



# Department of Environmental Protection

Jeb Bush  
Governor

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2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

David B. Struhs  
Secretary

April 26, 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:

The Department received the initial application for this project on March 13, 2001. Additional modeling information was received on March 27, 2001. Based on our review of this modeling information, we have determined that additional information is needed in order to continue processing this application package. Please submit the information requested below to the Department's Bureau of Air Regulation:

1. The U.S. Fish and Wildlife Service (USFWS) has directed that sulfuric acid mist emissions should be included in the CALPUFF regional haze analysis as a separate emission input. Please remodel with these changes and provide the results to us.
2. Communication between the Bureau of Air Regulation and your consultant indicate that the maximum predicted 24-hour and 3-hour SO<sub>2</sub> PSD Class I increment results shown in Table 6-20 of the March 27, 2001, submittal were incorrect. We understand that this modeling is being redone using the updated emission inventory used with the March 27 submittal. Please provide these updated results to us.
3. The onsite truck traffic emissions should be explicitly modeled and included in the modeling analyses to be compared to the PM<sub>10</sub> ambient air quality standards (AAQS) and Class I and II PSD increments.
4. In Table 6-8 the title indicates that this table is a summary of only sources greater than 10 TPY of SO<sub>2</sub> emissions. All sources of SO<sub>2</sub>, even those with emissions of less than 10 TPY, should be included for evaluation within 0.5 km of the outer edge of the Significant Impact Area (SIA). Please correct this table and include any additional sources not eliminated by the North Carolina Screening Technique or 20 X D formula. In addition, six sources from this table which had emissions greater than the 20 X D formula were not included in the SO<sub>2</sub> modeling emissions input files. These sources, which are Speedling, Delta Asphalt, Atlas-Transoil, Coastal Fuels Marketing, FP&L (PMS), and International Petroleum, should be included in these modeling files.
5. In Table 6-9 the title indicates that this table is a summary of only sources greater than 50 TPY of PM emissions. Similar to the comment above, all sources of PM regardless of size, should be initially included for evaluation by the North Carolina Screening Technique.
6. It appears that the maximum refined modeled SO<sub>2</sub> 24-hour value of 232 ug/m<sup>3</sup> in Table 6-16 may be located at a receptor on the western edge of the receptor grid used in the refined SO<sub>2</sub> analysis. Table 6-16 shows maximum predicted concentrations for comparison to the AAQS. Please review the model

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results and update or provide additional refined modeling, if necessary, to insure that the maximum value has been located.

7. In addition to the modeling questions above, the USFWS sent the attached correspondence. Please address the comment on the BACT for sulfuric acid mist.

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. Cleve Holladay at 850/921-8986, or Mr. Syed Arif, P.E., at 850/921-9528.

Sincerely,



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

AAL/ch

Enclosure

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