

Golder Associates Inc.

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February 4, 2004

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RECEIVED

FEB 05 2004

Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2400

BUREAU OF AIR REGULATION

Attention: A.A. Linero, P.E., Bureau of Air Regulation

RE: DEP File No. 0570008-044-AC; PSD-FL-336
CARGILL FERTILIZER, INC. - RIVERVIEW FACILITY, NO. 6 GRANULATION PLANT
RESPONSE TO REQUESTS FOR ADDITIONAL INFORMATION

Dear Mr. Linero:

Cargill Fertilizer, Inc. (Cargill) and Golder Associates Inc. (Golder) have received the Department's requests for additional information (RAIs) dated November 5, 2003, and November 14, 2003, concerning the permit no. 0570008-044-AC; PSD-FL-336 for modification of the No. 6 Granulation Plant (formerly EPP Plant). The comments are addressed below in the order they appear in each letter.

November 5, 2003 RAI

1. Please provide sufficiently detailed drawings of the scrubber systems being relocated and the proposed new scrubbers to allow a proper engineering evaluation of their expected performance. Also provide sufficiently detailed engineering descriptions of the new and existing scrubbers including calculations of their design efficiencies for PM/PM₁₀ and fluoride removal. [Rule 62-4.070(3), F.A.C., Standards for Issuance or Denial of Permits. Rule 62-212.400, F.A.C., Prevention of Significant Deterioration/Best Available Control Technology]

Response:

Detailed drawings of the scrubber systems are included in Attachment A. The design of the emission control systems proposed by Cargill for this project are based on actual performance tests from the similar system in operation at Cargill's Green Bay North MAP/DAP Plant, rather than on theoretical design efficiencies.

Cargill has previously submitted historic emissions test data for the North MAP/DAP Plant to the Department in conjunction with a PSD application for the Green Bay facility. As an update to the previously submitted test data, please refer to Tables A and B (attached), which revises the 10/26/99-10/27/99 MAP test data originally presented in Table 5-7 of Golder's October 1, 2003, letter regarding the Green Bay PSD application. These results represent total emissions from both the RG stack and the dryer/cooler/vents stack serving the North MAP/DAP Plant.

The test data from the North MAP/DAP Plant supports Cargill's proposed limits of 0.04 lb/ton P₂O₅ for fluorides and 0.15 lb/ton P₂O₅ for PM. The highest compliance test for fluorides is 0.036 lb/ton. Allowing a 10 percent safety factor above this measured result yields a limit of 0.04 lb/ton. This proposed limit is also consistent (within round-off error) with the most stringent BACT determinations issued to date, which range from 0.037 to 0.042 lb/ton.

The highest compliance tests for PM at the North MAP/DAP Plant are above Cargill's proposed limit of 0.15 lb/ton. However, the majority of tests are below the 0.15-lb/ton level, and Cargill believes the improved equipment proposed for the No. 6 Granulation Plant can meet the proposed limit. This proposed limit is also consistent with the most stringent BACT determinations issued to date (0.15 lb/ton).

2. Since the new scrubbing configuration involves removing the reactor/granulator tail gas scrubber, please provide sufficiently detailed engineering calculations of the relative PM/PM₁₀ and fluoride removal efficiencies for two cases: (a) the ammonia vaporizer without a tailgas scrubber as proposed; and (b) the ammonia vaporizer exhaust being directed to the dryer tail gas scrubber. Also, please quantify the gaseous fluoride that will be stripped from the RGV Venturi Scrubber solution and the total fluoride removal effected by the recirculated condensate in the ammonia vaporizer. [Rule 62-4.070(3), F.A.C., Standards for Issuance or Denial of Permits. Rule 62-212.400, F.A.C., Prevention of Significant Deterioration/Best Available Control Technology]

Response:

Please see the response to Item 1, above, for more discussion regarding fluoride emission performance of the proposed vaporizer scrubber. As indicated by the actual performance data from the similarly designed scrubber at the Green Bay facility, the proposed system is capable of achieving emission levels consistent with current BACT levels. A review of the Green Bay North Granulation Plant emission test results shows that the largest source of potential fluoride emissions (the Reactor/Granulator section) has lower emissions than the Dryer section of the plant. This is due to the superior performance of the vaporizer scrubbing system versus the conventional pond water packed scrubber.

November 14, 2003 RAI

1. It appears there is a discrepancy in the proposed production rate increase for the AP Plant of 4000 TPD vs. 4478 TPD. Which one is correct?

Response:

The correct AP production rate for the No. 6 Granulation Plant is 4,478 TPD.

2. What is the capacity of the new Pipe Reactor and the new reactor that will replace Reactor Nos. 1 & 2? Submit design drawings and specifications of all the proposed new equipment.

Response:

The capacity of the new Pipe Reactor is 40 percent of the total capacity, or 1,791 TPD AP. The capacity of the new reactor that will replace Reactor Nos. 1 and 2 is 60 percent of the total capacity, or 2,687 TPD AP. The design drawings and specifications are included in Attachment B.

3. Please explain in details the mode of operation of this plant and the different processes (i.e.: GTSP, AP, and the phosphates fertilizers with added nitrogen, sulfur and micronutrients)?

Response:

The modes of operation are described in detail in the following.

Ammoniated Phosphate (AP) modes:

DAP:

Diammonium Phosphate (DAP) fertilizer will be produced by a slurry process. This is done by mixing phosphoric acid with ammonia. The mixing will take place inside a preneutralizer and/or a pipe reactor (the preneutralizer and pipe reactor will run in parallel). For added flexibility, the preneutralizer or the pipe reactor can run independently of each other as well (i.e., one may be shut down for maintenance, while the other continues to produce product). Final ammoniation will occur inside the granulator where both the preneutralizer's slurry and the pipe reactor's slurry discharge on top of the granulator's bed of recycle material. The ammonia sparger is buried in this bed of material.

The moist granules from the granulator are dried and screened. The product-sized material is cooled, while the undersized and crushed oversized granules are recycled.

When necessary to boost nitrogen grade, a 60-percent urea solution can be sprayed onto the product inside the rotary cooler.

Ammonia and dust escaping from the granulator, preneutralizer, and dryer circuits are recovered by scrubbing with phosphoric acid and this scrubber solution is added to the preneutralizer and/or pipe reactor.

MAP:

This process is similar to the DAP process with the exception that phosphoric acid may be sprayed in the granulator bed instead of ammonia. Less ammonia is used to produce monoammonium phosphate (MAP) than is used for DAP. Urea is not needed for grade control.

MicroEssentials™:

This process can be integrated into the ammoniated phosphate (AP) production processes mentioned above. Inclusion of nutrient sulfur and microelements is accomplished by adding sulfur and/or sulfuric acid along with several micronutrients in various combinations and concentrations.

The sulfur is added by a patented process in its molten state via a spray header inside the granulator. The sulfur then becomes incorporated into the fertilizer granules.

Sulfur grade may also be increased by mixing sulfuric acid with ammonia, either in the preneutralizer or pipe reactor, to make ammonium sulfate. The ammonium sulfate becomes a part of the reactor slurry, which in turn is incorporated into the fertilizer granules.

Micronutrients can be added one of two ways. They may be slurried with phosphoric acid and then pumped to the preneutralizer or the pipe reactor; or micronutrients may be added dry to the recycle stream. Both methods result in the micronutrients being incorporated within the fertilizer granules.

4. Your application states that fluoride (F) emissions from the No. 2 and No. 4 building will not be increased since they stored GTSP and this production rate is not increased by this project. Since the AP production rate will increase, would it be any increase of F in the building as a result of storing AP? (Refer to Sections 2.2.5 and 2.22.7 of the PSD report)

Response:

The F emission limit for the GTSP Storage Building Nos. 2 and 4 applies solely due to the storage of GTSP. This is because GTSP has a high F content. However, the GTSP Storage Buildings

Nos. 2 and 4 do not have an F limit for the storage of AP because AP emits very minimal amounts of F emissions during storage. Since the GTSP production rate is not increasing as part of this project, the F emissions from the GTSP Storage Buildings will not increase.

5. **Since the facility expansion permitted in 2001 has not been completed, recalculate Table 3-3 of the application using actual emission data for the last 2 years of operation. The GTSP plant and the other affected units are existing emission units that have been operating for several years. Therefore, actual emissions data should be used in this calculation.**

Response:

The construction authorized under Permit No. 0570008-036-AC is not completed. This permit authorized construction activities for the following emission units:

- Molten Sulfur Handling System
- Nos. 8 and 9 Sulfuric Acid Plants
- Phosphoric Acid Plant
- GTSP Plant (renamed the EPP Plant; now called No. 6 Granulation Plant)
- AFI Plant No. 1
- AFI Plant No. 2
- No. 5 DAP Plant (now called No. 5 Granulation Plant)

PSD review was triggered for the following pollutants in the facility-wide PSD permit: fluorides, SO₂, NO_x, PM, PM₁₀, and sulfuric acid mist.

Table 3-3 of the application included the Phosphoric Acid Plant, EPP Plant, Material Handling System, and the new Molten Sulfur Tank as "affected" emission units. The Phosphoric Acid Plant completed construction under the 2001 facility-wide permit with the compliance testing conducted on April 3, 2003. The EPP Plant is still undergoing construction related to the 2001 facility-wide permit. The plant is not yet operating at the higher production rate of 52 TPH to 100 TPH. The new Molten Sulfur Tank has not yet been completed. Since construction is not complete on these units, Cargill has not begun "normal" operation with these modified emissions units.

In the PSD rules, "actual emissions" are defined several ways. Per Rule 62-210.200(11)(c) and 40 CFR 51.166(21)(iv), actual emissions for an emissions unit that has not begun normal operation on the particular date shall equal the potential-to-emit of the emissions unit on that date. Since these emissions units have not begun normal operation as of the date of the No. 6 Granulation Plant application, by rule the potential emissions are used to represent the past "actual emissions" of these modified emissions units.

Furthermore, since actual emissions from the previous 2 years of operation do not reflect the normal operation of these modified emissions units under Permit No. 0570008-036-AC, it would not be appropriate to use the actual emissions for the years 2002-2003 to represent these emissions units. Therefore, it is justified to use the potential emissions from Permit No. 0570008-036-AC as the "actual emissions" in Tables 2-4 and 3-3.

Moreover, the allowable or maximum emissions shown in Table 3-3 as the past actual emissions for these emissions units have already undergone PSD review (in the 2001 facility-wide PSD permit). Requiring the 2002-2003 actual emissions to be used for these emissions units would, in essence, treat the 2001 PSD permit as if it never existed. The emissions that have already been approved would now be re-reviewed (i.e., double jeopardy).

Cargill therefore believes it is appropriate to use, in Table 3-3, the allowable or maximum emissions approved in the 2001 facility-wide PSD permit as "past actual emissions" for the Phosphoric Acid Plant, EPP Plant, and Molten Sulfur Tank. Golder also believes that this is appropriate according to the PSD regulations.

6. **Are the potential F emissions as a result of this modification 15.04 TPY or 22.46 TPY? It appears that the GTSP emissions (7.42 TPY) are not counted (Refer to Page 19—Section G of the application and Table 3-3 of the PSD report). Please explain.**

Response:

The maximum potential F emissions as a result of the modification are 3.43 lb/hr and 15.04 TPY as stated in the application. Since GTSP and AP are not produced simultaneously, it is not appropriate to add the maximum potential emissions resulting from production of AP (15.04 TPY) to the maximum potential emissions resulting from production of GTSP (7.42 TPY). The No. 6 Granulation Plant produces either AP or GTSP at a given time. Therefore, the maximum potential emissions at a given time would result from the product (AP or GTSP) that was being produced during that time. To estimate the maximum potential emissions for the No. 6 Granulation Plant, the maximum potential emissions resulting from the production of AP and GTSP were calculated separately. Therefore, the maximum potential F emissions for the proposed project were based on the worst-case emissions from AP production.

7. **Are the potential PM/PM₁₀ emissions as a result of this modification 19.82/19.58 or 84.20 TPY? It appears that the total GTSP and AP emissions (56.39 + 27.81 TPY) are not counted (Refer to Page 19—Section G of the application and Table 3-3 of the PSD report). Please explain.**

Response:

The maximum potential PM/PM₁₀ emissions as a result of the modification are 12.88 lb/hr and 56.39 TPY as stated in the application. As stated in response no. 6 above, since GTSP and AP are not produced simultaneously, it is not appropriate to add the maximum potential emissions resulting from production of AP (56.39 TPY) to the maximum potential emissions resulting from production of GTSP (27.81 TPY). The No. 6 Granulation Plant produces either AP or GTSP at a given time. Therefore, the maximum potential emissions at a given time would result from the product (AP or GTSP) that was being produced during that time. To estimate the maximum potential emissions for the No. 6 Granulation Plant, the maximum potential emissions resulting from the production of AP and GTSP were calculated separately. Therefore, the maximum potential PM/PM₁₀ emissions for the proposed project were based on the worst-case emissions from AP production.

8. **Your application states that the GTSP plant is not subject to the NSPS, Subpart W requirements due to this modification (Page 3-11). Please explain.**

Response:

The NSPS, Subpart W applies to facilities that commence construction or modification after October 22, 1974. The No. 6 Granulation Plant (formerly GTSP Plant) was constructed prior to October 22, 1974. The NSPS General Provisions (40 CFR 60 Subpart A) define "modification" as:

Any physical change in, or change in the method of operation of, an existing facility which increases the amount of any air pollutant (to which a standard applies) emitted into the atmosphere by that facility or which results in the emission of any air pollutant (to which a standard applies) into the atmosphere not previously emitted.

The NSPS General Provisions (40 CFR 60 Subpart A) also defines "emission rate" for a modification as:

Emission rate shall be expressed as kg/hr of any pollutant discharged into the atmosphere for which a standard is applicable.

The proposed modification of the No. 6 Granulation Plant does not meet this NSPS definition of modification since the actual emissions are not increasing on a lb/hr basis for the pollutant for which the standard applies (F emissions from GTSP production). This is because the GTSP production rate is not being modified as part of the proposed project. Therefore, since the No. 6 Granulation Plant was neither constructed or modified after October 22, 1974, the NSPS, Subpart W does not apply to the No. 6 Granulation Plant.

9. Please redo any significant impact area modeling due to emissions changes as a result of recalculations required by comment number 5 above. Also update Table 6-3 to reflect the use of actual emissions. If the significant impact area changes for PM₁₀, then further applicable AAQS and increment modeling should be done. If current versus future fluoride impacts change, these changes should be updated in Tables 6-16 and 6-17. If pollutant applicability changes and other pollutants are subject to PSD, then all required modeling associated with those pollutants should be performed. In addition, if the emission changes impact the regional haze analysis, it needs to be updated.

Response:

As explained in comment No. 5 above, it is not appropriate to revise the emissions. Therefore, it is not necessary to revise the modeling analyses.

If you have any questions concerning this information, please call me at (352) 336-5600 or Dean Ahrens, Cargill, at (813) 671-6369.

Sincerely,

GOLDER ASSOCIATES INC.



David A. Buff, P. E., Q. E. P.

Principal Engineer

Florida P. E. #19011

SEAL

DB/FWB/jej

Enclosures

cc: D. Ahrens, Cargill
F. Bergen, Golder
A. Harmon, HCEPC
D. Jellerson, Cargill
G. Kissel, FDEP SW District

D. Ahrens
Y:\Projects\2002\0237575\Cargill Riverview-4.4.1\020404\L020404.doc

C. Holladay
J. Shultz, EPA
G. Bumgarner, NPS

Table A. Summary of Recent Particulate Matter Emission Tests at the North MAP/DAP Fertilizer Plant, Cargill Green Bay

Date	Average Production Rate ^a (tons/hr)	Average Process Rate ^b (tons/hr)	PM Emissions ^c	
	avg lb/hr	avg lb/ton P_2O_5		
MAP Production				
8/1/02-8/2/02	160.4	81.8	10.19	0.125
3/27/01-3/28/01	167.3	85.3	8.44	0.099
3/16/00-3/17/00	148.6	75.8	16.99	0.224
3/16/00-3/20/00	150.1	76.6	11.75	0.154
10/26/99-10/27/99	139.7	71.3	9.07	0.127
6/30/99-7/2/99	143.5	73.2	6.90	0.094
4/12/99-4/14/99	158.0	80.6	6.77	0.084
DAP Production				
5/1/02-5/2/02	94.8	43.6	14.02	0.322
2/13/01-2/14/01	106.0	48.8	7.24	0.148
4/6/00-4/7/00	97.9	45.1	3.03	0.067
3/17/99-3/18/99	94.9	43.7	2.02	0.046
1/20/99-1/21/99	94.0	43.3	5.12	0.118
1/26/98-1/29/98	99.3	45.7	7.90	0.173

^a As MAP or DAP. Based on 51% P_2O_5 for MAP and 46% P_2O_5 for DAP.

^b As P_2O_5 .

^c Represents both stacks combined.

Table B. Summary of Recent Fluoride Emission Tests at the North MAP/DAP Fertilizer Plant, Cargill Green Bay

Date	Average Production Rate ^a (tons/hr)	Average Process Rate ^b (tons/hr)	R/G Stack Emissions		Dryer Stack Emissions		Total F Emissions ^c	
			avg lb/hr	avg lb/ton P ₂ O ₅	avg lb/hr	avg lb/ton P ₂ O ₅	avg lb/hr	avg lb/ton P ₂ O ₅
MAP Production								
8/1/02-8/2/02	160.4	81.8	0.27	0.0033	0.54	0.0066	0.81	0.0099
3/27/01-3/28/01	167.3	85.3	0.43	0.0050	0.50	0.0058	0.93	0.0108
3/16/00-3/17/00	148.6	75.8	0.12	0.0016	1.09	0.0144	1.21	0.0160
3/16/00-3/20/00	150.1	76.6	1.23	0.0160	0.33	0.0043	1.55	0.0203
10/26/99-10/27/99	139.7	71.3	1.17	0.0164	0.64	0.0090	1.80	0.0253
6/30/99-7/2/99	143.5	73.2	0.63	0.0086	2.01	0.0275	2.64	0.0361
4/12/99-4/14/99	158.0	80.6	1.05	0.0130	0.92	0.0114	1.97	0.0244
DAP Production								
5/1/02-5/2/02	94.8	43.6	0.03	0.0008	1.02	0.0235	1.06	0.0242
2/13/01-2/14/01	106.0	48.8	0.12	0.0024	0.90	0.0185	1.02	0.0209
4/6/00-4/7/00	97.9	45.1	0.18	0.0040	0.10	0.0022	0.28	0.0061
3/17/99-3/18/99	94.9	43.7	0.02	0.0004	0.69	0.0158	0.71	0.0162
1/20/99-1/21/99	94.0	43.3	0.06	0.0013	0.50	0.0116	0.56	0.0129
1/26/98-1/29/98	99.3	45.7	0.25	0.0056	0.57	0.0125	0.83	0.0181

^a As MAP or DAP. Based on 51% P₂O₅ for MAP and 46% P₂O₅ for DAP.

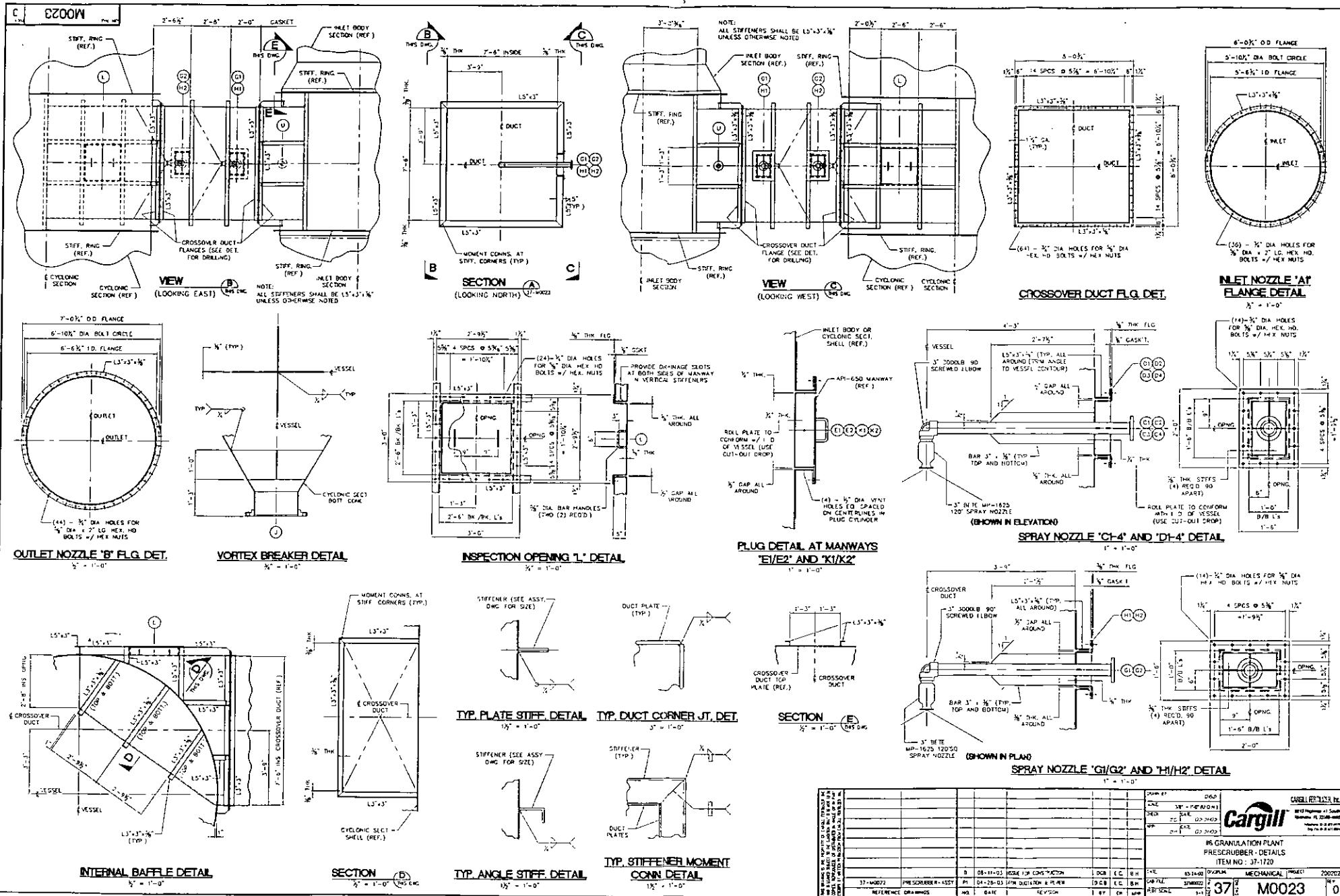
^b As P₂O₅.

^c Represents both stacks combined.

ATTACHMENT A

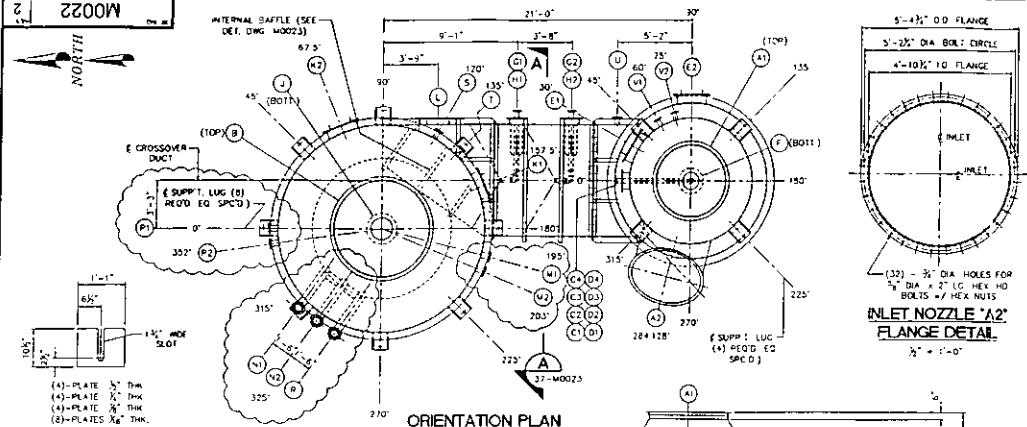
Attachment A, List of Attachments

<u>Drawing Number</u>	<u>Drawing Title</u>
37 M0023 0	No. 6 Granulation Plant Prescrubber-Details
37 M0022 2	No. 6 Granulation Plant Prescrubber-Assembly
37 M0021 0	No. 6 Granulation Plant Cooler Venturi Scrubber-Details
37 M0020 0	No. 6 Granulation Plant Cooler Venturi Scrubber-Assembly
37 M0025 0	No. 6 Granulation Plant Dryer Scrubber-Details
37 M0024 0	No. 6 Granulation Plant Dryer Scrubber-Assembly
37 M0027 0	No. 6 Granulation Plant RGV Scrubber-Details
37 M0026 1	No. 6 Granulation Plant RGV Scrubber-Assembly
37 M0057 0	No. 6 Granulation Plant Dryer Scrubber-Adjustable Throat Venturi Details
37 M0058 0	No. 6 Granulation Plant RGV Scrubber-Adjustable Throat Venturi Details
37 M0015 P1	No. 6 Granulation Plant Dryer Tailgas Scrubber-Modification Details
32-M-328	GTSP Plant Dryer Tailgas Scrubber Plan, Elevation, & Details
32-M-333	GTSP Plant Dryer Tailgas Scrubber-Scrubber Details & Sections

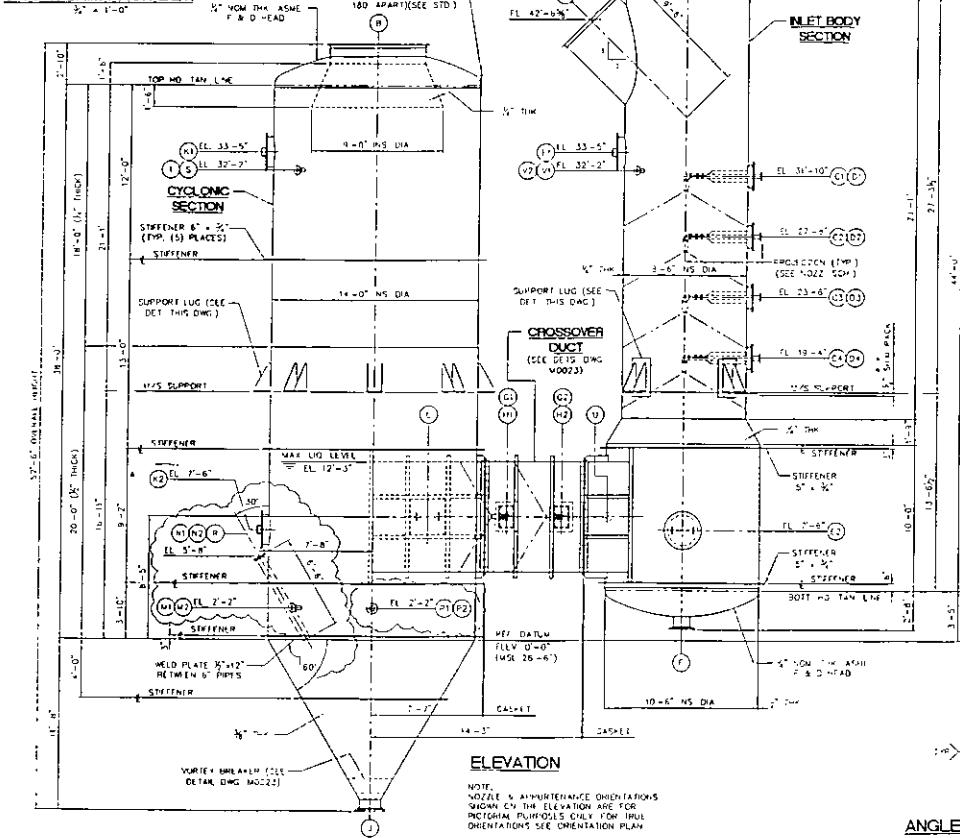


M0022

NORTH



ORIENTATION PLAN

INLET BODY SECT.
SUPPT. SHIM PACK DET.

NOZZLE SCHEDULE

CORR	QTY	ACT	CLASS	PROJECTION	NO. NUTS	DESIGN
A1	1	6"	13 3/8"	VAPOR INLET	1-3/8"	SEE Dwg M0023
A2	1	5 1/2"	13 3/8"	VAPOR INLET	1-3/8"	SEE Dwg M0023
B1	1	70"	3 3/4"	VAPOR OUTLET	3 3/4"	SEE Dwg M0023
C1	1	3"	13 3/8"	CROSSOVER SPRAY	SCH 40S	-5°
C2	1	3"	13 3/8"	CROSSOVER SPRAY	SCH 40S	-5°
C3	1	3"	13 3/8"	CROSSOVER SPRAY	SCH 40S	-5°
C4	1	3"	13 3/8"	CROSSOVER SPRAY	SCH 40S	-5°
D1	1	12'-0"	13 3/8"	INLET BODY SPRAY	SCH 40S	12'-0"
D2	1	12'-0"	13 3/8"	INLET BODY SPRAY	SCH 40S	12'-0"
D3	1	12'-0"	13 3/8"	INLET BODY SPRAY	SCH 40S	12'-0"
E1	1	12'-0"	13 3/8"	INLET BODY SPRAY	SCH 40S	12'-0"
E2	1	12'-0"	13 3/8"	INLET BODY SPRAY	SCH 40S	12'-0"
E3	1	12'-0"	13 3/8"	INLET BODY SPRAY	SCH 40S	12'-0"
F1	1	12'-0"	13 3/8"	INLET BODY SPRAY	SCH 40S	12'-0"
G1	1	14"	13 3/8"	INLET BODY SPRAY	SCH 40S	14"
H1	1	12'-0"	13 3/8"	MOUNT FOR GL	SCH 40S	12'-0"
I1	1	12'-0"	13 3/8"	MOUNT FOR GL	SCH 40S	12'-0"
J1	1	12'-0"	13 3/8"	MOUNT FOR GL	SCH 40S	12'-0"
K1	1	24"	PER 4 A.M.P. CYCLONE SECTION DRAIN	SCH 40S	24"	SEE Dwg M0023
L1	1	24"	PER 4 A.M.P. CYCLONE SECTION SHELL M/W H/D	SCH 40S	24"	SEE Dwg M0023
M1	1	24"	PER 4 A.M.P. CYCLONE SECTION SHELL M/W H/D	SCH 40S	24"	SEE Dwg M0023
N1	1	6"	13 3/8"	CROSSOVER DUCT SPRAY	SCH 40S	6"
O1	1	14"	13 3/8"	CROSSOVER DUCT SPRAY	SCH 40S	14"
P1	1	6"	13 3/8"	CROSSOVER DUCT SPRAY	SCH 40S	6"
Q1	1	6"	13 3/8"	CROSSOVER DUCT SPRAY	SCH 40S	6"
R1	1	6"	13 3/8"	CROSSOVER DUCT SPRAY	SCH 40S	6"
S1	1	3"	13 3/8"	INLET BODY SPRAY	SCH 40S	3"
T1	1	3"	13 3/8"	INLET BODY SPRAY	SCH 40S	3"
U1	1	3"	13 3/8"	INLET BODY SPRAY	SCH 40S	3"
V1	1	3"	13 3/8"	INLET BODY SPRAY	SCH 40S	3"
W1	1	3"	13 3/8"	INLET BODY SPRAY	SCH 40S	3"
X1	1	3"	13 3/8"	INLET BODY SPRAY	SCH 40S	3"

DESIGN DATA

GENERAL		PERMITTED
DESIGN AND CONSTRUCTION CODE	API 650 LATEST EDITION	7" AND 5"
APPLICABLE CODE ADDENDUMS		107
DESIGN INTERNAL DIMS & DESIGN LID DESIGN		2157
PRESSURE INTERNAL	-40 TO 40	TEMP MAXIMUM 100°F
OPERATING INTERNAL	20 TO 100	TEMP MAXIMUM 100°F
PRESSURE EXTERNAL	-25 TO -75°F	TEMP MAXIMUM 100°F
OPERATING EXTERNAL	50 TO 140°F	TEMP MAXIMUM 100°F
Liquid OPERATING LEVELS	EMPTY	PUMPING RATES
MINIMUM	SEE Dwg	OUT
MAXIMUM	SEE Dwg	SEE Dwg
LEVELS	SEE Dwg	SEE Dwg

CONTENTS: AMMONIA DUST + NH3. ACID NEUTRALIZED TO ANH3 PH OF 7-1-45
COMPUTED SPECIFIC GRAVITY 1.35
COMPUTED VOLUME 3000 cu ft
PER ASME B31.3
WELD TEST PER CODE: NOSE & END OF WELD M0023

SEISMIC DESIGN	
0.2 SPECIAL RESPONSE ACC 1/3 GROSS	10% SPECIAL RESPONSE ACC 1/4 GROSS
SHELL	STRUCTURES
INTERNAL	REMOVABLE INTERNALS
ANCHOR BOLTS	OPERATING INLET BODY SECT. (INC. 2 OF CROSSOVER) 8,000 GALS. (RES UL) CYCLONE SECT. (INC. 2 OF CROSSOVER) 21,000 GALS.
CYLINDRICAL SECTION	FABRICATED CYCLONE SECTION 52,000 LBS
WEIGHTS	EMPTY INLET BODY SECTION 35,500 LBS. FILLED INLET BODY SECTION 173,000 LBS. OPERATING INLET BODY SECTION (RES. UL) CYCLONE SECTION 228,000 LBS. TOTAL MAXIMUM OPERATING 335,000 LBS.
FORCES	MAX OVER TURNING MOMENT AT SUPPORTS (MIN.) LATEN FT LES LATEN FT LES MAX SHEAR AT SUPPORTS (MIN.) LATEN FT LES LATEN FT LES

INSPECTION AND TESTING

INSPECTION BY	TESTING
WELD RADIOGRAPHY SHOT FIN API 520	ICP HD SW / SOAP Suds
EXAM 1	LEAK TEST FL AM / SOAP Suds

WILL TEE REPORTS REQUIRED	YES
CCDS	CCDS
TOP HEAD TYPE	FLANGE AND AXLE F.D.
BOTTOM HEAD TYPE	CONCENTRIC AND AXLE F.D.
PLATE SEAMS	TOP HEAD BOTTOM HEAD

MISCELLANEOUS	NOTES
PAINTING	LARGER SHELL PARTS LIGHT COATIFICATION INTERIOR EXTERNAL PAINTING
INSULATION	NOT REQUIRED

REFERENCE STANDARDS AND SPECIFICATIONS

STANDARDS	1" AND 1 1/2" ALLS. PRECAUTIONS NO. 10000-1
RATING	MIN. CARBON STEEL (20-300-100) MAX. 200°F
VESSEL CONSTR. TOLERANCES	ASME B31.3 10000-1
VESSEL LIFTING LUGS	ASME B31.3 10000-1

MATERIALS

SHELL	4"-240 GR 366 (100%)	4"-240 GR 366
ROTATION HEAD		
TOP HEAD		
BOTTOM HEAD		
PLATE SEAMS		

MATERIALS	4"-192 GR 366 (100%)	4"-312 GR 366
NOZZLES (PLATE)		
NECKS (PLATE)		
FLANGES		
ANCHORS		
STIFFENERS		

MATERIALS	1/2" THK NOZZLES FULL FACE (20 DUOMETER)	4"-192 F/TBL
NOZZLES		
NECKS		
FLANGES		
ANCHORS		
STIFFENERS		

MATERIALS	1/2" THK NOZ. PLATE PLATED (20 DUOMETER)	4"-192 F/TBL
NOZ. PLATE		
NECKS		
FLANGES		
ANCHORS		
STIFFENERS		

MATERIALS	1/2" THK NOZ. PLATE PLATED (20 DUOMETER)	4"-192 F/TBL
NOZ. PLATE		
NECKS		
FLANGES		
ANCHORS		
STIFFENERS		

MATERIALS	1/2" THK NOZ. PLATE PLATED (20 DUOMETER)	4"-192 F/TBL
NOZ. PLATE		
NECKS		
FLANGES		
ANCHORS		
STIFFENERS		

MATERIALS	1/2" THK NOZ. PLATE PLATED (20 DUOMETER)	4"-192 F/TBL
NOZ. PLATE		
NECKS		
FLANGES		
ANCHORS		
STIFFENERS		

MATERIALS	1/2" THK NOZ. PLATE PLATED (20 DUOMETER)	4"-192 F/TBL
NOZ. PLATE		
NECKS		
FLANGES		
ANCHORS		
STIFFENERS		

MATERIALS	1/2" THK NOZ. PLATE PLATED (20 DUOMETER)	4"-192 F/TBL
NOZ. PLATE		
NECKS		
FLANGES		
ANCHORS		
STIFFENERS		

MATERIALS	1/2" THK NOZ. PLATE PLATED (20 DUOMETER)	4"-192 F/TBL
NOZ. PLATE		
NECKS		
FLANGES		
ANCHORS		
STIFFENERS		

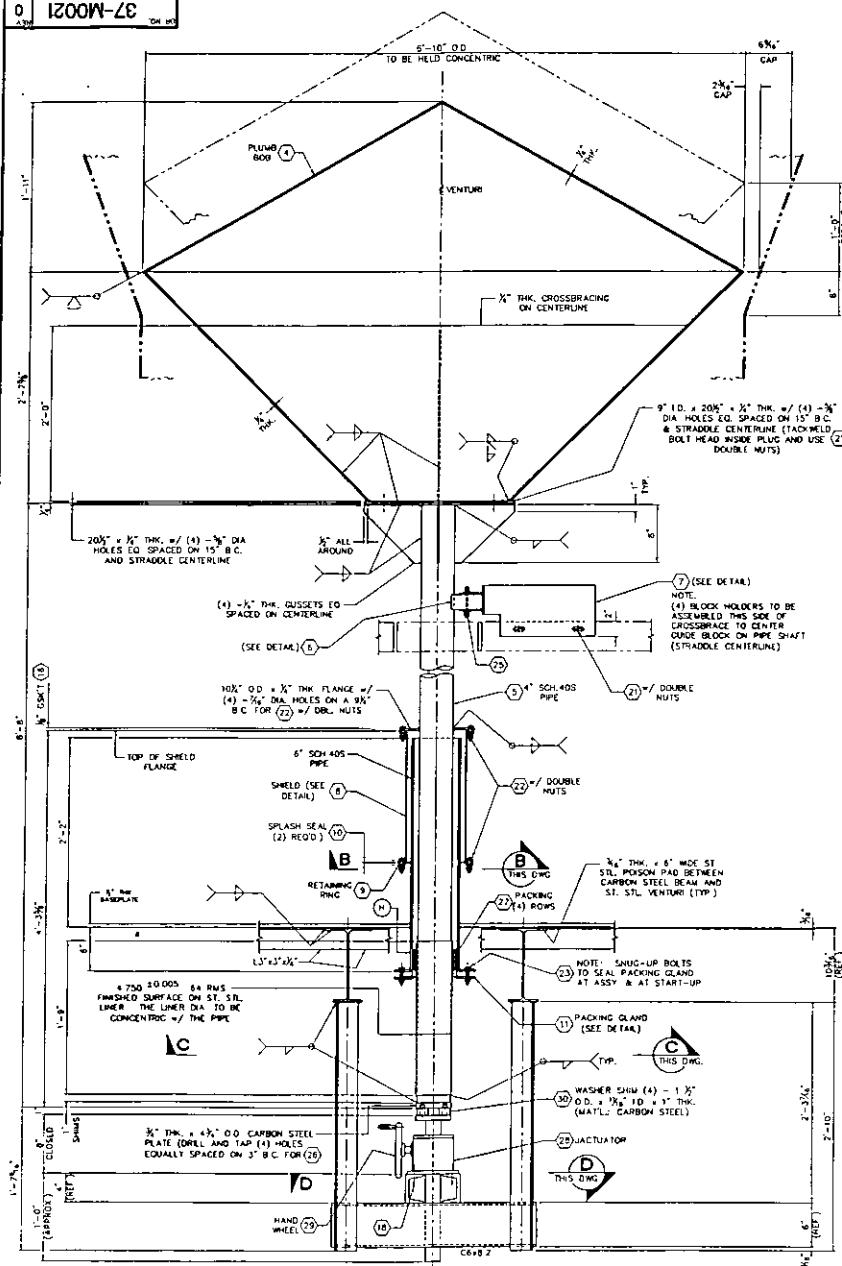
MATERIALS	1/2" THK NOZ. PLATE PLATED (20 DUOMETER)	4"-192 F/TBL
NOZ. PLATE		
NECKS		
FLANGES		
ANCHORS		
STIFFENERS		

MATERIALS	1/2" THK NOZ. PLATE PLATED (20 DUOMETER)	4"-192 F/TBL
NOZ. PLATE		
NECKS		
FLANGES		
ANCHORS		
STIFFENERS		

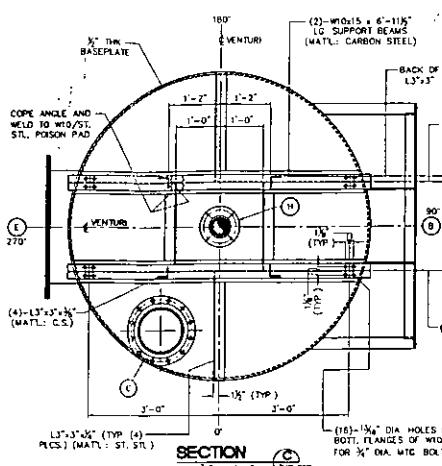
MATERIALS	1/2" THK NOZ. PLATE PLATED (20 DUOMETER)	4"-192 F/TBL
NOZ. PLATE		
NECKS		
FLANGES		
ANCHORS		
STIFFENERS		

ITEM NO

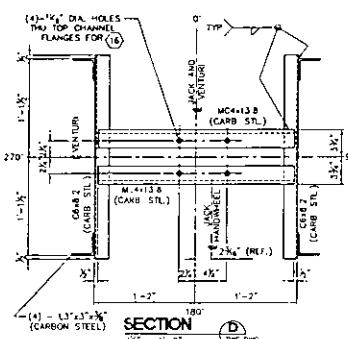
37-M0021



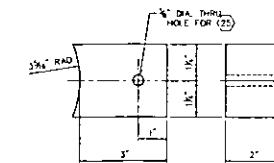
ADJUSTABLE PLUG ASSEMBLY



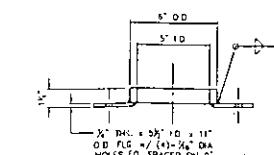
SECTION



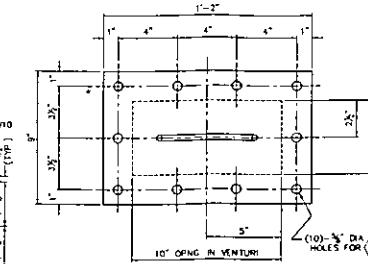
$\beta_2 = 1 - \theta$



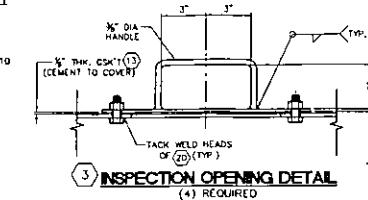
5 GUIDE BLOCK DETAIL



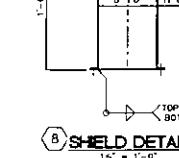
⑥ PACKING GLAND DETAIL



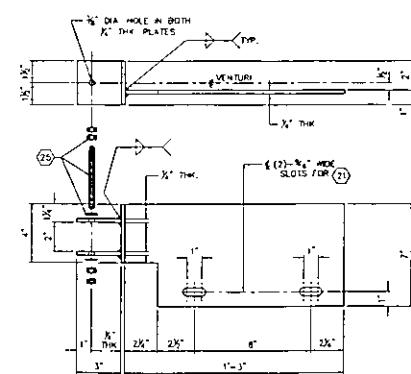
(TYP. TAN. NOZZS. '01-04')



**3) INSPECTION OPENING DATA
(4) REQUIRED**



8 SHIELD DETAIL



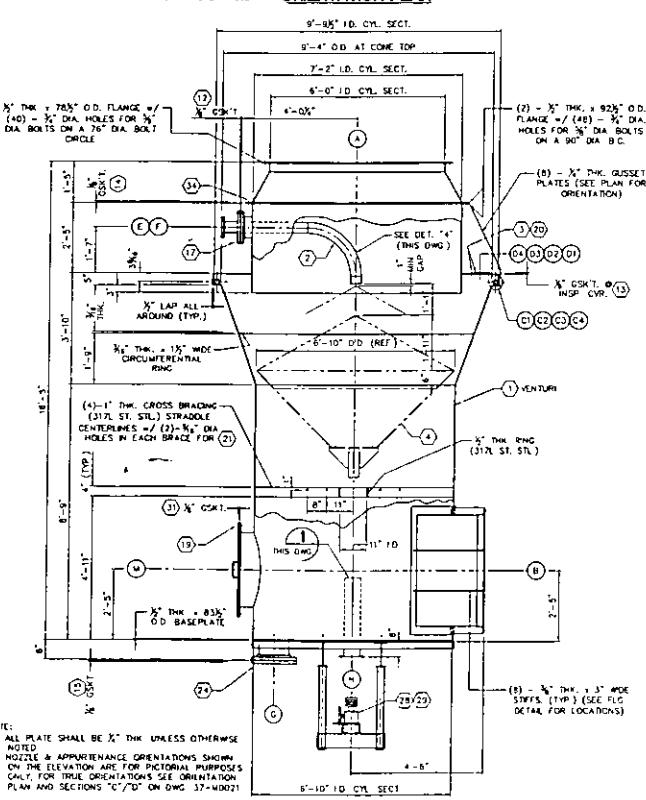
7 GUIDE BLOCK HOLDER DETAILS

37-M002

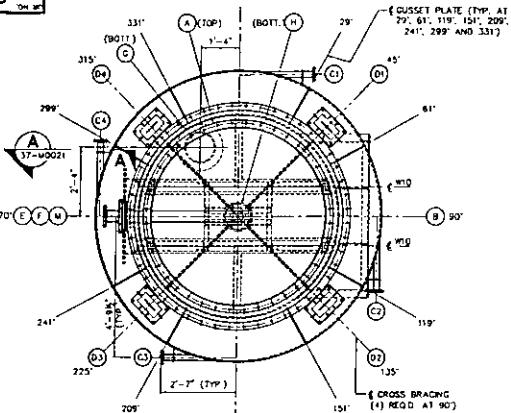
NORTH

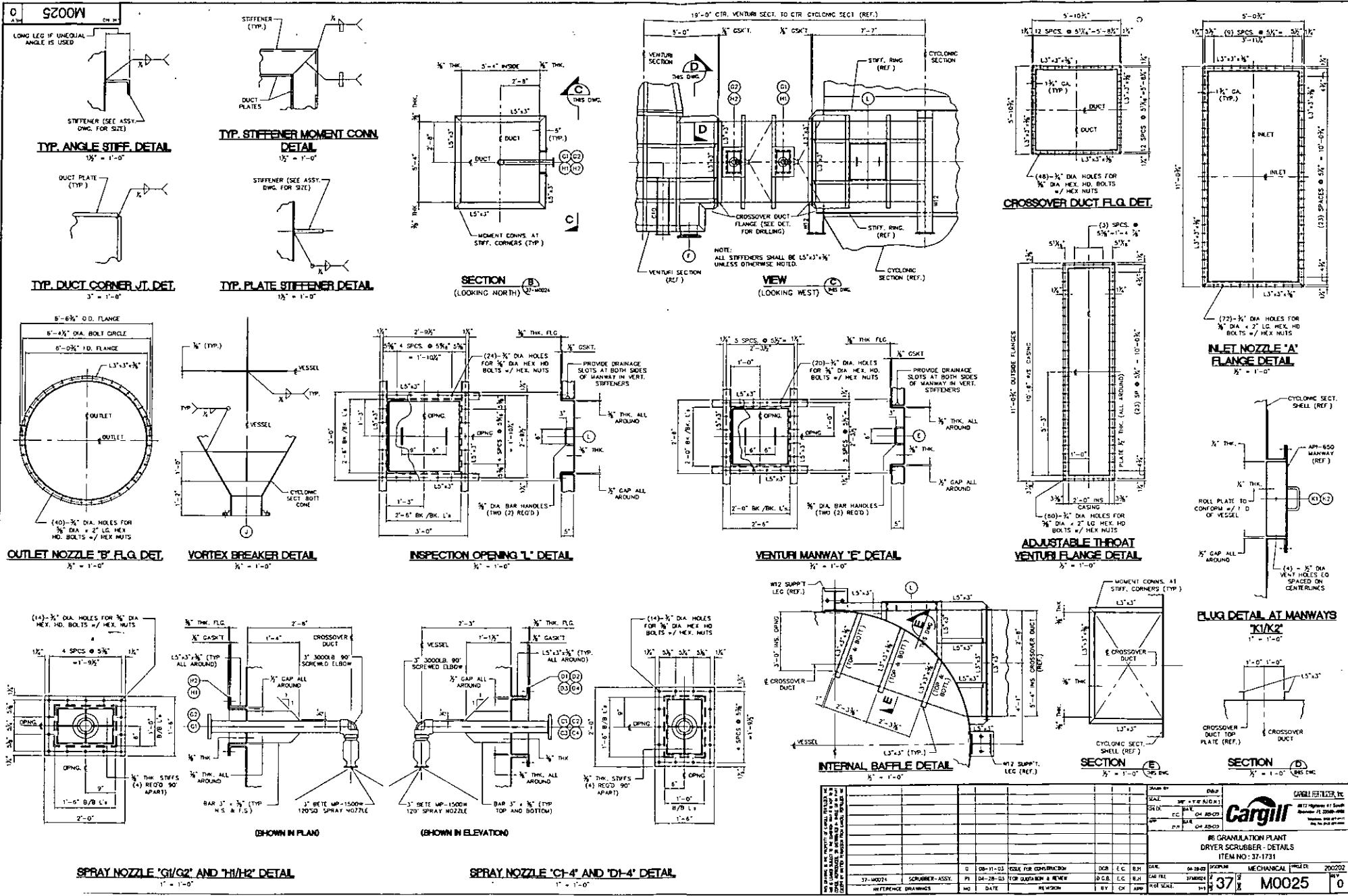
NOTE: FOR ORIENTATION NOT SHOWN ON THIS PLAN SEE SECTIONS "C" AND "D" ON DRAWING 37-M0021

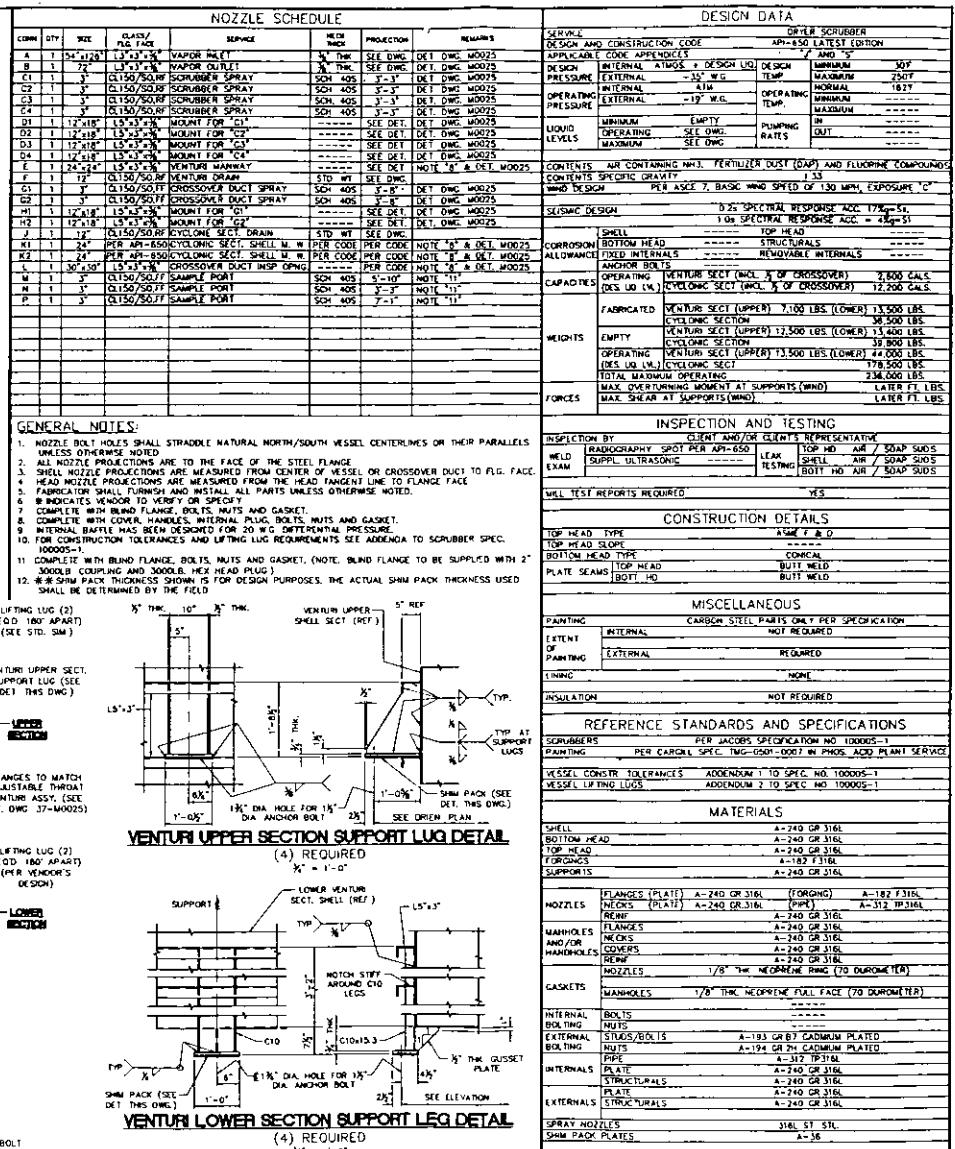
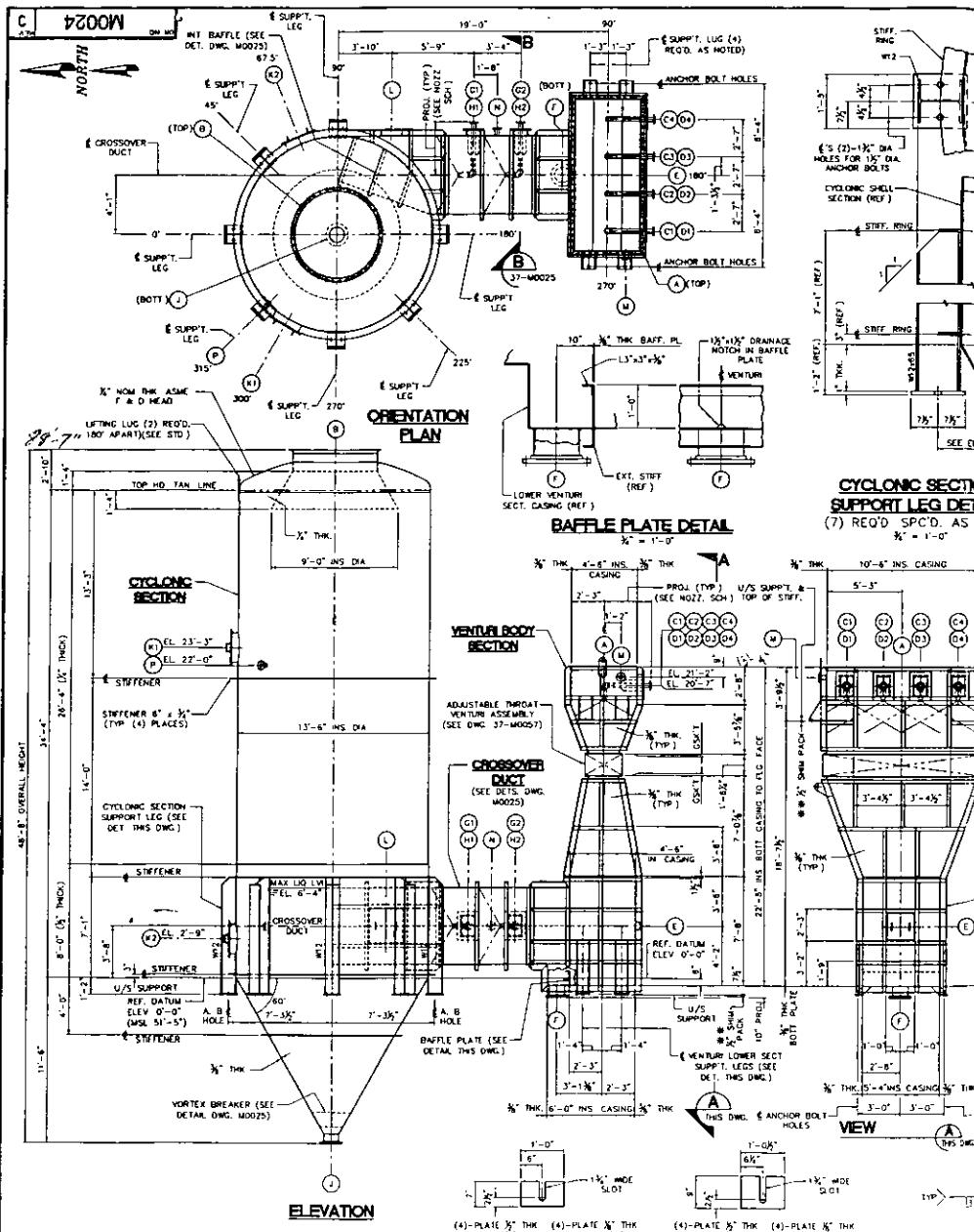
ORIENTATION PLAN



ELEVATION ①





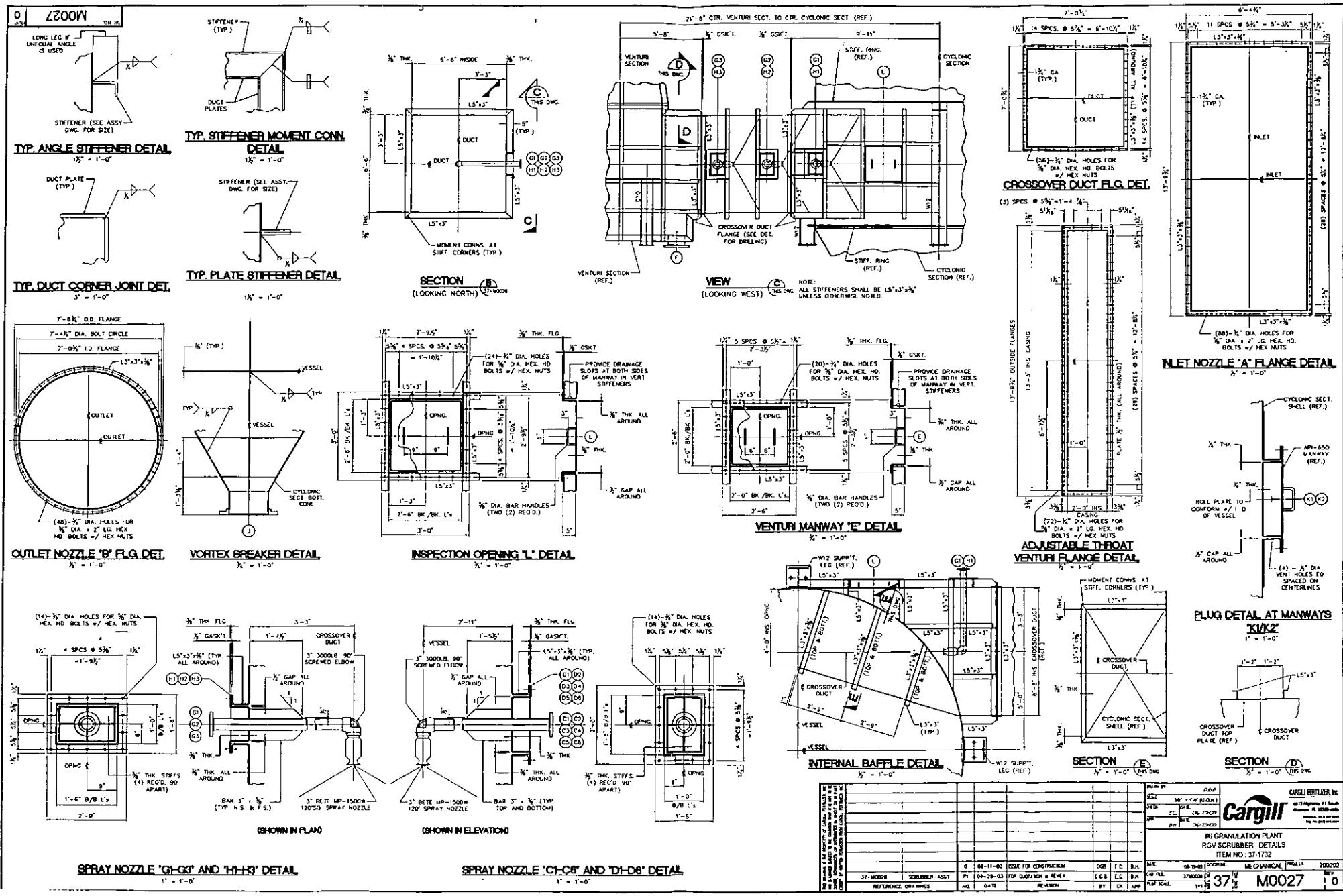


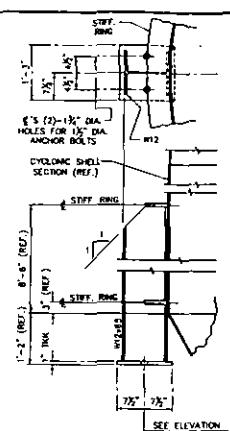
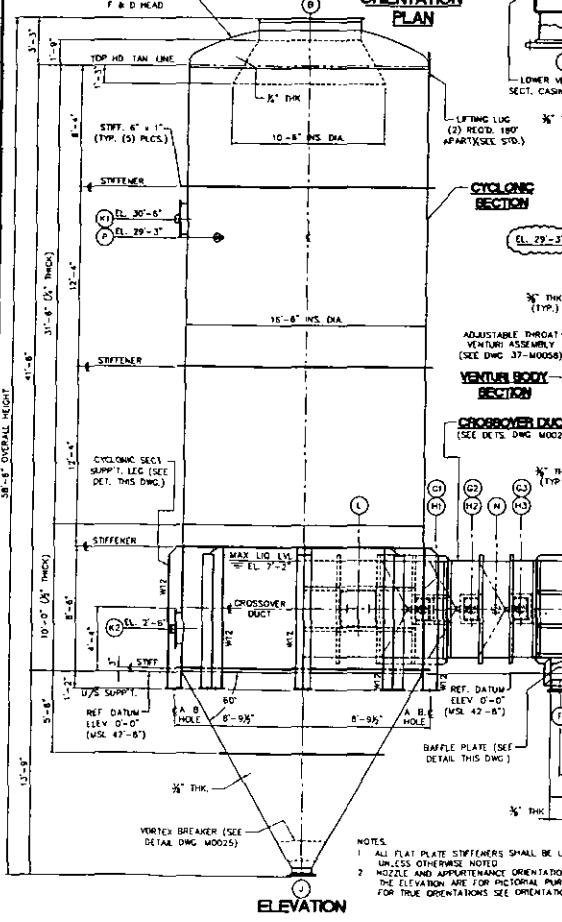
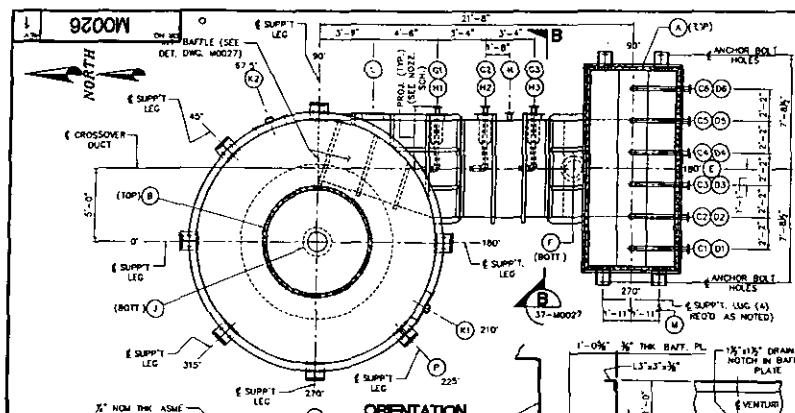
1	2	3	4	5	6	7
OPEN BY	C.R.P.	C.R.P.	C.R.P.	C.R.P.	C.R.P.	C.R.P.
NAME	W/C/F	W/C/F	W/C/F	W/C/F	W/C/F	W/C/F
DATE	DATE	DATE	DATE	DATE	DATE	DATE
APP. DATE	APP. DATE	APP. DATE	APP. DATE	APP. DATE	APP. DATE	APP. DATE
37-M0025	NOV-11-03	NOV-11-03	NOV-11-03	NOV-11-03	NOV-11-03	NOV-11-03
37-M0025	NOV-12-03	NOV-12-03	NOV-12-03	NOV-12-03	NOV-12-03	NOV-12-03
REFERENCE DRAWINGS	NO	DATE	REVISION	BY	DATE	REVISION
37	37	37	37	37	37	37
M0024	0	0	0	0	0	0

CARGILL
AGRI FERTILIZER INC.
1011 Highway 41 South
P.O. Box 10000
Montgomery, AL 36117-1000
(334) 274-1000

#5 GRANULATION PLANT
DRYER SCRUBBER ASSEMBLY
ITEM NO. 37-1731

DATE: 04-24-03
TIME: 10:00 AM
PAGE: 37
DRAWING NUMBER: M0024





CYCLONIC SECTION SUPPORT LEG DETAIL

(7) REQ'D. SPC'D. AS NOTED
 $3\frac{1}{2}' - 1\frac{1}{2}'$

NOZZLE SCHEDULE

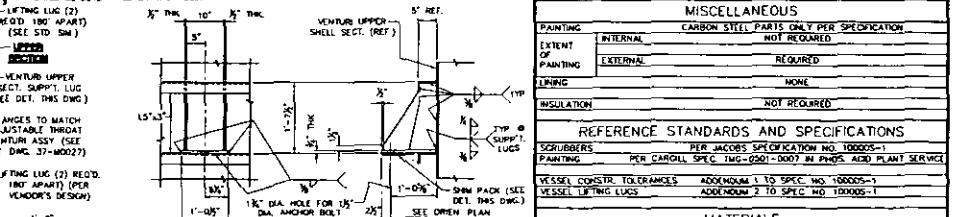
NAME	QTY	SIZE	CLASS/FACE	SERVICE	SIZE	PROJECTION	REMARKS
A	1	70	13/16"	VAPOR INLET	1/4	SEE DWG. DET. D/WC M0027	APPLICABLE CODE APPENDICES
B	8	9/16"	13/16"-3/4"	VAPOR OUTLET	1/4	THK. SEE DWG. DET. D/WC M0027	"J" AND "S"
C1	1	3/4"	13/16"-3/4"	SCRUBBER SPRAY	405	3"-11" DEI. D/WC M0027	DESIGN INTERNAL PRESSURE
C2	1	3/4"	13/16"-3/4"	SCRUBBER SPRAY	405	405 DEI. D/WC M0027	OPERATING INTERNAL PRESSURE
C3	1	3/4"	13/16"-3/4"	SCRUBBER SPRAY	405	3"-11" DEI. D/WC M0027	MINIMUM OPERATING PRESSURE
C4	1	3/4"	13/16"-3/4"	SCRUBBER SPRAY	405	3"-11" DEI. D/WC M0027	MEDIUM OPERATING PRESSURE
C5	1	3/4"	13/16"-3/4"	SCRUBBER SPRAY	405	3"-11" DEI. D/WC M0027	HIGH OPERATING PRESSURE
D1	1	13/16"	13/16"-3/4"	VENTURE TUBE G1	1/4	SEE DET. D/WC M0027	LOWEST OPERATING LEVELS
D2	1	13/16"	13/16"-3/4"	INLET FOR G1	1/4	SEE DET. D/WC M0027	EMPTY SET DWG. OUT
D3	1	12 15/16"	13/16"-3/4"	INLET FOR G2	1/4	SEE DET. D/WC M0027	CONTENTS AIR CONTAINING NH3, FERTILIZER DUST (DAP) AND FLUORINE COMPOUNDS
D4	1	12 15/16"	13/16"-3/4"	INLET FOR G4	1/4	SEE DET. D/WC M0027	CONTENTS SPECIFIC GRAVITY
D5	1	12 15/16"	13/16"-3/4"	INLET FOR G6	1/4	SEE DET. D/WC M0027	MIN DESIGN PER ASCE 7, BASIC WIND SPEED OF 130 MPH, EXPOSURE "C"
E	1	24"-24"	13/16"-3/4"	VENTURE MANWAY	1/4	SEE DET. D/WC M0027	SEISMIC DESIGN
F	1	14"	13/16"-3/4"	VENTURE MANWAY	STD. WT. SEE DWG.	0.2g SPECTRAL RESPONSE ACC. 17% GS	
G1	1	3"	13/16"-3/4"	VENTURE DUCT G1	SOH. 405	1.0g SPECTRAL RESPONSE ACC. 45% GS	
G2	1	12"-18"	13/16"-3/4"	VENTURE DUCT G2	SOH. 405	SHELL	
G3	1	12"-18"	13/16"-3/4"	VENTURE DUCT G3	SOH. 405	BOTTOM HEAD	
H1	1	12"-18"	13/16"-3/4"	VENTURE DUCT G1	SOH. 405	STRUCTURAL	
H2	1	12"-18"	13/16"-3/4"	VENTURE DUCT G2	SOH. 405	ANCHOR BOLTS	
H3	1	12"-18"	13/16"-3/4"	VENTURE DUCT G3	SOH. 405	OPERATING INTERNAL PRESSURE	
I1	1	14"	13/16"-3/4"	VENTURE SECT. D/WC	STD. WT. SEE DWG.	OPERATING INTERNAL PRESSURE	
K1	1	24"	PER API-650 CYLONE SECT. SHELL M. W. PER CODE	VENTURE SECT. D/WC	14,500 LBS. (LW)	MAX. OPERATING INTERNAL PRESSURE	
K2	1	24"	PER API-650 CYLONE SECT. SHELL M. W. PER CODE	VENTURE SECT. D/WC	20,000 LBS. (LW)	MAX. OPERATING INTERNAL PRESSURE	
L	1	30'-6"	13/16"-3/4"	CROSSOVER DUCT INSP. D/WC	PER CODE D/WC	WEIGHTS	
M	1	30'-6"	13/16"-3/4"	SAMPLE PORT	13,200 LBS. (LW)	EMPTIED CYCLONE SECTION	
N	1	30'-6"	13/16"-3/4"	SAMPLE PORT	70,000 LBS. (LW)	VENTURE SECT. D/WC	
P	1	30'-6"	13/16"-3/4"	SAMPLE PORT	300,000 LBS. (LW)	TOTAL MASS/MANUFACTURER'S DATA	
					394,000 LBS. (LW)	OPERATING INTERNAL PRESSURE	
					MAX. OPERATING INTERNAL PRESSURE (1 SUPPORTS (LW))	MAX. OPERATING INTERNAL PRESSURE	
					LATERAL FT. LBS.	MAX. SHEAR AT SUPPORTS (LW)	
					LATERAL FT. LBS.	MAX. SHEAR AT SUPPORTS (LW)	

DESIGN DATA

SERVICE	ROY SCRUBBER
DESIGN AND CONSTRUCTION CODE	API-650 LATEST EDITION
APPLICABLE CODE APPENDICES	"J" AND "S"
DESIGN INTERNAL ATMOS. & DESIGN LID	LINEAR
DESIGN INTERNAL PRESSURE	100
INTERNAL HEAD	100
INTERNAL PRESSURE	100
EXTERNAL HEAD	100
EXTERNAL PRESSURE	100
OPERATING INTERNAL PRESSURE	100
OPERATING EXTERNAL PRESSURE	100
MINIMUM OPERATING PRESSURE	100
MEDIUM OPERATING PRESSURE	100
HIGH OPERATING PRESSURE	100
LOWEST OPERATING LEVELS	100
EMPTY SET DWG. OUT	100
PUMPING RATES	100
MAXIMUM SET DWG.	100
REMARKS	100

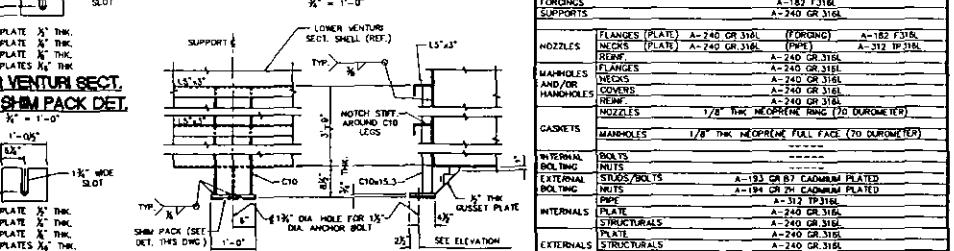
GENERAL NOTES:

1. NOZZLE BOLT HOLES SHALL STRADDLE NATURAL NORTH/SOUTH VESSEL CENTERLINES OR THEIR PARALLELS UNLESS OTHERWISE NOTED.
2. ALL NOZZLE PROJECTIONS ARE TO THE FACE OF THE STEEL FLANGE. PROJECTIONS ARE TO THE FACE OF THE STEEL FLANGE OR CROSSOVER DUCT TO FLG. FACE.
3. HEAD PROJECTIONS ARE TO BE MEASURED FROM THE HEAD TANGENT LINE TO FLANGE FACE.
4. FABRICATOR SHALL FURNISH AND INSTALL ALL PARTS UNLESS OTHERWISE NOTED.
5. INDICATES VESSEL TO VERIFY SPECS.
6. COMPLETE WITH COVERS, PLUGS, NUTS AND GASKET.
7. COMPLETE WITH COVERS, PLUGS, NUTS AND GASKET.
8. COMPLETE WITH COVER, HANDLES, INTERNAL PLUG, NUTS AND GASKET.
9. INTERNAL BATTLE HAS BEEN DESIGNED FOR 20 V.G. DIFFERENTIAL PRESSURE.
10. FOLLOW API-650 TOLERANCES AND LIFTING LUG REQUIREMENTS SEE ADDENDA TO SCRUBBER SPEC. 10000-001.
11. COMPLETE WITH BLIND FLANGE, BOLTS, NUTS AND GASKET (NOTE: BLIND FLANGE TO BE SUPPLIED WITH 2" DOUBBLE COUPLING AND SOURCE FLANGE HEAD PLUG).
12. SPANNING DIMENSIONS SHOWN FOR DESIGN PURPOSES, THE ACTUAL SHIM PACK THICKNESS USED SHALL BE DETERMINED BY THE FIELD.



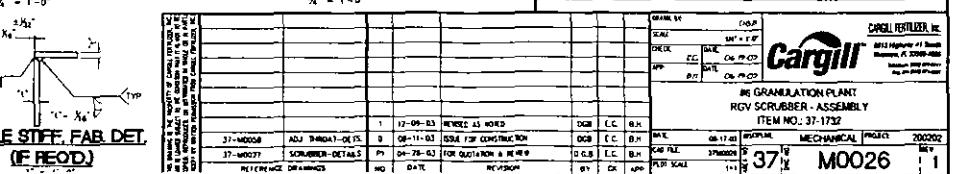
VENTURI UPPER SECTION SUPPORT LUG DETAIL

(4) REQUIRED
 $3\frac{1}{2}' - 1\frac{1}{2}'$



VENTURI LOWER SECTION SUPPORT LEG DETAIL

(4) REQUIRED
 $3\frac{1}{2}' - 1\frac{1}{2}'$

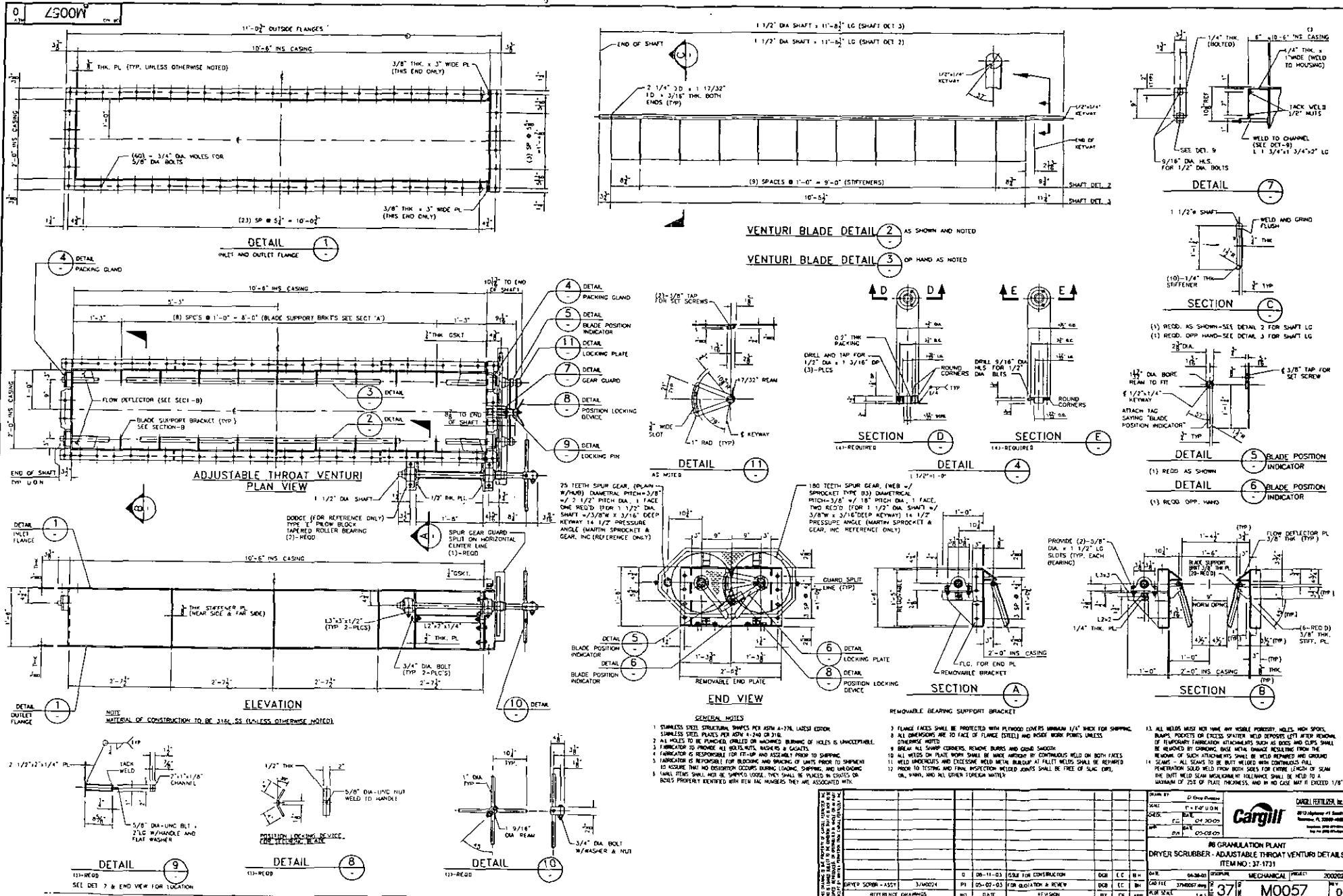


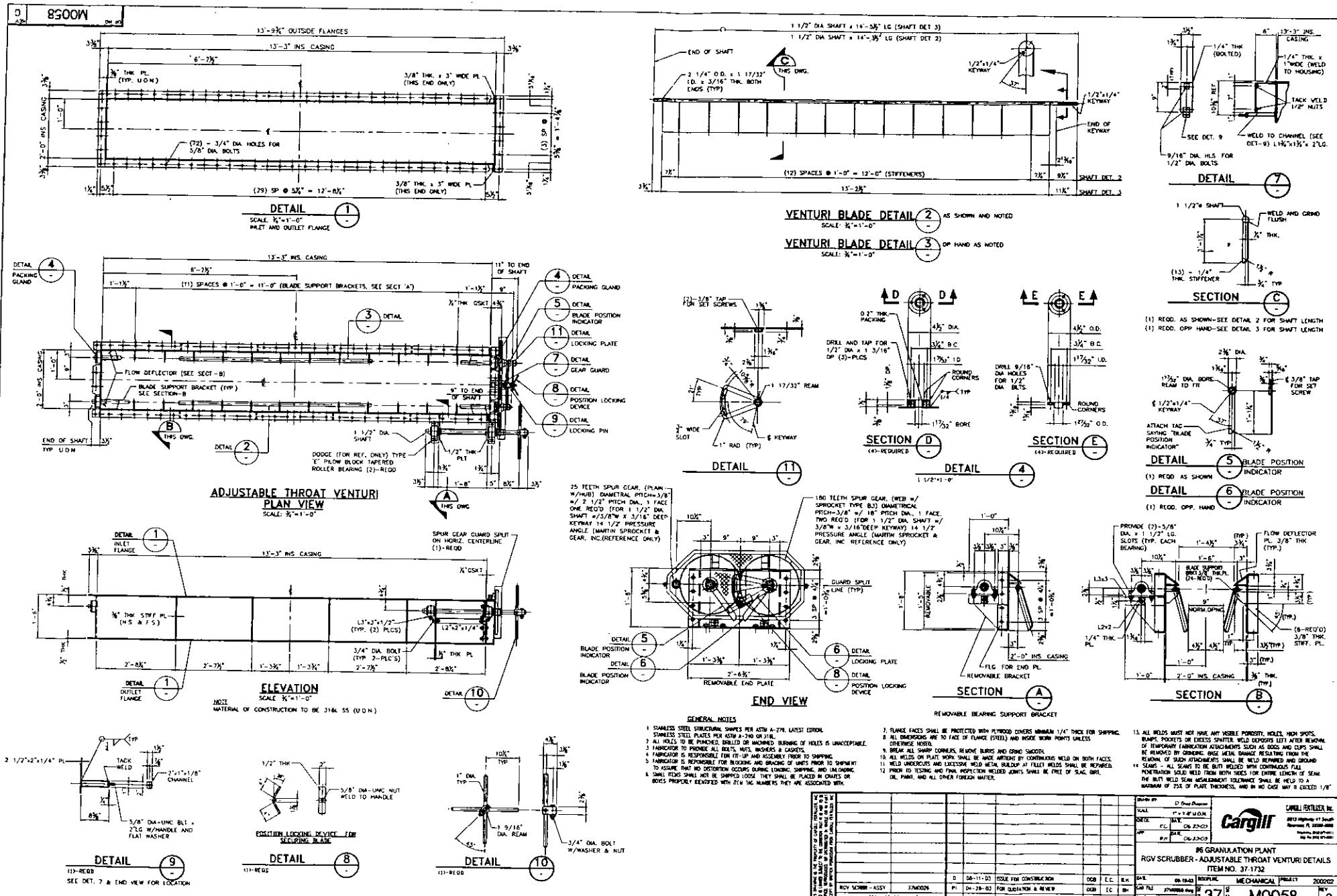
IN GRANULATION PLANT
ROY SCRUBBER - ASSEMBLY
ITEM NO. 37-132

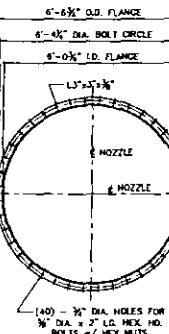
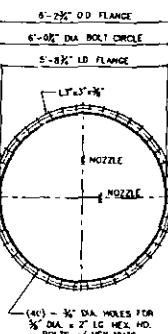
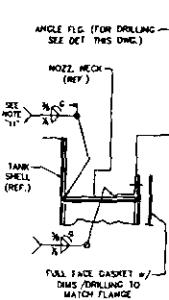
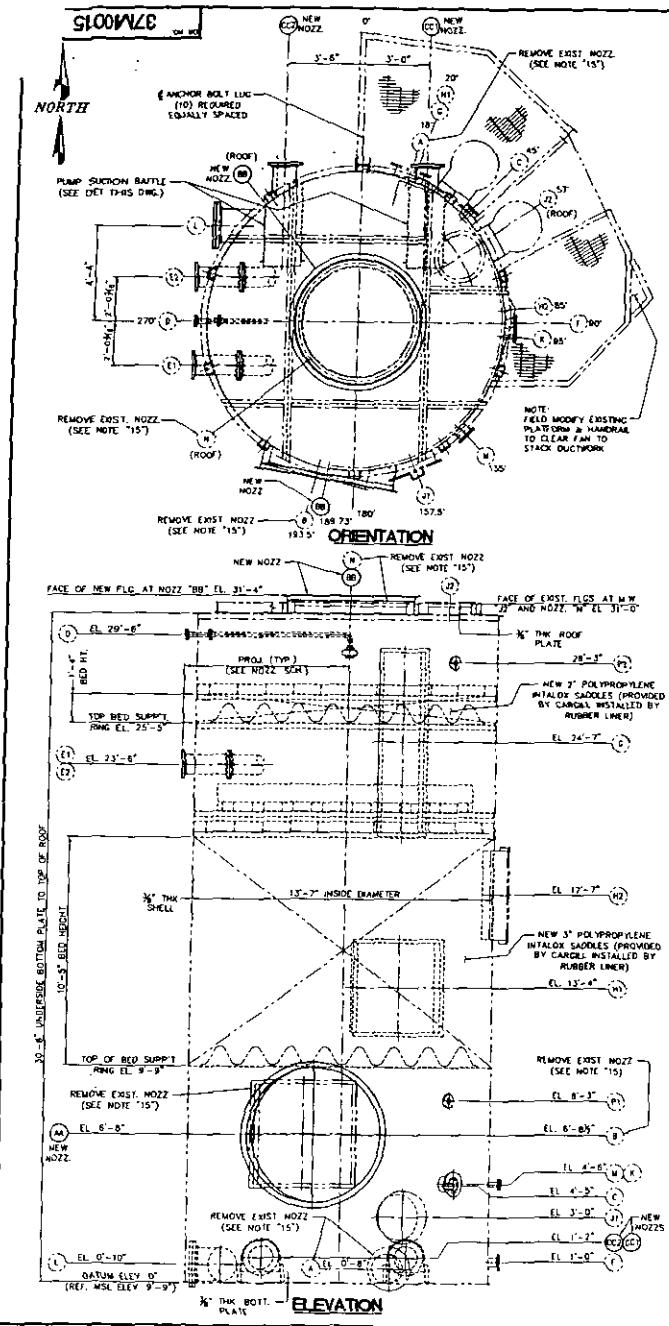
Cargill
BEAUMONT, TEXAS
10000-001
REV. A
DATE: 02/01/93
DRAWING NO.: 37-132

MECHANICAL PROJECT 200002

37-132 M0026



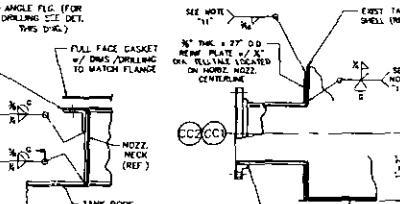
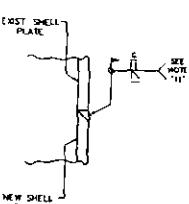




NOZZLE 'AA' DETAIL
SCALE: 1"-1'-0"

NOZZLE 'BB' FLG. DET.
SCALE: 1"-1'-0"

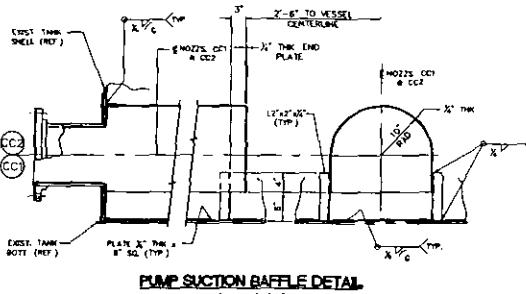
NOZZLE 'AA' FLG. DET.
SCALE: 1"-1'-0"



TYPICAL SHELL PLATE
INSERT WELD DETAIL
6"-1'-0"

NOZZLE 'BB' DET.
6"-1'-0"

NOZZLES 'CC1/CC2' DET.
SCALE: 1"-1'-0"



PUMP SUCTION BAFFLE DETAIL
SCALE: 1"-1'-0"

DESIGN DATA:
SERVICE: DUST & FUME SCRUBBING FROM DRYER REF. STDS: API-553 & API-550 (INCL. APPENDIX "M") LATEST EDITIONS
DESIGN PRESSURE: ATMOS. TO -35° W.C. DESIGN TEMP.: 30° MSL. 230°F MAX. OPER. TEMP.: 160°F APPROX.
MAX. LIQ. LEVEL: 4'-8" SPECIFIC GRAVITY OF PRODUCT: 1.33 CONTENTS: POND WATER

MATERIALS:
EXIST. & NEW SHELL:
ASTM A-36
EXIST. SHELL PLATE:
ASTM A-36
PIPE (ALL NOZZLS EXCEPT 'D' & 'E'):
ASTM A-53 GR. B OR A-106 GR. B
PIPE (NOZZLS 'D' & 'E'):
ASTM A-312 TP316L ST. STL.
FLANGE (ALL NOZZLS EXCEPT 'D' & 'E'):
ASTM A-182 F316L ST. STL.
FLANGE (NOZZLS 'D' & 'E'):
ASTM A-193 GR. B7 (BOLTS)
ASTM A-194 GR. 2H (NUTS)
FLANGE SUPPORTS:
ASTM A-182 F316L ST. STL.
GASKETS:
INTERIOR SADDLES:
RUBBER LINING:
X TIC HEOPRENE (70 DUROMETER)
PVC LINING:
X TIC RUBBER LINING TRIFLEX OR EQUAL (BOTTOM AND MANNAYS
SHALL BE DOUBLE THICKNESS RUBBER LINED) (NOTE: RUBBER LINER TO
VERIFY RUBBER AND THICKNESS SPECIFIED FOR THE SERVICE SHOWN)

SCOPE:

1. REMOVE ALL EXISTING INTERNALS AND PACKING.
2. DISPOSE OF EXISTING INTERNALS.
3. EXIST. RUBBER LINING.
4. DESIGN, SUPPLY AND INSTALL LIFTING LUGS FOR RELOCATING VESSEL.
5. REMOVE EXISTING NOZZLES INDICATED ON DRAWINGS.
6. ADD INTERNAL NOZZLES AS INDICATED ON DRAWINGS.
7. NON DESTRUCTIVE EXAMINATION OF ALL NEW WELDS AS INDICATED.
8. INSPECT AND REPAIR ALL DEFECTS.
9. REPAIR EXISTING INTERNALS AS INDICATED.
10. REMANUFACTURE EXISTING INTERNALS AND NEW PACKING SUPPLIED BY CARGILL.
11. SANDBLAST PRIME AND PAINT EXTERIOR OF VESSEL AS INDICATED.

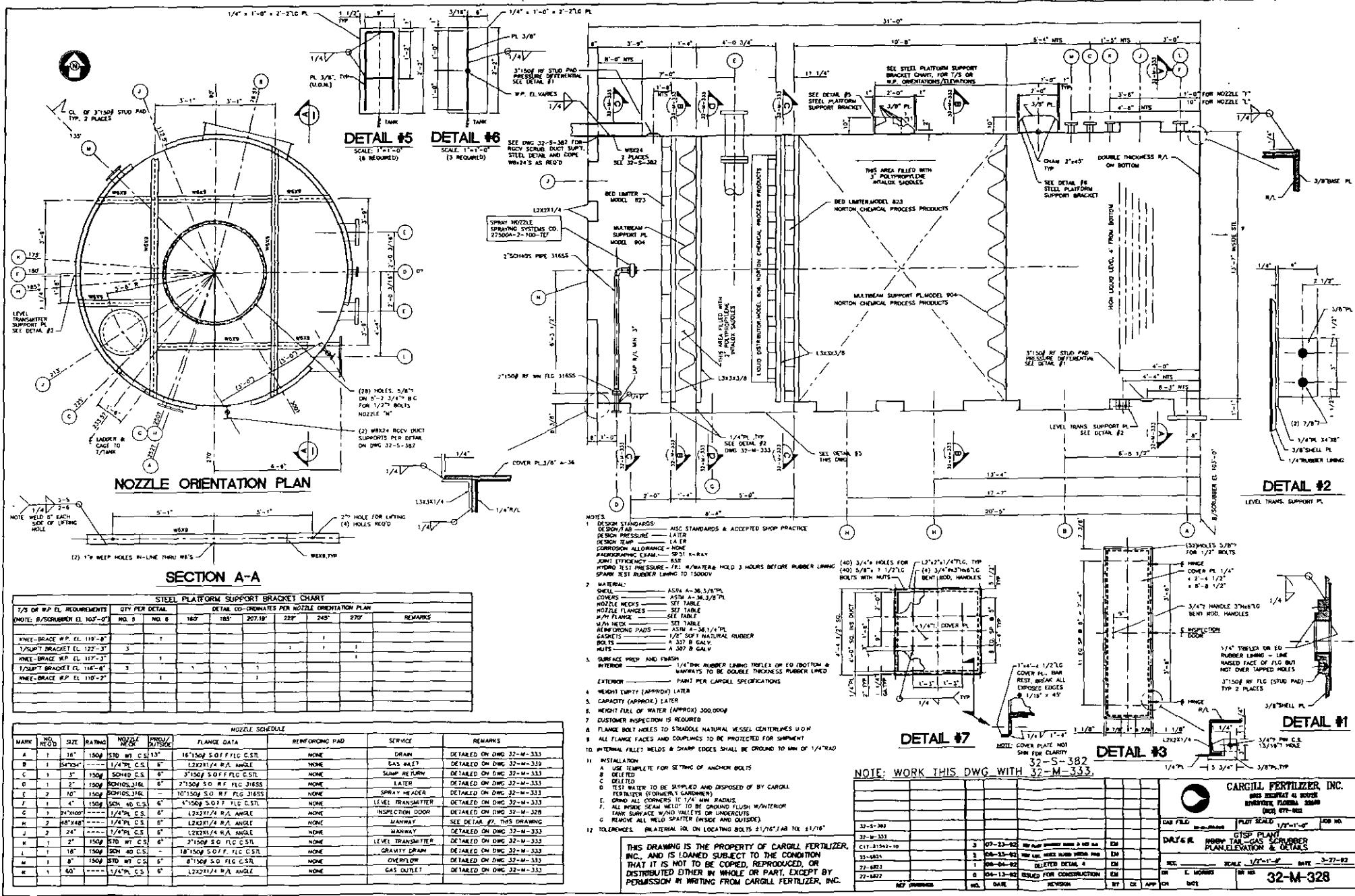
GENERAL NOTES:

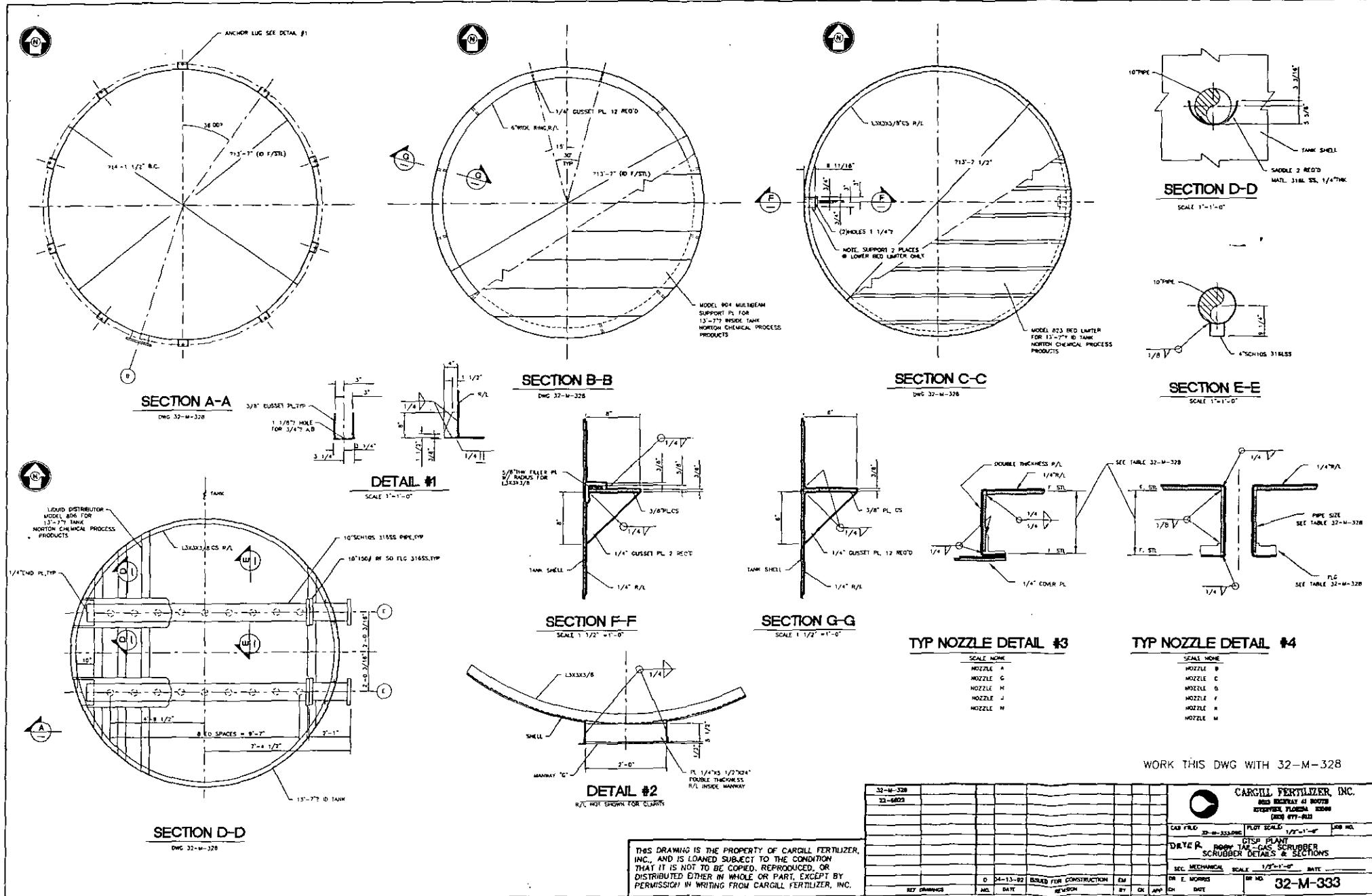
1. NOZZLE BOLT HOLES SHALL STRADDLE NATURAL NORTH/SOUTH TANK CENTERLINES OR THEIR PARALLELS UNLESS OTHERWISE SPECIFIED.
2. ALL NOZZLE PROJECTIONS OR ELEVATIONS ARE TO THE FACE OF THE STEEL FLANGE.
3. SHELL NOZZLE BOLT HOLES ARE LOCATED IN THE SHELL PLATE TO THE CENTERLINE OF THE NOZZLE.
4. ALL EXISTING SHELL PLATES SHALL BE REMOVED AND INSTALLED IN PARTS UNLESS OTHERWISE NOTED.
5. ALL INTERNAL SURFACES OF TANK AS WELL AS NOZZLE FLANGE FACES AND PIPE INTERIORS SHALL BE RUBBER LINED OR CONTINUOUS & SMOOTH W/ NO POROSITY, HIGH SPOTS, UNDERCUTTING, LUMPS OR POKETS. ALL SHARP EDGES & CORNERS SHALL BE FILLED IN W/ HELD METAL AND/OR GROUND TO A 3/16" MINIMUM RADIUS.
6. ALL EXISTING SHELL PLATES SHALL BE OF THE SAME THICKNESS W/ O/D DRILLING MAY BE SUBSTITUTED IN LIEU OF THE FORGING SHOWN.
7. ALL INTERNAL CARBON STEEL SURFACES OF TANK AS WELL AS NOZZLE FLANGE FACES AND PIPE INTERIORS SHALL BE RUBBER LINED IN ACCORDANCE WITH CARGILL SPECIFICATION TWO-0501-0001.
8. EXIST. SHELL PLATES SHALL BE REMOVED AND INSTALLED IN PARTS UNLESS OTHERWISE NOTED.
9. ALL NOZZLES SHALL HAVE REINFORCEMENT PLATE IN ACCORDANCE WITH API-553 CONNECTIONS.
10. NEW SHELL BUTT WELDS AND NEW WELDS ATTACHING THE NOZZLE FLCH TO SHELL AND REINFORCING PLATE TO SHELL/NOZZLE CONNECTIONS SHALL BE RUBBER LINED AT ALL FLANGE FACADES AND PIPE INTERIORS.
11. EXIST. SHELL PLATES SHALL BE REMOVED AND INSTALLED IN PARTS UNLESS OTHERWISE NOTED.
12. EXTERIOR SURFACE PREPARATION SHALL BE IN ACCORDANCE WITH SSPC-SP-6.
13. EXTERIOR FINISH SHALL BE IN ACCORDANCE WITH SPECIFICATION TWO-0501-0001.
14. AFTER COMPLETION OF RUBBER LINING, THE INSPECTOR AND CARGILL INSTALLER SHALL PAINT CLEARLY IN 6" HIGH LETTERS THE FOLLOWING WARNING SIGN: THIS VESSEL IS RUBBER LINED. DO NOT WELD OR BURN.
15. REMOVE NOZZLE AND ADJACENT PLATE SECTION LARGE ENOUGH TO ACCOMMODATE NEW NOZZLE INSTALLATION.
16. INSTALL NEW BUNG FLANGE w/ BOLTS, NUTS AND GASKETS AT EXISTING NOZZLES AS INDICATED.
17. A VISUAL INSPECTION OF THE ENTIRE VESSEL SHALL BE MADE. ANY AREAS SHOWING EXCESSIVE CORROSION OR DAMAGE SHALL BE SUBJECT TO FURTHER TESTING AND/OR REPAIR.

NOZZLE SCHEDULE

COMP.	UTY	SIZE	GASKET	SURFACE	WELL	PROJECTION	ELEVATION	REMARKS
EXIST. A	1"	18"	CL150/50FF	DRAIN	STD. THK.	7"-3/4"	SEE Dwg.	w/ BOLTS, NUTS & GASK.
EXIST. B	1"	23/8"-24"	CL150/50FF	GAS INLET	STD. THK.	7"-3/4"	SEE Dwg.	
EXIST. C	1"	24"	CL150/50FF	COND. IN FROM VAPORIZER	STD. THK.	7"-3/4"	SEE Dwg.	
EXIST. D	1"	24"	CL150/50FF	SPARE SPRAY MOUNT	STD. THK.	7"-3/4"	SEE Dwg.	
EXIST. E	1"	24"	CL150/50FF	SPARE BUNG	STD. THK.	7"-3/4"	SEE Dwg.	
EXIST. F	1"	24"	CL150/50FF	LEVEL TRANSMITTER	STD. THK.	7"-3/4"	SEE Dwg.	
EXIST. G	1"	24"-100"	CL150/50FF	INLET DOOR w/ 1/2" THK COVER	STD. THK.	7"-3/4"	SEE Dwg.	w/ BOLTS, NUTS & GASK.
EXIST. H	1"	48"-44"	CL150/50FF	MANWAY w/ 1/2" THK COVER	STD. THK.	7"-3/4"	SEE Dwg.	w/ BOLTS, NUTS & GASK.
EXIST. I	1"	18"-14"	CL150/50FF	SHIELD MANW. w/ 1/2" THK COVER	STD. THK.	7"-3/4"	SEE Dwg.	w/ BOLTS, NUTS & GASK.
EXIST. J	2"	24"	CL150/50FF	ROOF MW. w/ 1/2" THK COVER	STD. THK.	7"-3/4"	SEE Dwg.	w/ BOLTS, NUTS & GASK.
EXIST. K	1"	18"	CL150/50FF	SAFETY VALVE (NOTE: 18")	STD. THK.	7"-3/4"	SEE Dwg.	w/ BOLTS, NUTS & GASK.
EXIST. L	1"	18"	CL150/50FF	ROOF BUNG	STD. THK.	7"-3/4"	SEE Dwg.	w/ BOLTS, NUTS & GASK.
EXIST. M	1"	18"	CL150/50FF	GAS OUTLET	STD. THK.	7"-3/4"	SEE Dwg.	
EXIST. P1	1"	12"	CL150/50FF	OUTLET	SCH. XS	7"-2"	SEE Dwg.	
EXIST. P2	1"	12"	CL150/50FF	PRESS. DIFF. & LEVEL TRANS.	---	---	SEE Dwg.	STICKING OUTLET
NEW AA	1"	22"	LP3/3-1/2"	GAS INLET	STD. THK.	7"-4"	SEE Dwg.	SEE DETAIL AND NOTE "15"
NEW BB	1"	55"	LP3/3-1/2"	GAS OUTLET	STD. THK.	---	SEE Dwg.	SEE DETAIL AND NOTE "15"
NEW CC1	1"	12"	CL150/50FF	OUTLET	SCH. XS	7"-2"	SEE Dwg.	SEE DETAIL AND NOTE "15"
NEW CC2	1"	12"	CL150/50FF	OUTLET	SCH. XS	7"-2"	SEE Dwg.	SEE DETAIL AND NOTE "15"
DATA BY	D.D.P.							
NAME	MR. SP. P. U.S.A.	DATA BY	MR. SP. P. U.S.A.	DATE	12-15-02	TIME	12:00 PM	
ROLE	EC	ROLE	EC	APPROVAL	12-15-02	APPROVAL	12:00 PM	
APPROVAL	EC	APPROVAL	EC	APPROVAL	12-15-02	APPROVAL	12:00 PM	

Cargill
GRANULATION PLANT
DRYER TAIL GAS SCRUBBER - MODIFICATION DETAILS
ITEM NO. 3714 M0015
P1





ATTACHMENT B

Attachment B, List of Attachments

<u>Drawing Number</u>	<u>Drawing Title</u>
37-2211	Data Sheet Pipe Reactor (Sheet 1 of 2)
37-2211	Data Sheet Pipe Reactor (Sheet 2 of 2)
37-2375	Data Sheet Vessel (Sheet 1 of 3)
37-2375	Data Sheet Vessel (Sheet 2 of 3)
37-2375	Data Sheet Vessel (Sheet 3 of 3)
37 M0012 1	No. 6 Granulation Plant Reactor
37 M0013 1	No. 6 Granulation Plant Reactor Sections and Details
37 M0019 1	No. 6 Granulation Plant Reactor Tank Top Structural Support Detail



**DATA SHEET
PIPE REACTOR**

Client:	CARGILL - TAMPA	
Plant:	DAF #6 PLANT	
Location:	TAMPA - USA	
Date:	Nov-03	Sheet 1 of 2

Item	37-2211	Specification	03-0011-37-2211
Nr required	1	Manufacturer	INCRO S.A.
Service	PIPE REACTOR	Model	RT 60
Project	03-0011	Type	INCRO S.A. DESIGN

UNIT DESCRIPTION

TYPE: Mixing and reacting head plus distributing tube, located inside granulator.

OPERATING CONDITIONS

Feedings Partially ammoniated phosacid, liquid ammonia and steam

Flow	Slurry	t/h	40 - 55 / 60 design
Liquid ammonia		lb/h	15000 - 20000 / 24000 design
Acid		gal/min	130 - 175 / 200 gal/min
Steam		lb/h	8000 only for flushing

Temperature °F 250 – 300 / 500 max

Pressure Normal / design psi 40 – 60 / 200

SIZE

Pipe reactor tube	6"
Ammonia nozzle	2"
PhosAcid nozzle	3"

MATERIALS

Mixing head	SS904L
Inlet connections	SS904L
Discharge tube	SS316L
Gaskets	Teflon

DIMENSIONS

See attached sketch Complete information to be given on granulator internals drawings supplied by INCRO S.A.

NOTES:-

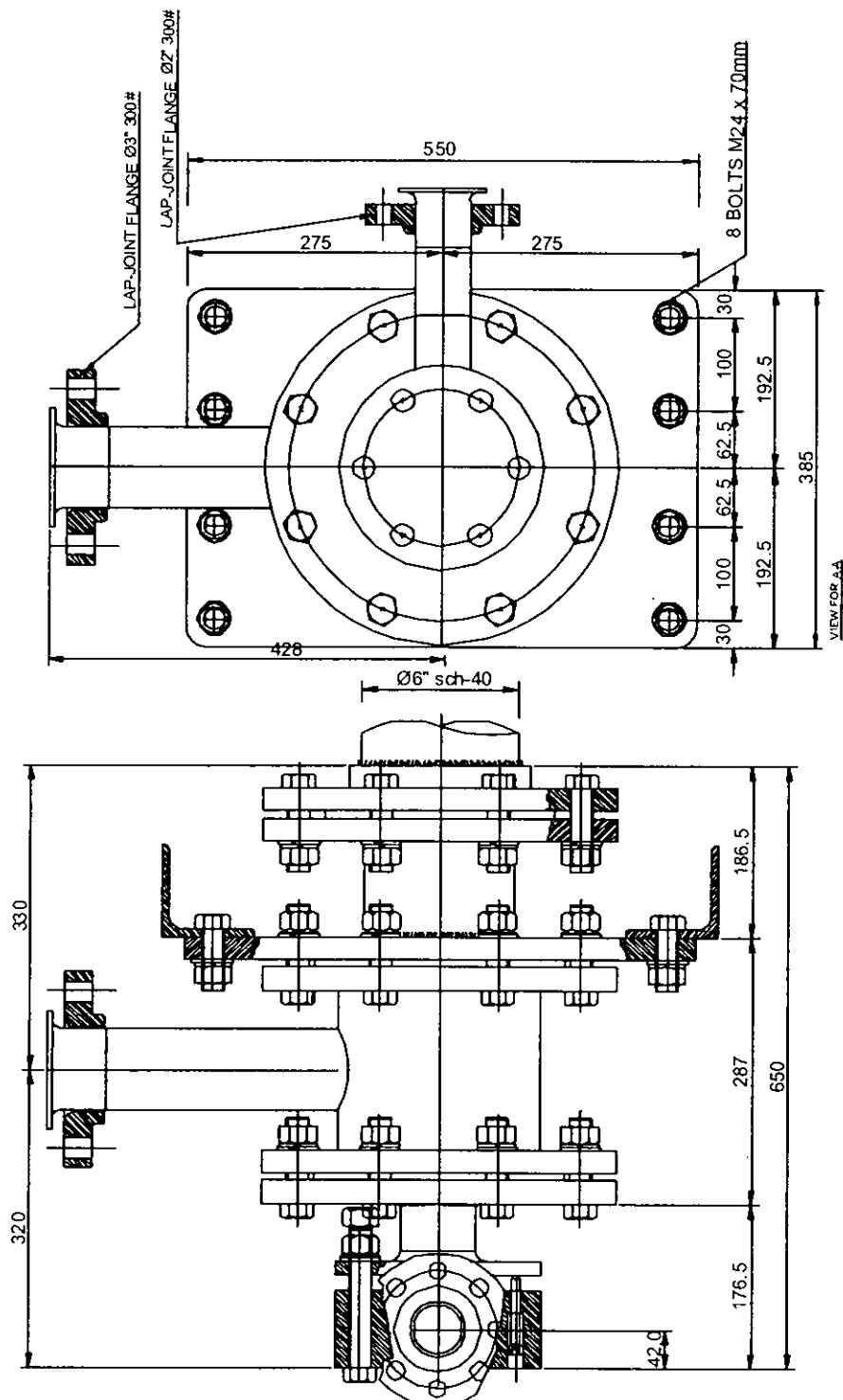
0	Nov-03	BASIC ENGINEERING	R.A.F.	S.C.C.
ISSUE	DATE	DESCRIPTION OF ISSUE	CHK'D	APP'D

INCRO

**DATA SHEET
PIPE REACTOR**

Client: CARGILL-TAMPA
 Plant: DAF #6 PLANT
 Location: TAMPA - USA
 Date: Nov-03 Sheet 2 of 2

Item	37-2211	Specification	03-0011-37-2211
Nr required	1	Manufacturer	INCRO S.A.
Service	PIPE REACTOR	Model	RT 60
Project	03-0011	Type	INCRO S.A. DESIGN



0	Nov-03	BASIC ENGINEERING	R.A.F.	S.C.C.
ISSUE	DATE	DESCRIPTION OF ISSUE	CHK'D	APP'D

INCRO

**DATA SHEET
VESSEL**

Client:	CARGILL - TAMPA
Plant:	DAF #6 PLANT
Location:	TAMPA - USA
Date:	Nov-03

Sheet 1 of 3

Item	37-2375		Specification	03-0011-37-2375		
Nr required	1		Manufacturer			
Service	PIPE REACTOR TANK		Model			
Project	03-0011		Type	Cylindrical vessel		
DESIGN DATA						
Fluid	40-48 % P ₂ O ₅ , N/P=0.05-0.5, 10% solids. 5 % H ₂ SO ₄ maximum. Traces Cl, F.					
Density	lb/ft ³		93-100			
Service pressure absolute	Atmospheric+liquid column					
Design pressure	Relative					
Internal	Atmospheric+liquid column					
External or vacuum	Atmospheric					
Temperature	°F		160-200 / 220 design			
Corrosion allowance	inch		1/15			
Design Code	ASME VIII - 1					
REQUIRED BY PROCESS						
Radiography : full / spot / none	None					
Stress relief	None					
INSULATION						
Required/Type	None					
SIZE	Diameter	ft	11			
	Height	ft	11			
VOLUME	ft ³		900 / 1000 design			
MATERIALS (3) (4)						
Shell	Rubber lining - carbon steel					
Heads	Rubber lining - carbon steel					
Internals	Rubber lining - carbon steel					
Bottom & 1m shell	Rubber lining - carbon steel					
Internal lining	Butyl rubber IIR					
Bolts / nuts	AISI 316					
NOZZLES						
Mark	Size	Qty.	Service			
1 A/B	6 inch	2	Suction pumps			
2	4 inch	1	52% Phosacid inlet			
3	4 inch	1	30% Phosacid inlet			
4	4 inch	1	from Pre-scrubber			
5	3 inch	1	Pumps return			
6	4 inch	1	Drain			
7	4 inch	1	Overflow			
8	3 inch	1	Vent			
9	1 ½ inch	1	Defoamer pump			
10	4 inch	1	Level transmitter			
11	1 ½ inch	1	Temperature indicator			
12	(2)	1	Agitator support			
13	24 inch	1	Flush type manhole			
14	24 inch	1	Manhole			
15	4 inch	1	Spare			

NOTES- (1) Phosacid and scrubbing liquor inlets have to install a deep pipe (300 mm deep) of AISI 316 to avoid solids abrasion.

accordingly, size of the nozzles has been increased. (2) To be given by agitator vendor.

(3) All internal welding will be ground smooth flush. (4) Hardness of rubber 55/60 shore. To be confirmed by vendor.

(5) Minimum size 1 ½" for RLCS.

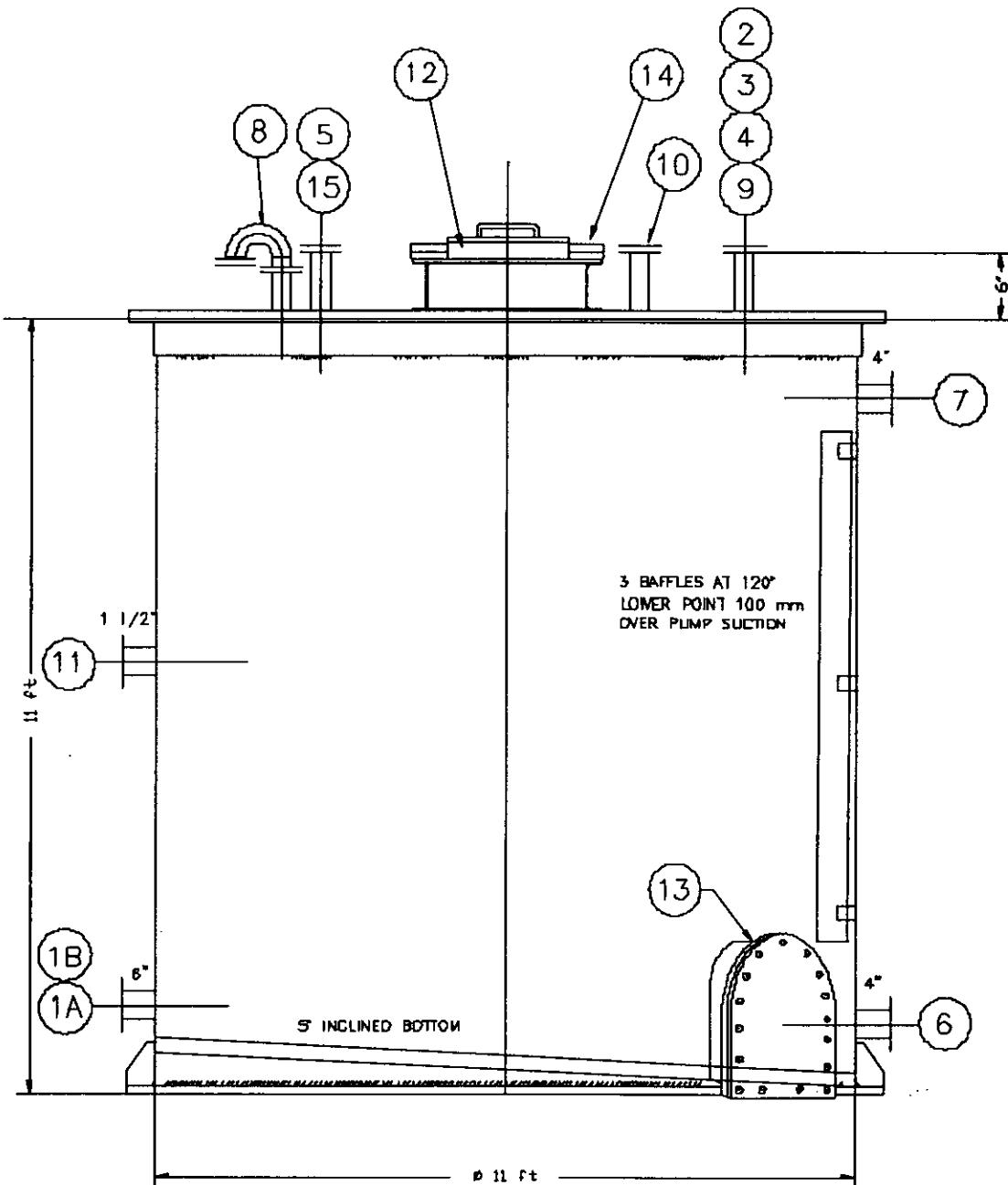
0	Nov-03	BASIC ENGINEERING	R.A.F.	S.C.C.
ISSUE	DATE	DESCRIPTION OF ISSUE	CHK'D	APP'D

INCRO

**DATA SHEET
VESSEL**

Client: CARGILL - TAMPA
 Plant: DAF #6 PLANT
 Location: TAMPA - USA
 Date: Nov-03 Sheet 2 of 3

Item	37-2375	Specification	03-0011-37-2375
Nr required	1	Manufacturer	
Service	PIPE REACTOR TANK	Model	
Project	03-0011	Type	Cylindrical vessel



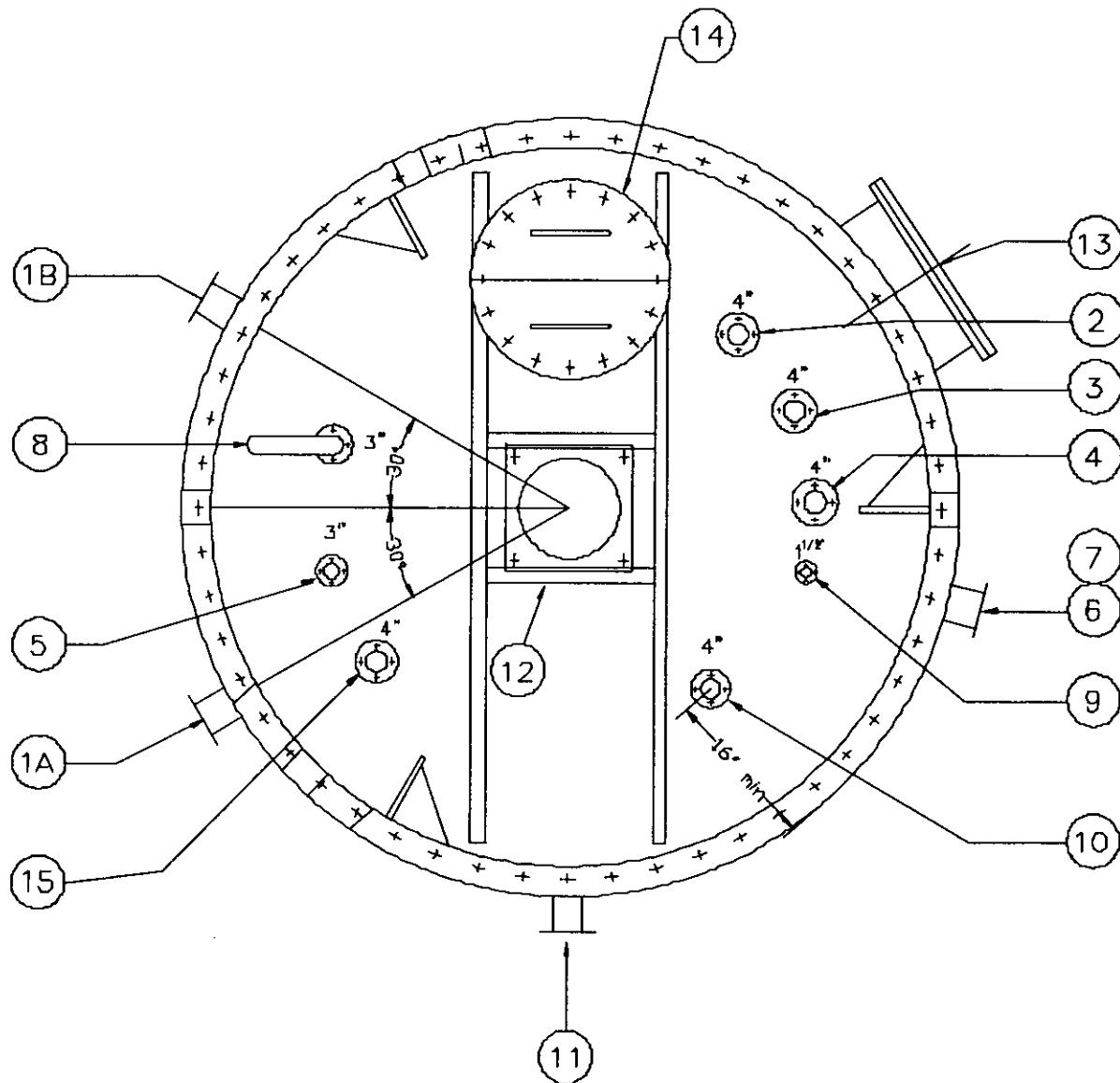
0	Nov-03	BASIC ENGINEERING	R.A.F.	S.C.C.
ISSUE	DATE	DESCRIPTION OF ISSUE	CHK'D	APP'D

INCRO

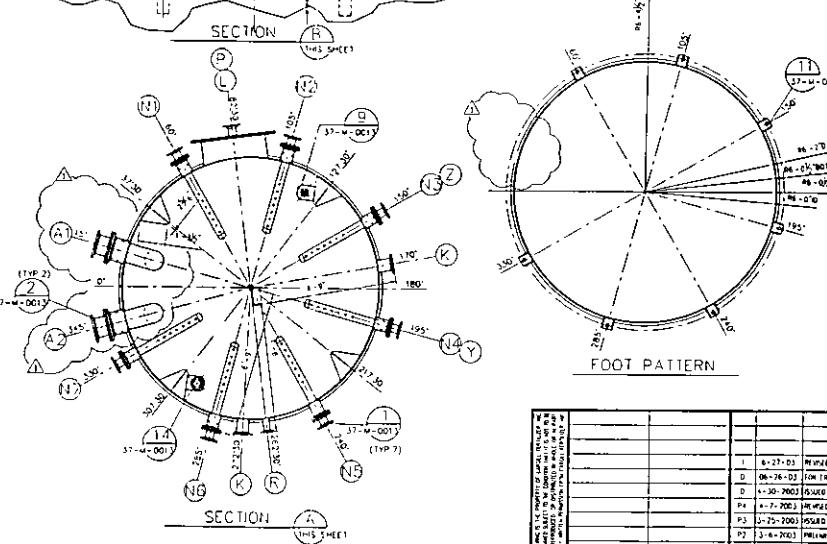
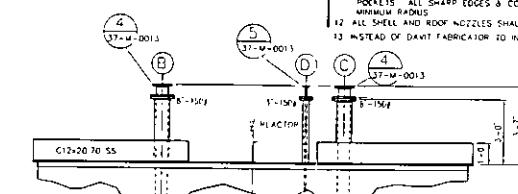
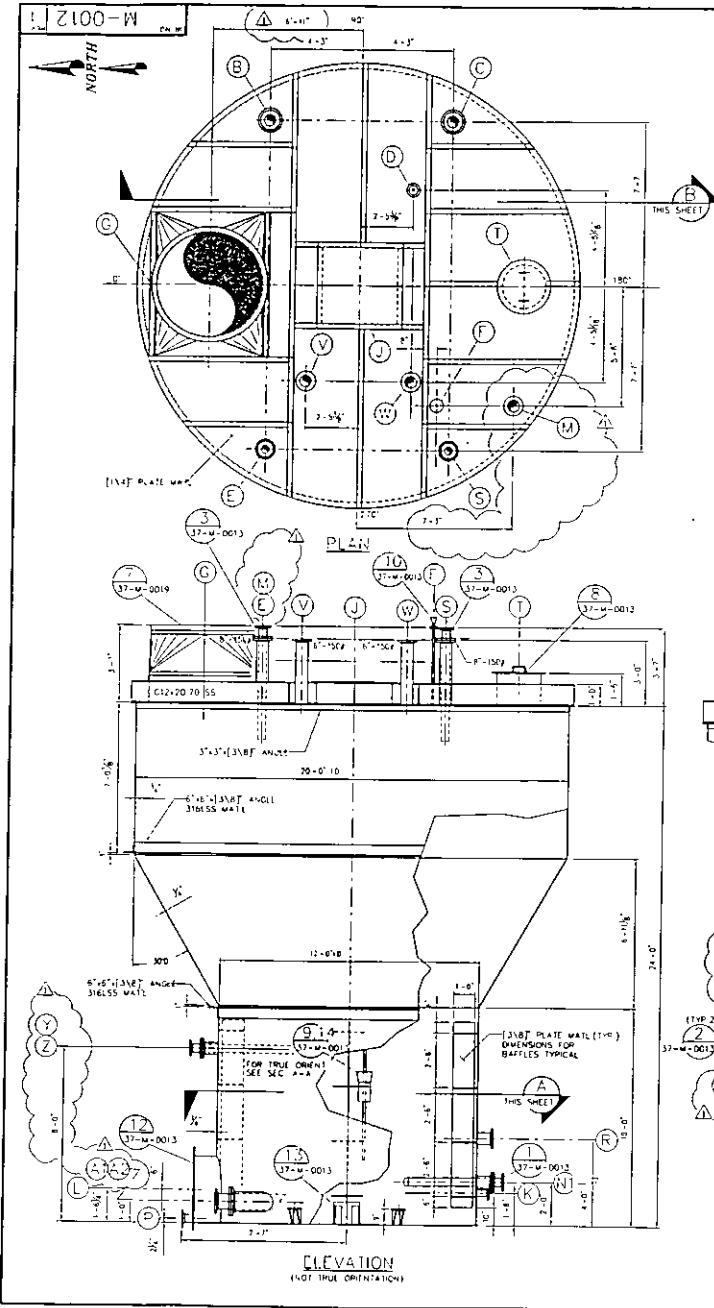
**DATA SHEET
VESSEL**

Client: CARGILL - TAMPA
 Plant: DAF #6 PLANT
 Location: TAMPA - USA
 Date: Nov-03 Sheet 3 of 3

Item	37-2375	Specification	03-0011-37-2375
Nr required	1	Manufacturer	
Service	PIPE REACTOR TANK	Model	
Project	03-0011	Type	Cylindrical vessel



0	Nov-03	BASIC ENGINEERING	R.A.F.	S.C.C.
ISSUE	DATE	DESCRIPTION OF ISSUE	CHK'D	APP'D



REF.	NAME	SIZE	MATERIAL	QUANTITY	DESCRIPTION
I	6-27-01	REINFORCED NOZZLE BOLT HOLD DOWN	MS	848	
D	06-16-00	NO FRICTION PIN	GS	FC	1P
D	1+30	2005 ISSUE FOR CONSTRUCTION	GS	FC	1P
Px	4-7-2003	REV FWD M	GS	FC	1P
P2	J-25-2003	ISSUE FOR APPROVAL & IN	GS	AG	1P
P3	J-4-2003	PRELIMINARY	GS	AG	1P
P4	2-22-2003	FINAL	GS	AG	1P
REFERENCE DRAWINGS	NO	DATE	BY WHOM	FOR WHOM	

NOZZLE SCHEDULE

C/N	DI	SIZE	CLASS/FACE	SERVICE	WECN	REMARKS	SERVICE	REACTOR SIZING
A1	1	10"	150# / 30# PLUG SECTION	STD. WT.	SEE Dwg 37-W-0013 DETAIL 3 FOR HOLE		APPLICABLE CODE APPENDICES	API-550 LATEST EDITS
B	1	8"	150# / 30# 1/2" PIDS INLET w/ INSERT	STD. WT.	SEE Dwg 37-W-0013 DETAIL 4 FOR INSERT		DESIGN INTERNAL	X-WG
C	1	6"	150# / 30# 1/2" PIDS INLET w/ INSERT	STD. WT.	SEE Dwg 37-W-0013 DETAIL 4 FOR INSERT		DESIGN EXTERNAL	ATU
D	2	4"	150# / 30# 1/2" PIDS INLET w/ INSERT	STD. WT.	SEE Dwg 37-W-0013 DETAIL 5 FOR INSERT		OPERATING INTERNAL PRESSURE	MEDIUM
E	1	3"	150# / 30# 1/2" PIDS INLET w/ INSERT	STD. WT.	SEE Dwg 37-W-0013 DETAIL 6 FOR INSERT		OPERATING EXTERNAL PRESSURE	HIGH
F	1	58"	150# / 30# GEFADER	STD. WT.	SEE Dwg 37-W-0013 DETAIL 7 FOR INSERT		LIQUID LEVELS	MINIMUM
G	1	58"	150# / 30# VENT TO SCRUBBER	STD. WT.	SEE Dwg 37-W-0013 DETAIL 7		LIQUID LEVELS	MAXIMUM
H	1	24"	150# / 30# OPERATING FOR AGITATOR BLADES	STD. WT.			LIQUID LEVELS	REAL ISL
K	2	6"	150# / 30# LEVEL TRANSMITTER	STD. WT.	INSERT PROVIDED BY CARGILL E&I		PRODUCT SPECIFIC GRAVITY	0.978
L	1	6"	150# / 30# CLEAN-OUT	STD. WT.	SEE Dwg 37-W-0013 DETAIL 12		WIND DESIGN	REF API-650
M1	1	6"	150# / 30# SCRAPER INLET w/ SPACER	STD. WT.	SEE Dwg 37-W-0013 DETAIL 3 FOR SPACER		SEISMIC DESIGN	NOT REQUIRED
N1	1	6"	150# / 30# AMMONIA INLET w/ SPACER	STD. WT.	SEE Dwg 37-W-0013 DETAIL 4 FOR SPACER		FOUNDATION	REINFORCED CONCRETE MAT
N2	1	6"	150# / 30# AMMONIA INLET w/ SPACER	STD. WT.	SEE Dwg 37-W-0013 DETAIL 4 FOR SPACER		SATEL	ROOF
N3	1	6"	150# / 30# AMMONIA INLET w/ SPACER	STD. WT.	SEE Dwg 37-W-0013 DETAIL 4 FOR SPACER		CORROSION BOTTOM	STRUCTURES
N5	1	6"	150# / 30# AMMONIA INLET w/ SPACER	STD. WT.	SEE Dwg 37-W-0013 DETAIL 4 FOR SPACER		ALLOWANCE	REMOVABLE INTERNALS
N7	1	6"	150# / 30# AMMONIA INLET w/ SPACER	STD. WT.	SEE Dwg 37-W-0013 DETAIL 4 FOR SPACER		ANCHOR POINTS	
R	1	6"	150# / 30# 1/2" PIDS INLET	STD. WT.	SEE Dwg 37-W-0013 DETAIL 10 FOR SPACER		CAPACITIES	OPERATING MIN 3X-37 14.337 GALS INCH 30-1/2 14.337 GALS
R	1	3"	150# / 30# TEMPERATURE ELEMENT	STD. WT.	SEE Dwg 37-W-0013 DETAIL 12		NET WORKING	8.170 GALS
S	1	6"	150# / 30# ISOLATE INLET w/ INSERT	STD. WT.	SEE Dwg 37-W-0013 DETAIL 10 FOR SPACER		WEIGHTS	BY VENDOR (LBS) FABRICATED BY VENDOR (LBS)
T	1	24"	150# / 30# MANWAY	STD. WT.	SEE Dwg 37-W-0013 DETAIL 8		FLUID OF WATER	14400 LBS
V	1	6"	150# / 30# IDENTITY	STD. WT.	INSERT PROVIDED BY CARGILL E&I		FLUID OF OPERATING LIQUID	BY VENDOR (LBS)
W	1	6"	150# / 30# SPARE	STD. WT.			MAXIMUM OVERTURNING MOMENT AT BASE	BY VENDOR (T) (LBS)
Y	1	6"	150# / 30# 1/2" PIDS INLET w/ INSERT	STD. WT.	SEE Dwg 37-W-0013 DETAIL 3 FOR SPACER		MAXIMUM SHEAR AT BASE	BY VENDOR (T) (LBS)
Z	1	6"	150# / 30# 1/2" PIDS INLET w/ INSERT	STD. WT.	SEE Dwg 37-W-0013 DETAIL 3 FOR SPACER		INSPECTION AND TESTING	

DESIGN DATA

REACTOR SIZING	API-650 LATEST EDITS
APPLICABLE CODE APPENDICES	XXXXXX
DESIGN INTERNAL	X-WG
DESIGN EXTERNAL	ATU
OPERATING INTERNAL PRESSURE	MEDIUM
OPERATING EXTERNAL PRESSURE	HIGH
LIQUID LEVELS	MINIMUM
LIQUID LEVELS	MAXIMUM
LIQUID LEVELS	REAL ISL
PRODUCT SPECIFIC GRAVITY	0.978
WIND DESIGN	REF API-650
SEISMIC DESIGN	NOT REQUIRED
FOUNDATION	
SATEL	
CORROSION BOTTOM	
ALLOWANCE	
ANCHOR POINTS	
CAPACITIES	OPERATING MIN 3X-37 14.337 GALS INCH 30-1/2 14.337 GALS
NET WORKING	8.170 GALS
WEIGHTS	BY VENDOR (LBS) FABRICATED BY VENDOR (LBS)
FLUID OF WATER	14400 LBS
FLUID OF OPERATING LIQUID	BY VENDOR (LBS)
MAXIMUM OVERTURNING MOMENT AT BASE	BY VENDOR (T) (LBS)
MAXIMUM SHEAR AT BASE	BY VENDOR (T) (LBS)
INSPECTION AND TESTING	

CONSTRUCTION DETAILS

ROOF TYPE	SLOPED
ROOF SLOPE OR RADIUS	5%
BOTTOM TIRE	FLAT
PLATE SEAMS	ROOF BUTT WELD
ROOF	BUTT WELD

TANK APPURTENANCES

LADDER	SUPPLIER	ON SITE FABRICATION
SUPPORT	STRAIGHT STAIRCASE	N/A
REACTOR VALVE	ROUDED	
FLAME ARRESTOR	RECLOSED	
LEVEL INDICATOR	RECLOSING	
EMERGENCY	RECLOSED	
DRAW OFF SHUT	RECLOSING	
AGITATOR SUPPORTS, PLATFORM & H.P.	RECLOSING	

MISCELLANEOUS

PAINTING	EXTERIOR ONLY PER SPECIFICATION
EXTENT OF PAINTING	INTERNAL NOT REQUIRED
EXTENT OF PAINTING	EXTERNAL NOT REQUIRED
LINING	REQUIRED (SEE MATERIALS BELOW)
INSULATION	NONE

REFERENCE STANDARDS AND SPECIFICATIONS

STRUCTURE TANKS	NOT APPLICABLE
PAINTING	NOT APPLICABLE

MATERIALS

SHELL	316SS
ROOF	316SS
BOTTOM	316SS
LINING	NOS HERKAMER
FORGINGS	A-182 FORGED
NOZZLES	FLANGES BEEVES
MANHOLES AND/OR HATCHES	2 1/2" 316 SS FLANGE 1 1/2" 316 SS FLANGE
NOZZLES	1 1/2" 316 SS FULL FACE NEOPRENE (10 DIAHETS) (8)
MANHOLES	1 1/2" 316 SS FULL FACE NEOPRENE (10 DIAHETS) (8)
INTERNAL BOLTS	1 1/2" 316 SS
EXTERNAL BOLTS	STUDS/BOLTS
PIPS	316SS
INTERNAL PLATE	316SS
INTERNAL STRUCTURALS	316SS
EXTERNAL PLATE	316SS
EXTERNAL STRUCTURALS	316SS

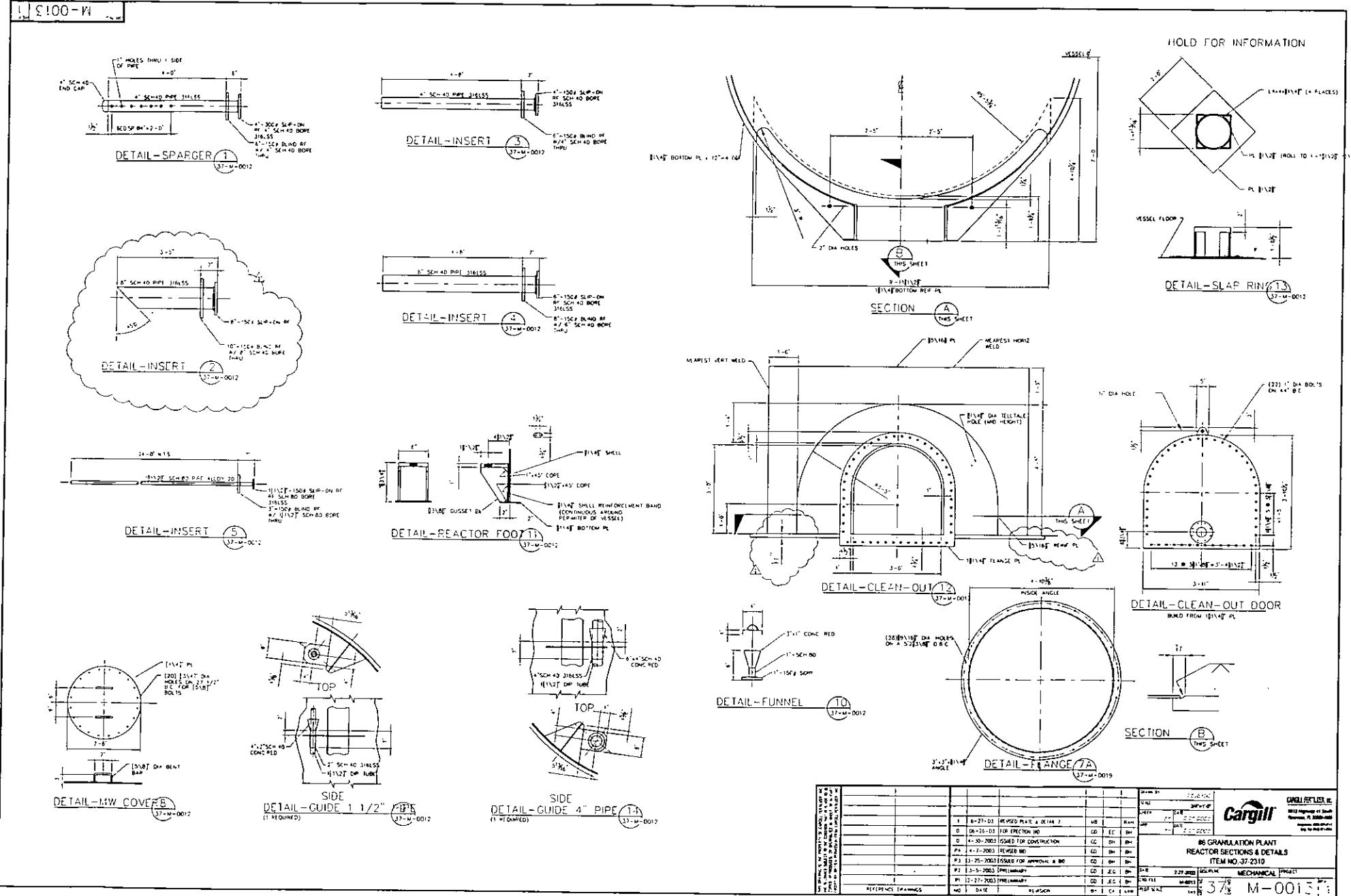
Cargill
Cargill Protein Inc.
1010 Highway 41 South
Appleton, WI 54914-4000
Tel: 920-833-3000
Fax: 920-833-3234

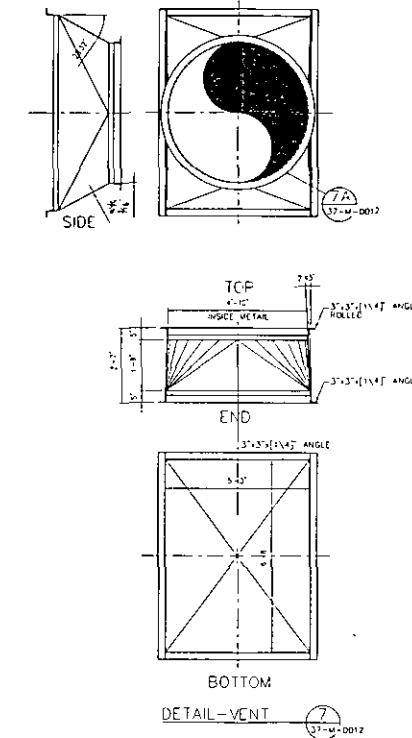
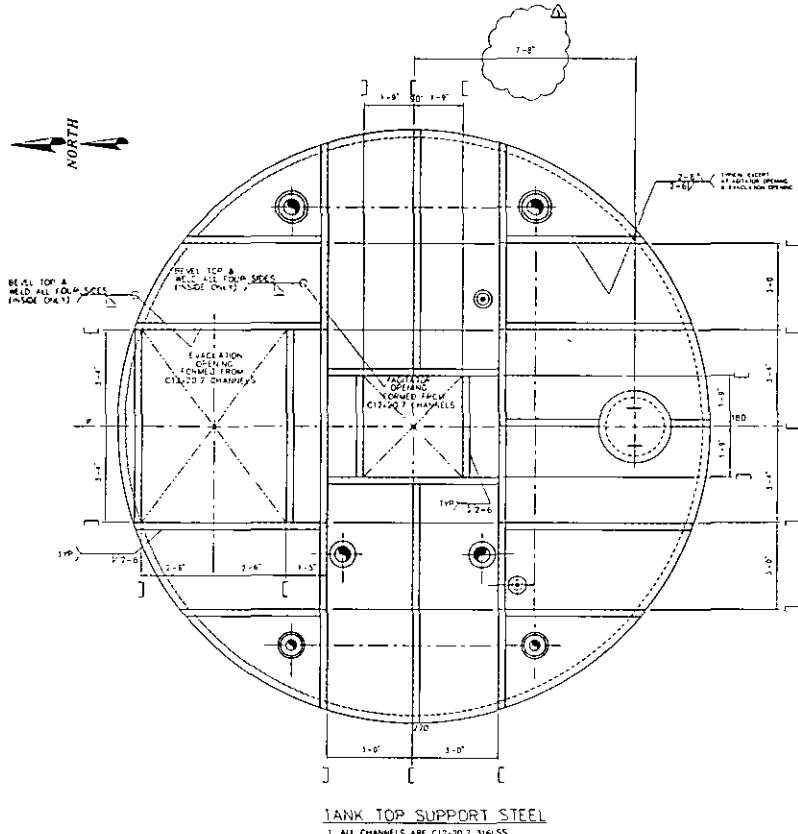
#6 GRANULATION PLANT REACTOR

ITEM NO. 31-2310

MECHANICAL PROJECT 200002

37 1/2 M-0012-1







Jeb Bush
Governor

Department of Environmental Protection

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

David B. Struhs
Secretary

November 14, 2003

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. E. O. Morris, Vice President
Environment, Health and Safety
Cargill Fertilizer, Inc.
8813 Highway 41 South
Riverview, Florida 33569

Re: DEP File No. 0570008-044-AC; PSD-FL-336
No. 6 Granulation Plant - Riverview

Dear Mr. Morris:

The Department has received the application on October 17, 2003, for the modification of the No. 6 Granulation Plant in Riverview, Hillsborough County. Based on our initial review of the proposed project, we have determined that additional information is needed in order to continue processing this application package. In addition to the information we requested by letter dated on November 5, please submit the information requested below to the Department's Bureau of Air Regulation:

1. It appears there is a discrepancy in the proposed production rate increase for the AP Plant of 4000 TPD vs 4478 TPD. Which one is correct?
2. What is the capacity of the new Pipe Reactor and the new reactor that will replace Reactor Nos. 1 & 2? Submit design drawings and specifications of all the proposed new equipment.
3. Please explain in details the mode of operation of this plant and the different processes (i.e.: GTSP, AP, and the phosphates fertilizers with added nitrogen, sulfur and micronutrients)?
4. Your application states that the fluoride (F) emissions from the No.2 and No.4 building will not be increased since they stored GTSP and this production rate is not increased by this project. Since the AP production rate will increase, would it be any increase of F in the building as a result of storing AP? (Refer to Sections 2.2.5 and 2.22.7 of the PSD report)
5. Since the facility expansion permitted in 2001 has not been completed, recalculate Table 3-3 of the application using actual emission data for the last 2 years of operation. The GTSP plant and the other affected units are existing emission units that have been operating for several years. Therefore, actual emissions data should be used in this calculation.
6. Are the potential F emissions as a result of this modification 15.04 TPY or 22.46 TPY? It appears that the GTSP emissions (7.42 TPY) are not counted (Refer to Page 19 – Section G of the application and Table 3-3 of the PSD report). Please explain.

"More Protection, Less Process"

Printed on recycled paper.

7. Are the potential PM/PM₁₀ emissions as a result of this modification 19.82/19.58 or 84.20 TPY? It appears that the total GTSP and AP emissions (56.39 + 27.81 TPY) are not counted (Refer to Page 19 – Section G of the application and Table 3-3 of the PSD report). Please explain.
8. Your application states that the GTSP Plant is not subject to the NSPS, Subpart W requirements due to this modification (Page 3-11). Please explain.
9. Please re do any significant impact area modeling due to emissions changes as a result of recalculations required by comment number 5 above. Also update Table 6-3 to reflect the use of actual emissions. If the significant impact area changes for PM₁₀, then further applicable AAQS and increment modeling should be done. If current versus future fluoride impacts change, these changes should be updated in Tables 6-16 and 6-17. If pollutant applicability changes and other pollutants are subject to PSD, then all required modeling associated with those pollutants should be performed. In addition, if the emission changes impact the regional haze analysis, it needs to be updated.

Any additional comments from EPA and the U.S. Fish and Wildlife Service will be forwarded to you after we receive them.

The Department will resume processing this application after receipt of the requested information. Rule 62-4.050(3), F.A.C. requires that all applications for a Department permit must be certified by a professional engineer registered in the State of Florida. This requirement also applies to responses to Department requests for additional information of an engineering nature. A new certification statement by the authorized representative or responsible official must accompany any material changes to the application. Rule 62-4.055(1), F.A.C. now requires applicants to respond to requests for information within 90 days.

We will be happy to meet and discuss the details with you or your staff. If you have any questions regarding this matter, you can call me at 850/921-9523.

Sincerely,



A.A. Linero, P.E. Administrator
New Source Review Section

AAL/th

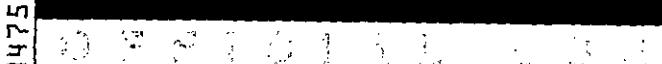
cc: J. Little, EPA
J. Bunyak, NPS
G. Kissel, DEP-SWD
A. Harmon, HCEPC
D. Buff, P.E., Golder Associates, Inc.

SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY											
<ul style="list-style-type: none"> ■ Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. ■ Print your name and address on the reverse so that we can return the card to you. ■ Attach this card to the back of the mailpiece, or on the front if space permits. 		<table border="1"> <tr> <td>A. Received by (Please Print Clearly)</td> <td>B. Date of Delivery</td> </tr> <tr> <td colspan="2"> <input style="width: 100%;" type="text" value="C. Signature"/> <input checked="" type="checkbox"/> Agent <input type="checkbox"/> Addressee </td> </tr> <tr> <td colspan="2"> D. Is delivery address different from item 1? <input type="checkbox"/> Yes <input type="checkbox"/> No If YES, enter delivery address below: <i>1117</i> </td> </tr> <tr> <td colspan="2"> 3. Service Type <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D. </td> </tr> <tr> <td colspan="2">4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</td> </tr> </table>		A. Received by (Please Print Clearly)	B. Date of Delivery	<input style="width: 100%;" type="text" value="C. Signature"/> <input checked="" type="checkbox"/> Agent <input type="checkbox"/> Addressee		D. Is delivery address different from item 1? <input type="checkbox"/> Yes <input type="checkbox"/> No If YES, enter delivery address below: <i>1117</i>		3. Service Type <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.		4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes	
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4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes													
1. Article Addressed to: Mr. E. O. Morris Vice President Environment, Health and Safety Cargill Fertilizer, Inc. 8813 Highway 41 South Riverview, FL 33569													
2. Article Number (Copy from service label) 7000 2870 0000 7028 3475													

PS Form 3811, July 1999

Domestic Return Receipt

102595-99-M-1789

U.S. Postal Service CERTIFIED MAIL RECEIPT (Domestic Mail Only; No Insurance Coverage Provided)																
																
<input type="checkbox"/> 5 <input type="checkbox"/> 10 <input type="checkbox"/> 20 <input type="checkbox"/> 25 <input type="checkbox"/> 30 <input type="checkbox"/> 40 <input type="checkbox"/> 50 <input type="checkbox"/> 60 <input type="checkbox"/> 70 <input type="checkbox"/> 80 <input type="checkbox"/> 90 <input type="checkbox"/> 100 <input type="checkbox"/> 125 <input type="checkbox"/> 150 <input type="checkbox"/> 175 <input type="checkbox"/> 200 <input type="checkbox"/> 225 <input type="checkbox"/> 250 <input type="checkbox"/> 275 <input type="checkbox"/> 300 <input type="checkbox"/> 325 <input type="checkbox"/> 350 <input type="checkbox"/> 375 <input type="checkbox"/> 400	<table border="1"> <tr> <td>Postage</td> <td>\$</td> <td></td> </tr> <tr> <td>Certified Fee</td> <td></td> <td></td> </tr> <tr> <td>Return Receipt Fee (Endorsement Required)</td> <td></td> <td></td> </tr> <tr> <td>Restricted Delivery Fee (Endorsement Required)</td> <td></td> <td></td> </tr> <tr> <td>Total Postage & Fees</td> <td>\$</td> <td></td> </tr> </table>	Postage	\$		Certified Fee			Return Receipt Fee (Endorsement Required)			Restricted Delivery Fee (Endorsement Required)			Total Postage & Fees	\$	
Postage	\$															
Certified Fee																
Return Receipt Fee (Endorsement Required)																
Restricted Delivery Fee (Endorsement Required)																
Total Postage & Fees	\$															
		Postmark Here														
Sent To E. O. Morris <i>Street, Apt. No.; or PO Box No.</i> 8813 Highway 41 South <i>City, State, ZIP+4</i> Riverview, FL 33569																
PS Form 3800, May 2000		See Reverse for Instructions														