



Florida Department of
Environmental Protection

Memorandum

TO: Howard L. Rhodes
THRU: Clair Fancy 
FROM: Al Linero  4/11
DATE: April 11, 2000
SUBJECT: Cargill Fertilizer, Inc., 0570008-032-AC, PSD-FL-234B
Riverview AFI Plant

Attached is a permit modification to allow Cargill's Riverview Animal Feed Ingredients (AFI) Plant to operate in either batch or continuous mode. The plant was originally permitted to operate only in batch mode. The modification involves no increase in actual or allowable emissions.

Public notice of the Intent to Issue was provided in accordance with Department rules with no comments received. Approval and signature of the final permit modification is requested.



Jeb Bush
Governor

Department of Environmental Protection

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

David B. Struhs
Secretary

April 11, 2000

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Ms. Kathy Edgemon
Environmental Superintendent
Cargill Fertilizer, Inc.
8813 Highway 41 South
Riverview, Florida 33569

Re: Permit Modification – Continuous Operating Mode for Riverview AFI Plant
DEP File No. 0570008-032-AC (PSD-FL-234B)

Dear Ms. Edgemon:

As requested, the following permit modification [Permit 0570008-032-AC (PSD-FL-234B)] allows operation of the AFI batch reactors in continuous mode. This permit modification involves no increase in actual or allowable emissions and no substantial physical changes to process equipment. The changes to the permit are indicated below:

Specific Condition No. 4

Unless the Department determines that the initial scrubber performance test data justify a higher limit, total fluoride emissions from the AFI Plant shall not exceed 0.50 lb./batch-hr and 4.30 TPY based on 281,050 tons AFI/year and 15,768 batch-hours/year (projection based on 90% operating factor) or 7,884 double batch-hours/year. The 0.5 lb./hr limit shall also apply when any of the three defluorination reactors is operated in a continuous process mode without the remaining two in operation. When any two or more of the three defluorination reactors are operated simultaneously in a continuous process, the fluoride emission limit shall be 1.0 lb./hr and 4.3 TPY. Since the duct configuration is not appropriate for a scrubber inlet test to be done, the fluoride scrubber design requirement shall be that the minimum capability of 8.0 mass transfer units be attested to by the scrubber manufacturer in writing. Compliance with the mass transfer requirement shall be determined by the Bureau of Air Regulation in Tallahassee based on calculations using test data. If the scrubber achieves an average of 8.0 mass transfer units using normal pond water, the Department shall consider the tests as successful and shall adjust the fluoride emission limit as appropriate. [Rule 62-212.400, F.A.C.]

Specific Condition No. 9

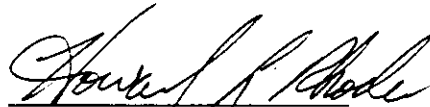
Before this construction permit expires, and annually thereafter, the subject emissions units shall be tested for compliance with the above emission limits. If the permittee elects to demonstrate initial and/or annual compliance in the batch process mode, the initial-performance tests for the fluoride scrubber shall consist of a three-run test during a double-batch beginning within one hour of the start of the second batch. If the permittee elects to demonstrate compliance in the continuous process mode, the performance test shall consist of a three-run test while any two or more of the three defluorination reactors are operating at permitted capacity. For the duration of all tests the emission units shall be operating at permitted capacity. Permitted capacity is defined as 90-100 percent of the maximum operating rate allowed by the permit. If it is impracticable to test at permitted capacity, then the emission unit may be tested at less than permitted

capacity (i.e., 90% of the maximum operating rate allowed by the permit). In this case, subsequent emission unit operation is limited to 110 percent of the test load until a new test is conducted. Once the emission unit is so limited, then operation at higher capacities is allowed for no more than 15 consecutive days for the purposes of additional compliance testing to regain the permitted capacity in the permit. [Rule 62-297.310, F.A.C.]

A copy of this letter shall be filed with the referenced permit and shall become part of the permit.

This permitting decision is issued pursuant to Chapter 403, Florida Statutes. Any party to this permitting decision (order) has the right to seek judicial review of it under section 120.68 of the Florida Statutes, by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel, Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000, and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The notice must be filed within thirty days after this order is filed with the clerk of the Department.

Executed in Tallahassee, Florida.



Howard L. Rhodes, Director
Division of Air Resources Management

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this PERMIT MODIFICATION was sent by certified mail (*) and copies were mailed by U.S. Mail before the close of business on 4-13-00 to the person(s) listed:

Ms. Kathy Edgemon*
Mr. Bill Thomas, SWD
Mr. Rick Kirby, ECPHC
Mr. Gregg Worley, EPA
Mr. John Bunyak, NPS

Clerk Stamp

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

Kim Johnson
(clerk)

4-13-00
(Date)

FINAL DETERMINATION
CARGILL FERTILIZER, INC.
AFI Plant Modification - Riverview
Permit No. 0570008-032-AC
PSD-FL-234B

An Intent to Issue Air Construction Permit to Cargill Fertilizer, Inc. for the modification of the Animal Feed Ingredients (AFI) Plant at the applicant's facility in Riverview, Hillsborough County, Florida was distributed on March 17, 2000. The proposed permit modification provided for operation of the AFI Plant in either batch or continuous mode. The plant was originally permitted to operate only in the batch mode. The change in operation mode will not cause any increase in actual or allowable emissions.

The Public Notice of Intent to Issue Air Construction Permit was published in the Tampa Tribune on March 23, 2000. The draft permit modification was posted on the Department's web site and copies were available for public inspection at the Department's offices in Tallahassee and Tampa and at the Environmental Protection Commission of Hillsborough County in Tampa. No comments were received. Therefore, the final action of the Department will be to issue the permit modification as proposed.

no green card

Z 031 391 943

US Postal Service

Receipt for Certified Mail

No Insurance Coverage Provided.

Do not use for International Mail (See reverse)

Sent to	Kathy Edgeron	
Street & Number	Cassile Feit.	
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	4-13-00	
0570008-032-AC		
PSD-F1-2348		

PS Form 3800, April 1995