



D.E.P.

DEC 21 1994

Tampa

December 19, 1994

Mr. Bill Thomas  
Air Permitting  
Florida Department of Environmental Protection  
3804 Coconut Palm Drive  
Tampa, FL 33619-8218

Re: Cargill Fertilizer, Inc.  
AC53-216288; PSD-FL-191  
AO53-243295  
Bartow Nos. 4, 5 & 6 Sulfuric Acid Plants

Dear Mr. Thomas:

In a recent phosphate industry meeting with FDEP Tallahassee (John Brown, Larry George Bruce Mitchell, Harry Kearns), there was discussion on the issue of permit conditions which are not necessary or are not based on regulatory requirements. It was Tallahassee's view that such permit conditions should be removed from the permit, at the permittee's request. A specific example discussed was that of NO<sub>x</sub> and ammonia emissions in the phosphate industry permits. In regards to NO<sub>x</sub>, no specific requirement was identified which would require NO<sub>x</sub> emission limits to be specified in a permit (unless the applicant was trying to escape PSD review, or due to a BACT analysis). It was further indicated that any changes of this nature needed in construction or operating permits should be requested and received prior to the Title V application due date (April 2, 1995, for most phosphate facilities).

On behalf of Cargill Fertilizer, I am requesting a change to the above referenced permits issued by the Department. The air construction permit for the Cargill Riverview sulfuric acid plants contains a limit on NO<sub>x</sub> emissions (Specific Condition 4). Specific Condition 4 of the draft permit places a limit upon NO<sub>x</sub> emissions from the sulfuric acid plants, in terms of lb/ton 100 percent sulfuric acid produced, lb/hr and tons/year. It is requested that this condition be deleted since there is no regulatory basis for any limit for NO<sub>x</sub>. The estimated NO<sub>x</sub> emissions are low, i.e., less than 100 TPY from each plant. PSD review was not triggered for the modification, and no synthetic restrictions were placed on the operation to avoid PSD review for NO<sub>x</sub>. There are no state or federal emission limiting standards for NO<sub>x</sub> emissions from sulfuric acid plants.

TO: J. BROWN VIA FAX 2PG5

BOTH PERMITS CONTAIN  
NO<sub>x</sub> LIMITS; TALL'E DID  
AC & WE DID AO. SHOULD  
TALL'E REVISE AC, THEN  
SWD AMEND AO? OR WE'LL ONLY  
AMEND AO SINCE WE'LL HAVE  
A TITLE V AO 'SOON', OR ??

12/27/94

WE'D BE  
HAPPY TO  
DO BOTH  
AC & AO

1432A1/2

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To reiterate, Cargill requests that the NO<sub>x</sub> emission limits contained in the above referenced permits be deleted. Please call if you have any questions concerning this information, and please advise if any permit application fee is required to process this request.

Sincerely,

David A. Buff, P.E.  
Principal Engineer

cc: David Jellerson, Cargill  
John Brown, FDEP-TALL  
File (2)

DB/mlb