



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET, N.E.
ATLANTA, GEORGIA 30365

RECEIVED

NOV 13 1991

Division of Air
Resources Management

NOV 8 1991

4APT-AEB

Mr. Clair H. Fancy, P.E., Chief
Bureau of Air Regulation
Florida Department of Environmental
Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

RE: Cargill Fertilizer, Incorporated, Riverview, Florida
(PSD-FL-178)

Dear Mr. Fancy:

This is to acknowledge receipt of your preliminary determination and draft Prevention of Significant Deterioration (PSD) permit for the above referenced facility by your letter dated October 14, 1991. Cargill Fertilizer, Incorporated, proposes to increase the diammonium phosphate (DAP) production rate at the No. 5 DAP plant from 114 TPH to 146 TPH.

We concur with your determination that a modified two-stage venturi/packed bed wet scrubber system represents BACT for DAP process equipment particulate emissions. As discussed between Mr. John Reynolds of your staff and Mr. Stan Kukier of my staff on October 28, 1991, FDER's particulate emission rate limit for the No. 5 DAP plant, 0.19 lb/ton P_2O_5 (12.8 lb/hr, 0.0122 gr/acf), is 14% lower than that originally requested by Cargill, based on the results of compliance stack testing conducted on July 18, 1991. The above particulate emission rate limit is 47% lower than the allowable PSD-FL-026 particulate emission rate limit, and also lower than any particulate limit previously determined BACT for a DAP facility.

A copy of the compliance stack test results, requested by Stan Kukier, was received by EPA-Region IV from John Reynolds on November 1, 1991.

Best Available Copy

-2-

Thank you for the opportunity to review and comment on this package. If you have any questions or comments, please contact Mr. Stan Kukier of my staff at (404) 347-5014.

Sincerely yours,

Sally L. Shaver, for

Jewell A. Harper, Chief
Air Enforcement Branch
Air, Pesticides, and Toxics
Management Division

*cc: J. Reynolds
C. Holladay
B. Chennier
D. Garjani*