

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
NOTICE OF PERMIT

In the matter of an
Application for Permit by:

DEP File No. AC 53-246403
PSD-FL-211
Polk County

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

Barbu Enclosed is Construction Permit Number AC 53-246403/PSD-FL-211 for the modification to increase the production rate of the No. 4 DAP plant located at ~~8813 Highway 41 South, Riverview, Polk County, Florida 33569.~~ This permit is issued pursuant to Section 403, Florida Statutes.

Any party to this Order (permit) has the right to seek judicial review of the permit pursuant to Section 120.68, Florida Statutes, by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the Department in the Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400; 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 of Appeal must be filed within 30 days from the date this Notice is filed with the Clerk of the Department.

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION

C. H. Fancy
C. H. Fancy, P.E., Chief
Bureau of Air Regulation
2600 Blair Stone Road
Tallahassee, FL 32399-2400
904-488-1344

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this NOTICE OF PERMIT and all copies were mailed before the close of business on 11/28/94 to the listed persons.

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED,
on this date, pursuant to
§120.52(11), Florida Statutes,
with the designated Department
Clerk, receipt of which is hereby
acknowledged.

Paula J. Portwell 11/28/94
(Clerk) (Date)

Copies furnished to:
Bill Thomas, SWD
Jewell Harper, EPA
Linda Novak, Polk County
John Bunyak, NPS
David Buff, P.E., KBN

SENDER:

- 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):

- ☐ Addressee's Address
- ☐ Restricted Delivery

Consult postmaster for fee.

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

4a. Article Number
Z 751 860 002

4b. Service Type
☐ Registered ☐ Insured
☒ Certified ☐ COD
☐ Express Mail ☐ Return Receipt for Merchandise

7. Date of Delivery
11/26/94

5. Signature (Addressee)
[Signature]

6. Signature (Agent)
[Signature]

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

PS Form 3811, December 1991 U.S. GPO: 1992-323-402 **DOMESTIC RETURN RECEIPT**

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Sent to
Mr. David B. Jellerson

Street and No.
8813 Highway 41 South

P.O. State and ZIP Code
Riverview, Florida 33569

Postage	\$
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Mailed: 11/28/94
AC 53-246403
PSD-FL-211

PS Form 3800, March 1993

Final Determination

Cargill Fertilizer, Inc.
Polk County
Bartow, Florida

No. 4 Diammonium Phosphate Plant
Production Increase to 120 TPH P_2O_5

Permit No. AC 53-246403
PSD-FL-211

Department of Environmental Protection
Division of Air Resources Management
Bureau of Air Regulation

November 14, 1994

Final Determination

The Technical Evaluation and Preliminary Determination for the permit to increase the production rate of the No. 4 Diammonium Phosphate Plant at Cargill's facility in Bartow, Polk County, Florida, was distributed on August 22, 1994. The Notice of Intent to Issue was published in the Ledger Newspaper on September 8, 1994. Copies of the evaluation were available for public inspection at the Department's Tallahassee and Tampa offices.

No adverse comments were submitted in the letters received from the EPA and the Fish and Wildlife service concerning the proposed permit. The applicant submitted comments requesting that the 750 hrs/yr restriction on oil usage be deleted since the annual consumption is limited to 200,000 gals/yr. The Department has no objection to this change. The applicant also requested that the 15 day period for additional compliance testing to regain permitted capacity be increased to 30 days. The Department feels that 15 days are adequate to accommodate additional compliance testing. The final action of the Department will be to issue construction permit AC 53-246403 (PSD-FL-211), as proposed in the Technical Evaluation and Preliminary Determination, with the change noted above.



Department of Environmental Protection

Lawton Chiles
Governor

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Virginia B. Wetherell
Secretary

PERMITTEE:
Cargill Fertilizer, Inc.
P. O. Box 471
Bartow, Florida 33830

Permit Number: AC53-246403
PSD-FL-211
Expiration Date: June 2, 1995
County: Polk
Latitude/Longitude: 27°54'22"N
81°54'59"W
Project: Bartow No. 4 Diammonium
Phosphate Plant - Production
**Increase to 261 TPH (120 TPH @ 100%
P₂O₅)**

This permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Chapters 62-210, 212, 272, 275, 296, and 297, Florida Administrative Code (F.A.C.); and, Chapter 62-4, F.A.C. The above named permittee is hereby authorized to perform the work or operate the emission unit/source shown on the application and approved drawings, plans, and other documents attached hereto or on file with the Department of Environmental Protection (Department) and specifically described as follows:

For an increase in production of diammonium phosphate from 165 TPH (76 TPH @ 100% P₂O₅) to 261 TPH (120 TPH @ 100% P₂O₅) and from 1,300,000 TPY to 2,170,212 TPY in the No. 4 diammonium phosphate plant. This emission unit/source is located at the permittee's existing facility in Bartow, Polk County, Florida. The UTM coordinates are Zone 17, 409.5 km East and 3086.8 km North.

The emission unit/source shall be constructed/modified in accordance with the permit application, plans, documents, amendments and drawings, except as otherwise noted in the General and Specific Conditions.

Attachments are listed below:

1. Department letter dated March 24, 1994.
2. NPS letter dated March 30, 1994.
3. KBN letter dated April 22, 1994.
4. Department letter dated May 9, 1994.
4. KBN letter dated June 27, 1994.
5. EPA letter dated July 11, 1994.
6. CARGILL letter dated September 7, 1994.

PERMITTEE:
Cargill Fertilizer, Inc.

Permit Number: AC 53-246403
PSD-FL-211
Expiration Date: June 2, 1995

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 403.727, or 403.859 through 403.861, F.S. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.
2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.
3. As provided in Subsections 403.087(6) and 403.722(5), F.S., the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit is not a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.
4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgement of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.
5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of F.S. and Department rules, unless specifically authorized by an order from the Department.
6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.

PERMITTEE:
Cargill Fertilizer, Inc.

Permit Number: AC 53-246403
PSD-FL-211
Expiration Date: June 2, 1995

GENERAL CONDITIONS:

7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:

- a. Have access to and copy any records that must be kept under the conditions of the permit;
- b. Inspect the facility, equipment, practices, or operations regulated or required under this permit; and,
- c. Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:

- a. A description of and cause of non-compliance; and,
- b. The period of noncompliance, including dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the F.S. or Department rules, except where such use is prescribed by Sections 403.73 and 403.111, F.S. Such evidence shall

PERMITTEE:
Cargill Fertilizer, Inc.

Permit Number: AC 53-246403
PSD-FL-211
Expiration Date: June 2, 1995

GENERAL CONDITIONS:

only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

10. The permittee agrees to comply with changes in Department rules and F.S. after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by F.S. or Department rules.

11. This permit is transferable only upon Department approval in accordance with Rules 62-4.120 and 62-30.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.

12. This permit or a copy thereof shall be kept at the work site of the permitted activity.

13. This permit also constitutes:

- (x) Determination of Best Available Control Technology (BACT)
- (x) Determination of Prevention of Significant Deterioration (PSD)
- (x) Compliance with New Source Performance Standards (NSPS)

14. The permittee shall comply with the following:

- a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
- b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.

PERMITTEE:
Cargill Fertilizer, Inc.

Permit Number: AC 53-246403
PSD-FL-211
Expiration Date: June 2, 1995

GENERAL CONDITIONS:

c. Records of monitoring information shall include:

- the date, exact place, and time of sampling or measurements;
- the person responsible for performing the sampling or measurements;
- the dates analyses were performed;
- the person responsible for performing the analyses;
- the analytical techniques or methods used; and,
- the results of such analyses.

15. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

SPECIFIC CONDITIONS:

1. Pursuant to Rule 62-212.200(56), F.A.C., Potential to Emit (PTE), the maximum permitted diammonium phosphate (DAP) production rate for the No. 4 DAP plant shall be 261 TPH (120 TPH @ 100% P₂O₅) and 2,170,212 TPY. Records shall be maintained by the permittee to document the hourly production.

2. Pursuant to Rule 62-212.200(56), F.A.C., the No. 4 DAP plant shall be operated no more than 8,500 hours per year.

3. Pursuant to Rule 62-212.200(56), F.A.C., natural gas shall be the primary fuel used in the drying operation. The maximum heat input rate to the dryer shall be 40 MMBtu/hr.

4. Pursuant to Rule 62-212.410, F.A.C., BACT, the total allowable emissions/limitations from the No. 4 DAP plant shall not exceed:

<u>Pollutant</u>	<u>Basis</u>	<u>Total Allowable Emissions/Limitations</u>
PM	0.19 lb/ton P ₂ O ₅	22.8 lbs/hr and 96.9 TPY
VE	Similar source permits	10% opacity max.

5. Pursuant to Rules 62-212.200(56) and 62-212.400(2)(g), F.A.C., PTE and Source Obligation, respectively, maximum SO₂ emissions from the No. 4 DAP plant shall be limited in accordance with the following fuel oil limitations; in addition, the No. 6 fuel oil is for emergency use only; and, any increase of SO₂ emissions of 2.2 TPY will require BACT:

<u>Pollutant</u>	<u>Fuel Oil Limitation</u>	<u>Total Allowable Fuel Oil Usage</u>
SO ₂	No. 6 fuel oil, max. 2.4%, by weight, sulfur	max. 200,000 gals/yr

PERMITTEE:
Cargill Fertilizer, Inc.

Permit Number: AC 53-246403
PSD-FL-211
Expiration Date: June 2, 1995

SPECIFIC CONDITIONS:

6. Pursuant to Rule 62-296.800, F.A.C., the following standards are incorporated by reference and are applicable:

o **40 CFR 60.222 Standard for fluorides.**

(a) Total fluoride emissions from this plant shall not exceed 30 g/metric ton of equivalent P_2O_5 feed (0.060 lb/ton; 5.50 lbs/hr; 23.40 TPY).

o **40 CFR 60.223 Monitoring of operations.**

(a) The owner or operator shall install, calibrate, maintain, and operate a monitoring device which can be used to determine the mass flow of phosphorus-bearing feed material to the process. The monitoring device shall have an accuracy of ± 5 percent over its operating range.

(b) The owner or operator shall maintain a daily record of equivalent P_2O_5 feed by first determining the total mass rate in metric ton/hour of phosphorus bearing feed using the flow monitoring device meeting the requirements of 40 CFR 60.223(a) and then by proceeding according to 40 CFR 60.224(b)(3).

(c) The owner or operator shall install, calibrate, maintain, and operate a monitoring device which continuously measures and permanently records the total pressure drop across the process scrubbing system. The monitoring device shall have an accuracy of ± 5 percent over its operating range.

7. Pursuant to Rules 62-296.800 and 62-297.401, F.A.C., the following standards are incorporated by reference and applicable:

o **40 CFR 60.224 Test methods and procedures.**

(a) The owner or operator shall use as reference methods and procedures the test methods in 40 CFR 60 Appendix A, except as provided in 40 CFR 60.8(b).

(b) The owner or operator shall determine compliance with the total fluoride emission standards as follows:

PERMITTEE:
Cargill Fertilizer, Inc.

Permit Number: AC 53-246403
PSD-FL-211
Expiration Date: June 2, 1995

SPECIFIC CONDITIONS:

(1) The emission rate (E) of total fluorides shall be computed for each run using the following equation:

$$E = \frac{N}{i=1} (\sum C_{si} Q_{sdi}) / (P K)$$

where:

E = emission rate of total fluorides, g/metric ton (lb/ton) of equivalent P_2O_5 feed.

C_{si} = concentration of total fluorides from emission point "i", mg/dscm (mg/dscf).

Q_{sdi} = volumetric flow rate of effluent gas from emission point "i", dscm/hr (dscf/hr).

N = number of emission points associated with the affected facility.

P = equivalent P_2O_5 feed rate, metric ton/hr (ton/hr).

K = conversion factor, 1000 mg/g (453,500 mg/lb).

(2) Method 13A or 13B shall be used to determine the total fluorides concentration (C_{si}) and volumetric flow rate (Q_{sdi}) of the effluent gas from each of the emission points. The sampling time and sample volume for each run shall be at least 60 minutes and 0.85 dscm (30 dscf).

(3) The equivalent P_2O_5 feed rate (P) shall be computed for each run using the following equation:

$$P = M_p R_p$$

where:

M_p = total mass flow rate of phosphorus-bearing feed, metric ton/hr (ton/hr).

R_p = P_2O_5 content, decimal fraction.

(i) The accountability system of 40 CFR 60.223(a) shall be used to determine the mass flow rate (M_p) of the phosphorus-bearing feed.

(ii) The Association of Official Analytical Chemists (AOAC) Method 9 (incorporated by reference-see 40 CFR 60.17) shall be used to determine the P_2O_5 content (R_p) of the feed.

8. Fugitive emissions from the process shall be controlled by sealing and/or venting all particulate matter and fumes from the equipment to the pollution abatement system.

9. Pursuant to Rule 62-297.340(1)(a), F.A.C., and before this construction permit expires, testing for PM, visible emissions and fluoride shall be conducted on the No. 4 DAP plant's common

PERMITTEE:
Cargill Fertilizer, Inc.

Permit Number: AC 53-246403
PSD-FL-211
Expiration Date: June 2, 1995

SPECIFIC CONDITIONS:

stack with the emission unit/source operating at permitted capacity. Permitted capacity is defined as 90-100 percent of the maximum operating rate allowed by the permit. If it is impracticable to test at permitted capacity, then the emission unit/source may be tested at less than capacity (i.e., less than 90% of maximum operating rate allowed by the permit); in this case, subsequent emission unit/source operation is limited to 110 percent of the test load until a new test is conducted. Once the emission unit/source is so limited, then operation at higher capacities is allowed for no more than 15 consecutive days for the purposes of additional compliance testing to regain the permitted capacity in the permit.

10. Pursuant to Rule 62-297.340(1)(i), the Department's Southwest District office shall be notified in writing at least 15 days prior to source testing. Pursuant to Rule 62-297.570(1) and (2), written reports of the test results shall be submitted to that office within 45 days of test completion.

11. Pursuant to Rules 62-296.800 and 62-297.401, F.A.C., the test procedures for PM, visible emissions and fluorides, shall be in accordance with EPA Reference Methods 1, 2, 3, 4 and 5, 9, and 13A or 13B, respectively, as published in 40 CFR 60, Appendix A (July 1, 1993 version). Compliance with the fuel oil sulfur content shall be determined using ASTM D240 or ASTM D1552 in accordance with 40 CFR 60.17 (July 1, 1992 version).

12. Pursuant to Rule 62-296.320(2), F.A.C., Objectionable Odor Prohibited, no person shall cause, suffer, allow, or permit the discharge of air pollutants which cause or contribute to an objectionable odor.

13. Pursuant to Rule 62-210.650, F.A.C., Circumvention, no person shall circumvent any air pollution control device, or allow the emission of air pollutants without the applicable air pollution control device operating properly.

14. Pursuant to Rule 62-210.700, Excess Emissions, the No. 4 DAP plant is subject to the following:

a. Rule 62-210.700(1): Excess emissions resulting from startup, shutdown or malfunction of any source shall be permitted providing (1) best operational practices to minimize emissions are adhered to and (2) the duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration.

b. Rule 62-210.700(4): Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other

PERMITTEE:
Cargill Fertilizer, Inc.

Permit Number: AC 53-246403
PSD-FL-211
Expiration Date: June 2, 1995

SPECIFIC CONDITIONS:

equipment or process failure which may reasonably be prevented during startup, shutdown, or malfunction shall be prohibited.

c. Rule 62-210.700(5): Considering operational variations in types of industrial equipment operations affected by this rule, the Department may adjust maximum and minimum factors to provide reasonable and practical regulatory controls consistent with the public interest.

d. Rule 62-210.700(6): In case of excess emissions resulting from malfunctions, each source shall notify the Department or the appropriate Local Program in accordance with Rule 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the Department.

15. Pursuant to Rules 62-210.370(2)(a) and (b), F.A.C., Reports, the permittee shall submit an Annual Operating Report using DEP Form 62-210.900(5) to the Department's Southwest District office by March 1 of the following year for the previous year's operation.

16. Pursuant to Rule 62-4.090, F.A.C., the permittee, for good cause, may request that this construction permit be extended. Such a request shall be submitted to the Bureau of Air Regulation prior to 60 days before the expiration of the permit.

17. Pursuant to Rules 62-4.055 and 62-4.220, F.A.C., an application for an operation permit must be submitted to the Southwest District office at least 90 days prior to the expiration date of this construction permit. To properly apply for an operation permit, the applicant shall submit the appropriate application form, fee, certification that construction was completed noting any deviations from the conditions in the construction permit, and compliance test reports as required by this permit.

Issued this 21st day
of November, 1994

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION

Virginia B. Wetherell
Virginia B. Wetherell, Secretary

Best Available Control Technology (BACT) Determination
Cargill Fertilizer, Inc.
Polk County
Permit Number AC 53-246403
PSD-FL-211

The applicant proposes to increase diammonium phosphate (DAP) production from 165 TPH (76 TPH @ 100% P₂O₅) to 261 TPH (120 TPH @ 100% P₂O₅) for the No. 4 DAP plant located at their existing Bartow phosphate fertilizer manufacturing facility in Polk County, Florida. The proposed project will result in a significant increase in emissions of particulate matter (PM/PM₁₀). The project is, therefore, subject to Prevention of Significant Deterioration (PSD) review in accordance with Rule 17-212.400, Florida Administrative Code (F.A.C.). The BACT review is part of the PSD review requirements in accordance with Rule 17-212.410, F.A.C.

Date of Receipt of BACT Application: March 3, 1994.

BACT Determination Requested by Applicant

<u>Control Technology</u>	Venturi acid scrubbing/packed section pond water scrubbing
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<u>Pollutant</u>	<u>Emission Limits</u>
PM/PM ₁₀	0.5 lb/ton P ₂ O ₅ (revised to 0.23)
Visible Emissions	Not specified

Basis of Review:

This determination is based on input from the applicant, EPA Region IV, and the Fish and Wildlife Service.

BACT Determination Procedure:

In accordance with Florida Administrative Code Chapter 17-212, this BACT determination is based on the maximum degree of reduction of each pollutant emitted which the Department, on a case by case basis, taking into account energy, environmental and economic impacts, and other costs, determines is achievable through application of production processes and available methods, systems, and techniques. In addition, Rule 17-212.410(1), F.A.C., states that in making the BACT determination the Department shall give consideration to:

- (a) Any Environmental Protection Agency determination of Best Available Control Technology pursuant to Section 169, and any emission limitation contained in 40 CFR Part 60 (Standards of Performance for New Stationary Sources) or 40 CFR Part 61 (National Emission Standards for Hazardous Air Pollutants).

- (b) All scientific, engineering, and technical material and other information available to the Department.
- (c) The emission limiting standards or BACT determinations of any other state.
- (d) The social and economic impact of the application of such technology.

The EPA currently stresses that BACT should be determined using the "top-down" approach. The first step in this approach is to determine for the emission source in question the most stringent control available for a similar or identical source or source category. If it is shown that this level of control is technically or economically infeasible for the source in question, then the next most stringent level of control is determined and similarly evaluated. This process continues until the BACT level under consideration cannot be eliminated by any substantial or unique technical, environmental, or economic objections.

BACT Determined by DEP:

<u>Control Technology</u>	Venturi acid scrubbing/packed section pond water scrubbing
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<u>Pollutant</u>	<u>Emission Limits</u>
PM/PM ₁₀	0.19 lb/ton P ₂ O ₅
Visible Emissions	10% opacity

BACT Determination Rationale

The Department's BACT determination is the same as that issued for the applicant's No. 5 DAP plant at their Riverview facility. The applicant's contention is that the lack of a second-stage cooler scrubber justifies a higher PM/PM₁₀ limit than required for the Riverview plant, although the primary purpose of the second-stage scrubber is fluoride removal. The most recent test data (1993) submitted with the application indicates that 0.19 lb/ton is being achieved. The Department agrees with the applicant that the cost of installing a second-stage cooler scrubber at the Bartow plant would not be cost-effective. A review of BACT/LAER Clearinghouse data indicates that venturi acid primary scrubbing followed by packed section pond water scrubbing is representative of BACT using the top-down approach.

Environmental Impact Analysis

The impact analysis for the BACT determination is based on 8,500 hours/year operation. The ambient air quality impact analysis for PM/PM₁₀ emissions showed an annual impact of 0.11 ug/m³, as compared to the PSD significant level of 1.0 ug/m³.


Conclusion

The ambient air quality impact from PM/PM₁₀ emissions due to the proposed modification is in compliance with all air pollution regulations. The impacts associated with the proposed increase in production support the Department's determination that the emission limits established herein represent BACT.

Details of the Analysis May be Obtained by Contacting:

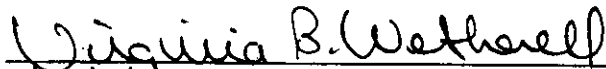
John C. Brown, Jr., P.E.
Department of Environmental Protection
Bureau of Air Regulation
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Recommended by:



C. H. Fancy, P.E., Chief
Bureau of Air Regulation
November 14, 1994
Date

Approved by:



Virginia B. Wetherell, Secretary
Dept. of Environmental Protection
November 21, 1994
Date

Memorandum

Florida Department of
Environmental Protection

TO: Virginia Wetherell
FROM: Howard L. Rhodes *HLR*
DATE: November 14, 1994
SUBJECT: Cargill Fertilizer, Inc.
No. 4 Diammonium Phosphate Plant Modification
AC53-246403 (PSD-FL-211)

Attached for your approval and signature is a permit and BACT Determination prepared by the Division of Air Resources Management to increase the production rate of the existing No. 4 Diammonium Phosphate Plant at Cargill's facility in Bartow, Florida. This production increase is not controversial.

I recommend that this permit be approved.

HR/JR/bjb

Attachments

DEPARTMENT OF ENVIRONMENTAL PROTECTION
OFFICE OF THE SECRETARY
CORRESPONDENCE REVIEW FORM

Prepared by:

John Reynolds

Reviewed by:

Howard L. Rhodes

C.H. Rhodes out of town,
so couldn't sign this)

Comments:

RE: Cargill Fertilizer, Inc. permit + BACT Determination

for signature