

Golder Associates Inc.

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BUREAU OF
AIR REGULATION



April 17, 1998

Mr. A. A. Linero, P.E.
New Source Review Section
Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2400

RE: Cargill Fertilizer, Inc. - Riverview Nos. 8 & 9 Sulfuric Acid Plants
AC29-241660
PSD-FL-209
Request to Shift Sulfuric Acid Capacity

Dear Mr. Linero:

The purpose of this correspondence is to respond to the Department's letter dated February 3, 1998, concerning the above referenced request, and in follow up to our recent conversations. As I explained in our conversation, both the No. 8 and No. 9 Sulfuric Acid Plants are currently under a construction permit for the increase in their permitted production rates. The No. 9 Sulfuric Acid Plant has only recently completed actual construction in regards to its permitted increase to 3,200 TPD of sulfuric acid. This construction was completed in November of 1997, during a planned plant turnaround. Therefore, there is no long term (i.e., 2-year) operational record upon which to establish its "actual" emissions. The potential (allowable) emissions for the No. 9 Sulfuric Acid plant is 4.0 lb/ton of 100% sulfuric acid produced.

The allowable emission rate for the No. 8 Sulfuric Acid plant is also 4.0 lb/ton; therefore, Cargill believes that shifting 200 TPD of acid production from the No. 8 to the No. 9 plant, while maintaining the 5,700 TPD cap for the two plants combined, would not constitute a modification since this entire modification of the No. 8 and No. 9 plants is still under a construction permit.

In regards to your questions as to whether the real SO₂ emissions to the atmosphere would increase due to the shift, I refer to the latest compliance tests conducted on the No. 8 and No. 9 Sulfuric Acid plants. The latest test on No. 8 Sulfuric Acid Plant was conducted on 8/21/97 and resulted in SO₂ emissions of 3.8 lb/ton at a production rate of 2,530 TPD. Since the modifications were completed on No. 9 Sulfuric Acid Plant in November, 1997, a compliance test was conducted in December, 1997, and resulted in SO₂ emissions of 3.7 lb/ton at a production rate of 3,154 TPD. Therefore, on the basis of the official compliance tests, emissions would decrease by shifting 200 TPD to No. 9 plant, since emissions from the No. 8 plant are higher.

Since the two plants are already under a construction permit and underwent PSD review at the time, the total allowable emissions have already been scrutinized and approved. There would be nothing

No. 8

3/2/95	3.3 ^{lb} _{Fun}
1/8/90	2.99 ^{lb} _{fun}
2/18/91	1.56 ^{lb} _{fun}
1/7/94	2.69 ^{lb} _{fun}

No. 9

7/26/95	3.03
7/28/94	2.70
1/13/94	3.80

Keep!!

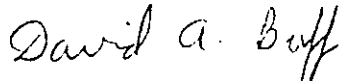
John Reynolds
 phone conversation
 w/ Gerald Kissell.

A.A. Linero
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gained by requiring another construction permit. Cargill has already submitted the required permit amendment fee of \$250.

This information should provide the Department with the information needed to process the permit amendment. If you require anything further, please do not hesitate to call.

Sincerely,



David A. Buff, P.E.
Principal Engineer
Florida P.E. #19011

S E A L

DB/arz

cc: David Jellerson, Cargill
Kathy Edgemon, Cargill
Bill Thomas, FDEP-SWD
File (2)

cc: J. Reynaltes, BTR