



Department of Environmental Protection

Jeb Bush
Governor

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

David B. Struhs
Secretary

April 24, 2001

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

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

Re: DEP File No. 0570008-036-AC; PSD-FL-315
Riverview Plant Expansion

Dear Mr. Morris:

Enclosed are comments submitted by Hillsborough County Environmental Protection Commission (HCEPC) in regards to the completeness issues for this project. Please submit the information as requested by HCEPC with a copy to the Department's Bureau of Air Regulation. We are still awaiting comments from Environmental Protection Agency and U.S. Fish and Wildlife Service, which 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.

If you have any questions regarding this matter, please call Mr. Syed Arif, P.E. at 850/921-9528 or Ms. Alice Harmon, P.E. of HCEPC at 813/272-5530.

Sincerely,

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

AAL/sa

Enclosure

cc: G. Worley, EPA
J. Bunyak, NPS
B. Thomas, DEP SWD
A. Harmon, HCEPC
D. Buff, P.E., Golder Associates, Inc.

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MEMORANDUM

Date: April 20, 2001

To: Syed Arif, P.E.

From: Diana M. Lee, P.E.

Thru: Alice Harman, P.E.

Subject: Cargill Fertilizer, Inc., Riverview Plant Expansion

I reviewed the revised PSD application report for Cargill's facility expansion project received on March 13, 2001. I looked at the emissions numbers provided in the report and cross referenced them to the 1999 and 2000 electronic AORs submitted to our office by Cargill. Several discrepancies were noted between the numbers provided in the report and the numbers given in the 2000 AOR. Attached is the excel document that I put together from the numbers provided in Cargill's AOR. In this document, I highlighted the numbers that show a discrepancy with Table A-1. Based on this finding, Cargill should clarify and provide explanations regarding these discrepancies. Also, if the numbers in the application report are changed, they may need to revise their PSD netting analysis.

In addition, Cargill Fertilizer has not sent us the permitting application fee of \$480.00. The check should be made out to the Environmental Protection Commission of Hillsborough County. Should you have any questions, you can contact me at (813)272-5530.

Cargill 2000 AOR

CARGILL FERTILIZER 2000	EMISSION POINT	THROUGHPUT (TPY)	FUEL USAGE	2000 AOR TOTAL (HR/YR)	PM (TPY)	SO2 (TPY)	NOX (TPY)	CO (TPY)	VOC (TPY)	F (TPY)	H2SO4 (TPY)	TRS (TPY)
008-05-1	SULFURIC PLANT 8	787105		8330		1574.2	47.23				14.56	
008-06-1	SULFURIC PLANT 9	822250		7449		851.2	49.34				8.22	
008-07-1	GTSP/DAP SCRUBBER	208404		6802	9.48					1.98		
008-07-2	Boiler		296.5	6802	1.13	0.089	14.83	12.45	0.82			
008-08-1	GTSP ROCK HANDLER	191448		6802	3.83							
008-51-1	DOCK WEST BAGHOUSE	1794214		3100	0.63							
008-52-1	VESSEL LOADING/SOUTH BAGHOUSE	1652514		2932	0.58							
008-53-1	VESSEL LOADING/EAST BAGHOUSE	1794214		2932	0.63							
008-55-1	No. 5 DAP	401960		7498	4.02					8.04		
008-55-2	No. 5 DAP		86.9	7498	0.33	0.03	4.34	3.65	0.24			
008-58-1	BUILDING #6 BAGHOUSE	845484		1357	0.30							
008-59-1	BELT #7 TO #8 BAGHOUSE	1794214		3100	0.63							
008-60-1	BELT #8 TO #9 BAGHOUSE	1794214		3100	0.63							
008-61-1	SHIPHOLD/CHOKEFEEDE	1652514		2932	0.25							
008-64-1	MOLTEN SULFUR STORAGE TANK #2	427316		8784	0.75	0.89			0.64			0.43
008-65-1	MOLTEN SULFUR STORAGE TANK #3	427316		8784	0.75	0.89			0.64			0.43
008-66-1	MOLTEN SULFUR PIT #7	328346		8784	0.23	0.03			0.02			0.01
008-67-1	MOLTEN SULFUR PIT #8	260200		8784	0.27	0.03			0.02			0.02
008-68-1	MOLTEN SULFUR PIT #9	271818		8784	0.29	0.03			0.02			0.02
008-69-1	SULFUR SHIP UNLOADING DOCK	854631		2000								
008-70-1	GTSP STORAGE BLDG #2	226526		8784						10.54		
008-71-1	GTSP STORAGE BLDG #4	226526		8784						10.54		
008-72-1	GTSP TRUCKLOADING	5986		174	0.01							
008-73-1	#3 & #4 PHOS ACID PLANT	887182		8784						4		
008-74-1	SULFUR TRUCK LOADING	0		0								
008-78-1	ANIMAL FEED PLANT NO 1	131634		7174	15.14					0.46		
008-78-2	ANIMAL FEED PLANT NO 1 NATURAL GAS USE		120.35	7174	0.46	0.04	6.02	5.05	0.33			
008-79-1	DIATOMACIOUS EARTH SILO	1530		8784	0.02							
008-80-1	LIMESTONE SILO	58495		8784	0.06							
008-81-1	LIMESTONE HOPPER- LOADOUT SYSTEM	136300		1363	0.68							
008-100-1	#5 RAYMOND MILL	69640		6899	1.74							
100-2	#5 RAYMOND MILL		87.9	6899	0.13	0.03	4.4	3.7	0.23			
008-101-1	#9 RAYMOND MILL	71942		7127	1.80							
101-2	#9 RAYMOND MILL		90.8	7127	0.14	0.03	4.54	3.8	0.24			
008-102-1	GROUND ROCK HANDLING/STORAGE SYSTE	191448		8784								
008-106-1	No. 7 ROCK MILL	49866		4940	1.25							
008-106-2	No. 7 ROCK MILL		63	4940	0.09	0.02	3.15	2.65	0.17			
TOTAL EMISSIONS				817.5	46.25	2427.489	130.7	28.65	3.2	35.56	22.78	0.91