

Golder Associates Inc.

6241 NW 23rd Street, Suite 500
Gainesville, FL 32653-1500
Telephone (352) 336-5600
Fax (352) 336-6603



January 11, 2002

0037649

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

RECEIVED

JAN 15 2002

BUREAU OF AIR REGULATION

Attention: A.A. Linero, P.E. Administrator

RE: DEP File No. 1050046-015-AC; PSD-FL-322
No. 4 Fertilizer Plant Modification—Bartow Facility

Dear Mr. Linero:

This letter serves as a response to a comment made in the Department's letter dated October 12, 2001 and further phone discussions with Syed Arif of your staff, in reference to the Cargill Bartow No. 4 Fertilizer Plant modification.

4. Table 3-4 lists as a footnote "If the proposed emissions increase at a major source is by itself less than significant, EPA policy does not require consideration of previous contemporaneous small missions increases". Please provide a rule reference in the Florida Administrative Code that conforms to this EPA policy.

Response: At the request of the Department, previous contemporaneous emission changes have been included in the total net change from the project (refer to revised Table 3-4 attached). However, in order to maintain the SO₂ emissions increase below the PSD significant emission rate of 40 tons per year (TPY), even considering the contemporaneous increases, Cargill is proposing to use fuel oil with a maximum sulfur content of 0.25% in both the Nos. 3 and 4 Fertilizer Plant dryers.

Since No. 2 fuel oil is only used as a back-up to natural gas, Cargill is proposing a bubble-limit of 2.2 million gallons per year (MMgal/yr) of fuel oil between both the No. 3 and 4 Fertilizer Plants. While either plant can consume up to 2.2 MMgal/yr of fuel oil alone, the combined maximum fuel oil consumption will not exceed 2.2 MMgal/yr. Tables 2-3(a) and 2-3(b) present the maximum emissions due to fuel combustion for the No. 4 and No. 3 Fertilizer Plant dryers at 2.2 MMgal/yr each, respectively, since each plant could individually burn up to this amount. Table 2-3(c) presents the combined maximum annual emissions due to fuel combustion for both plants (i.e., 2.2 MMgal/yr). As shown, the SO₂ emissions resulting from burning 2.2 MMGal/yr of 0.25% sulfur fuel oil is less than 40 TPY.

Table 3-4 presents the revised fuel combustion emissions from the Nos. 3 and 4 Fertilizer Plants. The potential SO₂, NO_x, CO, VOC and SAM emissions from the modified No. 4 Fertilizer Plant/No. 3 Fertilizer Plant reflect the difference between the maximum combined annual emissions from both plants [refer to Table 2-3(c)]

and the emissions previously accounted for under the No. 3 Fertilizer Plant contemporaneous emission changes [refer to Table 2-3(b) for basis].

As a result of considering these changes and the previous contemporaneous changes, PSD review was additionally triggered for NO_x . Therefore, Class I and II significant impact analyses are required for NO_x . Since PSD review was triggered for NO_x , Class I and II significant impact analyses were performed.

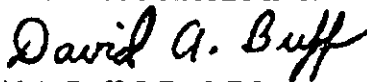
Revised Table 6-2 presents the emission rates used in the significant impact analysis. The results of these analyses are presented in revised Tables 6-17 and 6-12, respectively. Revised Table 3-5 compares the maximum predicted NO_2 concentration to Class II significant impact levels and *de minimis* monitoring levels. The maximum predicted annual NO_2 concentration at the Chassahowitzka PSD Class I area was $0.00012 \mu\text{g}/\text{m}^3$, which is well below the Class I significant impact level of $0.1 \mu\text{g}/\text{m}^3$. The maximum predicted annual NO_2 concentration predicted in the vicinity of the plant was $0.08 \mu\text{g}/\text{m}^3$, which is well below the Class II significant impact level of $1 \mu\text{g}/\text{m}^3$ and the *de minimis* monitoring level of $14 \mu\text{g}/\text{m}^3$. Therefore, further modeling analyses as well as pre-construction NO_x monitoring are not required.

All of the applicable PSD construction application pages have been revised and are attached. Supportive modeling files have been emailed to Cleve Holladay of your staff.

If you have any questions, please call me at (352) 336-5600 or email me at dave_buff@golder.com.

Sincerely,

GOLDER ASSOCIATES INC.



David A. Buff, P.E., Q.E.P.
Principal Engineer
Florida P.E. # 19011
SEAL

DB/FH/arz

Attachments

cc: J. Bunyak, NPS
C. Holladay, FDEP
D. Jellerson, Cargill
B. Thomas, DEP-SWD
D. Waters, Cargill
G. Worley, EPA

Table 2-3(a). Maximum Emissions Due to Fuel Combustion for the Dryer at the No. 4 Fertilizer Plant, Cargill Bartow (Revised 1/9/02)

Parameter	Units	No. 2 Fuel Oil	Natural Gas
<u>Operating Data</u>			
Annual Operating Hours	hr/yr	7,700 ^a	8,500
Maximum Heat Input Rate	10 ⁶ Btu/hr	40	40
Hourly Fuel Oil Usage ^a	10 ³ gal/hr	0.286	N/A
Annual Fuel Oil Usage	10 ³ gal/yr	2,200	N/A
Maximum Sulfur Content	Weight %	0.25	N/A
Hourly Natural Gas Usage ^b	scf/hr	N/A	40,000
Annual Natural Gas Usage	10 ⁶ scf/yr	N/A	340

Pollutant	AP-42 Emissions Factor ^c	No. 2 Fuel Oil		Natural gas		Maximum Total Emission Rate	
		Hourly Emission Rate (lb/hr)	Annual Emission Rate (TPY)	Hourly Emission Rate (lb/hr)	Annual Emission Rate (TPY)	Hourly Emission Rate (lb/hr)	Annual Emission Rate (TPY)
<u>Sulfur Dioxide</u>							
Fuel oil	142 ^a (S)lb/10 ³ gal ^d	10.14	39.05	--	--	--	--
Natural gas	0.6 lb/10 ⁶ ft ³	--	--	0.024	0.10	--	--
Worse-Case Combination of Fuels		--	--	--	--	10.14	39.06
<u>Sulfuric Acid Mist</u>							
Fuel oil	2.4 ^a (S)lb/10 ³ gal ^{d,f}	0.17	0.66	--	--	0.17	0.66
<u>Nitrogen Oxides</u>							
Fuel oil	20 lb/10 ³ gal	5.71	22.00	--	--	--	--
Natural gas	100 lb/10 ⁶ ft ³	--	--	4.000	17.00	--	--
Worse-Case Combination of Fuels		--	--	--	--	5.71	23.60
<u>Carbon Monoxide</u>							
Fuel oil	5 lb/10 ³ gal	1.43	5.50	--	--	--	--
Natural gas	84 lb/10 ⁶ ft ³	--	--	3.360	14.28	--	--
Worse-Case Combination of Fuels		--	--	--	--	3.36	14.28
<u>Volatile Organic Compounds</u>							
Fuel oil	0.2 lb/10 ³ gal	0.06	0.220	--	--	--	--
Natural gas	5.5 lb/10 ⁶ ft ^{3e}	--	--	0.220	0.935	--	--
Worse-Case Combination of Fuels		--	--	--	--	0.22	0.94

Footnotes:

Particulate matter emissions through the common plant stack are included in Table 3-3.

^a Based on the heat content of fuel oil of 140,000 Btu/gallon.^b Based on the heat content of natural gas of 1,000 Btu/scf.^c Emission factors for fuel oil are based on AP-42, Section 1.3, September 1998. Emission factors for natural gas are based on AP-42, Section 1.4, July 1998.^d S denotes the weight-percent of sulfur in fuel oil; maximum sulfur content = 0.25%.^e Based on methane comprised of 52% total VOC.^f Sulfuric acid mist emission factor based on emission factor for SO₃ (AP-42, Section 1.3) converted to H₂SO₄ using the molecular weight.^g Equivalent operating hours at maximum fuel oil consumption. Actual operating hours may be more.

Table 2-3(b). Maximum Emission Rates Due to Fuel Combustion for the Dryer at the No. 3 Fertilizer Plant (Revised 1/9/02)

Parameter	Units	No. 2 Fuel Oil	Natural Gas
<u>Operating Data</u>			
Annual Operating Hours	hr/yr	7,700 ^f	8,760
Maximum Heat Input Rate	10 ⁶ Btu/hr	40	40
Hourly Fuel Oil Usage ^a	10 ³ gal/hr	0.286	N/A
Annual Fuel Oil Usage	10 ³ gal/yr	2,200	N/A
Maximum Sulfur Content	Weight %	0.25	N/A
Hourly Natural Gas Usage ^b	10 ⁶ scf/hr	N/A	0.04
Annual Natural Gas Usage	10 ⁶ scf/yr	N/A	350.4

Pollutant	AP-42 Emissions Factor ^c	No. 2 Fuel Oil		Natural gas		Maximum Total Emission Rate	
		Hourly Emission Rate (lb/hr)	Annual Emission Rate (TPY)	Hourly Emission Rate (lb/hr)	Annual Emission Rate (TPY)	Hourly Emission Rate (lb/hr)	Annual Emission Rate (TPY)
<u>Sulfur Dioxide</u>							
Fuel oil	142 ^a (S)lb/10 ³ gal ^d	10.143	39.050	--	--	--	--
Natural gas	0.6 lb/10 ⁶ ft ³	--	--	0.024	0.105	--	--
Worse-Case Combination of Fuels		--	--	--	--	10.17	39.16
<u>Nitrogen Oxides</u>							
Fuel oil	20 lb/10 ³ gal	5.714	22.000	--	--	--	--
Natural gas	100 lb/10 ⁶ ft ³	--	--	4.000	17.520	--	--
Worse-Case Combination of Fuels		--	--	--	--	9.71	39.52
<u>Carbon Monoxide</u>							
Fuel oil	5 lb/10 ³ gal	1.429	5.500	--	--	--	--
Natural gas	84 lb/10 ⁶ ft ³	--	--	3.360	14.717	--	--
Worse-Case Combination of Fuels		--	--	--	--	4.79	20.22
<u>Volatile Organic Compounds</u>							
Fuel oil	0.2 lb/10 ³ gal	0.057	0.220	--	--	--	--
Natural gas	5.5 lb/10 ⁶ ft ^{3e}	--	--	0.220	0.964	--	--
Worse-Case Combination of Fuels		--	--	--	--	0.28	1.18

Footnotes:

^a Based on the heat content of fuel oil of 140,000 Btu/gallon.^b Based on the heat content of natural gas of 1,000 Btu/scf.^c Emission factors for fuel oil are based on AP-42, Section 1.3, September 1998. Emission factors for natural gas are based on AP-42, Section 1.4, July 1998.^d S denotes the weight-percent of Sulfur in fuel oil; Maximum sulfur content = 0.25%.^e Based on methane comprised of 52% total VOC.^f Equivalent operating hours at maximum fuel oil consumption. Actual operating hours may be more.

Table 2-3(c). Combined Maximum Annual Emissions Due to Fuel Combustion for the Dryers at the Nos. 3 and 4 Fertilizer Plants, Cargill Bartow

Parameter	Units	No. 2 Fuel Oil	Natural Gas	
<u>Operating Data</u>				
Annual Operating Hours	hr/yr	15,400	17,260	
Maximum Heat Input Rate	10 ⁶ Btu/hr	80	80	
Annual Fuel Oil Usage	10 ³ gal/yr	2,200 ^g	N/A	
Maximum Sulfur Content	Weight %	0.25	N/A	
Annual Natural Gas Usage	10 ⁶ scf/yr	N/A	690.4	
Pollutant	AP-42 Emissions Factor ^c	No. 2 Fuel Oil Annual Emission Rate (TPY)	Natural gas Annual Emission Rate (TPY)	Total Emission Annual Emission Rate (TPY)
<u>Sulfur Dioxide</u>				
Fuel oil	142 *(S)lb/10 ³ gal ^d	39.05	--	--
Natural gas	0.6 lb/10 ⁶ ft ³	--	0.21	--
Worse-Case Combination of Fuels		--	--	39.26
<u>Sulfuric Acid Mist</u>				
Fuel oil	2.4 *(S)lb/10 ³ gal ^{d,f}	0.66	--	0.66
<u>Nitrogen Oxides</u>				
Fuel oil	20 lb/10 ³ gal	22.00	--	--
Natural gas	100 lb/10 ⁶ ft ³	--	34.52	--
Worse-Case Combination of Fuels		--	--	56.52
<u>Carbon Monoxide</u>				
Fuel oil	5 lb/10 ³ gal	5.50	--	--
Natural gas	84 lb/10 ⁶ ft ³	--	29.00	--
Worse-Case Combination of Fuels		--	--	34.50
<u>Volatile Organic Compounds</u>				
Fuel oil	0.2 lb/10 ³ gal	0.220	--	--
Natural gas	5.5 lb/10 ⁶ ft ^{3e}	--	1.899	--
Worse-Case Combination of Fuels		--	--	2.12

Footnotes:

Particulate matter emissions through the common plant stack are included in Table 3-3.

^a Based on the heat content of fuel oil of 140,000 Btu/gallon.^b Based on the heat content of natural gas of 1,000 Btu/scf.^c Emission factors for fuel oil are based on AP-42, Section 1.3, September 1998. Emission factors for natural gas are based on AP-42, Section 1.4, July 1998.^d S denotes the weight-percent of sulfur in fuel oil; maximum sulfur content = 0.25%.^e Based on methane comprised of 52% total VOC.^f Sulfuric acid mist emission factor based on emission factor for SO₃ (AP-42, Section 1.3) converted to H₂SO₄ using the molecular weight.^g Combined maximum fuel consumption. Both plants combined will not exceed this maximum fuel oil limit.

Table 3-4. Contemporaneous and Debottlenecking Emissions Analysis and PSD Applicability (Revised 1/9/02)

Source Description	Pollutant Emission Rate (TPY)							
	SO ₂	NO _x	CO	PM	PM ₁₀	VOC	Fluoride	SAM
<u>Potential Emissions From Modified/New/Affected Sources^a</u>								
A. Existing No. 4 Fertilizer Shipping Plant	--	--	--	31.60	31.60	--	--	--
B. Modified No. 4 Fertilizer Plant/No. 3 Fertilizer Plant ^c	0.10	16.76	14.28	76.50	76.50	0.94	20.40	0.66
<u>Total Potential Emission Rates</u>	0.10	16.76	14.28	108.10	108.10	0.94	20.40	0.66
<u>Actual Emissions from Current Operations^b</u>								
A. No. 4 Fertilizer Shipping Plant	--	--	--	0.53	0.53	--	--	--
B. No. 4 DAP Plant	0.08	12.72	10.69	22.65	22.65	0.70	5.40	0.00
<u>Total Actual Emission Rates</u>	0.08	12.72	10.69	23.18	23.18	0.70	5.40	0.00
TOTAL CHANGE DUE TO PROPOSED PROJECT	0.02	4.04	3.59	84.92	84.92	0.24	15.00	0.66
<u>Contemporaneous Emission Changes</u>								
A. No. 3 Fertilizer Plant Expansion (April 1999) ^f	39.16	39.52	20.22	^c	^c	1.18	^c	--
B. Phosphoric Acid Reactor Modification (April 1999) ^d	--	--	--	--	--	--	--	--
C. Phosphoric Acid Plant Filter Replacement (Oct. 2000)	^e	21.30	1.40	^c	^c	0.57	^c	--
<u>Total Contemporaneous Emission Changes</u>	39.16	60.82	21.62	0.00	0.00	1.75	0.00	0.00
TOTAL NET CHANGE	39.18	64.86	25.21	84.92	84.92	1.99	15.00	0.66
PSD SIGNIFICANT EMISSION RATE	40	40	100	15	15	40	3	7
PSD REVIEW TRIGGERED?	No	Yes	No	Yes	Yes	No	Yes	No

Notes: NA = Not Applicable

^a Potential emissions from Table 3-3, except where noted.^b Current actual emissions from Table 2-2.^c Denotes that PSD review was triggered for this pollutant, therefore any previous contemporaneous increases/decreases are wiped clean.^d Project was determined to not result in an increase in emissions of any pollutant.^e SO₂, NO_x, CO, VOC, and SAM emissions reflect the difference between the total combined emissions from the Nos. 3 and 4 Fertilizer plants [refer to Table 2-3(c)] and emissions from the No. 3 Fertilizer plant [refer to Table 2-3(b)] that are accounted for under contemporaneous emissions changes.^f Emissions based on 0.25% sulfur content fuel oil. Refer to Table 2-3(b) for calculations.

Table 3-5. Predicted Impacts Due to the Proposed Project Compared to Class II Significant Impact Levels and Ambient Monitoring *De Minimis* Levels (Revised 1/9/02)

Pollutant	Averaging Time	Maximum Concentration ^a ($\mu\text{g}/\text{m}^3$)	EPA Class II Significant Impact Levels ($\mu\text{g}/\text{m}^3$)	<i>De Minimis</i> Monitoring Concentration ($\mu\text{g}/\text{m}^3$)	Ambient Monitoring Review Applies?
Particulate (PM ₁₀)	Annual	0.75	1	NA	NA
	24-hour	13.76	5	10	Yes
Fluorides	24-hour	1.55	NA	0.25	Yes
Nitrogen Dioxide (NO ₂)	Annual	0.08	1	14	No

^a Highest concentration from significant impact analysis (see Section 6.0).

Note: NA = Not Applicable

Table 6-2. Summary of Emission Rate Increase for Project Affected Sources Included in the Significant Impact Analysis, Cargill Bartow (Revised 1/9/02)

Source	ISCST Model ID	Short-Term PM/PM ₁₀		Annual PM/PM ₁₀		Short-Term F		Annual F		Annual NO _x	
		Emissions		Emissions		Emissions		Emissions		Emissions	
		lb/hr	g/sec	TPY	g/sec	lb/hr	g/sec	TPY	g/sec	TPY	g/sec
<u>CURRENT SOURCES</u>											
No. 4 DAP Plant ^a	DAP4C	7.30	0.920	22.65	0.652	2.15	0.271	5.40	0.155	12.72	0.366
No. 4 Fertilizer Shipping Plant ^a	SHIP4C	1.37	0.173	0.53	0.015	--	--	--	--	--	--
<u>FUTURE SOURCES</u>											
No. 4 (DAP) Fertilizer Plant ^b	DAP4	18.0	2.268	76.50	2.201	4.80	0.605	20.40	0.587	23.60	0.679
No. 4 Fertilizer Shipping Plant ^c	SHIP4	10.54	1.328	31.60	0.909	--	--	--	--	--	--

^a Annual emissions based on Table 2-2. Short-term emissions based on recent stack test data (refer to Table 5-1).^b PM/PM₁₀ and F emissions based on Table 2-1. NO_x emissions based on Table 2-3(a).^c Emissions based on Title V Permit No. 1050046-003-AV.

Table 6-12. Maximum Predicted Increase in Pollutant Impacts Due to the Proposed Project Only (Revised 1/9/02)

Averaging Period	Concentration ^a (µg/m ³)	Receptor Location ^b		Time Period (YYMMDDHH)	EPA Significant Impact Level
		Direction (degrees)	Distance (m)		(µg/m ³)
<u>PM₁₀</u>					
Annual	0.68	237	2,098	91123124	1
	0.64	230	1,761	92123124	
	0.72	230	1,761	93123124	
	0.74	228	1,700	94123124	
	0.75	228	1,700	95123124	
High 24-Hour	7.5	134	1,221	91021124	5
	6.6	139	1,187	92010424	
	8.3	126	1,310	93021324	
	7.8	220	1,481	94112524	
	13.8	180	1,142	95120424	
<u>NO₂</u>					
Annual	0.076	237	2,098	91123124	1
	0.070	228	1,700	92123124	
	0.073	228	1,700	93123124	
	0.080	228	1,700	94123124	
	0.076	228	1,700	95123124	

^a Based on 5-year meteorological record, Tampa/Ruskin, 1991-95.

^b Relative to No. 4 Fertilizer Plant Stack location.

Note:


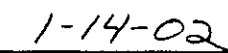
YYMMDDHH = Year, Month, Day, Hour Ending.

Table 6-17. Maximum Predicted PM₁₀ Impacts for the Proposed Project Only at the Chassahowitzka PSD Class I Area Using the CALPUFF Model (Revised 1/9/02)

Averaging Period	Concentration ^a (µg/m ³)	Proposed EPA PSD Class I Significant Impact Level (µg/m ³)
<u>PM₁₀</u>		
Annual	0.001	0.2
24-Hour	0.023	0.3
8-Hour	0.046	NA
3-Hour	0.074	NA
1-Hour	0.091	NA
<u>NO₂</u>		
Annual	0.00012	0.1
24-Hour	0.0027	NA
8-Hour	0.0056	NA
3-Hour	0.0087	NA
1-Hour	0.011	NA

^a Concentrations predicted with the CALPUFF model and 1990 CALMET Tampa Bay wind field meteorological data.
Note: NA = Not Applicable.

Owner/Authorized Representative or Responsible Official

1. Name and Title of Owner/Authorized Representative or Responsible Official: David Jellerson, Environmental Manager
2. Owner/Authorized Representative or Responsible Official Mailing Address: Organization/Firm: Cargill Fertilizer, Inc. Street Address: 8133 U.S. Highway 41 South City: Riverview State: FL Zip Code: 33569
3. Owner/Authorized Representative or Responsible Official Telephone Numbers: Telephone: (813) 671-6297 Fax: (813) 671-6149
4. Owner/Authorized Representative or Responsible Official Statement: <i>I, the undersigned, am the owner or authorized representative*(check here [X], if so) or the responsible official (check here [], if so) of the Title V source addressed in this application, whichever is applicable. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof. I understand that a permit, if granted by the Department, cannot be transferred without authorization from the Department, and I will promptly notify the Department upon sale or legal transfer of any permitted emissions unit.</i>  Signature  Date

* Attach letter of authorization if not currently on file.

Professional Engineer Certification

1. Professional Engineer Name: David A. Buff Registration Number: 19011
2. Professional Engineer Mailing Address: Organization/Firm: Golder Associates Inc. Street Address: 6241 NW 23rd Street, Suite 500 City: Gainesville State: FL Zip Code: 32653-1500
3. Professional Engineer Telephone Numbers: Telephone: (352) 336 - 5600 Fax: (352) 336 - 6603

4. Professional Engineer Statement:

I, the undersigned, hereby certify, except as particularly noted herein, that:*

(1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this Application for Air Permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; and

(2) To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application.

If the purpose of this application is to obtain a Title V source air operation permit (check here [], if so), I further certify that each emissions unit described in this Application for Air Permit, when properly operated and maintained, will comply with the applicable requirements identified in this application to which the unit is subject, except those emissions units for which a compliance schedule is submitted with this application.

If the purpose of this application is to obtain an air construction permit for one or more proposed new or modified emissions units (check here [X], if so), I further certify that the engineering features of each such emissions unit described in this application have been designed or examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application.

If the purpose of this application is to obtain an initial air operation permit or operation permit revision for one or more newly constructed or modified emissions units (check here [], if so), I further certify that, with the exception of any changes detailed as part of this application, each such emissions unit has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with all provisions contained in such permit.

David A. Buff

Signature

1/11/02
Date

(seal)

* Attach any exception to certification statement.

E. SEGMENT (PROCESS/FUEL) INFORMATION
(All Emissions Units)

Segment Description and Rate: Segment 1 of 3

1. Segment Description (Process/Fuel Type) (limit to 500 characters): Chemical Manufacturing; Ammonium Phosphates; Ammoniator/Granulator		
2. Source Classification Code (SCC): 3-01-030-02		3. SCC Units: Tons P₂O₅ Produced
4. Maximum Hourly Rate: 120	5. Maximum Annual Rate: 998,298	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment (limit to 200 characters): Maximum Hourly rate is 120 TPH P₂O₅. Max annual rate based on 2,170,212 TPY DAP from permit and 46% P₂O₅ in DAP. Urea is added to process only when necessary for grade control.		

Segment Description and Rate: Segment 2 of 3

1. Segment Description (Process/Fuel Type) (limit to 500 characters): In-Process Fuel use; Distillate oil; Ammonium Phosphate dryer		
2. Source Classification Code (SCC): 3-90-005-89		3. SCC Units: 1000 gallons burned
4. Maximum Hourly Rate: 0.286	5. Maximum Annual Rate: 2,200	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur: 0.25	8. Maximum % Ash:	9. Million Btu per SCC Unit: 140
10. Segment Comment (limit to 200 characters): Maximum hourly rate based on heat input of 40.0 MMBtu/hr.		

G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units -
Emissions-Limited and Preconstruction Review Pollutants Only)

Potential/Fugitive Emissions

1. Pollutant Emitted: SO₂	2. Total Percent Efficiency of Control: %
3. Potential Emissions: 10.14 lb/hour 39.06 tons/year	4. Synthetically Limited? []
5. Range of Estimated Fugitive Emissions: [] 1 [] 2 [] 3 _____ to _____ tons/year	
6. Emission Factor: 142 S lb/10³ gal Reference: AP-42	7. Emissions Method Code: 0
8. Calculation of Emissions (limit to 600 characters): See PSD Report, Table 2-3(a).	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters):	

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: OTHER	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units: 0.25% S fuel oil	4. Equivalent Allowable Emissions: 10.14 lb/hour 39.06 tons/year
5. Method of Compliance (limit to 60 characters): Fuel analysis and usage records.	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters):	

Golder Associates Inc.

6241 NW 23rd Street, Suite 500
Gainesville, FL 32653-1500
Telephone (352) 336-5600
Fax (352) 336-6603



January 14, 2002

0037649

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

RECEIVED

JAN 15 2002

BUREAU OF AIR REGULATION

Attention: A.A. Linero, P.E. Administrator

RE: DEP File No. 1050046-015-AC; PSD-FL-322
No. 4 Fertilizer Plant Modification—Bartow Facility

Dear Mr. Linero:

In a letter dated January 11, 2002, Golder Associates Inc. submitted a response to comments made by the Department regarding Cargill Bartow's Prevention of Significant Deterioration (PSD) application to modify the No. 4 Fertilizer Plant. The best available control technology (BACT) analysis for NO_x was inadvertently omitted.

As indicated in the January 11 letter, the No. 4 Fertilizer Plant dryer is a small source of NO_x. Good combustion practices and low sulfur content oil (which has a low nitrogen content) constitute BACT for this source.

If you have any questions, please call me at (352) 336-5600 or email me at dave_buff@golder.com.

Sincerely,

GOLDER ASSOCIATES INC.

David A. Buff, P.E., Q.E.P.
Principal Engineer
Florida P.E. # 19011
SEAL

DB/FH

Attachments

cc: J. Bunyak, NPS
C. Holladay, FDEP
D. Jellerson, Cargill
B. Thomas, DEP-SWD
D. Waters, Cargill
G. Worley, EPA

H:\Cargill\Bartow\NO 4 DAP PSD Followup\BACT Ltr DEP.doc

Golder Associates Inc.

6241 NW 23rd Street, Suite 500
Gainesville, FL 32653-1500
Telephone (352) 336-5600
Fax (352) 336-6603



December 14, 2001

003-7649

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

RECEIVED

DEC 17 2001

Attention: A.A. Lincro, P.E. Administrator

BUREAU OF AIR REGULATION

RE: DEP File No. 1050046-015-AC; PSD-FL-322
No. 4 Fertilizer Plant Modification—Bartow Facility

Dear Mr. Lincro:

This letter serves as a response to the comments in the Department's letters dated October 12, 2001 and October 19, 2001, in reference to the Cargill Bartow No. 4 Fertilizer Plant modification. The comments are addressed in the same order they appear in the letters.

October 12 Letter

1. Please explain the reasons for installing a pipe reactor at the granulator inlet. What functions will it serve? Where will the additional phosphoric acid, sulfuric acid, and ammonia come from that will be used in the pipe reactor? How much of each material will be added to the pipe reactor.

Response: As stated on page 2-2 of the PSD application, the pipe reactor at the granulator inlet is being installed to improve the product quality. Specifically, it is expected that the pipe reactor will improve granulation and the quality of the finished product.

The pipe reactor will be sized to accommodate approximately 50% of P_2O_5 throughput. However, the total throughput will remain the same, so the installation of the pipe reactor will not create the need for any additional phosphoric acid, sulfuric acid, or ammonia. The ratio of inputs for phosphoric acid, sulfuric acid and ammonia will not change with operation of the pipe reactor.

2. Table 2-2 provides the actual annual emissions for the past two years. Please include additional information in terms of lb/ton of P_2O_5 fed for particulate matter and fluorides for those two years.

Response: Please refer to attached Table 1 for additional information.

3. Table 2-3 lists 8,500 as annual operating hours for No. 2 fuel oil, but the annual emission rates for all the pollutants is based on a different annual operating hour. Please explain the discrepancy. Also, explain how the maximum total emission rate numbers were arrived at, and why were these numbers not used for SO_2 and NO_x in Table 3-4?

Response: The emission calculations presented in Table 2-3 for No. 2 fuel oil are based on a limited fuel oil amount of 1.1 MMgal/yr not the annual operating hours of 8,500

hr/yr. For the pollutants that had a higher hourly fuel oil emission rate than hourly natural gas emission rate, the annual emission calculations were based on fuel oil combustion up to the maximum fuel oil of 1.1 MMgal/yr (equivalent to 3,850 hr/yr at maximum fuel oil firing), with the emissions due to natural gas combustion for the remaining annual hours (4,650 hr/yr).

The discrepancy in SO₂ and NO_x emissions in Table 3-4 has been corrected. Please refer to the revised Table 3-4 attached. The emissions in Table 2-3 represent the correct emission rates.

4. Table 3-4 lists as a footnote "If the proposed emissions increase at a major source is by itself less than significant, EPA policy does not require consideration of previous contemporaneous small emissions increases". Please provide a rule reference in the Florida Administrative Code that conforms to this EPA policy.

Response: Because this is an EPA policy, there is no corresponding rule citation in either the federal or state PSD regulations. However, this does not change the fact that FDEP PSD rules promulgated in the early 1980's were designed to conform to the federal PSD rules. This is borne out by the fact that an economic impact statement and approval by the Governor would have been required if the state rules were to be more stringent than the federal rules. Such a statement or approval were never addressed. In addition, FDEP has consistently adhered to EPA PSD policies over the past 20 years. EPA has issued hundreds of PSD guidance memos over the years, covering this issue as well as many other PSD issues.

October 19 Letter

1. In Table 4-1, the lowest values from the monitoring information provided in this table were used as background values. No justification for using these lower values was given. Please provide a justification of these values.

Response: The PM₁₀ monitoring values that were selected for both the 24-hour and annual averaging times represent the highest values measured at the NW 4th Circle monitor in Mulberry for either 1999 or 2000. These reported concentrations are considered to be more representative based on the larger number of observations (indicating a greater range of measurements). This is a continuous PM₁₀ monitor. The NW 4th Circle monitor is also closer to the Bartow facility (approximately 6.8 miles) than the Anderson & Pinecrest monitor (approximately 11 miles). Therefore, the concentrations measured at the NW 4th Circle monitor were selected to represent the background values for the Cargill Bartow facility.

2. The value given for the No. 4 Fertilizer NO_x emissions in Table 6-8 does not match the value given in Table 2-3. Please explain.

Response: The NO_x emissions in Table 6-8 represent the difference between future and actual emissions. The future emissions (in lb/hr) are shown in Table 2-3, while the actual emissions (given in TPY and converted to lb/hr based on 8,760 hr/yr) are shown in Table 2-2.

The original Table 6-8 submitted with the PSD application contained a minor error in the NO_x emissions. Please see the revised Table 6-8 for the corrected NO_x emissions.

3. In Section 7.3.4 impacts due to associated population growth were addressed; however, impacts due to industrial growth were not. Please address these impacts.

Response: The proposed project will not require a significant amount of materials or services to complete the modifications. And since there will only be a small, temporary increase in workers during the construction period, there will not be any increase in materials or services provided to employees. Therefore, there will be no anticipated permanent impacts on air quality caused by associated industrial growth.

If you have any questions, please call me at (352) 336-5600 or email me at dave_buff@golder.com.

Sincerely,

GOLDER ASSOCIATES INC.



David A. Buff, P.E., Q.E.P.
Principal Engineer
Florida P.E. # 19011
SEAL

DB/FH

Attachments

cc: J. Bunyak, NPS
A. Harmon, HCEPC
C. Holladay, FDEP
F. Howard, Golder
D. Jellerson, Cargill
B. Thomas, DEP-SWD
D. Waters, Cargill
G. Worley, EPA

H:\Cargill\Bartow\NO. 4 DAP PSD Followup\DEP Response Ltr\Linero.doc

Table 1. Actual Annual PM/PM₁₀ and F Emissions for 1999 and 2000, Cargill Fertilizer, Bartow

EU ID	Source Description	TPY of P ₂ O ₅	Pollutant Emission Rate					
			PM		PM ₁₀ ^a		FL	
			lb/ton P ₂ O ₅	TPY	lb/ton P ₂ O ₅	TPY	lb/ton P ₂ O ₅	TPY
<u>ACTUAL EMISSIONS FOR 2000</u>								
002	No. 4 Fertilizer Shipping Plant	715,683	0.0022	0.78	0.0022	0.78	--	--
021	Diammonium Phosphate Fertilizer Plant	710,369	0.073	26.00 ^b	0.073	26.00 ^b	0.020	7.10
<u>ACTUAL EMISSIONS FOR 1999</u>								
002	No. 4 Fertilizer Shipping Plant	264,056	0.0022	0.29	0.0022	0.29	--	--
021	Diammonium Phosphate Fertilizer Plant	740,108	0.0522	19.30 ^c	0.0522	19.30 ^c	0.010	3.70
<u>AVERAGE ACTUAL EMISSIONS FOR 2000 & 1999</u>								
002	No. 4 Fertilizer Shipping Plant	489,870	0.00	0.53	0.00	0.53	--	--
021	Diammonium Phosphate Fertilizer Plant	725,239	0.06	22.65	0.06	22.65	0.02	5.40

References: 1999 and 2000 Annual Operating Permits, Cargill Fertilizer, Inc.

Footnotes:

^a PM₁₀ emissions are calculated as 100% of PM emissions.

^b PM and PM₁₀ emissions due to P₂O₅ production (24.86 TPY each) and natural gas combustion (1.13 TPY each).

^c PM and PM₁₀ emissions due to P₂O₅ production (18.50 TPY each) and natural gas combustion (0.80 TPY each).

Table 3-4. Contemporaneous and Debottlenecking Emissions Analysis and PSD Applicability (Revised 11/27/01)

Source Description	Pollutant Emission Rate (TPY)							
	SO ₂	NO _x	CO	PM	PM ₁₀	VOC	Fluoride	SAM
Potential Emissions From Modified/New/Affected Sources^a								
A. Existing No. 4 Fertilizer Shipping Plant	--	--	--	31.60	31.60	--	--	--
B. Modified No. 4 Fertilizer Plant	39.11	20.30	14.28	76.50	76.50	0.94	20.40	0.66
Total Potential Emission Rates	39.11	20.30	14.28	108.10	108.10	0.94	20.40	0.66
Actual Emissions from Current Operations^b								
A. No. 4 Fertilizer Shipping Plant	--	--	--	0.53	0.53	--	--	--
B. No. 4 DAP Plant	0.08	12.72	10.69	22.65	22.65	0.70	5.40	0.00
Total Actual Emission Rates	0.08	12.72	10.69	23.18	23.18	0.70	5.40	0.00
TOTAL CHANGE DUE TO PROPOSED PROJECT	39.03	7.58	3.59	84.92	84.92	0.24	15.00	0.66
Contemporaneous Emission Changes								
A. No. 3 Fertilizer Plant Expansion (April 1999)	39.60	17.80	3.60	^c	^c	0.29	^c	--
B. Phosphoric Acid Reactor Modification (April 1999) ^d	--	--	--	--	--	--	--	--
C. Phosphoric Acid Plant Filter Replacement (Oct. 2000)	^c	21.30	1.40	^c	^c	0.57	^c	--
Total Contemporaneous Emission Changes	39.60	39.10	5.00	0.00	0.00	0.86	0.00	0.00
TOTAL NET CHANGE^e	39.03	7.58	3.59	84.92	84.92	0.24	15.00	0.66
PSD SIGNIFICANT EMISSION RATE	40	40	100	15	15	40	3	7
PSD REVIEW TRIGGERED?	No	No	No	Yes	Yes	No	Yes	No

Notes: NA = Not Applicable

^a Potential emissions from Table 3-3.

^b Current actual emissions from Table 2-2.

^c Denotes that PSD review was triggered for this pollutant, therefore any previous contemporaneous increases/decreases are wiped clean.

^d Project was determined to not result in an increase in emissions of any pollutant.

^e If the proposed emissions increase at a major source is by itself less than "significant", EPA policy does not require consideration of previous contemporaneous small emissions increases (EPA New Source Review Workshop Manual, Section III.B.1, October 1990). Therefore, contemporaneous emissions changes were not considered for SO₂, NO_x, CO, and VOC since the project emissions by themselves are less than the significant emission rates.

Table 6-8. Summary of Increases in SO₂, SAM, and NO_x Emission Rates due to the
Proposed Project Used in the Regional Haze Analysis (Revised 11/27/01)

Source	SO ₂ Emissions ^a		NO _x Emissions ^a		SAM Emissions ^a	
	(lb/hr)	(g/s)	(lb/hr)	(g/s)	(lb/hr)	(g/s)
No. 4 Fertilizer Plant	20.27	2.55	2.81	0.35	0.34	0.04
No. 4 Fertilizer Shipping Plant	0.00	0.00	0.00	0.00	0.00	0.00

^a Based on the difference between potential and actual emission rates presented in Tables 2-3 and 2-2, respectively.

Notes: SAM = Sulfuric Acid Mist

SO₂ = Sulfur Dioxide

NO_x = Nitrogen Oxides



Jeb Bush
Governor

Department of Environmental Protection

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

David B. Struhs
Secretary

October 19, 2001

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. David Jellerson, Environmental Manager
Cargill Fertilizer, Inc.
8813 Highway 41 South
Riverview, Florida 33569

Re: DEP File No. 1050046-015-AC; PSD-FL-322
#4 Fertilizer Plant Modification – Bartow Facility

Dear Mr. Jellerson:

The Department has received the application on August 20, 2001, and a facsimile providing additional review time on September 17, 2001 for the No. 4 Fertilizer (DAP) Plant in Polk County. Based on our initial review of the proposed project, we have determined that additional information concerning the air quality modeling is needed in order to continue processing this application package. Please submit the information requested below to the Department's Bureau of Air Regulation:

1. In Table 4-1, the lowest values from the monitoring information provided in this table were used as background values. No justification for using these lower values was given. Please provide a justification of these values.
2. The value given for No. 4 Fertilizer NOx emissions in Table 6-8 does not match the value given in Table 2-3. Please explain.
3. In Section 7.3.4 impacts due to associated population growth were addressed; however, impacts due to industrial were not. Please address these impacts.

Please note the enclosed U.S. Fish and Wildlife Service comments for future modeling guidance.

The Department will resume processing this application after receipt of the requested information. Rule 62-4.050(3), F.A.C. requires that all applications for a Department permit must be certified by a professional engineer registered in the State of Florida. This requirement also applies to responses to Department requests for additional information of an engineering nature. A new certification statement by the authorized representative or responsible official must accompany any material changes to the application.

Please note that in accordance with Rule 62-4.055(1), "The applicant shall have **ninety days** after the Department mails a timely request for additional information to submit that information to

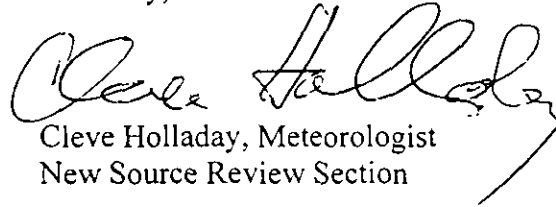
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the Department..... Failure of an applicant to provide the timely requested information by the applicable date **shall** result in denial of the application.”

You may discuss these modeling requirements with me at 850/921-8689.

Sincerely,



Cleve Holladay, Meteorologist
New Source Review Section

Enclosure

CH/ch

cc: G. Worley, EPA
J. Bunyak, NPS
B. Thomas, DEP-SWD
A. Harmon, HCEPC
D. Waters, Cargill – Bartow Facility
D. Buff, P.E., Golder Associates, Inc.



U.S. FISH & WILDLIFE SERVICE
AIR QUALITY BRANCH

P.O. BOX 25287, Denver, CO 80225-0287

Date: October 11, 2001

Telephone: (303) 969-2617

Fax: (303) 969-2822

To: Cleve Holladay

From: Ellen Porter

Subject: Cargill Fertilizer – Bartow Facility #4 Fertilizer Plant Modifications

We have reviewed the PSD Report for Cargill's proposal to modify its Bartow #4 DAP plant. Cargill is proposing to modify the existing No. 4 DAP plant to improve energy efficiency, and product quality. Potential PSD-significant emissions increases include 85 tpy of PM10 and 15 tpy of fluoride. The facility is located 118 km SE of Chassahowitzka Wilderness, a Class I area administered by the U.S. Fish and Wildlife Service.

Cargill is proposing a 0.04 lb F/ton P_2O_5 as BACT. We agree that this represents BACT.

Analyses predicted that the project would not contribute significantly to increment consumption at Chassahowitzka. CALPUFF/CALMET were used to predict the project's contribution to light extinction. Cargill used a background visual range of 65 km. Please note that all applicants should now be using natural background estimates provided by the FLAG guidance document. Because Cargill requested modeling guidance prior to final FLAG implementation, their analysis is acceptable. Their predicted change in light extinction was 0.25%, significantly below the criteria value of 5%. Therefore, this project is not expected to contribute significantly to haze at Chassahowitzka.

Cargill did not assess their contribution to deposition at Chassahowitzka, but, since they requested modeling guidance prior to our providing guidance on deposition analyses and deposition analysis thresholds, we will not request a deposition analysis. Please note that permit applicants, after consultation with us, should now be conducting nitrogen deposition analyses and applying the deposition analysis threshold for nitrogen (found on the FLAG webpage at <http://www2.nature.nps.gov/ard/flagfree/index.htm>). Similar thresholds for sulfur deposition will soon be available.

Cargill states on p. 7-4 that, except for visibility, AQRVs have not been specifically defined by the U.S. Fish and Wildlife Service for Chassahowitzka. U.S. Fish and Wildlife Service has identified AQRVs for Chassahowitzka (including vegetation, wildlife, soils, water, visibility), but up to recently, only required analyses for visibility. However, U.S. Fish and Wildlife Service now has evidence that coastal water quality at Chassahowitzka is sensitive to air pollution, particularly nitrogen deposition. Therefore, sources are now required to do a nitrogen deposition analysis and compare their results to the deposition analysis thresholds.

Thank you for giving us the opportunity to comment on this project.



Jeb Bush
Governor

Department of Environmental Protection

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

David B. Struhs
Secretary

October 12, 2001

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. David Jellerson, Environmental Manager
Cargill Fertilizer, Inc.
8813 Highway 41 South
Riverview, Florida 33569

Re: DEP File No. 1050046-015-AC; PSD-FL-322
#4 Fertilizer Plant Modification – Bartow Facility

Dear Mr. Jellerson:

The Department has received the application on August 20, 2001, and a facsimile providing additional review time on September 17, 2001 for the No. 4 Fertilizer (DAP) Plant in Polk County. Based on our initial review of the proposed project, we have determined that additional information is needed in order to continue processing this application package. Please submit the information requested below to the Department's Bureau of Air Regulation:

1. Please explain the reasons for installing a pipe reactor at the granulator inlet. What functions will it serve? Where will the additional phosphoric acid, sulfuric acid and ammonia come from that will be used in the pipe reactor. How much of each material will be added to the pipe reactor.
2. Table 2-2 provides the actual annual emissions for the past two years. Please include additional information in terms of lb/ton of P_2O_5 fed for particulate matter and fluorides for those two years.
3. Table 2-3 lists 8,500 as annual operating hours for No. 2 fuel oil, but the annual emission rates for all the pollutants is based on a different annual operating hour. Please explain the discrepancy. Also, explain how the maximum total emission rate numbers were arrived at, and why were these numbers not used for SO_2 and NO_x in Table 3-4?
4. Table 3-4 lists as a footnote "If the proposed emissions increase at a major source is by itself less than significant, EPA policy does not require consideration of previous contemporaneous small emissions increases". Please provide a rule reference in the Florida Administrative Code that conforms to this EPA policy.

Any additional comments from EPA and the U.S. Fish and Wildlife Service will be forwarded to you after we receive them. Also, additional comments regarding modeling will be sent by October 19, prior to completion of the 30-day review period.

The Department will resume processing this application after receipt of the requested information. Rule 62-4.050(3), F.A.C. requires that all applications for a Department permit must be certified by a professional engineer registered in the State of Florida. This requirement also applies to responses to Department

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requests for additional information of an engineering nature. A new certification statement by the authorized representative or responsible official must accompany any material changes to the application.

Please note that in accordance with Rule 62-4.055(1), "The applicant shall have **ninety days** after the Department mails a timely request for additional information to submit that information to the Department..... Failure of an applicant to provide the timely requested information by the applicable date **shall** result in denial of the application."

We will be happy to meet and discuss the details with you and your staff. Mr. Syed Arif, P.E. is responsible for the technical review of the application. He may be contacted at 850/921-9528. You may discuss the forthcoming modeling requirements with Mr. Cleve Holladay at 850/921-8689.

Sincerely,

 10/12

A.A. Linero, P.E. Administrator
New Source Review Section

AAL/sa

cc: G. Worley, EPA
J. Bunyak, NPS
B. Thomas, DEP-SWD
A. Harmon, HCEPC
D. Waters, Cargill – Bartow Facility
D. Buff, P.E., Golder Associates, Inc.

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 Riverview, FL 33569

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- Attach this card to the back of the mailpiece, or on the front if space permits.

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 Mr. David Jellerson
 Environmental Manager
 Cargill Fertilizer, Inc.
 8813 Highway 41 South
 Riverview, FL 33569

2. Article Number (Copy from service label)
 7000 2870 0000 7028 2737

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 C. Signature *C. Summerall* ☐ Agent ☐ Addressee
 D. Is delivery address different from item 1? ☐ Yes ☐ No
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4. Restricted Delivery? (Extra Fee) ☐ Yes



**CARGILL
FERTILIZER, INC.**

P.O. Box 9002 • Bartow, Florida 33831 • Telephone 941-534-9610 • FAX 863-534-9680

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SEP 24 2001

BUREAU OF AIR REGULATION

September 13, 2001
Certified Mail
7099 3220 0007 3016 7574

Syed Arif PE
New Source Review Section
Division of Air Resources Management
Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Dear Mr. Arif:

RE: CARGILL FERTILIZER – BARTOW FACILITY
TITLE V PERMIT NO. 1050046-003-AV
#4 FERTILIZER PLANT MODIFICATION APPLICATION

Cargill Fertilizer submitted an application for a permit to make modifications to our #4 DAP plant on August 15, 2001. The purpose of this letter is to inform the Department that, due to priorities within Cargill, we wish to waive the requirement for comments from the FEPA within 30 days of receipt of the application. As we discussed on the phone, an additional 30 days should be sufficient to review the application. We look forward to your comments by mid-October.

If you have any questions, please do not hesitate to call me at (863) 534-9615 or email debbie_waters@cargill.com

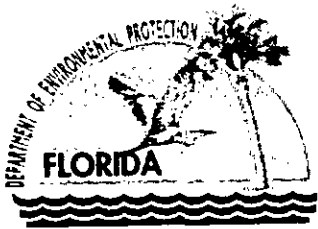
Sincerely,

Debra R. Waters
Environmental Superintendent

Xc: Jellerson, Edgemon, Royster, MacConnell, Lulf, Dennis
File 60-07-07A



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Jeb Bush
Governor

Department of Environmental Protection

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

August 28, 2001

David B. Struhs
Secretary

Mr. Gregg Worley, Chief
Air, Radiation Technology Branch
Preconstruction/HAP Section
U.S. EPA, Region 4
61 Forsyth Street
Atlanta, Georgia 30303

RE: Cargill Fertilizer, Inc.
Bartow Plant
DEP File No. 1050046-015-AC, PSD-FL-322

Dear Mr. Worley:

Enclosed for your review and comment is an application for a PSD source submitted by Cargill Fertilizer, Inc. The proposed project for the No. 4 Fertilizer Plant at the company's existing facility in Bartow, Florida. Please note the PSD number assigned to this project is the same as the one originally assigned to the application from Tropicana Products received in July. The Tropicana application number has changed to PSD-FL-303A.

Your comments may be forwarded to my attention at the letterhead address or faxed to the Bureau of Air Regulation at 850/922-6979. If you have any questions, please contact Syed Arif, review engineer, at 850/921-9528.

Sincerely,

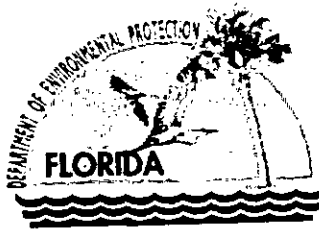
for Patty Adams
Al Linero, P.E.
Administrator

New Source Review Section

AAL/pa
Enclosure

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Jeb Bush
Governor

Department of Environmental Protection

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

David B. Struhs
Secretary

August 28, 2001

Mr. John Bunyak, Chief
Policy, Planning & Permit Review Branch
NPS – Air Quality Division
Post Office Box 25287
Denver, Colorado 80225


RE: Cargill Fertilizer, Inc.
Bartow Plant
DEP File No. 1050046-015-AC, PSD-FL-322

Dear Mr. Bunyak:

Enclosed for your review and comment is an application for a PSD source submitted by Cargill Fertilizer, Inc. The proposed project for the No. 4 Fertilizer Plant at the company's existing facility in Bartow, Florida. Please note the PSD number assigned to this project is the same as the one originally assigned to the application from Tropicana Products received in July. The Tropicana application number has changed to PSD-FL-303A.

Your comments may be forwarded to my attention at the letterhead address or faxed to the Bureau of Air Regulation at 850/922-6979. If you have any questions, please contact Syed Arif, review engineer, at 850/921-9528.

Sincerely,


for Al Linero, P.E.
Administrator
New Source Review Section

AAL/pa
Enclosure

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CARGILL FERTILIZER, INC.

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

August 15, 2001

Certified Mail: 7000 1670 0002 1996 1917

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

RECEIVED

AUG 20 2001

BUREAU OF AIR REGULATION

Dear Mr. Linero:

RE: CARGILL FERTILIZER - BARTOW FACILITY
TITLE V PERMIT NO. 1050046-003-AV
#4 FERTILIZER PLANT MODIFICATIONS
PERMIT APPLICATION

Enclosed please find 6 signed copies of an Application for Air Permit - Title V Source (Form 62-210.900(1)), PDS Report and Air Quality Impacts Analysis for the #4 Fertilizer Plant (E.U. 021) located at Cargill Fertilizer's Bartow Facility. Also enclosed is a check in the amount of \$7,500 for the application fee.

If you have any questions please call me at (813) 671-6297 or email david_jellerson@cargill.com

Sincerely,

David Jellerson, P.E.
Environmental Manager

Xc: Waters, Buff, File 60-07-07A

cc: *L. Alf*
C. Holladay
D. Thomas, SWD
H. Straley, EPA
G. Campbell, NPS

