 - Confining abrasive blasting where possible.
 - Enclosure or covering of conveyor systems.

NOTE: Facilities that cause frequent, valid complaints may be required by the Southwest District office in Tampa to take these or other reasonable precautions. In determining what constitutes reasonable precautions for a particular source, the Department shall consider the cost of the control technique or work practice, the environmental impacts of the technique or practice, and the degree of reduction of emissions expected from a particular technique or practice.

2.3 General Pollutant Emission Limiting Standards: [Rule 62-296.320, F.A.C.]

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SECTION II. EMISSION UNIT(S) COMMON SPECIFIC CONDITIONS

- (a) No person shall store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds or organic solvents without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department.
- (b) No person shall cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor.

NOTE: An objectionable odor is defined as any odor present in the outdoor atmosphere which by itself or in combination with other odors, is or may be harmful or injurious to human health or welfare, which unreasonably interferes with the comfortable use and enjoyment of life or property, or which creates a nuisance. [F.A.C. 62-212.198(123)]

3.0 OPERATION AND MAINTENANCE

3.1 Summary of Sources: The following is a summary of the sources, emission control equipment, limitations on production and hours of operation for this facility:

| <u>Source</u> | <u>Control Device</u> | <u>Operating Hours</u> |
|---|-----------------------|------------------------|
| COMMON STACK AFI No. 1 & 2 Defluor. Tanks | Wet Scrubber | 8,760 |
| Reactor/Granulator/ Materials Handling | Dryer Scrubber | 8,760 |
| DE SILO | Baghouse | 8,760 |
| LIMESTONE SILO | Baghouse | 8,760 |
| AFP LOADOUT SYSTEM | Baghouse | 3,500 |

Production Limitation (Combined AFI No. 1 & 2): 1160 tons/day and 300,000 tons/year.

3.2 Changes/Modifications: The owner or operator of any emissions unit which emits or can reasonably be expected to emit any air pollutant shall obtain an appropriate permit from the Department prior to beginning construction, modification, or initial or continued operation of the emissions unit unless exempted pursuant to Department rule or statute. All emissions limitations, controls, and other requirements imposed by such permits shall be at least as stringent as any applicable limitations and requirements contained in or enforceable under the State Implementation Plan (SIP) or that are otherwise federally enforceable. Issuance of a permit does not relieve the owner or operator of any emissions unit from complying with applicable emission limiting standards or other requirements of the air pollution rules of the Department, or any other applicable requirements under federal, state, or local law.

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SECTION II. EMISSION UNIT(S) COMMON SPECIFIC CONDITIONS

In addition, the term "Modification" is defined as:

Any physical change in, change in the method of operation of, or addition to a facility which would result in an increase in the actual emissions of any air pollutant subject to regulation under the Act, including any not previously emitted, from any emissions unit or facility.

1. A physical change or change in the method of operation shall not include:
 - (a) Routine maintenance, repair, or replacement of component parts of an emissions unit; or
 - (b) A change in ownership of an emissions unit or facility.
 2. For any pollutant that is specifically regulated by the EPA under the Clean Air Act, a change in the method of operation shall not include an increase in the hours of operation or in the production rate, unless such change would be prohibited under any federally enforceable permit condition which was established after January 6, 1975.
 3. For any pollutant that is not specifically regulated by the EPA under the Clean Air Act, a change in the method of operation shall not include an increase in the hours of operation or in the production rate, unless such change would exceed any restriction on hours of operation or production rate included in any applicable Department air construction or air operation permit. [Rules 62-4.030, 62-210.300, 62-210(185) and 62-4.070(3), F.A.C.]
- 3.3 Plant Operation - Problems: If temporarily unable to comply with any of the conditions of the permit due to breakdown of equipment or destruction by hazard of fire, wind or by other cause, the owner or operator shall notify the HCEPC office in Tampa as soon as possible, but at least within (1) working day, excluding weekends and holidays. The notification shall include: pertinent information as to the cause of the problem; the steps being taken to correct the problem and prevent future recurrence; and where applicable, the owner's intent toward reconstruction of destroyed facilities. Such notification does not release the permittee from any liability for failure to comply with the conditions of this permit and the regulations. [Rule 62-4.130, F.A.C.]
- 3.4 Circumvention: The owner or operator shall not circumvent the air pollution control equipment or allow the emission of air pollutants without this equipment operating properly. [Rule 62-210.650, F.A.C.]
- 3.5 Excess Emissions Requirements [Rule 62-210.700, F.A.C.]
- (a) Excess emissions resulting from start-up, shutdown or malfunction of these emissions units 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 Southwest District office for longer duration. [Rule 62-210.700(1), F.A.C.]

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SECTION II. EMISSION UNIT(S) COMMON SPECIFIC CONDITIONS

- (b) 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 start-up, shutdown, or malfunction shall be prohibited. [Rule 62-210.700(4), F.A.C.]
- (c) In case of excess emissions resulting from malfunctions, each owner or operator shall notify the Department or the appropriate Local 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. [Rule 62-210.700(6), F.A.C.]

4.0 MONITORING OF OPERATIONS

4.1 Determination of Process Variables

- (a) The permittee shall install, operate, and maintain equipment and/or instruments necessary to determine process variables, such as process weight input or heat input, when such data is needed in conjunction with emissions data to determine the compliance of the emissions unit with applicable emission limiting standards.
- (b) Equipment and/or instruments used to directly or indirectly determine such process variables, including devices such as belt scales, weight hoppers, flow meters, and tank scales, shall be calibrated and adjusted to indicate the true value of the parameter being measured with sufficient accuracy to allow the applicable process variable to be determined within 10% of its true value. [Rule 62-297.310(5), F.A.C.]

5.0 TEST REQUIREMENTS

5.1 Test Performance: During each federal fiscal year (October 1- September 30), unless otherwise specified by rule, order, or permit, the owner or operator of each emissions unit shall have a formal compliance test conducted for:

- (a) Visible emissions, if there is an applicable standard;
- (b) Each of the following pollutants, if there is an applicable standard, and if the emissions unit emits or has the potential to emit: 5 tons per year or more of lead or lead compounds measured as elemental lead; 30 tons per year or more of acrylonitrile; or 100 tons per year or more of any other regulated air pollutant; and
- (c) Each NESHAP pollutant, if there is an applicable emission standard. [Rule 62-297.310 (7), F.A.C.]

5.2 Test procedures: Testing of emissions shall be conducted with the emissions unit operation at permitted capacity. Permitted capacity is defined as 90-100% of the maximum operating rate allowed by the permit. If it is impractical to test at permitted capacity, an emissions unit may be tested at less than the minimum permitted capacity; in this case, subsequent emissions unit operation is limited to 110 percent of the test load until a new test is conducted. Once the unit is so limited, operation at higher capacities is allowed for no more than 15 consecutive days for the purpose of additional compliance testing to regain the authority to

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SECTION II. EMISSION UNIT(S) COMMON SPECIFIC CONDITIONS

operate at the permitted capacity. The test results shall be submitted to the HCEPC office in Tampa within 45 days of testing. Acceptance of the test by the Department will automatically constitute an amended permit at the higher tested rate plus 10%, but in no case shall the maximum permitted rate be exceeded. Failure to submit records of the production rate during the test period, along with the test report, may invalidate the test and fail to provide reasonable assurance of compliance. [Rule 62-297.310, F.A.C.]

- 5.3 Test Notification: The owner or operator shall notify the HCEPC office in Tampa, at least 15 days prior to the date on which each formal compliance test is to begin, of the date, time, and place of each such test, and the test contact person who will be responsible for coordinating and having such test conducted for the owner or operator. [Rule 62-297.310, F.A.C.]
- 5.4 Special Compliance Tests: When the Department, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in Rule 62-204, 62-210, 62-212, 62-296 and 62-297, F.A.C. or in a permit issued pursuant to those rules is being violated, it may require the owner or operator of the facility to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions units and to provide a report on the results of said tests to the HCEPC office in Tampa. [Rule 62-297.310 F.A.C.]
- 5.5 Stack Testing Facilities: The owner or operator shall install stack testing facilities in accordance with Rule 62-297.310 F.A.C..
- 5.6 Exceptions and Approval of Alternate Procedures and Requirements: An Alternate Sampling Procedure (ASP) may be requested from the Bureau of Air Monitoring and Mobile Sources of the Florida Department of Environmental Protection in accordance with the procedures specified in Rule 62-297.620, F.A.C.

6.0 REPORTS AND RECORDS

- 6.1 Duration: All reports and records required by this permit shall be kept for at least (5) years from the date the information was recorded. [62-213.440(1)(b)2, F.A.C.]
- 6.2 Emission Compliance Stack Test Reports:
- (a) A test report indicating the results of the required compliance tests shall be filed with the HCEPC office in Tampa as soon as practical, but no later than 45 days after the last sampling run is completed. [Rule 62-297.310, F.A.C.]
 - (b) The report shall provide sufficient detail on the tested emission unit and the procedures used to allow the HCEPC to determine if the test was properly conducted and if the test results were properly computed. At a minimum, the test report shall provide the applicable information listed in Rule 62-297.310, F.A.C.

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SECTION II. EMISSION UNIT(S) COMMON SPECIFIC CONDITIONS

- 6.3 Annual Operating Report for Air Pollutant Emitting Facility: Before March 1st of each year, the owner or operator shall submit to the Department this required report [DEP Form No. 62-210.900(5)], which summarizes operations for the previous calendar year. [Rule 62-210.370(2), F.A.C.]

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SECTION III. EMISSION UNIT(S) SPECIFIC CONDITIONS

SUBSECTION A. COMMON CONDITIONS:

EMISSION UNITS

This permit addresses the following emission units.

| EMISSION UNIT NO. | EMISSION UNIT DESCRIPTION |
|-------------------|--------------------------------------|
| 078 | Common Stack Animal Feed Plant No. 1 |
| 079 | Diatomaceous Earth Silo |
| 080 | Limestone Silo |
| 081 | Animal Feed Plant Loadout System |
| 103 | Common Stack Animal Feed Plant No. 2 |

SUBSECTION B. SPECIFIC CONDITIONS:

The following Specific Conditions apply to the following emission units:

| EMISSION UNIT NO. | EMISSION UNIT DESCRIPTION |
|-------------------|--------------------------------------|
| 078 | Common Stack Animal Feed Plant No. 1 |
| 103 | Common Stack Animal Feed Plant No. 2 |

EMISSION LIMITATIONS

B.1 The emissions from these emission units shall not exceed the allowable emission rates listed in Table 1-1 Air Pollutant Standards and Terms (attached).

CONTROL EQUIPMENT

B.2 The BACT determination requires the installation of a packed crossflow scrubber for control of gaseous fluoride and particulate matter emissions. The permittee shall submit the necessary scrubber efficiency calculations and drawings to the Department for approval prior to modifying the existing scrubber. [Rule 62-212.400(6), F.A.C.]

B.3 The following scrubber operating parameters shall be monitored during any compliance test and a summary of this data shall be included in any emissions test report. [Rule 62-4.070(3), F.A.C.]

(X) Water Pressure or Volumetric Liquid Water Flow Rate

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SECTION III. EMISSION UNIT(S) SPECIFIC CONDITIONS

(X) Gas Pressure Drop

- B.4 To provide reasonable assurance of compliance with Specific Condition B.1, Cargill shall create and keep a record log of the scrubber operating parameters. The record log shall contain, at a minimum, the volumetric liquid water flow rate (or the water pressure), the gas pressure drop, and the date and time of the measurements. Where measurements are collected manually, the person responsible for performing the measurements shall also be recorded. A record log entry shall be made at least once for every 8 hour shift that the animal feed ingredient plants operate. The record log shall be maintained at the facility and shall be retained at least five years from the date of the measurement. [Rule 62-4.070(3), F.A.C.]
- B.5 Cargill may, at its option, substitute continuous monitoring and data logging or recordings for the manual recordkeeping required by Specific Condition B.4. If this option is exercised, then all calibration and maintenance records and logged or recorded data shall be retained at least five years. [Rule 62-4.070(3), F.A.C.]

OPERATIONAL LIMITATIONS

- B.6 Animal Feed Plant No. 1 and No. 2 is allowed to operate continuously (8760 hours/year). [Rule 62-210.200, F.A.C. Definitions-Potential to emit (PTE)]

Process operating rates:

- B.7 The combined maximum production rates for Animal Feed Plants No. 1 and No. 2 shall not exceed 1160 TPD and 300,000 TPY. [Rule 62-210.200, F.A.C.,(PTE)] $1160 \times 365 = 423,400$
- B.8 The dryers for each Animal Feed Plant shall be fired with natural gas as primary fuel or with new No. 2 fuel oil having a maximum sulfur content not to exceed 0.5% by weight as standby during natural gas curtailment at a maximum of 400 hours/year. The maximum natural gas usage for the two dryers combined shall not exceed 93,000 cubic feet/hour (annual avg.). The maximum new No. 2 fuel oil usage for the two dryers combined shall not exceed 662 gallons/hour (daily avg.). Use of fuels other than those listed above is prohibited. [Rule 62-210.200, F.A.C.,(PTE)]

TEST METHODS AND PROCEDURES

- B.9 Emission Units 078 and 103 shall be tested in accordance with the EPA/reference method, testing time frequency, and minimum compliance test duration in Table 2-1. Compliance Requirements (attached). [Rules 62-204.800 and 62-297.401, F.A.C.]
- B.10 In conducting the initial or annual compliance tests, the permittee shall use as reference methods and procedures the test methods in Rule 62-297.401, F.A.C., or other methods and procedures as specified in

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SECTION III. EMISSION UNIT(S) SPECIFIC CONDITIONS

this permit. No other test method shall be used unless approval from the Department has been received in writing. [Rule 62-297.620, F.A.C.]

- B.11 Compliance with the particulate matter, fluoride and nitrogen oxides standards contained in Table 1 (attached) shall be determined using EPA Method 5, EPA Methods 13A, 13B or the modified 13B and EPA Method 7E respectively. [Rules 62-204.800 and 62-297.401, F.A.C.]
- B.12 The initial compliance test for fluoride shall be conducted by performing nine test runs (3 tests). The first three runs shall be completed within five hours of adding DE to the batch tank. The remaining six runs shall be evenly spaced for the remainder of the batch cycle. The three consecutive runs will be averaged (3 data points for the nine runs) to demonstrate compliance with the proposed fluoride emissions limit. In order to ease the testing burden and cost, the test run frequency may be reduced after the initial compliance test, if justified, based on the results of the initial compliance test. Compliance with the fluoride emission limit in Table 1-1 will be demonstrated if average emissions over the three test runs do not exceed 1.4 lb/hr/batch or 2.8 lb/hr/2 batches. [Rule 62-297.310, F.A.C.]
- B.13 The visible emissions test shall be conducted by a certified observer and be a minimum of 30 minutes in duration. [Rule 62-297.310 (7), F.A.C.]
- B.14 Test results will be the average of three valid one-hour runs. The HCEPC office in Tampa will be notified at least 15 days in advance of the compliance test(s). The notification shall include the compliance test date, time, and place of such test, and the facility contact person for the test. [Rule 62-297.310, F.A.C.]
- B.15 Operating procedures shall include good combustion practices. The good combustion practices shall meet the guidelines and procedures as established by the equipment manufacturers. All operators (including supervisors) of air pollution control devices shall be properly trained in plant specific equipment. [Rule 62-4.070(3), F.A.C.]

RECORDKEEPING AND REPORTING REQUIREMENTS

- B.16 The following fuel records shall be maintained and made available upon request:
1. Liquid Fuels
 - (a) The fuel type (number) and usage rate in gal/day; and
 - (b) Records of the sulfur content and heating value (Btu/gal) of each oil shipment based upon analysis of a sample representative of the shipment
 2. Natural Gas
 - (a) The fuel usage rate in cubic feet per day.

AIR CONSTRUCTION PERMIT 057008-013-AC

SECTION III. EMISSION UNIT(S) SPECIFIC CONDITIONS

B.17 Two copies of the results of the emission tests for the pollutants listed in Condition B.1 for these emission units shall be submitted within forty-five days of the last sampling run to the HCEPC office in Tampa. Reports shall be in a format consistent with and shall include the information in accordance with Rule 62-297.310 (8), F.A.C. [Rule 62-.297.310(8), F.A.C.]

Daily Operation and Maintenance (O&M) Log:

B.18 This facility shall maintain a file containing all measurements, records, and other data that are required to be collected pursuant to the various specific conditions of this permit. Operators shall keep a daily O&M log to include, at a minimum, the following information

- the data collected from in-stack monitoring instruments;
- the records on daily feed rates and production rate;
- the amount and type of fuel burned per affected unit;
- the results of all source tests; and,
- Fuel analysis data.

All measurements, records, and other data required to be maintained by Cargill, shall be retained for at least five (5) years following the data on which such measurements, records, or data are recorded. These data shall be made available to the Department upon request. [Rule 62-4.070(3), F.A.C.]

AIR CONSTRUCTION PERMIT 057008-013-AC

SECTION III. EMISSION UNIT(S) SPECIFIC CONDITIONS

SUBSECTION C. SPECIFIC CONDITIONS:

The following Specific Conditions apply to the following emission units:

| EMISSION UNIT NO. | EMISSION UNIT DESCRIPTION |
|-------------------|----------------------------------|
| 079 | Diatomaceous Earth Silo |
| 080 | Limestone Silo |
| 081 | Animal Feed Plant Loadout System |

EMISSION LIMITATIONS

- C.1 The emissions from these emission units shall not exceed the allowable emission rates listed in Table 1-1 Air Pollutant Standards and Terms (attached). Because of the expense and complexity of conducting a stack test on minor sources of particulate matter, and because these sources are equipped with a baghouse control device, the Department, pursuant to the authority granted under Rule 62-296.711(3)(c), F.A.C., hereby establishes a visible emission limitation not to exceed an opacity of 5% in lieu of a particulate stack test. [Rule 62-296.711(3)(c), F.A.C]

OPERATIONAL LIMITATIONS

- C.2 The Diatomaceous Earth Silo and the Limestone Earth Silo are allowed to operate continuously (8760 hours/year). The Animal Feed Plant Loadout System is allowed to operate 3500 hours/year [Rule 62-210.200, F.A.C. Definitions-Potential to emit (PTE)]

TEST METHODS AND PROCEDURES

- C.3 The visible emissions test shall be conducted by a certified observer and be a minimum of 30 minutes in duration. [Rule 62-297.310 (7), F.A.C.]

SECTION III. EMISSION UNITS SPECIFIC CONDITIONS

Daily Operation and Maintenance (O&M) Log:

- C.4 This facility shall maintain a file containing all measurements, records, and other data that are required to be collected pursuant to the various specific conditions of this permit. Operators shall keep a daily O&M log to include, at a minimum, the following information:
- the results of all source tests;

AIR CONSTRUCTION PERMIT 057008-013-AC

SECTION III. EMISSION UNIT(S) SPECIFIC CONDITIONS

- calibration logs for all instruments required by Common Specific Condition 4.1; and
- maintenance/repair logs for any work performed on equipment or instrument which is subject to this permit.

All measurements, records, and other data required to be maintained by Cargill, shall be retained for at least five (5) years following the data on which such measurements, records, or data are recorded. These data shall be made available to the Department upon request. **[Rule 62-4.070(3), F.A.C]**

Table 1-1. Air Pollutant Standards and Terms.

FACILITY ID NUMBER: 0570008

DRAFT Permit No.: 0570008-013-AC

Permittee:
Cargill Fertilizer, Inc.
Animal Feed Ingredient Plant

Emission Unit 078/103 - AFI No. 1/AFI No. 2
Emission Unit 079/080/081 - DE Silo/Limestone Silo/Loadout System

| E.U. ID# | Description | Pollutant ID | Fuel(s) | gr/dscf | lb/ton P ₂ O ₅ | lb/hr | TPY | Regulation(s) |
|----------|----------------|---------------------|---------|---------|--------------------------------------|---------------|-------|----------------------------|
| 078 | AFI No. 1 | PM/PM ₁₀ | Gas/Oil | N/A | N/A | 6.00 | 26.28 | Rule 62-212.410, F.A.C. |
| 078 | AFI No. 1 | F | Gas/Oil | N/A | 0.04 | 7.70 lb/batch | 1.63 | Rule 62-212.410, F.A.C. |
| 078 | AFI No. 1 | NO _x | Gas/Oil | N/A | N/A | 6.50 | 28.42 | Rule 62-212.410, F.A.C. |
| 078 | AFI No. 1 | 20% VE | Gas/Oil | N/A | N/A | N/A | N/A | Rule 62-204.800, F.A.C. |
| 103 | AFI No. 2 | PM/PM ₁₀ | Gas/Oil | N/A | N/A | 6.00 | 26.28 | Rule 62-212.410, F.A.C. |
| 103 | AFI No. 2 | F | Gas/Oil | N/A | 0.04 | 7.70 lb/batch | 1.63 | Rule 62-212.410, F.A.C. |
| 103 | AFI No. 2 | NO _x | Gas/Oil | N/A | N/A | 6.50 | 28.42 | Rule 62-212.410, F.A.C. |
| 103 | AFI No. 2 | 20% VE | Gas/Oil | N/A | N/A | N/A | N/A | Rule 62-204.800, F.A.C. |
| 079 | DE Silo | 5% VE | N/A | 0.02 | N/A | 0.09 | 0.39 | Rule 62-297.620(4), F.A.C. |
| 080 | Limestone Silo | 5% VE | N/A | 0.02 | N/A | 0.12 | 0.52 | Rule 62-297.620(4), F.A.C. |
| 081 | Loadout System | 5% VE | N/A | 0.02 | N/A | 2.22 | 3.89 | Rule 62-297.620(4), F.A.C. |

ALLOWABLE OPERATING RATES

| | hr | AFI No. 1 | AFI No. 2 | DE Silo | LIMESTONE Silo | LOADOUT System |
|--------------------|-----|-----------|-----------|---------|----------------|----------------|
| Hours of operation | hr | 8760 | 8760 | 8760 | 8760 | 3500 |
| Production rate | TPD | 580 | 580 | N/A | N/A | N/A |

$$\frac{580}{24} = 24.2 \text{ TPH}$$

$$\times 8760$$

$$\hline 211,700 \text{ TPY}$$

Table 2-1. Compliance Requirements.

FACILITY ID NUMBER: 0570008

Permittee:
Cargill Fertilizer, Inc.
Animal Feed Ingredient Plant

DRAFT Permit No.: -No.: 0570008-013-AC

| E.U. ID# | Description | Pollutant Name or parameter | Fuel(s) | EPA/Reference Method * | Testing Time Frequency | Min. Compliance Test Duration |
|-----------|------------------|-----------------------------|---------|------------------------|------------------------|-------------------------------|
| 078 & 103 | AFI No.1 & No.2 | PM/PM ₁₀ | Gas/Oil | 5 | initial/annual | 3hr |
| 078 & 103 | AFI No.1 & No.2 | VE | Gas/Oil | 9 | annual | 1/2 hr |
| 078 & 103 | AFI No.1 & No.2 | NO _x | Gas/Oil | 7E | initial | 3hr |
| 078 & 103 | AFI No.1 & No. 2 | F | Gas/Oil | 13A or B or Mod. 13B | initial/annual | 3-3hr/1-3hr |
| 079 | DE Silo | VE | N/A | 9 | initial/annual | 1/2 hr |
| 080 | Limestone Silo | VE | N/A | 9 | initial/annual | 1/2 hr |
| 081 | Loadout System | VE | N/A | 9 | initial/annual | 1/2 hr |

Notes:

- [1] Testing of emissions shall be conducted while burning natural gas.
- [2] Both AFI plants are allowed to burn No. 2 fuel oil with a maximum sulfur content of 0.5% by weight for 400 hours per year as auxiliary fuel. See specific condition No. B8.

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BEST AVAILABLE CONTROL TECHNOLOGY (BACT)

CARGILL FERTILIZER, INC.
ANIMAL FEED INGREDIENT PLANT
PSD-FL-234 and 0570008-013-AC
Hillsborough County

The applicant, Cargill Fertilizer, Inc. (Cargill), requested to revise the allowable emissions limits for particulate matter (PM/PM₁₀) at their existing Animal Feed Ingredient (AFI) Plant No. 1. Cargill also requested to construct a second AFI plant, designated as AFI Plant No. 2, which will increase the production rate of the AFI plant from 150,000 tons/year (TPY) to 300,000 TPY. The original AFI project constituted a minor modification to an existing major source. Since an alteration in federally enforceable permit restrictions is being requested, air permitting source applicability is determined as though construction had not yet commenced on the AFI plant [Rule 62-212.500(2)(d)5]. The proposed modification at Cargill will result in significant net emissions increases for particulate matter/particulate matter less than or equal to 10 micrometers (PM/PM₁₀), fluorides (F) and nitrogen oxides (NO_x), and prevention of significant deterioration (PSD) new source review will be required for these pollutants

This facility has a maximum combined production rate of 1160 ton per day (AFI No. 1 & 2) of animal feed product (AFP). This facility consists of defluorinated acid batch tanks (3), pug mill, dryer and cooler/classifier along with diatomaceous earth and limestone unloading systems, and the AFI loadout system. A process description is included in the Technical Evaluation and Preliminary Determination.

Following is the BACT determination proposed by the applicant:

BACT DETERMINATION REQUESTED BY THE APPLICANT:

| POLLUTANT | EMISSION LIMIT |
|---|---|
| PM/PM ₁₀ (Material Handling Sources) | 0.02 gr/dscf by baghouses |
| PM/PM ₁₀ (Process Equipment) | 6.0 lb/hr by wet scrubber |
| F | 0.04 lb/ton P ₂ O ₅ input |
| NO _x | Low nitrogen containing fuels Combustion Control |

The animal feed plant uses a combination of baghouses, cyclones and wet scrubbers to control PM/PM₁₀ emissions. Baghouses are used to control all raw material (diatomaceous earth and limestone) handling operations, as well as product loadout operations. PM/PM₁₀ emissions from the

APPENDIX BD
BEST AVAILABLE CONTROL TECHNOLOGY (BACT)

animal feed dryers and cooler/classifier systems are controlled by cyclones followed by a wet scrubber.

Fertilizer Manufacturing plants are among the 28 major facilities listed in Florida Administrative Code (F.A.C.) Chapter 62-212, Prevention of Significant Deterioration (PSD), Table 212.400-1, "Major Facilities Categories." A BACT determination is required for each pollutant exceeding the significant emission rates in Table 212.400-2, "Regulated Air Pollutants Significant Emissions Rates," which in this case are particulate matter (PM/PM10), fluoride (F) and nitrogen oxides (NO_x).

DATE OF RECEIPT OF A BACT APPLICATION:

July 17, 1996

REVIEW GROUP MEMBERS:

Syed Arif and A. A. Linero of the New Source Review Section.

BACT Determination Procedure

In accordance with Chapter 62-212, F.A.C., this BACT determination is based on the maximum degree of reduction of each pollutant emitted which the Department of Environmental Protection (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, the regulations state that, in making the BACT determination, the Department shall give consideration to:

- (a) Any Environmental Protection Agency determination of BACT 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 determination of any other state.
- (d) The social and economic impact of the application of such technology.

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 unit in question, the most stringent

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BEST AVAILABLE CONTROL TECHNOLOGY (BACT)

control available for a similar or identical emission unit or emission unit category. If it is shown that this level of control is technically or economically infeasible for the emission unit in question, 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.

The air pollutant emissions from this facility can be grouped into categories based upon the control equipment and techniques that are available to control emissions from these emission units. Using this approach, the emissions can be classified as follows:

- o Combustion Products (e.g., SO₂, NO_x). These are controlled generally by gaseous control devices and fuel quality.
- o Products of Incomplete Combustion (e.g., CO, VOC). Control is largely achieved by proper combustion techniques.
- o Emissions from materials handling, conveyance, and storage (primarily PM). These are controlled generally by fabric filters and reasonable precautions.

Grouping the pollutants in this manner facilitates the BACT analysis because it enables the equipment available to control the type or group of pollutants emitted and the corresponding energy, economic, and environmental impacts to be examined on a common basis. Although all of the pollutants addressed in the BACT analysis may be subject to a specific emission limiting standard as a result of PSD review, the control of "non-regulated" air pollutants is considered in imposing a more stringent BACT limit on a "regulated" pollutant (i.e., PM, SO₂, H₂SO₄, fluorides, etc.), if a reduction in "non-regulated" air pollutants can be directly attributed to the control device selected as BACT for the abatement of the "regulated" pollutants.

Particulate Matter (PM, PM₁₀)

Particulate Matter is generated by the material handling sources and process equipment from this facility. Baghouses are used to control all raw material (diatomaceous earth and limestone) handling operations, as well as product loadout operations. Baghouse technology represents the state of the art in control of PM/PM₁₀ emissions for material handling sources. Baghouses are highly efficient and allow collected PM to be recovered as product. Baghouse technology is proposed as BACT for the material handling sources within the animal feed plants. *The proposed BACT emission level for the material handling sources is 0.02 gr/dscf for each baghouse.*

PM emissions from the animal feed dryers and cooler/classifier systems are controlled by cyclones followed by a wet scrubber. This combination provides for a high overall PM collection efficiency. The cyclones allow for recovery of product in a dry form, with subsequent recycling back

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BEST AVAILABLE CONTROL TECHNOLOGY (BACT)

to the process. The wet venturi scrubber control is an efficient control device and is the most appropriate technology for gas streams that contain a significant amount of moisture. *The proposed BACT emission level for the process equipment is 6.0 lb/hr for the wet venturi scrubber.*

Common control devices include settling chambers, inertial separators, impingement separators, wet scrubbers, fabric filters, and electrostatic precipitators. Fabric filters (baghouses) and electrostatic precipitator (ESPs) are generally considered equivalent for particulate control. Both types of devices can achieve removal efficiencies of over 99%. Both types of control equipment provide for the recovery/recycling of collected dust back into the process stream. Baggouses are also used to control particulate emissions from most other material processing operations at fertilizer manufacturing plants.

Common controls to limit particulate emissions from fugitive sources (such as roadways, stockpiles, and material processing and conveying equipment) include wet suppression, sweeping, application of surfactants, paving of roads and covering of stockpiles to reduce wind erosion. Wet suppression of fugitive particulate emissions is considered as BACT for most material handling operations and unpaved roads. Dust from stockpiles can be minimized by relatively high material moisture content with additional water spraying as necessary.

A review of the BACT Clearinghouse shows that baghouses and scrubbers are widely used to control particulate matter from process emission units at fertilizer manufacturing plants. They are commonly accepted as BACT.

Fluorides (F)

AFI Plant No. 1, when originally permitted in 1994, was subject to Rule 62-296.403(1)(I), which requires BACT for fluorides. Consequently, AFI Plant No. 1 underwent a BACT determination. The resulting BACT was determined to be a wet cross-flow scrubbers/demisters utilizing pond water as the scrubbing medium and discharging to a common stack. The BACT emission limit from the defluorination systems, reactor/granulation system and the dryer was 0.04 lb/ton of phosphorus pentoxide (P_2O_5) input (0.53 lb/hr or 1.63 TPY).

AFI Plant No. 2 is proposing to add a third acid batch tank and an additional acid heater to meet a fluoride emission limit identical to AFI Plant No. 1. The existing AFI Plant No. 1 scrubber will be modified to accommodate two batch tanks defluorinating acid at any one time. *The BACT emission limit from the defluorination systems, reactor/granulation system and the dryer discharging to a common stack for AFI Plant No. 1 is 0.04 lb/ton of P_2O_5 input (0.53 lb/hr or 1.63 TPY).*

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Nitrogen Oxides (NO_x)

In the animal feed plant, NO_x is created during the combustion of natural gas, the primary fuel, or No. 2 fuel oil, the backup fuel. The fuel combustion takes place in the rotary dryer, which dries the wet granulated animal feed product. The use of natural gas, which contains no fuel bound nitrogen, and No. 2 fuel oil, which contains low fuel bound nitrogen levels, result in low NO_x emissions relative to burning of other types of fossil fuel, such as No. 6 fuel oil or coal. Good combustion practices are implemented to achieve the highest combustion efficiency. While this reduces fuel consumption and lowers carbon monoxide and volatile organic compounds emissions, higher NO_x emissions can result. However, the level of NO_x emissions (57 TPY) are relatively low, and do not warrant further reduction.

Phosphate fertilizer plants typically have several rotary dryers located throughout the plant, such as those associated with DAP, MAP and GTSP production. Although several add-on NO_x control technologies are potentially available for application to rotary dryers, these are not known to have been applied in the phosphate industry. These technologies include flue gas recirculation, selective non-catalytic reduction (SNCR by ammonia or urea injection), and selective catalytic reduction (SCR).

Based on the low NO_x emissions from the expanded animal feed plant, the use of low nitrogen containing fuels (natural gas and No. 2 fuel oil) and good combustion practices are proposed as BACT for NO_x emissions.

BACT Determination by DEP:

Based on the information provided by the applicant and the information searches conducted by the Department, a top-down BACT approach for PM/PM₁₀, F and NO_x was employed.

For PM/PM₁₀ emissions, the Department accepts the applicant's proposed standard of 0.02 gr/dscf for material handling sources utilizing baghouses, and 6.0 lb/hr for process equipment utilizing venturi scrubber.

For F emissions, the Department is accepting the revised design as proposed by the applicant in a letter dated March 13, 1997. Based on the letter, the total fluoride emissions are calculated as 5.72 lb per batch for the 17-hour batch and 7.70 lb per batch for a 30-hour batch. Approximately 91 percent of the fluoride evolution from the batch tank occurs during the first 5 hours after the diatomaceous earth is added to the batch tank, with the remaining 9 percent being evolved over the remaining hours of the batch. Using this basis and 7.70 lb per batch or 15.40 lb/2 batches, proper operation of the scrubber would be demonstrated if fluoride emissions during the stack test do not exceed 1.4 lb/hr/batch or 2.8 lb/hr/2 batches (average of first five hours after adding DE to a batch tank). In order to demonstrate compliance with F emissions, the Department is proposing a 9 test

APPENDIX BD
BEST AVAILABLE CONTROL TECHNOLOGY (BACT)

runs for the initial compliance test. The first 3 runs will be conducted in the first five hours after adding DE to a batch tank, and the remaining 6 runs will be evenly spaced for the remainder of the batch cycle. Each consecutive three runs will be averaged to constitute a test average. The test run frequency may be reduced after the initial compliance test, if justified, based on the results of the initial compliance test. The applicant is also required to submit the necessary scrubber efficiency calculations and drawings to the Department for approval prior to modifying the existing scrubber.

For NO_x emissions, the Department accepts the applicant proposed use of low nitrogen containing fuels and good combustion practices.

The BACT emission levels established by the Department are as follows:

| <u>Source</u> | <u>Pollutant Emission Limit</u> |
|--|---|
| Common Stack (PM/PM10) AFI No. 1 or AFI No. 2 plant | 6.0 lb/hr (26.28 TPY) |
| Common Stack (F) AFI No. 1 or AFI No. 2 plant | 0.04 lb/ton of P_2O_5 input 1.4 lb/hr/batch or 2.8 lb/hr/2 batches (average of first 5 hours after DE addition) 7.70 lb/batch or 15.40 lb/2 batches |
| Common Stack (VE) | Visible emissions not to exceed 20% opacity |
| Minor points sources with baghouses | Visible emissions not to exceed 5% opacity |

Compliance with the particulate emission limitations shall be in accordance with the EPA Reference Method 5 as contained in Appendix A, 40 CFR 60.

Compliance with the F limitations shall be in accordance with the EPA Reference Method 13A, 13B or Modified 13B as contained in Appendix A, 40 CFR 60.

Compliance with opacity standards (minor sources controlled by baghouses) shall be determined by conducting observations in accordance with 40 CFR 60, Appendix A, Method 9.


APPENDIX BD
BEST AVAILABLE CONTROL TECHNOLOGY (BACT)

DETAILS OF THE ANALYSIS MAY BE OBTAINED BY CONTACTING:


Syed Arif, Review Engineer
A. A. Linero, Administrator, New Source Review Section
Department of Environmental Protection
Bureau of Air Regulation
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Recommended By:

Approved By:



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



HW Howard L. Rhodes, Director
Division of Air Resources Management

6/12/97

Date:

6/12/97

Date:

APPENDIX GC
GENERAL PERMIT CONDITIONS [F.A.C. 62-4.160]

- G.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, Florida Statutes. 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.
- G.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 or exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.
- G.3 As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey and 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 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.
- G.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.
- G.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.
- G.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.
- G.7 The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of 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 and 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.

- G.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.

APPENDIX GC
GENERAL PERMIT CONDITIONS [F.A.C. 62-4.160]

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.

- G.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, Florida Statutes. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.
- G.10 The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.
- G.11 This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 62-4.120 and 62-730.300, 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.
- G.12 This permit or a copy thereof shall be kept at the work site of the permitted activity.
- G.13 This permit also constitutes:
- (a) Determination of Best Available Control Technology (x)
 - (b) Determination of Prevention of Significant Deterioration (x); and
 - (c) Compliance with New Source Performance Standards ().
- G.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 or 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:
 - 1. The date, exact place, and time of sampling or measurements;
 - 2. The person responsible for performing the sampling or measurements;
 - 3. The dates analyses were performed;
 - 4. The person responsible for performing the analyses;
 - 5. The analytical techniques or methods used; and
 - 6. The results of such analyses.
- G.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.

Florida Department of
Environmental Protection

Memorandum

TO: Howard L. Rhodes

THRU: Clair Fancy
Al Linero *Al Linero*

FROM: Syed Arif *Syed Arif*

DATE: June 10, 1997

SUBJECT: Cargill Fertilizer, Inc., 0570008-013-AC, PSD-FL-234

Attached for approval and signature is a construction permit number 0570008-013-AC, PSD-FL-234 for Cargill Fertilizer, Inc., animal feed ingredient plant to be located in Riverview, Florida. A revised Technical Evaluation and Preliminary Determination was issued based on the project modifications since the original application, and the facility was required to do a second public notice.

The plant is a source of fluoride emissions which are controlled by a cross-flow packed scrubber and particulate emissions which are controlled by baghouses.

The project modification provides reasonable assurance that all the requirements of the permit and BACT determination will be complied with.

I recommend your approval and signature.

Florida Department of
Environmental Protection

Memorandum

TO: Clair Fancy

FROM: Al Linero  10/8

DATE: October 8, 1996

SUBJECT: Draft Permit - Cargill Animal Feed Ingredient Plants

Attached for your review and approval is the Draft Air Construction Permit, TEPD, BACT and the public notice package for the Animal Feed Ingredients Plants located at the Cargill Riverview / Fertilizer Facility in Hillsborough County.

The review included revising the permitted emission limits for the existing animal feed ingredient plant, allowing construction of a second identical animal feed ingredient plant, and issuing a single permit covering both plants pursuant to PSD. The controls utilized for particulate matter are baghouses and crossflow packed scrubber. The controls for fluoride will be crossflow packed scrubber. NO_x will be minimized by using low nitrogen fuels and combustion control.

We prepared the public notice and the draft permit in the new format. This will be the first complete permit issued under this new format.

AAL/aal/l