



Department of Environmental Protection

Lawton Chiles
Governor

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400
November 22, 1995

Virginia B. Wetherell
Secretary

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. David B. Jellerson, P.E.
Environmental Superintendent
Cargill Fertilizer, Inc.
P.O. Box 9002
Bartow, Florida 33830

Dear Mr. Jellerson:

The Department received your November 3 letter and fee on November 13 requesting a minor amendment of the Bartow Phos Acid Permit PSD-FL-224. Your letter also advised the Department that Cargill intends to install a level of control that appears to be below that identified in the BACT determination (i.e. venturi vs. packed scrubbing).

The purpose of this early partial response is to advise Cargill prior to ordering the control equipment that the Department does not consider the proposed 12 inch w.c. venturi scrubber as being consistent with the BACT determination which states that packed scrubbing is required, either as a primary device or as a secondary scrubber.

The BACT determination presented two equivalent options for achieving the required level of fluoride removal (packed or venturi plus packed secondary). The Department does not consider a moderate energy venturi to be the equivalent of an appropriately designed packed scrubber, and therefore the venturi by itself is not an equivalent option in this case. You would probably have to use fresh water or install several venturis in series to achieve the same mass transfer as packed scrubbers provide when using pond water. In any event, please send us the mass transfer calculations for your proposed scheme.

Sincerely,

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

AAL/JR/t

cc: W. Thomas, SWD
J. Harper, EPA
D. Buff, P.E., KBN

R. Harwood, Polk Co.
J. Bunyak, NPS

Z 127 632 579



Receipt for Certified Mail

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(See Reverse)

PS Form 3800, March 1993

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David Jellerson	
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11-22-95 PSD-FI-224	

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- Complete items 3, and 4a & b.
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- ☐ Addressee's Address
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David B. Jellerson, PE
Cairle Fertilizer
PO Box 9002
Baton, FL 33830

4a. Article Number
Z 127 632 579

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

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11/27/95

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Betty Pickard

PS Form 3811, December 1991

★U.S. GPO: 1993-352-714

DOMESTIC RETURN RECEIPT

Thank you for using Return Receipt Service.



CARGILL FERTILIZER, INC.

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

November 3, 1995

Certified Mail: P 013 142 441

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

RECEIVED

NOV 13 1995

MAILROOM # 2

Dear Mr. Linero:

SUBJECT: Permit AC53-262532

Please find attached a check in the amount of \$250 (check # 577223081) for a minor modification of Permit AC53-262532 as described below.

On August 24, 1995, the FDEP issued the above-referenced permit allowing for construction of a new filter and an increase in production rate for our Nos. 4 and 5 phosphoric acid plants. During the permitting of this project, Cargill indicated that we did not believe that 30% phosphoric acid tanks and gypsum tanks were subject to the New Source Performance Standards - Subpart T. However, the Department relied on an August 11, 1988 determination by EPA and required these tanks to be included in the applicable source. As a result, the final permit required evacuation of the new filtrate tank, the new gypsum tank and the existing 30% acid clarification area (ten tanks).

On September 15, 1995, EPA issued a revised determination (attached) which specifically states that sources such as clarifiers, phosphoric acid storage tanks and evaporator feed tanks are not subject to the standards for fluorides specified in the Subpart T regulations. Therefore, we request that the requirement to install new control equipment on the 30% clarification tanks be deleted. Note, however, that we intend to proceed with installation of the necessary equipment to control the new filtrate tank and gypsum tank since this can easily be accomplished with new scrubber being installed. The only permit change necessary to accommodate this request will be to delete the last sentence of Specific Condition 10.a.



Mr. Al-Linero
November 3, 1995
Page 2

In addition to the above, we would like to advise you that we have begun to order equipment for the construction project and intend to make an improvement in the design of the proposed scrubber for the new filter. The permit application indicated that the installed scrubber would be similar to the installation at our Riverview facility which has a low energy venturi having a pressure drop of less than 1 inch W.C. Now, however, we intend to install a more efficient high energy venturi scrubber having a design pressure drop of greater than 12 inches W.C. with once-through liquid flow rate of 600 gpm and a stack exhaust flow of approximately 60,000 ACFM. This installation has been selected to provide us with greater assurance that the source will achieve the stringent emission limitation imposed by the permit.

Should you have any questions, or require additional information, please feel free to contact me at (941) 534-9613.

Sincerely,



David B. Jellerson, P.E.,
Environmental Superintendent

cc: Pinney, Morris
Buff (KBN)
P-20-03



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET, N.E.
ATLANTA, GEORGIA 30365

4APT-AEB

SEP 15 1995

Mr. C. H. Fancy, P.E.
Chief, Bureau of Air Regulation
Florida Department Of Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400

RE: New Source Performance Standards (NSPS)-Subpart T
Phosphate Fertilizer Industry: Wet-Process Phosphoric
Acid Plants

Dear Mr. Fancy:

On May 25, 1995, we received a letter from KBN Engineering and Applied Sciences, Inc. (KBN) regarding a determination which we made on August 11, 1988, concerning the New Source Performance Standards (NSPS) for Subpart T - Standards of Performance for the Phosphate Fertilizer Industry: Wet-Process Phosphoric Acid Plants. Our August 11, 1988, letter was sent to the Hillsborough County Environmental Protection Commission in response to a June 16, 1988, letter we had received from them concerning Gardinier, Inc. in Gibsonton, Florida. A copy of this correspondence is enclosed for your review. The letter we have received from KBN relates to the emission sources which are components of an affected facility and requests clarification concerning the determination which was made in reference to Gardinier, Inc. Based on our further review of this issue, we have determined that our August 11, 1988, letter regarding emission sources which are included in an affected facility is partially incorrect. Because of the importance of this issue and its connection to Title V permitting requirements, we are bringing it to your attention.

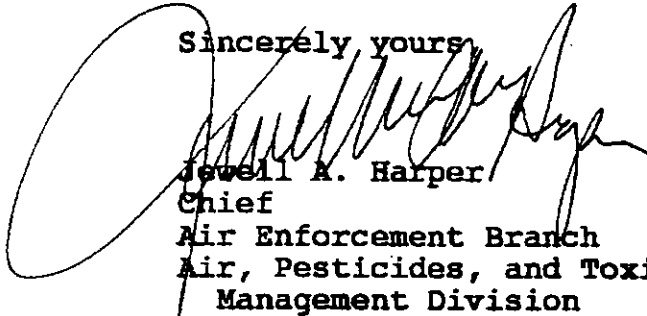
As stated in the Subpart T regulations at 40 CFR Part 60.200(a), an affected facility includes any combination of reactors, filters, evaporators, and hot wells. Further clarification regarding the sources which are regulated in an affected facility is provided in the Federal Register, Vol. 40, No. 152, August 6, 1975, which states that any sources not listed in the regulation are not components of an affected facility and are not covered by the standard for fluorides. Therefore, sources such as clarifiers, phosphoric acid storage tanks, and evaporator feed tanks are not included in the affected facility and are not subject to the standards for fluorides specified in the Subpart T regulations.

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The determination provided in our August 11, 1988, letter that phosphoric acid plant Nos. 3 and 4 at Gardinier are considered to be parts of one affected facility subject to 40 CFR Part 60, Subpart T, remains intact. The definition of an affected facility is any combination of reactors, filters, evaporators, and hot wells. At the Gardinier facility, plant Nos. 3 and 4 are two reactors which utilize common filters, evaporators, and hot wells, and the two plants are considered to be in the same affected facility.

If there are any questions regarding the contents of this letter, please contact Keith Goff of my staff at (404)347-3555, extension 4141.

Sincerely yours,



Jewell A. Harper
Chief
Air Enforcement Branch
Air, Pesticides, and Toxics
Management Division

Attachments

cc: Mr. Iwan Choronenko, Director
Hillsborough County Environmental Protection Commission

Mr. Jerry Campbell
Hillsborough County Environmental Protection Commission

✓ Mr. Dave Buff, P.E.
KBN Engineering and Applied Sciences, Inc.