

Sheplak, Scott

- file -

From: Mohammad, Sal [Sal_Mohammad@golder.com]
Sent: Wednesday, October 24, 2007 5:22 PM
To: Sheplak, Scott
Subject: Mosaic Riverview

Hi Scott,
Sorry I am a little late getting back to you on this. I was out yesterday for a conference. Regarding your request for a reference of the shutdown units at Mosaic Riverview, I was told that the shutdown will be reflected in 0570008-058-AC, which is the application for the expansion of the Animal Feed Ingredient (AFI) Plant.
Hope this helps.

Thanks,
Sal

Sal Mohammad
Project Engineer
Golder Associates Inc.
6241 NW 23rd Street, Ste. 500
Gainesville, FL 32653
352/336-5600
www.golder.com

Events Scheduled

90 of 90

AIRS ID: 0570008 Site Name: MOSAIC FERTILIZER-RIVERVIEW FACILITY

Permit #: Type/Subtype: AC / 1C Received: 06/27/2007

Project #: 058 Project Name: (AFI PLANT MODIFICATION)

> Awaiting Additional Information: Pending

Event	Begin Date	Period	Due Date	Rmn	Status	End Date
Receive Request	06/27/2007	1	06/28/2007		Done	06/27/2007
Fee Verification	06/27/2007	2	06/29/2007		Sufficient Fee	06/28/2007
Completeness Review	06/27/2007	30	07/27/2007		Incomplete	07/26/2007
RESET CLOCK	07/26/2007	1	07/27/2007		Done	07/26/2007
Awaiting Additional Information	07/26/2007	90	10/24/2007		Received	10/04/2007
Completeness Review	10/04/2007	30	11/03/2007		Incomplete	11/01/2007
RESET CLOCK	11/01/2007	1	11/02/2007		Done	11/01/2007
Awaiting Additional Information	11/01/2007	90	01/30/2008	90	Pending	

Permitting Application - Permit Detail and Log Permit								
ARMS Facility								
POINT	AIRS ID	0570008	STATUS	A	OFFICE	SWHI	SW: HILLSBOROUGH	
SITE NAME			MOSAIC FERTILIZER-RIVERVIEW FACILITY		COUNTY			HILLSBOROUGH
OWNER/COMPANY			MOSAIC FERTILIZER, LLC					
Project								
AIR Permit #			Project #	058	CRA Reference #			
Permit Office	SWD (DISTRICT)			Agency Action				Pending
Project Name	AFI PLANT MODIFICATION		Desc					modifying the animal feed ingredient plant to achieve production rat
Type/Sub/Des	AC	/	1C	Source 50 tpy but less than 100 \$4500			Logged	06/28/2007
Received	06/27/2007	Issued		Expires		OGC		<input type="checkbox"/>
Fee	0.00	Fee Recd		Dele		Override		TITLE V
Related Party								
Role	APPLICANT		Begin	06/28/2007	End			
Name	STEWART, JEFF			Company	MOSAIC			
Address	8813 US HWY 41 SOUTH							
City	RIVERVIEW		State	FL	Zip	33569	Country	U.S.A.
Phone	813-671-6369		Fax	813-671-6149				
Processors								
Processor	NOOR_Q		<input checked="" type="checkbox"/>	Active	06/28/2007	Inactive	<input type="checkbox"/>	Events

Sheplak, Scott*-file-*

From: Mohammad, Sal [Sal_Mohammad@golder.com]
Sent: Friday, September 21, 2007 10:04 AM
To: Sheplak, Scott
Cc: Buff, Dave; Nelson, Deborah
Subject: FW: Mosaic Riverview BART

Scott,

I confirmed with Mosaic that the data I sent to you yesterday (also attached below) are CEM data. These are maximum lb/hr based on tons/day of H2SO4 production and SO2 in lb/ton H2SO4. Please let me know if you needed anything else.

Thanks,

Sal Mohammad
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From: Mohammad, Sal
Sent: Thursday, September 20, 2007 2:07 PM
To: 'Sheplak, Scott'
Cc: Buff, Dave; 'Nelson, Deborah'
Subject: RE: Mosaic Riverview BART

Scott,

I have attached below the information given to me by Mosaic. As far as I know, these are from CEM data. I am trying to get more information from Mosaic and will let you know. These rates were calculated based on actual daily production and actual operating hours of the day and are the max. 24-hour rates since 2002.

Thanks,

Sal

plant	date	tpd	lb/ton	lb/hr	hrs
7	10/18/04	1265	3.33	439	9.6
8	12/19/04	1251	3.42	382	11.2
9	04/13/02	3361	3.36	476	23.75

From: Sheplak, Scott [mailto:Scott.Sheplak@dep.state.fl.us]
Sent: Thursday, September 20, 2007 12:22 PM
To: Mohammad, Sal
Cc: Buff, Dave; Nelson, Deborah
Subject: RE: Mosaic Riverview BART

That is based on stack tests not CEMs.

From: Mohammad, Sal [mailto:Sal_Mohammad@golder.com]
Sent: Thursday, September 20, 2007 11:58 AM
To: Sheplak, Scott

9/24/2007

Cc: Buff, Dave; Nelson, Deborah
Subject: RE: Mosaic Riverview BART

Based on Mosaic data, actual emissions are 439 lb/hr (10/18/04), 382 lb/hr (12/19/04), and 476 lb/hr (4/13/02) for SAPs 7, 8, and 9, respectively. Allowable emissions are 467, 393.8, and 495.8 lb/hr for SAPs 7, 8, and 9, respectively. So more than 90% for each SAP.

Thank you,

Sal Mohammad
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From: Sheplak, Scott [mailto:Scott.Sheplak@dep.state.fl.us]
Sent: Thursday, September 20, 2007 11:25 AM
To: Mohammad, Sal
Cc: Buff, Dave; Nelson, Deborah
Subject: RE: Mosaic Riverview BART

Is there a % estimate available between the CEMs actual emissions vs. the allowable emissions? Example, are actual emissions within approximately 90% of the allowables.

From: Mohammad, Sal [mailto:Sal_Mohammad@golder.com]
Sent: Thursday, September 20, 2007 10:07 AM
To: Nelson, Deborah
Cc: Buff, Dave; Sheplak, Scott
Subject: RE: Mosaic Riverview BART

Hi Debbie,

Good morning! I was out yesterday for a workshop in Orlando. I have used the CEM data to re-evaluate the impacts which are presented in Table 1 of the September response letter. I just mentioned that the permit allowable rates that I had used in the original report was more conservative because the post-control emission rates are based on the baseline emission rates. In Appendix Y to 40 CFR Part 51 (FR July 6, 2005, Page 39170), it says "Post-control emission rates are calculated as a percentage of pre-control emission rates." So the post-control visibility level and the visibility reduction is proportional to whatever emission rate is used as the baseline. This is also demonstrated in Table 1 - because the baseline rates are now lower, reduction in visibility (based on 95% reduction) is also lower. As a result the cost effectiveness figures have gone up from what was reported before.

Thank you,

Sal

Sal Mohammad
 Project Engineer
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From: Nelson, Deborah [mailto:Deborah.Nelson@dep.state.fl.us]
Sent: Wednesday, September 19, 2007 4:16 PM
To: Mohammad, Sal

9/24/2007

Cc: Sheplak, Scott
Subject: Mosaic Riverview BART

Sal,

I have a question regarding the Mosaic BART response. I do not understand your response to comments regarding the modeling. My understanding of BART is that you compare visibility impacts before and after BART controls. Then, you analyze the visibility reduction with cost, feasibility, etc. In the Mosaic Review you used PTE's instead of CEMS. You state that this method is more conservative. However, I don't believe that it is more conservative. I think that it is less conservative because you are comparing visibility from PTE to post BART controls. Your visibility reduction, thus would be less than if you were to use CEMS. If you used CEMS, as the protocol suggests, you will show a greater reduction in visibility impacts. Any comments?

Thanks,

Debbie

Debbie Nelson
Meteorologist
Air Permitting South
850-921-9537
deborah.nelson@dep.state.fl.us

9/24/2007