



# Florida Department of Environmental Protection

Bob Martinez Center  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Charlie Crist  
Governor

Jeff Kottkamp  
Lt. Governor

Mimi A. Drew  
Interim Secretary

December 9, 2010

*Electronic Mail – Received Receipt Requested*

Rob Larson, Environmental Superintendant  
Mosaic Fertilizer, LLC  
13830 Circa Crossing Drive  
Lithia, Florida 33547

**Re: Request for Additional Information**  
Project No. 1050046-029-AC (PSD-FL-255A)  
Mosaic Fertilizer, LLC, Bartow Facility  
Add a New Particulate Matter Emission Limit

Dear Mr. Larson:

On November 10, 2010, we received your application and sufficient fee for an air construction permit to add a new particulate matter emission limit for the No. 3 Phosphate Fertilizer Plant (EU-001). The facility is located in Polk County at 3200 Highway 60 West in Bartow, Florida. The application indicates that the project is subject to general preconstruction review pursuant to rule 62-212.300 of the Florida Administrative Code (F.A.C.). The application is incomplete. In order to continue processing your application, please provide the additional information requested below. Should your response to any of the requested items require new calculations, please submit the new calculations, assumptions, reference material and appropriate revised pages of the application form.

1. An alternate emissions limit of 0.088 pounds per ton (PPT) of product is proposed for when the plant is processing micronutrients additives. The current emission rate is based pounds per ton of phosphorus pentoxide (  $P_2O_5$  ) feed into the process plant.

The rational for this request is that when micronutrients are being processed during a compliance test, there is less phosphoric acid input to the plant. As such, Mosaic is unable to produce sufficient product to achieve the permitted minimum of 90 % feed rate of  $P_2O_5$ . (Rule 62-297.32 limiting emissions units operation to 110 percent of the test rate until a new test is conducted) Please advise that the current maximum allowable particulate matter emissions rate of 11.0 pounds per hour (PPH) and 0.18 PPT  $P_2O_5$  of feed will remain unchanged.

2. Because this modification will influence regulated emissions from the facility for total hazardous air pollutants (HAPs) and radionuclide, the following information regarding the micronutrient additives is being requested:
- a. Please indicate when Mosaic Fertilizer, LLC begin introducing micronutrient additives into the product of the No. 3 Phosphate Fertilizer Plant.
  - b. Please provide the source or origin of the micronutrient additives.
  - c. Please specify the constituents on a mass by mass basis for metals and radionuclide that are present in detectable and non-detectable quantities for species or compounds as listed below:
    - Antimony
    - Arsenic (inorganic including arsine)
    - Beryllium
    - Cadmium
    - Chromium
    - Cobalt
    - Cyanide
    - Lead
    - Manganese
    - Mercury
    - Nickel
    - Radionuclides (including radon)
    - Selenium(Section 112(b) of the Clean Air Act)
  - d. Please identify what the maximum mass feed rate of the micronutrient additives are in tons per hour or percentage of product into the No. 3 Phosphate Fertilizer Plant.

The above information is requested pursuant to the following F.A.C. regulations: Rule 62-4.050 (Procedures to Obtain Permits and Other Authorizations; Applications); 62-4.055 (Permit Processing); 62-4.070 (Standards for Issuing or Denying Permits; Issuance; Denial); 62-4.120 (Construction Permits); 62-204.800 (Federal Regulations Adopted by Reference); 62-212.300 (Permits Required); 62-210.370 (Emissions Computations and Reporting); 62-210.900 (Forms and Instructions); 62-212.300 (General Preconstruction Review); and 62-212.400 (Prevention of Significant Deterioration). All applications for a Department permit must be certified by a professional engineer registered in the State of Florida pursuant to Rule 62-4.050(3), F.A.C. This requirement also applies to responses to Department requests for additional information

of an engineering nature. For any material changes to the application, please include a new certification statement by the authorized representative or responsible official.

We will resume processing your application after receipt of the requested information. You are reminded that Rule 62-4.055(1), F.A.C. requires applicants to respond to requests for information within 90 days or to provide a written request for an additional period of time to submit the information. If you have any questions regarding this matter, please contact the project engineer, Marilyn Koletzke, at 850/ 273-6629.

Sincerely,



Marilyn Koletzke, P.E.  
New Source Review Section

This letter was sent to the following people by electronic mail with received receipt requested.

Rob Larson, Environmental Superintendant ([Robert.larson@mosaicco.com](mailto:Robert.larson@mosaicco.com))

David G Buff, P.E., Golder Associates, Inc. ([dbuff@golder.com](mailto:dbuff@golder.com))

Cindy Zhang-Torres, District Air Program, Southwest District  
([Cindy.Zhang-Torres@dep.state.fl.us](mailto:Cindy.Zhang-Torres@dep.state.fl.us))

Ms. Kathleen Forney, EPA Region 4 ([forney.kathleen@epa.gov](mailto:forney.kathleen@epa.gov))

Ms. Heather Abrams, EPA Region 4 ([abrams.heather@epa.gov](mailto:abrams.heather@epa.gov))

Ms. Vickie Gibson, DEP BAR Reading File ([victoria.gibson@dep.state.fl.us](mailto:victoria.gibson@dep.state.fl.us))

JFK/mk

## Livingston, Sylvia

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**From:** Livingston, Sylvia  
**Sent:** Thursday, December 09, 2010 3:05 PM  
**To:** 'Robert.larson@mosaicco.com'  
**Cc:** 'dbuff@golder.com'; Zhang-Torres; 'forney.kathleen@epa.gov'; 'abrams.heather@epa.gov'; Gibson, Victoria; Koerner, Jeff; Koletzke, Marilyn; Walker, Elizabeth (AIR)  
**Subject:** Request for Additional Information: Mosaic Fertilizer, LLC - Bartow Facility (1050046-029-AC/ PSD-FL-255A)  
**Attachments:** RAI 1050046-029-AC.pdf

Dear Sir/Madam:

Please send a "reply" message verifying receipt of the attached document(s); this may be done by selecting "Reply" on the menu bar of your e-mail software, *noting that you can view the documents*, and then selecting "Send". We must receive verification of receipt and your reply will preclude subsequent e-mail transmissions to verify receipt of the document(s).

The document(s) may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible.

The document is in Adobe Portable Document Format (pdf). Adobe Acrobat Reader can be downloaded for free at the following internet site: <http://www.adobe.com/products/acrobat/readstep.html> .

The Bureau of Air Regulation is issuing electronic documents for permits, notices and other correspondence in lieu of hard copies through the United States Postal System, to provide greater service to the applicant and the engineering community. Please advise this office of any changes to your e-mail address or that of the Engineer-of-Record.

Thank you,

Sylvia Livingston  
Division of Air Resource Management (DARM)  
Department of Environmental Protection  
850/921-9561  
[sylvia.livingston@dep.state.fl.us](mailto:sylvia.livingston@dep.state.fl.us)

Tracking:

## **Livingston, Sylvia**

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**From:** Larson, Robert - Bartow [Robert.Larson@mosaicco.com]  
**Sent:** Thursday, December 09, 2010 3:40 PM  
**To:** Livingston, Sylvia  
**Cc:** Buff, Dave; Cobb, Phil  
**Subject:** RE: Request for Additional Information: Mosaic Fertilizer, LLC - Bartow Facility (1050046-029-AC/ PSD-FL-255A)

Received

Rob Larson

Mosaic LLC, Bartow-Mulberry-Green Bay

**From:** Livingston, Sylvia [mailto:Sylvia.Livingston@dep.state.fl.us]

**Sent:** Thursday, December 09, 2010 3:05 PM

**To:** Larson, Robert - Bartow

**Cc:** dbuff@golder.com; Zhang-Torres; forney.kathleen@epa.gov; abrams.heather@epa.gov; Gibson, Victoria; Koerner, Jeff; Koletzke, Marilyn; Walker, Elizabeth (AIR)

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The Bureau of Air Regulation is issuing electronic documents for permits, notices and other correspondence in lieu of hard copies through the United States Postal System, to provide greater service to the applicant and the engineering community. Please advise this office of any changes to your e-mail address or that of the Engineer-of-Record.

Thank you,

Sylvia Livingston

Division of Air Resource Management (DARM)

Department of Environmental Protection

850/921-9561

[sylvia.livingston@dep.state.fl.us](mailto:sylvia.livingston@dep.state.fl.us)

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