



**CARGILL
FERTILIZER, INC.**

RECEIVED

NOV 01 1999

BUREAU OF AIR REGULATION

8813 Highway 41 South - Riverview, Florida 33569 - Telephone 813-677-9111 - TWX 810-876-0648 - Telex 52666 - FAX 813-671-6146

October 22, 1999

Certified Mail: Z 426 769 151

Mr. Al Linero, PE
New Source Review Section
Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2400

1050046-012-AC ?

RE: Cargill Fertilizer, Inc.
No. 3 Fertilizer Plant Expansion
Permit PSD-FL-255 / 1050046-008-AC

Dear Al,

This letter is to request a modification to the project description contained in the above-referenced construction permit issued by your office on April 21, 1999.

As you are aware, the subject emissions unit is permitted to produce various grades of ammoniated phosphate fertilizer products (Monoammonium Phosphate and Diammonium Phosphate). However, in response to market demands, Cargill wishes to enhance this product mix by addition of micronutrients. Micronutrients will be added to the production process so that the granulated DAP and MAP products will contain small amounts of these materials.

Micronutrient additions will be accomplished by adding the materials into the production process so that the nutrient will be granulated into the finished ammoniated phosphate fertilizers. Micronutrients will be received either in bags or in bulk containers. All material handling activities will be conducted inside the buildings so that no additional air emission units will be required.

The No. 3 Fertilizer Plant is currently undergoing modifications in accordance with the above-referenced construction permit. The permit as issued included specific requirements for pollution control and the unit was subjected to a Best Available Control Technology (BACT) analysis to assure effective control of particulate emissions. The proposed change to the product grade will not result in any increase in production rates, airflow or emissions. Performance testing has not yet been conducted and can be performed while producing product containing the micronutrient additives. The only change required to the permit will be in the project description. Following is suggested permit language which would accomplish the requested modification:

Project and Location:

Permit for the construction/modification of the No. 3 Fertilizer Plant that produces monoammonium and diammonium phosphate (MAP/DAP) with addition of micromutrients. The project involves replacement of air pollution control equipment and process modifications



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necessary to increase the production rate from 2,640 to 3,000 tons MAP/DAP per day (TPD) including addition of micronutrients. The project is located at the Cargill Fertilizer facility, 3200 Highway 60 West, Bartow, Polk County. UTM coordinates are Zone 17; 409.8 km E; 3086.7 km N.

As indicated above, this change to the project description will not result in any additional emissions. The permitting review and BACT analysis conducted by the Department in developing the permit will assure effective control of process emissions. Therefore, we request that the project description of the permit be modified to reflect the revised project scope.

Should you have any questions or require additional information, please feel free to contact me.

Sincerely,



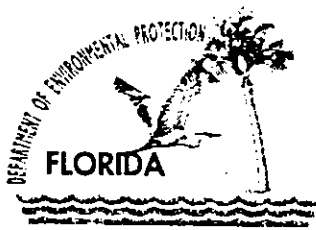
David B. Jellerson, P.E.

Environmental Superintendent

cc: John Reynolds, BAR
EPA
NPS
SWD
Polk Co.



recycled paper



Jeb Bush
Governor

Department of Environmental Protection

Marjory Stoneman Douglas Building
3900 Commonwealth Boulevard
Tallahassee, Florida 32399-3000

David B. Struhs
Secretary

November 24, 1999

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. David B. Jellerson, P.E.
Environmental Superintendent
Cargill Fertilizer, Inc.
8813 Highway 41 South
Riverview, Florida 33569

RE: DEP File No. 1050046 (PSD-FL-255)
Permit Modification – Bartow No. 3 Fertilizer Plant Expansion

1050046-012-AC

Dear Mr. Jellerson:

This is in response to your letter dated October 22, 1999 requesting changes to the subject construction permit to allow blending of micronutrients into the product fertilizer. The plant is already undergoing modifications pursuant to an Air Construction and PSD permit issued April 21, 1999 to increase production. The present approved project is not yet complete and the facility has not yet achieved normal operation following a modification. The potential to emit is not affected by the small changes described below. The referenced permit is hereby modified as follows:

Project and Location:

Permit for the construction/modification of the No. 3 Fertilizer Plant that produces monoammonium and diammonium phosphate (MAP/DAP) with addition of commercially available zinc, copper, boron, manganese, and/or sulfur micronutrients. The project involves the replacement of air pollution control equipment and process modifications necessary to increase the production rate from 2,640 to 3,000 tons MAP/DAP per day (TPD) including addition of micronutrients. The project is located at the Cargill Fertilizer facility, 3200 Highway 60 West, Bartow, Polk County. UTM coordinates are Zone 17; 409.8 km E; 3086.7 km N.

Specific Condition No. 3:

The No. 3 MAP/DAP Plant shall not produce more than 3,000 tons per day of MAP or DAP product including commercially available zinc, copper, boron, manganese, and/or sulfur micronutrients or process more than 61.25 tons of P_2O_5 input per hour for either product as determined using the procedure in Specific Condition No. 13. All micronutrients used shall be only those sold commercially as soil nutrients and shall be received, unloaded, handled and processed such that all emissions of micronutrients are captured by existing air pollution control devices. [Rule 62-210.200, F.A.C.]

A copy of this letter shall be filed with the referenced permit and certification and shall become part of the permit.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under Sections 120.569 and 120.57 of the Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida, 32399-3000. Petitions filed by the permit applicant or any of the parties listed below must be filed within fourteen days of

receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3) of the Florida Statutes must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of this notice of intent, whichever occurs first. Under Section 120.60(3), however, any person who asked the Department for notice of agency action may file a petition within fourteen days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57 F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205 of the Florida Administrative Code.

A petition that disputes the material facts on which the Department's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner, the name, address, and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of how and when petitioner received notice of the agency action or proposed action; (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate; (e) A concise statement of the ultimate facts alleged, as well as the Rules and statutes which entitle the petitioner to relief; and (f) A demand for relief.

A petition that does not dispute the material facts upon which the Department's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that 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 such final decision of the Department on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above. Mediation is not available in this proceeding.

In addition to the above, a person subject to regulation has a right to apply for a variance from or waiver of the requirements of particular Rules, on certain conditions, under Section 120.542 F.S. The relief provided by this state statute applies only to state Rules, not statutes, and not to any federal regulatory requirements. Applying for a variance or waiver does not substitute or extend the time for filing a petition for an administrative hearing or exercising any other right that a person may have in relation to the action proposed in this notice of intent.

The application for a variance or waiver is made by filing a petition with the Office of General Counsel of the Department, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. The petition must specify the following information: (a) The name, address, and telephone number of the petitioner; (b) The name, address, and telephone number of the attorney or qualified representative of the petitioner, if any; (c) Each Rule or portion of a Rule from which a variance or waiver is requested; (d) The citation to the statute underlying (implemented by) the Rule identified in (c) above; (e) The type of action requested; (f) The specific facts that would justify a variance or waiver for the petitioner; (g) The reason why the variance or waiver would serve the purposes of the underlying statute (implemented by the Rule); and (h) A statement whether the variance or waiver is permanent or temporary and, if temporary, a statement of the dates showing the duration of the variance or waiver requested.

The Department will grant a variance or waiver when the petition demonstrates both that the application of the Rule would create a substantial hardship or violate principles of fairness, as each of those terms is defined in Section 120.542(2) F.S., and that the purpose of the underlying statute will be or has been achieved by other means by the petitioner.

Is your RETURN ADDRESS completed on the reverse side?

SENDER:

- Complete items 1 and/or 2 for additional services.
- Complete items 3, 4a, and 4b.
- 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):

- ☐ Addressee's Address
 - ☐ Restricted Delivery
- Consult postmaster for fee.

3. Article Addressed to:

David Jellison, PE
Cansile Fertilizer
8813 Hwy 41 South
Riverview, FL 33569

4a. Article Number:

2 031 392 027

4b. Service Type

- ☐ Registered ☒ Certified
☐ Express Mail ☐ Insured
☐ Return Receipt for Merchandise ☐ COD

7. Date of Delivery

12-1-99

5. Received By: (Print Name)

ROY BURNETT

6. Signature: (Addressee or Agent)

X ROY BURNETT

8. Addressee's Address (Only if requested and fee is paid):

PS Form 3811, December 1994

102595-98-8-0229

Domestic Return Receipt

Thank you for using Return Receipt Service.

Z 031 392 027

**US Postal Service
Receipt for Certified Mail**

No Insurance Coverage Provided.
Do not use for International Mail (See reverse)

Sent to	David Jellison
Street & Number	Cansile Fert.
Post Office, State, & ZIP Code	Riverview FL
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	11-29-99

PS Form 3800, April 1995

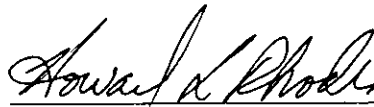
1D50046-
P5D-F1-255(A)

Persons subject to regulation pursuant to any federally delegated or approved air program should be aware that Florida is specifically not authorized to issue variances or waivers from any requirements of any such federally delegated or approved program. The requirements of the program remain fully enforceable by the Administrator of the EPA and by any person under the Clean Air Act unless and until the Administrator separately approves any variance or waiver in accordance with the procedures of the federal program.

This permitting decision is final and effective on the date filed with the clerk of the Department unless a petition is filed in accordance with the above paragraphs or unless a request for extension of time in which to file a petition is filed within the time specified for filing a petition pursuant to Rule 62-110.106, F.A.C., and the petition conforms to the content requirements of Rules 28-106.201 and 28-106.301, F.A.C. Upon timely filing of a petition or a request for extension of time, this order will not be effective until further order of the Department.

Any party to this permitting decision (order) has the right to seek judicial review of it under section 120.68 of the Florida Statutes, by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel, Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000, and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The notice must be filed within thirty days after this order is filed with the clerk of the Department.

Executed in Tallahassee, Florida.



Howard L. Rhodes, Director
Division of Air Resources
Management

CERTIFICATE OF SERVICE

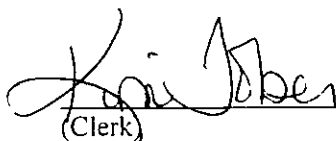
The undersigned duly designated deputy agency clerk hereby certifies that this Permit Modification was sent by certified mail (*) and copies were mailed by U.S. Mail before the close of business on

11-29-99 to the person(s) listed:

David Jellerson, Cargill *
Bill Thomas, SWD
Iris Hill, Polk County Natural Resources
Gregg Worley, EPA
John Bunyak, NPS

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to §120.52, Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.

 11-29-99
(Clerk) (Date)

Memorandum

Florida Department of Environmental Protection

al

TO:	Howard L. Rhodes
THROUGH:	Clair Fancy <i>cd</i> Al Linero <i>al</i>
FROM:	John Reynolds <i>JR</i>
DATE:	November 16, 1999
SUBJECT:	Approval of Request for Amendment of Construction Permit No. 1050046-012-AC (PSD-FL-255) Cargill Fertilizer, Inc.

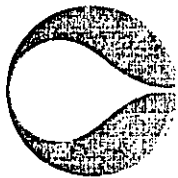
Approval and signature is requested for amendment of the subject construction permit. The facility is a 3,000 tons per day Monoammonium Phosphate/Diammonium Phosphate (MAP/DAP) Plant operated by Cargill in Bartow, Polk County. The amendment involves modifying permit language to allow micronutrients to be included in the 3,000 tons per day production limit. The addition of micronutrients will be handled so that there will be no increase in actual emissions from the source.

Attachments

Permit being revised is an active A/C.
Facility has not completed project, so I
think this small request can be added.
No impact on emissions

al

I held this up until we
got clarification exactly what
are micronutrients. These
are metals + sulfur
that make fertilizer
more active.
al



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BUREAU OF AIR REGULATION

8813 Highway 41 South - Riverview, Florida 33569 - Telephone 813-677-9111 - TWX 810-876-0648 - Telex 52666 - FAX 813-671-6146

October 22, 1999

Certified Mail: Z 426 769 151

Mr. Al Linero, PE
New Source Review Section
Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2400

1050046-012-AC

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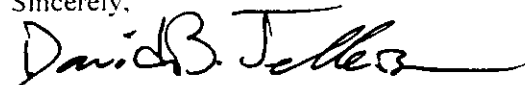
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Sincerely,



David B. Jellerson, P.E.
Environmental Superintendent

cc: John Reynolds, BAR
EPA
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Polk Co.



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