



**CARGILL  
FERTILIZER, INC.**

**RECEIVED**

**JUL 20 1992**

8813 Highway 41 South - Riverview, Florida 33569 - Telephone 813-677-9111 - TWX 810-876-0648 - Telex 52666 - FAX 813-671-6146

July 8, 1992

CERTIFIED MAIL: 723 750 714

Bureau of  
Air Regulation

Mr. Clair Fancy  
Bureau of Air Quality Management  
Florida Department of Environmental Regulation  
2600 Blair Stone Rd.  
Tallahassee, FL 32399-2400

Subject: Construction Permits: No. 3 MAP AC29-194504  
No. 4 MAP AC29-194507  
MAP Cooler AC29-194508  
No. 5 DAP AC29-196763, PSD-FL-178

Dear Mr. Fancy,

As you are aware, there have been some questions raised regarding the procedures used in recent modifications to the above-referenced permits. Therefore, as per your letter dated May 4, 1992 (copy attached), please accept this letter as a revised permit modification request to increase permitted production rates of the above-referenced sources as follows:

Permit AC29-196763 - Increase the allowable production input rate of the No. 5 Diammonium Phosphate Plant to 73.5 TPH P<sub>2</sub>O<sub>5</sub>.

Permits AC29-194504 (No. 3 MAP), AC29-194507 (No. 4 MAP) and AC29-194508 (MAP Cooler) - Increase the total allowable production rate to 59.2 TPH (29.6 TPH/Unit). This will require 30.6 TPH P<sub>2</sub>O<sub>5</sub> input and 7.5 TPH of ammonia.

As we previously indicated, we are willing to accept the increased production rates without any associated increase in maximum allowable hourly or annual emissions.

Should you have any questions or require additional information, please feel free to call me or David Buff at 813/671-6207 or 904/331-9000, respectively.

Sincerely,

David B. Jellerson, P.E.  
Environmental Supervisor

Signed David A. Buff  
David A. Buff

KBN Engineering and Applied Sciences, Inc.

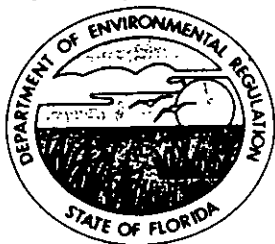
Florida Registration No. PE 19011

cc: B. Thomas - FDER, Tampa  
D. Graziani - EPCHC  
File P-8,9,10,44

Date 7/15/92

*Handwritten notes:*  
D. Jellerson  
7/15/92





# Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Lawton Chiles, Governor

Carol M. Browner, Secretary

May 4, 1992

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

Mr. E. O. Morris  
Environmental Manager  
Cargill Fertilizer, Inc.  
8813 Highway 41 South  
Riverview, Florida 33569

Dear Mr. Morris:

Re: Evaluation of Previously Issued Amendments

No. 3 MAP: AC 29-194504  
No. 4 MAP: AC 29-194507  
MAP Cooler: AC 29-194508  
No. 5 DAP: AC 29-196763, PSD-FL-178

After careful review of the regulations and the recent permitting action taken on the above referenced sources/permits (i.e., amendments made to the above referenced permits); it is apparent that modifications should have been issued instead of amendments in order to establish federally enforceable permit conditions through the Public Notice requirement. Therefore, please provide the following information to the Department's Bureau of Air Regulation and the modifications will be processed as expeditiously as possible:

- o Submit the permitting action requests (i.e., modification instead of amendment) for the above referenced sources/permits under the seal of the original P.E. of Record, since all technical information that is submitted to the Department regarding permitting activity must be properly sealed by a Florida registered P.E. No additional processing fee will be required.

After processing the requests, the Department will issue its Intent, which will have to be Public Noticed in order to establish federally enforceable permit conditions. Upon the completion of the Public Notice period, the permit modifications will be submitted for signature.

I am sorry for the potential inconvenience this activity may cause you. However, this action is to protect your permit rights to operate the referenced sources as you desire and to be

Mr. E. O. Morris  
Page 2

protected under the regulations of Florida Administrative Code Chapters 17-2 and 17-4, and Section 403, Florida Statutes. If there are any questions, please call Bruce Mitchell at (904)488-1344 or write to me at the above address.

Sincerely,



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

CHF/BM/rbm

cc: B. Thomas, SWD  
D. Graziani, HCEPC  
D. Buff, P.E., KBN  
G. Smallridge, Esq., DER

P 710 058 530



### Certified Mail Receipt

No Insurance Coverage Provided  
Do not use for International Mail  
(See Reverse)

PS Form 3800, June 1990

Sent to	
Mr. E. O. Morris, Cargill	
Street & No.	Fertilizer
8813 Highway 41 South	
P.O., State & ZIP Code	
Riverview, FL 33569	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Address of Delivery	
TOTAL Postage & Fees	\$
Postmark or Date	
Mailed: 5-4-92	
Permit: AC 29-194504, 07, 08	
AC 29-196763	
PSD-FL-178	

#### 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 next to the article number.

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

- 1.  Addressee's Address
- 2.  Restricted Delivery

Consult postmaster for fee.

#### 3. Article Addressed to:

Mr. E. O. Morris  
Environmental Manager  
Cargill Fertilizer, Inc.  
8813 Highway 41 South  
Riverview, FL 33569

#### 4a. Article Number

P 710 058 530

#### 4b. Service Type

- Registered  Insured
- Certified  COD
- Express Mail  Return Merch.

#### 7. Date of Delivery

5-7-92

#### 5. Signature (Addressee)

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

#### 6. Signature (Agent)

*Ruth E. Smith*

PS Form 3800 October 1990

U.S. GPO: 1990-273-881

**DOMESTIC RETURN RECEIPT**

COMMISSION  
PHYLLIS BUSANSKY  
JOE CHILLURA  
PAM IORIO  
SYLVIA KIMBELL  
JAN KAMINIS PLATT  
JAMES D. SELVEY  
ED TURANCHIK

FAX (813) 272-5157



ROGER P. STEWART  
EXECUTIVE DIRECTOR  
ADMINISTRATIVE OFFICES  
AND  
WATER MANAGEMENT DIVISION  
1900 - 9TH AVENUE  
TAMPA, FLORIDA 33605  
TELEPHONE (813) 272-5960

AIR MANAGEMENT DIVISION  
TELEPHONE (813) 272-5530

WASTE MANAGEMENT DIVISION  
TELEPHONE (813) 272-5788

ECOSYSTEMS MANAGEMENT DIVISION  
TELEPHONE (813) 272-7104

RECEIVED  
FEB 19 1992  
Division of Air  
Resources Management

February 13, 1992

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

Re: Minor Modification Procedures

Dear Mr. Fancy:

As you are aware, the recent changes to Chapter 17-4, F.A.C. included a \$50.00 fee for "minor modifications." This inclusion has raised several questions and has been discussed briefly at the Air Permit Engineer's Teleconference. Recently the issue impacted our agency when Cargill Fertilizer, Inc. requested "amendments" to four (4) recently issued construction permits. Each of these permits issued by Tallahassee contained a federally enforceable permit condition which restricted production rates. On January 9, 1992, we wrote to you and recommended that the Department deny the amendment request since by Rule 17-2.100(126), F.A.C., it was actually a modification. In response to my letter and under the advice of your staff, Cargill resubmitted their original request as a "minor modification." In discussing the situation with your staff it became very clear that there are no set procedures for processing minor modifications.

We would like to recommend that the BAR issue some guidelines on processing minor modifications as soon as possible. These guidelines should, as a minimum, address the following:

- 1) What constitutes a minor modification?
- 2) How does a permittee apply for a minor modification?
- 3) What information is needed to ensure that a proposed modification is minor?
- 4) Are PE seals required for a minor modification?
- 5) Is public notice required?
- 6) Is a revised or new Preliminary Determination and Technical Evaluation needed?

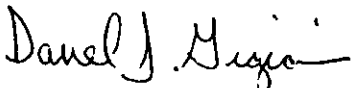
Mr. Clair Fancy, P.E.  
February 13, 1992  
Page 2

- 7) What do we issue the permittee in regards to a permit (i.e., whole new permit or just a letter?)
- 8) Who processes the minor modifications (Districts or Tallahassee)?

We believe that without proper guidelines the "minor modification" will become a basis for debate and argument between the regulatory agencies and the regulated community. We hope that you will be able to take the lead and develop guidelines which are both fair and reasonable for reviewing minor modifications. We would suggest that you circulate a draft of your guidelines to interested locals such as ours, so that we may provide input prior to the procedure becoming final.

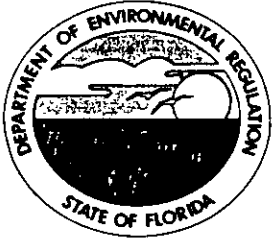
If you have any questions please feel free to contact me at Suncom 543-5530.

Sincerely,



Darrel J. Graziani  
Chief, Air Permitting Section

cc: J. Harry Kerns, P.E., FDER SW District Office



# Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Lawton Chiles, Governor

Carol M. Browner, Secretary

January 30, 1992

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Ozzie Morris, Environmental Manager  
Cargill Fertilizer, Inc.  
8813 Highway 41 South  
Riverview, Florida 33569

Dear Mr. Morris:

Re: Amendment to Permit AC 29-196763, PSD-FL-178  
No. 5 DAP Plant

This is in response to Cargill's letters dated December 26, 1991, and January 22, 1992, requesting amendment of the above permit to allow a 9.4% increase in the permitted production rate without any increase in allowable emissions. The request is acceptable. Specific Condition No. 1 shall be changed as follows:

**FROM:**

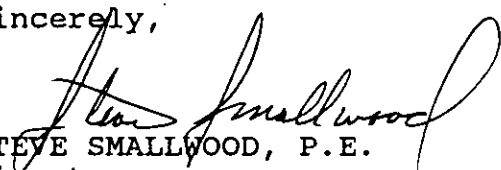
1. Maximum permitted production rate for the No. 5 diammonium phosphate plant shall be 67.2 TPH P<sub>2</sub>O<sub>5</sub> input. If the production rate ..... days.

**TO:**

1. Maximum permitted production rate for the No. 5 diammonium phosphate plant shall be 73.5 TPH P<sub>2</sub>O<sub>5</sub> input. If the production rate ..... days.

This letter shall become Attachment 13, while Cargill's letters of December 26 and January 22, and EPCHC's letter of January 9, shall become Attachments 10, 11 and 12 respectively.

Sincerely,

  
STEVE SMALLWOOD, P.E.  
Director  
Division of Air Resources Mgmt.

SS/JR/plm

Attachments

c: W. Thomas, SWD      J. Campbell, EPCHC      J. Harper, EPA  
C. Shaver, NPS      D. Buff, P.E.

P 832 538 776



### Certified Mail Receipt

No Insurance Coverage Provided  
Do not use for International Mail  
(See Reverse)

Sent to <b>Mr. Ozzie Morris, Cargill</b>	
Street & No <b>Fertilizer</b> <b>8813 Highway 41 South</b>	
P.O., State & ZIP Code <b>Riverview, FL 33569</b>	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Address of Delivery	
TOTAL Postage & Fees	\$
Postmark or Date <b>Mailed: 2-19-92</b> <b>Permit: AC 29-196763</b>	

PS Form 3800, June 1990

#### 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 Fee will provide you the signature of the person delivered to and the date of delivery.

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:

**Mr. Ozzie Morris**  
**Environmental Manager**  
**Cargill Fertilizer, Inc.**  
**8813 Highway 41 South**  
**Riverview, FL 33569**

#### 4a. Article Number

**P 832 538 785**

#### 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

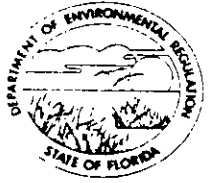
**3-2-92**

#### 5. Signature (Addressee)

#### 6. Signature (Agent)

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





State of Florida  
DEPARTMENT OF ENVIRONMENTAL REGULATION

For Routing To Other Than The Addressee	
To: _____	Location: _____
To: _____	Location: _____
To: _____	Location: _____
From: _____	Date: _____

# Interoffice Memorandum

TO: Steve Smallwood  
FROM: Clair Fancy *CF*  
DATE: January 30, 1992  
SUBJ: Amendment to Construction Permit AC 29-196763  
PSD-FL-178, Cargill Fertilizer, Inc.

Attached for your approval and signature is a letter amending the above referenced permit to allow a small production increase with no increase in allowable emissions. The company claims that the production increase is needed to meet changing market conditions and will be achieved mainly by altering current product screening requirements.

The Bureau recommends approval of this amendment.

Attachments

CHF/JR/plm



# CARGILL FERTILIZER, INC.

8813 Highway 41 South - Riverview, Florida 33569 - Telephone 813-677-9111 - TWX 810-876-0648 - Telex 52666 - FAX 813-671-6146

RECEIVED  
JAN 22 1992  
Division of Air  
Resources Management

January 22, 1992

CERTIFIED MAIL #: 303 011 705

Mr. Clair Fancy  
Bureau of Air Quality Management  
Florida Department of  
Environmental Regulation  
2600 Blair Stone Rd.  
Tallahassee, FL 32399-2400

Subject: Construction Permits: No. 3 MAP AC29-194504  
No. 4 MAP AC29-194507  
MAP Cooler AC29-194508  
No. 5 DAP AC29-196763

Dear Mr. Fancy,

Attached, please find a check (No. 577101052) in the amount of \$1,000 to cover the minor permit modification requests submitted to you on December 26, 1991 concerning the above-referenced permits.

In addition, after discussing the requested permit changes for the No. 5 DAP plant with Mr. John Reynolds of your staff, we would like to reduce our requested production increase. In our December 26, 1991 letter we requested that the No. 5 DAP source production permit limit be increased from 67.2 TPH P<sub>2</sub>O<sub>5</sub> to 76.7 TPH P<sub>2</sub>O<sub>5</sub>. We would like to reduce the requested amount to 73.5 TPH P<sub>2</sub>O<sub>5</sub>. Further, as we previously discussed, no increase in emissions is requested.

Should you have any questions or require additional information, please feel free to call me or David Jellerson at 671-6153 or 671-6207, respectively.

Sincerely,

*E. O. Morris*

E. O. Morris  
Environmental Manager

cc: B. Thomas - FDER, Tampa  
W. Hanks, J. Reynolds - FDER, Tallahassee  
D. Graziani - EPCHC  
Wilcox, Singletary, Jellerson  
file P-44A,10,9,8

90%



COMMISSION  
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PAM IORIO  
SYLVIA KIMBELL  
JAN KAMINIS PLATT  
JAMES D. SELVEY  
ED TURANCHIK

FAX (813) 272-5157



ROGER P. STEWART  
EXECUTIVE DIRECTOR  
ADMINISTRATIVE OFFICES  
AND  
WATER MANAGEMENT DIVISION  
1900 - 8TH AVENUE  
TAMPA, FLORIDA 33605  
TELEPHONE (813) 272-5960

AIR MANAGEMENT DIVISION  
TELEPHONE (813) 272-5530

WASTE MANAGEMENT DIVISION  
TELEPHONE (813) 272-5786

ECOSYSTEMS MANAGEMENT DIVISION  
TELEPHONE (813) 272-7104

January 9, 1992

Division of Air  
Resources Management

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

Re: DER Permit Nos. AC29-196763 (No. 5 DAP Plant), AC29-194504  
(No. 3 MAP Plant), AC29-194507 (No. 4 MAP Plant) and AC29-  
194508 (Cooler)

Dear Mr. Fancy:

On December 26, 1991, Cargill Fertilizer, Inc. requested the Department to amend the above permits to allow an increase in production rates. The company is reporting that the rate increases are a result of the modifications authorized by these construction permits.

A review of the permits indicates that the permits contain "federally enforceable permit conditions" which restrict the production and/or throughput rates. As such, the company's request should be viewed as a modification (Rule 17-2.100(126), F.A.C.) and an application for the higher rates should be requested by the Department.

Based on my review, I recommend that the Department deny the company's requests for the rate increases.

Sincerely,

Darrel Graziani  
Chief, Air Permitting Section

bm

cc: J. Harry Kerns, P.E., FDER SW-District  
Ozzie Morris, Cargill Fertilizer, Inc.

*J. Kerns*  
*O. Morris*



**CARGILL  
FERTILIZER, INC.**

RECEIVED

DEC 30 1991

Division of Air  
Resources Management

8813 Highway 41 South - Riverview, Florida 33569 - Telephone 813-677-9111 - TWX 810-876-0648 - Telex 52666 - FAX 813-671-6146

December 26, 1991

CERTIFIED MAIL #: 303 011 700

Mr. Clair Fancy  
Bureau of Air Quality Management  
Florida Department of  
Environmental Regulation  
2600 Blair Stone Rd.  
Tallahassee, FL 32399-2400

Subject: Construction Permit AC29-196763  
No. 5 DAP Plant Expansion

Dear Mr. Fancy,

On 11/26/91 the Department issued permit AC29-196763 to increase the production input rate of the No. 5 Diammonium Phosphate Plant from 55.2 TPH  $P_2O_5$  to 67.2 TPH  $P_2O_5$ . The permit application for the plant expansion included a BACT determination which resulted in permit with emission limitations substantially more stringent than New Source Performance Standards. The new emissions limitations are as follows:

POLLUTANT	STANDARD	MAXIMUM ALLOWABLE EMISSIONS	
	lb/T $P_2O_5$	lb/hr	T/yr
PM/PM10	0.19	12.8	56.0
SO <sub>2</sub>	0.58	32.4	83.7
Fluoride	0.06	3.3	14.5

The increase in production was to be accomplished by upgrading screens, mills, elevators, and conveyors to increase recycle capacity. Along with the production modifications, pollution control upgrades included an improved ammonia recovery system, installation of more efficient scrubber spray nozzles, increased scrubber liquid flow rates and improved energy efficiency.

As indicated, the primary focus of the production modifications was in recycle and screening capacity to produce a high quality, specifically sized product. However, marketing opportunities have



RECYCLED PAPER

arisen with less stringent customer requirements. As a result, the expanded plant is capable of producing larger quantities of product by reducing recycle volume and screening requirements.

*14% increase*  
The construction permit provides that the unit may be operated at rates more than 10% greater than 67.2 TPH P<sub>2</sub>O<sub>5</sub>, provide the agencies are notified and a compliance test is conducted. We therefore request that the construction permit be modified to allow production of up to 76.7 TPH P<sub>2</sub>O<sub>5</sub>. Further, we are willing to accept the increased production rate without any associated increase in maximum allowable hourly or annual emissions. We also recognize that whenever production rates exceed rates during the most recent compliance test by more than 10%, a new compliance test must be conducted.

Should you have any questions or require additional information, please feel free to call me or David Jellerson at 671-6153 or 671-6207, respectively.

Sincerely,

*E. O. Morris*

E. O. Morris  
Environmental Manager

cc: B. Thomas - FDER, Tampa  
D. Graziani - EPCHC  
D. Jellerson  
A. Wilcox  
J. Singletary  
P-44 A

*J. Repolite*

