



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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ATLANTA, GEORGIA 30303-8960

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BUREAU OF AIR REGULATION

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

Dear Mr. Linero:

Thank you for submitting the Prevention of Significant Deterioration (PSD) preliminary determination for Cargill Fertilizer - Riverview (PSD-FL-315), dated October 2, 2001, to the U.S. Environmental Protection Agency (EPA) for comments. The proposed project involves the removal of existing production limits for Sulfuric Acid Plants Nos. 8 and 9 to allow operation at their maximum capacities. The proposed project also involves the modifications of the Phosphoric Acid Plant, Enhanced Phosphate Products (EPP) Plant, Animal Feed Ingredient (AFI) Plant No. 1, and Diammonium Phosphate Plant No. 5 and the construction of AFI Plant No. 2. The total emission increases of sulfur dioxide, oxides of nitrogen, total particulate matter, particulate matter less than or equal to ten microns in diameter, sulfuric acid mist (SAM), and fluorides from the proposed project are above significance thresholds requiring PSD review.

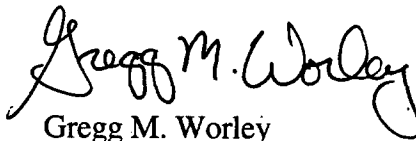
Based on a review of the preliminary determination and PSD permit application, EPA has the following comments:

1. The table in Section II.F. of the preliminary determination shows that there will be SAM emission increases related to the modifications of the EPP Plant and AFI Plant No. 1 and the construction of AFI Plant No. 2. However, no best available control technology (BACT) analysis was performed for these units with respect to SAM emissions. Although the SAM emission increases are relatively small (0.1 and 0.2 tons per year, respectively), PSD review requires that BACT be applied to all new or modified emission units with any increase in emissions of pollutants subject to PSD review. Therefore, the final determination should include BACT analyses for the EPP Plant and AFI Plants Nos. 1 and 2.
2. Section IV.H., *Additional Impact Analysis*, of the preliminary determination does not address the potential impacts of fluoride and SAM emissions in the PSD class II area

where the Riverview facility is located. Furthermore, the permit application contains an evaluation which shows the maximum ambient concentration of fluorides on a 3-hour basis ($18.1 \mu\text{g}/\text{m}^3$) to be higher than the 3-hour value cited in the application that can cause damage to sensitive species of vegetation ($16 \mu\text{g}/\text{m}^3$). EPA recommends that the Florida Department of Environmental Protection comment on the likelihood that fluoride and SAM emissions may cause adverse impacts within the area near the Riverview facility.

Thank you for the opportunity to comment on the Cargill-Riverview preliminary determination. If you have any questions regarding these comments, please direct them to either Art Hofmeister at (404) 562-9115 or Jim Little at (404) 562-9118.

Sincerely,



Gregg M. Worley
Chief
Air Permits Section