



FOLEY & LARDNER LLP  
ATTORNEYS AT LAW  
100 NORTH TAMPA STREET, SUITE 2700  
TAMPA, FL 33602-5810  
P.O. BOX 3391  
TAMPA, FL 33601-3391  
TELEPHONE: 813.229.2300  
FACSIMILE: 813.221.4210  
WWW.FOLEY.COM

## FACSIMILE TRANSMISSION

Total # of Pages 24 (including this page)

TO:	PHONE #:	FAX #:
Bruce Mitchell Department of Environmental Protection	850-413-9198	850-921-9533

From : Margo T. Valenti, Paralegal  
Email Address : mvalenti@foley.com  
Sender's Direct Dial : 813.225.4110  
Date : September 28, 2004  
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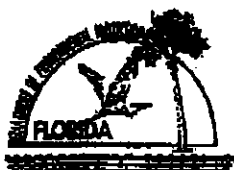
## MESSAGE:

Attached please find a Statement of Compliance – Title V Source for each facility. If you have any questions or need additional information, please do not hesitate to give me a call.

If there are any problems with this transmission or if you have not received all of the pages, please call 813.229.2300.

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# Department of Environmental Protection

## Division of Air Resource Management

### STATEMENT OF COMPLIANCE - TITLE V SOURCE

REASON FOR SUBMISSION (Check one to indicate why this statement of compliance is being submitted)

☐ Annual Requirement      ☒ Transfer of Permit      ☐ Permanent Facility Shutdown

REPORTING PERIOD*		REPORT DEADLINE**
January	through May 31 of 2004 (year)	August 26, 2004

\*The statement of compliance must cover all conditions that were in effect during the indicated reporting period, including any conditions that were added, deleted, or changed through permit revision.

\*\*See Rule 62-213.440(3)(a)2., F.A.C.

Facility Owner/Company Name: Cargill Fertilizer

Site Name: Bartow Facility      Facility ID No. 1050046      County: Polk

COMPLIANCE STATEMENT (Check only one of the following three options)

☐ A. This facility was in compliance with all terms and conditions of the Title V Air Operation Permit and, if applicable, the Acid Rain Part, and there were no reportable incidents of deviations from applicable requirements associated with any malfunction or breakdown of process, fuel burning or emission control equipment, or monitoring systems during the reporting period identified above.

☐ B. This facility was in compliance with all terms and conditions of the Title V Air Operation Permit and, if applicable, the Acid Rain Part; however, there were one or more reportable incidents of deviations from applicable requirements associated with malfunctions or breakdowns of process, fuel burning or emission control equipment, or monitoring systems during the reporting period identified above, which were reported to the Department. For each incident of deviation, the following information is included:

1. Date of report previously submitted identifying the incident of deviation.
2. Description of the incident.

☒ C. This facility was in compliance with all terms and conditions of the Title V Air Operation Permit and, if applicable, the Acid Rain Part, EXCEPT those identified in the pages attached to this report and any reportable incidents of deviations from applicable requirements associated with malfunctions or breakdowns of process, fuel burning or emission control equipment, or monitoring systems during the reporting period identified above, which were reported to the Department. For each item of noncompliance, the following information is included:

1. Emissions unit identification number.
2. Specific permit condition number (note whether the permit condition has been added, deleted, or changed during certification period).
3. Description of the requirement of the permit condition.
4. Basis for the determination of noncompliance (for monitored parameters, indicate whether monitoring was continuous, i.e., recorded at least every 15 minutes, or intermittent).
5. Beginning and ending dates of periods of noncompliance.
6. Identification of the probable cause of noncompliance and description of corrective action or preventative measures implemented.
7. Dates of any reports previously submitted identifying this incident of noncompliance.

For each incident of deviation, as described in paragraph B. above, the following information is included:

1. Date of report previously submitted identifying the incident of deviation.
2. Description of the incident.

**STATEMENT OF COMPLIANCE - TITLE V SOURCE****RESPONSIBLE OFFICIAL CERTIFICATION**

I, the undersigned, am a responsible official (Title V air permit application or responsible official notification form on file with the Department) of the Title V source for which this document is being submitted. With respect to all matters other than Acid Rain program requirements, I hereby certify, based on the information and belief formed after reasonable inquiry, that the statements made and data contained in this document are true, accurate, and complete.

David B. Jellerson  
(Signature of Title V Source Responsible Official)

8-26-04  
(Date)

Name: David B. Jellerson

Title: Environmental Manager

**DESIGNATED REPRESENTATIVE CERTIFICATION (only applicable to Acid Rain source)**

I, the undersigned, am authorized to make this submission on behalf of the owners and operators of the Acid Rain source or Acid Rain units for which the submission is made. I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment.

\_\_\_\_\_  
(Signature of Acid Rain Source Designated Representative)

\_\_\_\_\_  
(Date)

Name: \_\_\_\_\_

Title: \_\_\_\_\_

*(Note: Attachments, if required, are created by a responsible official or designated representative, as appropriate, and should consist of the information specified and any supporting records. Additional information may also be attached by a responsible official or designated representative when elaboration is required for clarity. This report is to be submitted to both the compliance authority (DEP district or local air program) and the U.S. Environmental Protection Agency (EPA) (U.S. EPA Region 4, Air and EPCRA Enforcement Branch, 61 Poyryth Street, Atlanta GA 30303).)*

**Title V Statement of Compliance  
January 1, 2004-May 31, 2004  
Cargill Fertilizer - Bartow Facility  
Permit No. 1058046-003-AV**

**Attachment 1 of 2**

1. Emissions unit identification number - #4 SAP-012, #5 SAP-032, #6 SAP-033
2. Specific permit condition number - Title V condition #III, E. 11. No change in certification period.
3. Description of the requirement of the permit condition - References 40 CFR 60.85 requirement for daily span checks for SO<sub>2</sub> CEM's at Sulfuric Acid Plants (40 CFR 60.13(d)).
4. Basis for determination of noncompliance - Review of span check records.
5. Beginning and ending dates of noncompliance - During the period from January 1, 2004 through May 31, 2004 there are no records of span checks for the SO<sub>2</sub> CEM for a total of 3 days at #4 SAP, 4 days at #5 SAP and 3 days at #6 SAP
6. Identification of probable cause of noncompliance and description of corrective action or preventative measures implemented - Probable cause is oversight by the electrician(s) responsible for performing the test on identified dates. Corrective action includes refresher training of the daily requirement for the electrical department. Refresher training completed August 26, 2004.
7. Dates of any reports previously submitted identifying this incident of noncompliance - None

**Title V Statement of Compliance  
January 1, 2004–May 31, 2004  
Cargill Fertilizer – Bartow Facility  
Permit No. 1050046-003-AV**

**Attachment 2 of 2**

8. Emissions unit identification number – 001, #3 Fertilizer Plant
9. Specific permit condition number – Title V condition III. A. 15. or Construction Permit No. 1050046-003-AC Condition 13. No change in certification period.
10. Description of the requirement of the permit condition – Requires daily record of equivalent P2O5 feed.
11. Basis for determination of noncompliance – Review of production records.
12. Beginning and ending dates of noncompliance – On February 20, 2004, March 2, 2004, March 29, 2004 and April 7, 2004 there was no laboratory analysis for P2O5 performed on feed acid to the #3 Fertilizer Plant.
13. Identification of probable cause of noncompliance and description of corrective action or preventative measures implemented – The #3 Fertilizer Plant was down for approximately half of the day on these dates. Operators likely did not collect acid samples for the lab on their regular rounds due to the down time. However, due to the lower production on those dates and based on dry tons produced, it is not possible that the daily production would have exceeded the permitted limit for P2O5 input. Corrective action includes refresher training for operations personnel of the daily analysis requirement in order to properly calculate total P2O5 input regardless of hours operated.
14. Dates of any reports previously submitted identifying this incident of noncompliance – None