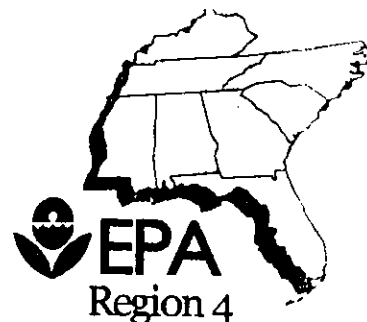


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Alabama, Florida, Georgia, Kentucky, Mississippi, North Carolina,
South Carolina, Tennessee

To: Al Linero
Florida DEP

Fax #: 850-922-6979

Subject: Comments Re: Cargill Fertilizer - Bartow
Preliminary Determination

From: Art Holmeister Phone #: 404-562-9115

Date: 10-16-00

of Pages: 3 (including this sheet)

Comments:

AL:

The following are EPA's comments regarding the preliminary determination for Cargill-Bartow. The original will follow in the mail. Thanks.

Air & Radiation Technology Branch
U.S. Environmental Protection Agency
61 Forsyth Street SW, 12th Floor
Atlanta, Georgia 30303

Phone: 404-562-9105
Fax: 404-562-9095



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

OCT 16 2000

4 APT-ARB

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

SUBJ: Prevention of Significant Deterioration (PSD) Preliminary Determination for Cargill
Fertilizer, Inc. located in Bartow (Polk County), Florida
PSD-FL-295

Dear Mr. Linero:

Thank you for submitting the above referenced PSD preliminary determination (dated September 15, 2000) to the U.S. Environmental Protection Agency (EPA) for comments. The proposed project involves the replacement of the No. 4 phosphoric acid filter with one of greater capacity at the existing phosphoric acid plant. The new filter will allow an additional 140 tons per hour of phosphoric acid (in the form of phosphorous pentoxide) to be recovered, thus increasing the amount of phosphoric acid used downstream in the Nos. 3 and 4 fertilizer and shipping plants. The net emissions increases of particulate matter greater than or equal to 10 microns (PM_{10}) and fluorides (F) resulting from the proposed project are above the respective significance thresholds requiring PSD review.

Based on a review of the preliminary determination, EPA has the following comments:

1. Although no ambient air quality standard or PSD increment exists for F, the applicant must still address the requirement for pre-construction monitoring of F. This is in direct accordance to Florida Rule 62-212-400(5)(f). A de minimis concentration has been specified for F (see Table C-3 of EPA's *New Source Review Workshop Manual*) above which pre-construction monitoring would typically be required. The applicant needs to model the proposed increase in F emissions and compare the predicted impact to this de minimis level to determine whether or not pre-construction monitoring will be required. Also, the applicant must address the additional impacts on soils, vegetation, wildlife, and visibility with respect to F.
2. Following a review of the table detailing the proposed project's emissions increases, it became apparent that the only pollutants which should have been subject to PSD review are PM_{10} and F. Sulfur dioxide, which will be increased by an insignificant

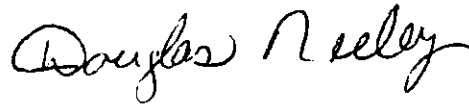
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amount as a result of the proposed project, is shown to be subject to PSD review as a result of a contemporaneous emission increase. It is current EPA policy that pollutants undergoing insignificant increases in emissions (i.e., those increases related to new, modified, or debottlenecked units) are not required to "net" contemporaneous emission increases and decreases.

Thank you for the opportunity to comment on the Cargill Fertilizer-Bartow 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,



R. Douglas Neeley, Chief
Air and Radiation Technology Branch
Air, Pesticides and Toxics
Management Division