



**CARGILL
FERTILIZER, INC.**

P.O. Box 9002
Bartow, FL

Phone: 941/534-9613
Fax : 941/534-9680

FACSIMILE TRANSMISSION

DATE: August 14, 1995

TO: JOHN REYNOLDS

COMPANY: FLORIDA DEP FAX: 904/922-6979

FROM: David Jellerson

MESSAGE:

Attached is a copy of the public notice published in the June 24, 1995 issue of the Lakeland Ledger. Also attached is a copy of the Certified Mail receipt which indicates that the proof of publication was received by the Department on July 5, 1995.

If you need any additional information, please give me a call.

NUMBER OF PAGES INCLUDING THIS COVER PAGE: 4

PLEASE CONTACT David Jellerson AT 941/534-9613 IF THERE IS DIFFICULTY WITH THIS TRANSMISSION.



CARGILL FERTILIZER, INC.

P.O. Box 9002 - Bartow, Florida 33830 - Telephone 941-534-9610 - FAX 941-534-9680

CERTIFIED MAIL: P 013 142 486

June 28, 1995

Department of Environmental Protection
Bureau of Air Regulation
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Subject: Intent to Issue a Permit (PSD-FL-224) to increase the production of the No. 4 and No. 5 phosphoric acid plants from 140 to 170 tons P₂O₅ per hour and to install a new phosphoric acid filter. The facility is located at 3200 Hwy 60 West, Bartow, Polk County, Florida.

Gentlemen:

You will find attached Proof of Publication of the Notice of Intent to Issue subject permit as required by Florida Department of Environmental Protection.

If there are any questions, please contact me at (813) 534-9613.

Sincerely,

David B. Jellerson
Environmental Superintendent



recycled paper

AFFIDAVIT OF PUBLICATION

THE LEDGER
Lakeland, Polk County, Florida

Case No.

STATE OF FLORIDA)
 COUNTY OF POLK)

Before the undersigned authority personally appeared Robert Lee, who on oath says that he is Classified Manager of The Ledger, a daily newspaper published in Polk County, Florida; that the attached copy of advertisement, being a

...Notice of Intent.....

in the matter of

PSP-F1-224

in the

Court, was published in said newspaper in the issues of
 June 24;

1995

Affiant further says that said The Ledger is a newspaper published at Lakeland, in said Polk County, Florida, and that the said newspaper has heretofore been continuously published in said Polk County, Florida, daily, and has been entered as second class matter at the post office in Lakeland, in said Polk County, Florida, for a period of one year next preceding the first publication of the attached copy of advertisement; and affiant further says that he has neither paid nor promised any person, firm or corporation any discount, rebate, commission or refund for the purpose of securing this advertisement for publication in the said newspaper.

Signed

Classified Advertising Manager

by Robert E. Lee who is
 personally known to me

Sworn to and subscribed before me this 24th

day of June A.D. 19 95

(Seal)

Barbara Thigpen
 Notary Public
 BARBARA THIGPEN

My Commission Expires

STATE OF FLORIDA
 DEPARTMENT OF ENVIRONMENTAL PROTECTION
 NOTICE OF INTENT TO ISSUE PERMIT
 PSD-FL-224

The Department of Environmental Protection (Department) gives notice of its intent to issue a permit to Cargill Fertilizer Inc., 3200 Highway 60 West, Bartow, Florida 33830. This company operates a phosphate fertilizer manufacturing facility at that address. The permit will allow the phosphoric acid production rate of the No. 4 and No. 6 plants to be increased from a total of 140 to 170 tons of P2O5 per hour with the installation of new filtering capacity. A determination of Best Available Control Technology (BACT) was required since the proposed project is subject to Prevention of Significant Deterioration (PSD) regulations. Modeling was done but was not used since there will be no increase in allowable emissions. The Department is issuing this intent to issue for the reasons stated in the Technical Evaluation and Preliminary Determination.

A person whose substantial interests are affected by the Department's proposed permitting decisions may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes (F.S.). The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, within 14 days of publication of this notice. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, F.S.

The Petition shall contain the following information: (a) The name, address, and the telephone number of each petitioner; the applicant's name and address; the Department permit file number and the county in which the project is proposed; (b) A statement of how and when each petitioner received notice of the Department's action or proposed action; (c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action; (d) A statement of the material facts disputed by petitioner; if any; (e) A statement of facts which petitioner contends warrants reversal or modification of the Department's action or proposed action; (f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and (g) A statement of the relief sought by petitioner. Department to take with respect to the Department's action or proposed action.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this Notice. Persons whose substantial interests will be affected by any decision of the Department with regard to the application/request have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of publication of this notice in the Office of General Counsel of the Department at the address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any rights such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-6.207, Florida Administrative Code.

The application/request is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

Department of Environmental Protection
 Bureau of Air Regulation
 111 S. Magnolia Drive, Suite 4
 Tallahassee, Florida 32301
 Department of Environmental Protection
 Southwest District
 8407 Laurel Fair Circle
 Tampa, Florida 33619

Any person may send written comments on the proposed action to Mr. Al Liner at the Department's Tallahassee address. All comments received within 30 days of the publication of this notice will be considered in the Department's final determination.

Further, a public hearing can be requested by any person(s). Such requests must be submitted within 30 days of this notice.

F014-6-24: 1995

Is your RETURN ADDRESS completed on the reverse side?	SENDER: <ul style="list-style-type: none">• Complete items 1 and/or 2 for additional services.• Complete items 3, and 4a & b.• Print your name and address on the reverse of this form so that we can return this card to you.• Attach this form to the front of the mailpiece, or on the back if space does not permit.• Write "Return Receipt Requested" on the mailpiece below the article number.• The Return Receipt will show to whom the article was delivered and the date delivered.		I also wish to receive the following services (for an extra fee): 1. <input type="checkbox"/> Addressee's Address 2. <input type="checkbox"/> Restricted Delivery Consult postmaster for fee.	
	3. Article Addressed to: DEP Air Regulation 8600 Blain Stone Rd Tallahassee FL 32399-2400		4a. Article Number P013 142 486	
			4b. Service Type <input type="checkbox"/> Registered <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD <input type="checkbox"/> Express Mail <input checked="" type="checkbox"/> Return Receipt for Merchandise	
	5. Signature (Addressee) W. M. Lytle		7. Date of Delivery JUL 05 1995	
	6. Signature (Agent)		8. Addressee's Address (Only if requested and fee is paid)	
PS Form 3811, December 1991 *U.S. GPO: 1993-362-714				
DOMESTIC RETURN RECEIPT				

Thank you for using Return Receipt Service.



RECEIVED

JUL 11 1995

Bureau of
Air Regulation

July 10, 1995

Mr. Al Linero, P.E.
Bureau of Air Regulation
Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Re: Cargill Fertilizer, Inc.
Bartow Nos. 4 and 5 Phosphoric Acid Plants
AC53-262532; PSD-FL-224

Dear Mr. Linero:

On behalf of Cargill Fertilizer, Inc., the following comments are being submitted in regards to the Department's Technical Evaluation and Preliminary Determination (TE&PD) for the above referenced permit. Please consider these comments in issuing the final permit for the phosphoric acid plant at Bartow.

Specific Condition 4

The modified phosphoric acid (PA) plant will be configured differently than the existing plant. In the existing PA plants (4 & 5), fluoride emissions from each plant (reactor, filter and tanks) are controlled by a separate scrubber. In the modified plant, fluoride emissions from one of the two filters serving the No. 5 PA plant will be controlled by the No. 4 PA plant scrubber, while emissions for the No. 5 PA plant reactor and second filter will be controlled by the No. 5 PA plant scrubber. As a result, the distribution of fluoride emissions between the scrubbers may change. Due to the uncertainty in the distribution of fluoride emissions for the modified plant, it is requested that a single limit for the modified plant be set, as opposed to individual limits for each scrubber.

The setting of a single overall limit for the modified PA plant is supported by the federal new source performance standards (NSPS) for phosphoric acid plants. The NSPS regulate fluoride emissions from the entire PA plant, which is defined as "any combination of reactors, filters, evaporators and hotwells". Florida Administrative Code (F.A.C.) Rule 62-296.403 regulates phosphoric acid plants in the same manner, setting an overall limit for "wet process phosphoric acid production and auxiliary equipment". BACT is imposed on "emissions units", which are defined in F.A.C. Rule 62-212 as "Any part or activity of a facility...." An entire PA plant can be regarded as a part or activity of a phosphate manufacturing facility.

14393Y/RTC2/I

KBN ENGINEERING AND APPLIED SCIENCES, INC.

6241 Northwest 23rd Street,
Suite 500
Gainesville, Florida 32653-1500
904-336-5600 FAX 904-336-6603

5405 West Cypress Street,
Suite 215
Tampa, Florida 33607
813-287-1717 FAX 813-287-1716

1801 Clint Moore Road, Suite 105
Boca Raton, Florida 33487
407-994-9910
FAX 407-994-9393

7785 Baymeadows Way,
Suite 105
Jacksonville, Florida 32256
904-739-5600 FAX 904-739-7777

1616 'P' Street N.W., Suite 450
Washington, D.C. 20036
202-462-1100
FAX 202-462-2270

EQUAL EMPLOYMENT OPPORTUNITY

AN AFFIRMATIVE ACTION EMPLOYER



It is understood that by setting an overall limit for the Bartow PA plant, that separate BACT determinations have been made for new and existing PA plants. As stated in the BACT determination section of the TE&PD, the Department believes that 0.012 lb F/ton P_2O_5 is the appropriate BACT limit for a new wet process PA plant, while the appropriate limit for an existing plant is 0.016 lb F/ton P_2O_5 . The overall limit of 2.29 lb/hr reflects the combination of both existing and new equipment which will be used in the Bartow PA plant.

It is also acknowledged that for compliance testing purposes, all three stacks within the modified PA plant will be tested simultaneously (this is already required by S.C. 5 of the draft permit). Results from each individual stack will be reported, as well as the total fluoride emissions for comparison to the plant limit.

In conclusion, and as agreed to in our July 6 meeting in Tallahassee, it is requested that Specific Condition 4 of the draft permit be reworded as follows:

4. Pursuant to Rule 62-212.410, F.A.C., fluoride emissions from the combined Nos. 4 and 5 Phosphoric Acid Plants shall not exceed the following: 2.29 lbs/hr and 10.03 TPY.

Specific Condition 6

This condition as worded requires that the Department be notified in writing of a compliance test. However, Rule 62-297.340(1)(i) does not require the notification to be in writing. In practice, the notification is often times verbal. Therefore, it is requested that the phrase "in writing" be deleted from this condition.

Specific Condition 9

Several of the PA tanks and clarifiers within the Nos. 4 and 5 PA plants will be evacuated to scrubbers. These tanks and clarifiers are covered tanks containing product acid. During control equipment maintenance, it is not feasible to remove all the acid from these tanks. During such periods, the evacuation system is not functioning (i.e., air flow from the tanks is decreased considerably); however, some small amount of fugitive fluoride emissions could escape from vents on the tanks. Depending on the nature of the maintenance, this condition could last for more than the two hours allowed by the excess emissions rule. Periods of maintenance are expected to be very infrequent; some periods are scheduled maintenance while others are unscheduled.

Therefore, it is requested that the permit authorize uncontrolled fugitive emissions from the tanks during control system maintenance. Cargill will agree to notify the Department in advance of all scheduled control system maintenance, and within two hours of any unscheduled control system maintenance, where the potential for excess emissions exists.



Thank you for consideration of these comments. Please call if you have any questions concerning this request.

Sincerely,

David A. Buff

David A. Buff, P.E.
Principal Engineer

DAB/arz

cc: David Jellerson
File (2)

cc: B. Thomas, SWD
L. Novak, Poek Co.
J. Harper, EPA
J. Buryak, NPS
C. Holladay, BAR

July 10, 1995

704-922-6977 704-536-6665

File

Mr. Al Linero, P.E.
Bureau of Air Regulation
Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Re: Cargill Fertilizer, Inc.
Bartow Nos. 4 and 5 Phosphoric Acid Plants
AC53-262532; PSD-FL-224

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143993Y/RTC2/1

DATE TRANSMITTED TO AIR QUALITY DIVISION: 7/10/95

10/11/95 10:00 AM
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SOIL CONCENTRATION OPPORTUNITY

ANALYTICAL ACTION BY DIVISION

Al Linero
 July 10, 1995
 Page 2



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Al Linero
July 10, 1995
Page 3



Thank you for consideration of these comments. Please call if you have any questions concerning this request.

Sincerely,

David A. Buff

David A. Buff, P.E.
Principal Engineer

DAB/arz

cc: David Jellerson
File (2)



IN REPLY REFER TO:

United States Department of the Interior

FISH AND WILDLIFE SERVICE

1875 Century Boulevard
Atlanta, Georgia 30345

JUL 03 1995

RECEIVED

JUL 5 1995

Mr. Clair H. Fancy
Chief, Bureau of Air Regulation
Department of Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road, MS 48
Tallahassee, Florida 32399

Bureau of
Air Regulation

Dear Mr. Fancy:

We have reviewed the Prevention of Significant Deterioration Application for the proposed increase in production at the Cargill Fertilizer, Inc., Nos. 4, 5, and 6 sulfuric acid (H_2SO_4) production plants in Bartow, Florida. Enclosed are the technical review comments from our Air Quality Branch.

Thank you for giving us the opportunity to comment on this permit application. We appreciate your cooperation in notifying us of proposed projects with the potential to impact the air quality and related resources of our Class I air quality areas. If you have questions, please contact Ms. Ellen Porter of our Air Quality Branch in Denver at telephone number 303/969-2617.

Sincerely yours,

Noreen K. Clough
Regional Director

Enclosure



Main file

DATE: 7-5-95

RECEIVED

TO: Al Linero

JUL 5 1995

ORGANIZATION: EDCPBureau of
Air RegulationFAX NUMBER: 904-922-6979 TELEPHONE NUMBER: _____FROM: David BuffOFFICE: ☒ Gainesville
☐ Washington D.C.☐ Tampa
☐ Jacksonville☐ Boca RatonTOTAL NUMBER OF PAGES: 2 (including cover page)

MESSAGE/INSTRUCTIONS:

Comments for
July 6 MeetingPROJECT NUMBER: 14393 FAX OPERATOR: _____

() This is the ONLY form of delivery of the transmitted document.

() The original of the transmitted document will be sent by:

() US Mail

() Overnight delivery

() Other: _____

Return original to _____

cc: Project File _____ yes _____ no _____

AF1-FAX (03/27/95)

KBN Engineering and Applied Sciences, Inc.
6241 NW 23rd Street
Gainesville, Florida, 32653-1500
(904) 336-5600/FAX (904) 336-6603

5405 West Cypress Street, Suite 215
Tampa, FL 33607
(813) 287-1717/FAX (813) 287-1716

1801 Clint Moore Road, Suite 105
Boca Raton, FL 33487
(407) 994-9910/FAX (407) 994-9393

1616 "P" Street N.W., Suite 450
Washington, DC 20036
(202) 462-1100/FAX (202) 462-2270

7785 Baymeadows Way, Suite 105
Jacksonville, FL 32256
(904) 739-5600/FAX (904) 739-7777

JUL 17 1995 10:40 AM KBN - GAINESVILLE 584 336 8800 P.01

MEMORANDUM

June 30, 1995

To: Mr. A. A. Linero, FDEP

From: David A. Buff, KBN *296*

Subject: Cargill Bartow Nos. 4 and 5 Phosphoric Acid TE&PD

Agenda and Comments for July 6, 3 pm Meeting

1. Discussion of fluoride test data

- FDEP approved compliance test data should not be considered as outliers. —
- Various methods of determining outliers. —
- Third filter emission estimates. —

2. Specifying emission rates for individual scrubbers

- Not consistent with past practice or with NSPS.
- Acids from both plants are commingled in the process and Fl emissions from both reactor systems go to No. 4 PA scrubber. Process is one plant with two reactors.

3. Allowance for scrubber/evacuation system maintenance (excess emissions rule).

4. Other comments on TE&PD and draft permit.

Original

CARGILL, INCORPORATED
LAW DEPARTMENT

James D. Moe
Corporate Vice President
General Counsel
& Secretary

John S. Erickson
Vice President &
Deputy
General Counsel

Mailing Address:
P.O. Box 5624
Minneapolis, MN 55440-5624

Gretchen O. Banks
Karen L. Baril
Shirley R. Boyd
Frederick L. Budde
James D. Dingel
Philip M. Fantie
Sheila Brennan Hagen
H. Jed Hepworth

Ronald E. Hunter
Joseph R. Liesch
Grace Murgia Musilek
LaRaye M. Osborne
Bonnie E. Raquet
Lawrence A. Willey
Laura Hicks Witte

Ronald L. Laumbach
Vice President &
North America
General Counsel

Location/Shipping Address:
15407 McGinty Road West
Wayzata, MN 55391-2399

Linda L. Cutler
Vice President
Assistant General Counsel
& Assistant Secretary

FAX (612) 742-6349
or (612) 742-7503

Steven M. Adams
David L. Biek
Carolyn J. Brue
Theresa A. Coons
Mark J. Isaacson
Robin P. Kinning
Colleen Murphy Knapp
Jay A. Kroese

Richard L. Mack
Thomas W. MacLeod
Brian R. Pioske
Maria-Ines Rajj
David A. Robertson
Randall J. Romsdahl
Timothy A. Thomas
Peter A. Vorbrich

Writer's Direct Dial Number
(612) 742-4653

June 27, 1995

CERTIFIED MAIL

RETURN RECEIPT REQUESTED

Ms. Kathy Carter
Florida Department of Environmental Protection
Office of General Counsel
2600 Blair Stone Road
Tallahassee, FL 32399-2400

RE: Permit No. AC53-262532; PSD-FL-224
Request for Extension of Time for Filing for Administrative Hearing

Dear Ms. Carter:

As you discussed with David Jellerson today, please accept this letter as a request for an extension of time until July 31, 1995 in which to file a petition for an administrative hearing regarding the above-referenced permit. This permit, which was received by Cargill Fertilizer, Inc. on June 16, 1995, contains certain conditions which are based on a BACT analysis which may contain errors or is otherwise unacceptable.

The time extension requested is intended to provide adequate time for Cargill and the Department to meet and resolve technical issues relating to the BACT analysis without the need for an administrative hearing.

Should you have any questions or require additional information, please feel free to contact me at 612/742-4653 or David Jellerson at 941/534-9613.

Sincerely yours,


Thomas W. MacLeod

TWM:pa
cil/40994

RECEIVED

Ms. Kathy Carter
June 27, 1995
Page 2

JUN 30 1995

Bureau of
Air Regulation

cc: Al Linero/FDEP
John Reynolds/FDEP
David Buff/KBN Engineering
David Jellerson/Fertilizer/Tampa, FL

6/30/95 { EPA
Hew { Park Service
SW District

~~Kashane~~ ^{Kim} - This one
is ~~on~~ on public notice
This response from ^{posted} ~~on docket~~
Cargill is important ~~in KBN~~
that they have requested
extension to file a
petition. Please copy
Reynolds, active files
EPA, Park Service, SW District.
I COPIED KBN