



**CARGILL
FERTILIZER, INC.**

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Department of Environmental Protection
SOUTHWEST DISTRICT
BY _____

HR13 Highway 41 South - Riverview, Florida 33569 - Telephone 813-677-9111 - TWX 810-876-0648 - Telex 52666 - FAX 813-671-6146

Airborne Express No: 458 325 4583

August 2, 2000

Mr. Jerry Kissell
Florida Department of Environmental Protection
3804 Coconut Palm Drive
Tampa, FL 33619-8318

Dear Mr. Kissell

RE: No. 9 Sulfuric Acid Plant Emission Reductions

As are aware, Cargill has agreed to a reduction in the permitted emission from our No's 8 & 9 Sulfuric Acid Plants at our Riverview facility by June 30, 2003. As the first step in this process for the No. 9 plant, Cargill intends to replace a portion of the conventional vanadium catalyst in the fourth mass with a cesium enhanced vanadium catalyst.

The purpose of this letter is to request an expedited authorization for this work. Due to some unanticipated mechanical problems at this unit, it is necessary for Cargill to conduct maintenance beginning as early as September 1, 2000. We have confirmed that the upgraded catalyst is available at this early date and would like to proceed with this phase of the emission reduction project. If the work is not completed at this time we will be forced to wait until the next turn-around which will likely not be conducted until sometime in 2002. Such a delay will not provide sufficient time to confirm the performance of the new catalyst and identify if any physical modifications are required to the plant to meet the reduced emission objectives by the required date.

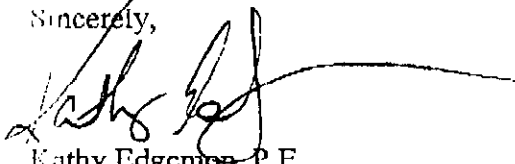
The new catalyst is expected to result in immediate emission reductions. The plant is already capable of operating a maximum permitted capacity and has done so on numerous occasions. No increase in permitted production is being requested in conjunction with the catalyst change.



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Should you have any questions or need additional information, please feel free to contact me by phone at 813-671-6369 or e-mail at kathy_edgemou@cargill.com.

Sincerely,



Kathy Edgemou, P.E.
Environmental Superintendent

cc: Jerry Campbell, EPCHC
Jellerson, Morris
File P-10-10

