


## Memorandum

## Florida Department of Environmental Protection

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To: Trina Vielhauer, Bureau of Air Regulation  
Through: Jeff Koerner, New Source Review Section   
From: Marilyn Koletzke, New Source Review Section  
Date: April 5, 2011  
Subject: Project No. 1050046-029-AC/PSD-FL-255A  
Draft Air Construction Permit Package  
Alternate Emissions Limit  
No. 3 Phosphate Fertilizer Plant  
Mosaic Fertilizer, LLC, Bartow Facility

Attached for your review is a draft air construction permit package for the existing Mosaic Fertilizer, LLC Bartow Facility, which is located in Polk County at 3200 Highway 60 West in Bartow, Florida 33830. For the existing No. 3 Phosphate Fertilizer Plant, the applicant proposed an alternate emissions limit when processing micronutrient additives. The alternate limit will lower the maximum allowable particulate matter emissions rate of 0.18 pounds per ton (PPT) of phosphorus pentoxide ( $P_2O_5$ ) feed to 0.088 PPT of  $P_2O_5$  feed when the plant is processing micronutrient additives. The project is not expected to increase emissions as it is intended to address regulatory process operation issues during compliance testing at 100% production. The project is not considered a new source review reform project. Day 90 of the permitting time clock is July 5, 2011. I recommend your approval of the attached draft permit package.

Attachments

TLV/jfk/mk

## P.E. CERTIFICATION STATEMENT

### PERMITTEE

Mosaic Fertilizer, LLC  
13830 Circa Crossing Drive  
Lithia, Florida 33547

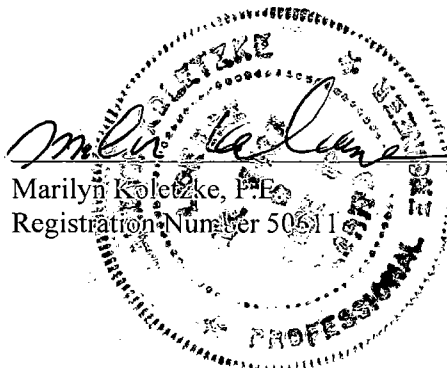
Draft Permit No. 1050046-029-AC  
PSD-FL-255A  
Mosaic Fertilizer, LLC  
Bartow Facility  
Polk County, Florida

### PROJECT DESCRIPTION

The Mosaic Fertilizer, LLC, Bartow Facility No. 3 Phosphate Fertilizer Plant requested an alternate emissions limit when processing micronutrient additives. The alternate limit will lower the maximum allowable particulate matter emissions rate of 0.18 pounds per ton (PPT) of phosphorus pentoxide ( $P_2O_5$ ) feed to 0.088 PPT of  $P_2O_5$  feed when the plant is processing micronutrient additives. Micronutrient additions were approved in the permit 1050046-012-AC issued on November 24, 1999. The project is not expected to increase emissions as it is intended to address regulatory process operation issues during compliance testing at 100% production.

This project is subject to the general preconstruction review requirements in Rule 62-212.300, Florida Administrative Code (F.A.C.) and is not subject to the preconstruction review requirements for major stationary sources in Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality. The Department's full review of the project and rationale for issuing the draft permit is provided in the Technical Evaluation and Preliminary Determination.

***I HEREBY CERTIFY*** that the air pollution control engineering features described in the above referenced application and subject to the proposed permit conditions provide reasonable assurance of compliance with applicable provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 62-4 and 62-204 through 62-297. However, I have not evaluated and I do not certify any other aspects of the proposal (including, but not limited to, the electrical, civil, mechanical, structural, hydrological, geological, and meteorological features).



Marilyn Koletzke, P.E.  
Registration Number 50561

4/5/2011  
(Date)



# Florida Department of Environmental Protection

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

Rick Scott  
Governor

Jennifer Carroll  
Lt. Governor

Herschel T. Vinyard Jr.  
Secretary

April 5, 2011

*Sent by Electronic Mail – Received Receipt Requested*

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

Re: Project No. 1050046-029-AC / PSD-FL-255A  
Mosaic Fertilizer, LLC, Bartow Facility  
No. 3 Phosphate Fertilizer Plant, Alternate Emissions Limit

Dear Mr. Larson:

You submitted an application requesting an alternate emissions limit for the No. 3 Phosphate Fertilizer Plant. The existing facility is located in Polk County at 3200 Highway 60 West in Bartow, Florida. Enclosed are the following documents: the Written Notice of Intent to Issue Air Permit; the Public Notice of Intent to Issue Air Permit; the Technical Evaluation and Preliminary Determination; and the Draft Permit with Appendices. The Public Notice of Intent to Issue Air Permit is the actual notice that you must have published in the legal advertisement section of a newspaper of general circulation in the area affected by this project. If you have any questions, please contact the project engineer, Marilyn Koletzke, at 850/717-9112.

Sincerely,

Trina Vielhauer, Chief  
Bureau of Air Regulation

Enclosures

TLV/jfk/mk

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## WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

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*In the Matter of an  
Application for Air Permit by:*

Mosaic Fertilizer, LLC  
13830 Circa Crossing Drive  
Lithia, Florida 33547

Project No. 1050046-029-AC  
Mosaic Fertilizer, LLC, Bartow Facility  
No. 3 Phosphate Fertilizer Plant  
Alternate Emissions Limit  
Polk County, Florida

*Authorized Representative:*

Mr. Rob Larson, Environmental Superintendant

**Facility Location:** Mosaic Fertilizer, LLC operates the existing No. 3 Phosphate Fertilizer Plant at the Bartow Facility, which is located in Polk County at 3200 Highway 60 West in Bartow, Florida 33830.

**Project:** For the existing No. 3 Phosphate Fertilizer Plant, the applicant proposes an alternate emissions limit when processing micronutrient additives. The alternate limit will lower the maximum allowable particulate matter emissions rate when the plant is processing micronutrient additives. The project is not expected to increase emissions as it is intended to address regulatory process operation issues during compliance testing at 100% production. Details of the project are provided in the application and the enclosed Technical Evaluation and Preliminary Determination.

**Permitting Authority:** Applications for air construction permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4, 62-210 and 62-212 of the Florida Administrative Code (F.A.C.). The proposed project is not exempt from air permitting requirements and an air permit is required to perform the proposed work. The Bureau of Air Regulation is the Permitting Authority responsible for making a permit determination for this project. The Permitting Authority's physical address is: 111 South Magnolia Drive, Suite #4, Tallahassee, Florida. The Permitting Authority's mailing address is: 2600 Blair Stone Road, MS #5505, Tallahassee, Florida 32399-2400. The Permitting Authority's telephone number is 850/717-9000.

**Project File:** A complete project file is available for public inspection during the normal business hours of 8:00 a.m. to 5:00 p.m., Monday through Friday (except legal holidays), at address indicated above for the Permitting Authority. The complete project file includes the Draft Permit, the Technical Evaluation and Preliminary Determination, the application, and the information submitted by the applicant, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Permitting Authority's project review engineer for additional information at the address or phone number listed above.

**Notice of Intent to Issue Permit:** The Permitting Authority gives notice of its intent to issue an air permit to the applicant for the project described above. The applicant has provided reasonable assurance that operation of the proposed equipment will not adversely impact air quality and that the project will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297, F.A.C. The Permitting Authority will issue a Final Permit in accordance with the conditions of the proposed Draft Permit unless a timely petition for an administrative hearing is filed under Sections 120.569 and 120.57, F.S. or unless public comment received in accordance with this notice results in a different decision or a significant change of terms or conditions.

**Public Notice:** Pursuant to Section 403.815, F.S. and Rules 62-110.106 and 62-210.350, F.A.C., you (the applicant) are required to publish at your own expense the enclosed Public Notice of Intent to Issue Air Permit (Public Notice). The Public Notice shall be published one time only as soon as possible in the legal advertisement section of a newspaper of general circulation in the area affected by this project. The newspaper used must meet the requirements of Sections 50.011 and 50.031, F.S. in the county where the activity is to take place. If you are uncertain that a newspaper meets these requirements, please contact the Permitting Authority at above address or phone number. Pursuant to Rule 62-110.106(5) and (9), F.A.C., the applicant shall provide proof of publication to the Permitting Authority at the above address within 7 days of publication. Failure to

## WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

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publish the notice and provide proof of publication may result in the denial of the permit pursuant to Rule 62-110.106(11), F.A.C.

**Comments:** The Permitting Authority will accept written comments concerning the proposed Draft Permit for a period of 14 days from the date of publication of the Public Notice. Written comments must be received by the Permitting Authority by close of business (5:00 p.m.) on or before the end of the 14-day period. If written comments received result in a significant change to the Draft Permit, the Permitting Authority shall revise the Draft Permit and require, if applicable, another Public Notice. All comments filed will be made available for public inspection.

**Petitions:** A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed with (received by) the Department's Agency Clerk in the Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. Petitions filed by the applicant or any of the parties listed below must be filed within 14 days of receipt of this Written Notice of Intent to Issue Air Permit. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S., must be filed within 14 days of publication of the attached Public Notice or within 14 days of receipt of this Written Notice of Intent to Issue Air Permit, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Permitting Authority for notice of agency action may file a petition within 14 days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention (in a proceeding initiated by another party) will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the Permitting Authority's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner; the name, address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of when and how each petitioner received notice of the agency action or proposed decision; (d) A statement of all disputed issues of material fact. If there are none, the petition must so state; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action including an explanation of how the alleged facts relate to the specific rules or statutes; and, (g) A statement of the relief sought by the petitioner, stating precisely the action the petitioner wishes the agency to take with respect to the agency's proposed action. A petition that does not dispute the material facts upon which the Permitting Authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

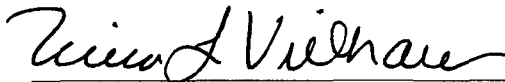
Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Permitting Authority's final action may be different from the position taken by it in this Written Notice of Intent to Issue Air Permit. Persons whose substantial interests will be affected by any such final decision of the Permitting Authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

**Mediation:** Mediation is not available in this proceeding.

**WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT**

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Executed in Tallahassee, Florida.



Trina Vielhauer, Chief  
Bureau of Air Regulation

**CERTIFICATE OF SERVICE**

The undersigned duly designated deputy agency clerk hereby certifies that this Written Notice of Intent to Issue Air Permit package (including the Written Notice of Intent to Issue Air Permit, the Public Notice of Intent to Issue Air Permit, the Technical Evaluation and Preliminary Determination and the Draft Permit with Appendices) was sent by electronic mail, or a link to these documents made available electronically on a publicly accessible server, with received receipt requested before the close of business on 4/5/11 to the persons listed below.

Mr. Rob Larson, Mosaic Fertilizer, LLC ([robert.larson@mosaicco.com](mailto:robert.larson@mosaicco.com))

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

Ms. Cindy Zang-Torres, DEP Southwest District Office ([cindy.zhang-torres@dep.state.fl.us](mailto:cindy.zhang-torres@dep.state.fl.us))

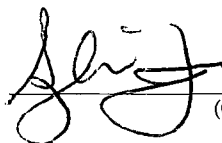
Ms. Kathleen Forney, EPA Region 4 ([forney.kathleen@epa.gov](mailto:forney.kathleen@epa.gov))

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))

Clerk Stamp

**FILING AND ACKNOWLEDGMENT FILED**, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated agency clerk, receipt of which is hereby acknowledged.



(Clerk)

4/5/11

(Date)

## PUBLIC NOTICE OF INTENT TO ISSUE AIR PERMIT

Florida Department of Environmental Protection  
Division of Air Resource Management, Bureau of Air Regulation  
Draft Air Construction Permit  
Project No. 1050046-029-AC  
Mosaic Fertilizer, LLC, Bartow Facility  
Polk County, Florida

**Applicant:** The applicant for this project is Mosaic Fertilizer, LLC. The applicant's authorized representative and mailing address is: Rob Larson, Environmental Superintendent, Mosaic Fertilizer, LLC, Bartow Facility, 3200 Highway 60 West in Bartow, Florida 33830.

**Facility Location:** Mosaic Fertilizer, LLC operates the existing No. 3 Phosphate Fertilizer Plant in Polk County at 3200 Highway 60 West in Bartow, Florida 33830.

**Project:** For the existing No. 3 Phosphate Fertilizer Plant, the applicant proposes an alternate emissions limit when processing micronutrient additives. The alternate limit will lower the maximum allowable particulate matter emissions rate. The project is not expected to increase emissions as it is intended to address regulatory process operation issues during compliance testing.

**Permitting Authority:** Applications for air construction permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4, 62-210 and 62-212 of the Florida Administrative Code (F.A.C.). The proposed project is not exempt from air permitting requirements and an air permit is required to perform the proposed work. The Permitting Authority responsible for making a permit determination for this project is the Bureau of Air Regulation in the Department of Environmental Protection's Division of Air Resource Management. The Permitting Authority's physical address is: 111 South Magnolia Drive, Suite #4, Tallahassee, Florida. The Permitting Authority's mailing address is: 2600 Blair Stone Road, MS #5505, Tallahassee, Florida 32399-2400. The Permitting Authority's telephone number is 850/717-9000.

**Project File:** A complete project file is available for public inspection during the normal business hours of 8:00 a.m. to 5:00 p.m., Monday through Friday (except legal holidays), at the physical address indicated above for the Permitting Authority. The complete project file includes the Draft Permit, the Technical Evaluation and Preliminary Determination, the application and information submitted by the applicant (exclusive of confidential records under Section 403.111, F.S.). Interested persons may contact the Permitting Authority's project engineer for additional information at the address and phone number listed above. In addition, electronic copies of these documents are available on the following web site by entering draft permit number:  
<http://www.dep.state.fl.us/air/emission/apds/default.asp>.

**Notice of Intent to Issue Air Permit:** The Permitting Authority gives notice of its intent to issue an air construction permit to the applicant for the project described above. The applicant has provided reasonable assurance that operation of proposed equipment will not adversely impact air quality and that the project will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297, F.A.C. The Permitting Authority will issue a Final Permit in accordance with the conditions of the proposed Draft Permit unless a timely petition for an administrative hearing is filed under Sections 120.569 and 120.57, F.S. or unless public comment received in accordance with this notice results in a different decision or a significant change of terms or conditions.

**Comments:** The Permitting Authority will accept written comments concerning the proposed Draft Permit for a period of 14 days from the date of publication of this Public Notice. Written comments must be received by the Permitting Authority by close of business (5:00 p.m.) on or before the end of the 14-day period. If written comments received result in a significant change to the Draft Permit, the Permitting Authority shall revise the Draft Permit and require, if applicable, another Public Notice. All comments filed will be made available for public inspection.

**Petitions:** A person whose substantial interests are affected by the proposed permitting decision may petition for

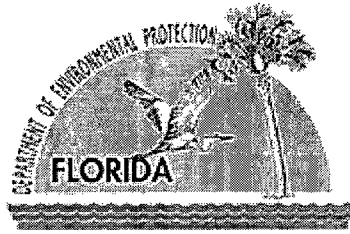
(Public Notice to be Published in the Newspaper)

an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed with (received by) the Department's Agency Clerk in the Office of General Counsel of the Department of Environmental Protection at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000 (Telephone: 850/717-9000). Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S. must be filed within 14 days of publication of this Public Notice or receipt of a written notice, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Permitting Authority for notice of agency action may file a petition within 14 days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention (in a proceeding initiated by another party) will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the Permitting Authority's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address and telephone number of the petitioner; the name address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial rights will be affected by the agency determination; (c) A statement of when and how the petitioner received notice of the agency action or proposed decision; (d) A statement of all disputed issues of material fact. If there are none, the petition must so state; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action including an explanation of how the alleged facts relate to the specific rules or statutes; and, (g) A statement of the relief sought by the petitioner, stating precisely the action the petitioner wishes the agency to take with respect to the agency's proposed action. A petition that does not dispute the material facts upon which the Permitting Authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Permitting Authority's final action may be different from the position taken by it in this Public Notice of Intent to Issue Air Permit. Persons whose substantial interests will be affected by any such final decision of the Permitting Authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

**Mediation:** Mediation is not available for this proceeding.



**TECHNICAL EVALUATION  
&  
PRELIMINARY DETERMINATION**

**APPLICANT**

Mosaic Fertilizer, LLC  
13830 Circa Crossing Drive  
Lithia, Florida 33547

Bartow Facility  
Facility ID No. 1050046

**PROJECT**

Project No. 1050046-029-AC / PSD-FL-255A  
Draft Air Construction Permit  
Alternate Emissions Limit for Processing Micronutrients

**COUNTY**

Polk County, Florida

**PERMITTING AUTHORITY**

Florida Department of Environmental Protection  
Division of Air Resource Management  
Bureau of Air Regulation  
New Source Review Section  
2600 Blair Stone Road, MS#5505  
Tallahassee, Florida 32399-2400

April 5, 2011

## 1. GENERAL PROJECT INFORMATION

### Air Pollution Regulations

Projects at stationary sources with the potential to emit air pollution are subject to the applicable environmental laws specified in Section 403 of the Florida Statutes (F.S.). The statutes authorize the Department of Environmental Protection (Department) to establish regulations regarding air quality as part of the Florida Administrative Code (F.A.C.), which includes the following applicable chapters: 62-4 (Permits); 62-204 (Air Pollution Control – General Provisions); 62-210 (Stationary Sources – General Requirements); 62-212 (Stationary Sources – Preconstruction Review); 62-213 (Operation Permits for Major Sources of Air Pollution); 62-296 (Stationary Sources - Emission Standards); and 62-297 (Stationary Sources – Emissions Monitoring). Specifically, air construction permits are required pursuant to Rules 62-4, 62-210 and 62-212, F.A.C.

In addition, the U. S. Environmental Protection Agency (EPA) establishes air quality regulations in Title 40 of the Code of Federal Regulations (CFR). Part 60 specifies New Source Performance Standards (NSPS) for numerous industrial categories. Part 61 specifies National Emission Standards for Hazardous Air Pollutants (NESHAP) based on specific pollutants. Part 63 specifies NESHAP based on the Maximum Achievable Control Technology (MACT) for numerous industrial categories. The Department adopts these federal regulations on a quarterly basis in Rule 62-204.800, F.A.C.

### Glossary of Common Terms

Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of this permit.

### Facility Description and Location

Mosaic Fertilizer, LLC operates an existing No. 3 Phosphate Fertilizer Plant, which is categorized under Standard Industrial Classification (SIC) No. 2874. The No. 3 Phosphate Fertilizer Plant is part of the existing Bartow Facility, located in Polk County at 3200 Highway 60 West in Bartow, Florida. The UTM Coordinates are 17, 409.77 km East and 3087.26 km North. This site is in an area that is in attainment (or designated as unclassifiable) for all air pollutants subject to state and federal Ambient Air Quality Standards (AAQS).

### Facility Regulatory Categories

- The facility is a major source of hazardous air pollutants (HAP).
- The facility is a Title V major source of air pollution in accordance with Chapter 62-213, F.A.C.
- The facility is a major stationary source in accordance with Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

### Project Description

The existing No. 3 Phosphate Fertilizer Plant was constructed in accordance with Permit No. 1050046-008-AC. The applicant proposes an alternative emissions limit when processing micronutrient additives. The alternate limit will lower the maximum allowable particulate matter emissions rate of 0.18 pounds per ton (PPT) of phosphorus pentoxide ( $P_2O_5$ ) feed to 0.088 PPT of  $P_2O_5$  feed when the plant is processing micronutrient additives. Micronutrient additions were approved in the permit 1050046-012-AC issued on November 24, 1999. The project is not expected to increase emissions as it is intended to address regulatory process operation issues during compliance testing at 100% production.

### Processing Schedule

- 11/01/10 Received the application for an air construction permit for the existing No. 3 Phosphate Fertilizer.
- 12/09/10 Additional information requested.
- 01/24/11 Received additional information.

## 2. PSD APPLICABILITY

The project will not increase emissions; therefore, the project is not subject to PSD preconstruction review.

## 3. DEPARTMENT REVIEW

### Alternate Emissions Limit

This draft permit allows for the use of an alternate emissions limit when processing micronutrient additives. The alternate limit will lower the maximum allowable particulate matter emissions rate of 0.18 pounds per ton (PPT) of phosphorus pentoxide ( $P_2O_5$ ) feed to 0.088 PPT of  $P_2O_5$  feed when the plant is processing micronutrient additives. The project is not expected to increase emissions as it is intended to address regulatory process operation issues during compliance testing at 100% production.

Currently, 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  $P_2O_5$ . Limiting emissions units operation to 110 % of the test rate until a new test is conducted is required pursuant to Rule 62-297.310.

The current maximum allowable particulate matter emissions rate of 0.18 PPT is in accordance with the NESHAP for Phosphate Fertilizers Production Plants [40 CFR Part 63 Subpart AA, 62-296.403]. The NESHAP emissions rate will remain effective when the plant is producing without micronutrients. The applicant provided micronutrient additive constituent data and confirmed that sulfur, copper, boron, and zinc were being processed in the No. 3 Phosphate Fertilizer Plant. Hazardous air pollutants (HAPs) and radionuclide as listed in "Section 112(b) of the Clean Air Act" have not been processed in the fertilizer plant.

## 4. PRELIMINARY DETERMINATION

The Department makes a preliminary determination that the proposed project will comply with all applicable state and federal air pollution regulations as conditioned by the draft permit. This determination is based on a technical review of the complete application, reasonable assurances provided by the applicant, and the conditions specified in the draft permit. No air quality modeling analysis is required because the project does not result in a significant increase in emissions. Marilyn Koletzke is the project engineer responsible for reviewing the application and drafting the permit. Additional details of this analysis may be obtained by contacting the project engineer at the Department's Bureau of Air Regulation at Mail Station #5505, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400.

**PERMITTEE**

Mosaic Fertilizer, LLC  
13830 Circa Crossing Drive  
Lithia, Florida 33547

Authorized Representative:  
Mr. Rob Larson, Environmental Superintendant

Air Permit No. 1050046-029-AC /  
PSD-FL-255A  
Mosaic Fertilizer, LLC, Bartow Facility  
No. 3 Phosphate Fertilizer Plant  
Alternate Emissions Limit  
Expires: April 5, 2012

**PROJECT AND LOCATION**

This is the final air construction permit, which authorizes an alternate emissions limit when processing micronutrient additives in the No. 3 Phosphate Fertilizer Plant. The No. 3 Phosphate Fertilizer Plant is at the existing Bartow Facility (SIC No. 2874), which is located in Polk County at 3200 Highway 60 West in Bartow, Florida 33830. The UTM Coordinates are Zone 17, 409.77 km East and 3087.26 km North.

This final permit is organized into the following sections: Section 1 (General Information); Section 2 (Administrative Requirements); Section 3 (Emissions Unit Specific Conditions); Section 4 (Appendices). Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of Section 4 of this permit.

**STATEMENT OF BASIS**

This air pollution construction permit is issued under the provisions of: Chapter 403 of the Florida Statutes (F.S.) and Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297 of the Florida Administrative Code (F.A.C.). The permittee is authorized to conduct the proposed work in accordance with the conditions of this permit. This project is subject to the general preconstruction review requirements in Rule 62-212.300, F.A.C. and is not subject to the preconstruction review requirements for major stationary sources in Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

Upon issuance of this final permit, any party to this order has the right to seek judicial review of it under Section 120.68 of the Florida Statutes by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel (Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000) and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The notice must be filed within 30 days after this order is filed with the clerk of the Department.

Executed in Tallahassee, Florida

**(DRAFT)**

Mike Halpin, Director  
Division of Air Resource Management

(Date)

**CERTIFICATE OF SERVICE**

The undersigned duly designated deputy agency clerk hereby certifies that this Final Air Permit package (including the Final Determination and Final Permit with Appendices) was sent by electronic mail, or a link to these documents made available electronically on a publicly accessible server, with received receipt requested before the close of business on           (DRAFT)           to the persons listed below.

Mr. Rob Larson, Mosaic Fertilizer, LLC ([robert.larson@mosaicco.com](mailto:robert.larson@mosaicco.com))

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

Ms. Cindy Zang-Torres, DEP Southwest District Office ([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))

Clerk Stamp

**FILING AND ACKNOWLEDGMENT FILED**, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated agency clerk, receipt of which is hereby acknowledged.

(DRAFT)

\_\_\_\_\_  
(Clerk)

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

## FACILITY DESCRIPTION

The existing No. 3 Phosphate Fertilizer Plant with a design capacity of 3000 tons per day processes ammonium phosphate products: monoammonium phosphate (MAP) and diammonium phosphate (DAP). The dryer has a design heat input rate of 40 MMBtu per hour and is fired by natural gas or fuel oil with a maximum sulfur content of 2.4 percent. Process gas streams have the following dedicated control equipment:

- Reactor has venturi scrubbers and a cyclonic scrubber.
- Dryer is controlled by a venturi scrubber and a cyclone scrubber.
- Granulator is controlled by a venturi scrubber and a cyclonic scrubber.
- Cooler has venturi scrubbers and a cyclonic scrubber.

The reactor process has a dedicated packed bed tail gas scrubber while the dryer, granulator, and cooler processes share a packed bed tail gas scrubber. Following treatment by the packed bed tail gas scrubbers, the gas streams are emitted to the atmosphere through a common stack.

## PROJECT DESCRIPTION

The No. 3 Phosphate Fertilizer Plant was previously permitted with a maximum allowable particulate matter emissions rate of 11.0 pounds per hour (PPH) and 0.18 pounds per ton (PPT) of phosphorus pentoxide ( $P_2O_5$ ) feed. The new of  $P_2O_5$  feed will be reduced to 0.088 PPT to allow micronutrient additives to be processed. The 0.18 PPT of  $P_2O_5$  particulate matter emissions rate is in accordance with the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Phosphate Fertilizers Production Plants. [40 CFR Part 63 Subpart AA, 62-296.403]

When micronutrients are being processed in accordance with permit number 1050046-12-AC as issued November 24, 1999, there is less  $P_2O_5$  being input to the plant. A lower maximum allowable particulate matter emissions rate of 0.088 pounds per ton (PPT) of  $P_2O_5$  feed will be in effect when the plant is processing micronutrient additives and will address regulatory process operation issues during compliance testing during compliance testing at 100% production.

Currently, 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  $P_2O_5$ . Limiting emissions units operation to 110 % of the test rate until a new test is conducted is required pursuant to Rule 62-297.310.

## EMISSION UNIT

This project potentially affects the following existing emissions unit.

EU No.	Emissions Unit Description
001	No. 3 Phosphate Fertilizer Plant

## Facility Regulatory Categories

- The facility is a major source of hazardous air pollutants (HAP).
- The facility is a Title V major source of air pollution in accordance with Chapter 62-213, F.A.C.
- The facility is a major stationary source in accordance with Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

## APPENDICES

The following Appendices are attached as part of this permit.

Appendix A. Citation Formats and Glossary of Common Terms

Appendix B. General Conditions

## SECTION 2. ADMINISTRATIVE REQUIREMENTS (DRAFT)

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1. Permitting Authority: The permitting authority for this project is the Bureau of Air Regulation, Division of Air Resource Management, Florida Department of Environmental Protection (Department). The Bureau of Air Regulation's mailing address is 2600 Blair Stone Road (MS #5505), Tallahassee, Florida 32399-2400. All documents related to applications for permits to operate an emissions unit shall be submitted to the Air Resource Section of the Department's Southwest District Office at 13051 North Telecom Parkway, Temple Terrace, FL 33637-0926.
2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Air Resource Section of the Department's Southwest District Office at 13051 North Telecom Parkway, Temple Terrace, FL 33637-0926.
3. Appendices: The following Appendices are attached as a part of this permit: Appendix A (Citation Formats and Glossary of Common Terms) and Appendix B (General Conditions).
4. Applicable Regulations, Forms and Application Procedures: Unless otherwise specified in this permit, the construction and operation of the subject emissions unit shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of: Chapter 403, F.S.; and Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296 and 62-297, F.A.C. Issuance of this permit does not relieve the permittee from compliance with any applicable federal, state, or local permitting or regulations.
5. New or Additional Conditions: For good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time. [Rule 62-4.080, F.A.C.]
6. Modifications: The permittee shall notify the Compliance Authority upon commencement of construction. No new emissions unit shall be constructed and no existing emissions unit shall be modified without obtaining an air construction permit from the Department. Such permit shall be obtained prior to beginning construction or modification. [Rules 62-210.300(1) and 62-212.300(1)(a), F.A.C.]
7. Application for Title V Permit: A Title V air operation permit is required for regular operation of the permitted emissions unit. The permittee shall apply for a Title V air operation permit at least 90 days prior to expiration of this permit, but no later than 180 days after commencing operation. To apply for a Title V operation permit, the applicant shall submit the appropriate application form, compliance test results, and such additional information as the Department may by law require. The application shall be submitted to the appropriate Permitting Authority with copies to the Compliance Authority. A Title V source may immediately implement such changes after they have been incorporated into the terms and conditions of a new or revised construction permit issued pursuant to Chapter 62-212, F.A.C., and after the source provides to EPA, the Department, each affected state and any approved local air program having geographic jurisdiction over the source, a copy of the source's application for operation permit revision. [Rule 62-213.410(2), F.A.C., Rules 62-4.030, 62-4.050, 62-4.220 and Chapter 62-213, F.A.C.]

### SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS (DRAFT)

#### A. No. 3 Phosphate Fertilizer Plant

This section of the permit addresses the following emissions unit (EU).

EU No.	Emissions Unit Description
001	No. 3 Phosphate Fertilizer Plant

#### PREVIOUS PERMITS

1. Permit Scope: Conditions of this permit supplement all previously issued air construction and operation permits for the affected emissions unit. These conditions are in addition to all other applicable permit conditions and regulatory requirements. Unless otherwise specified by this permit, the permittee shall continue to comply with the conditions of those permits, which include restrictions and standards regarding capacities, production, operation, fuels, emissions, monitoring, record keeping, reporting, etc.  
[Rule 62-4.070, F.A.C.]

#### EMISSION AND PERFORMANCE REQUIREMENTS

2. PM Standard: Pursuant to 40 CFR 60.63 the maximum allowable particulate matter emissions rate is 11.0 PPH and 0.18 PPT of  $P_2O_5$  feed. An alternate maximum allowable particulate matter emissions rate of 0.088 pounds per ton (PPT) of product shall be in effect when the plant is processing micronutrient additives. Production rate for the ammonium/diammonium phosphate plant shall not exceed 3000 tons per day of DAP or MAP product.
3. Visible emissions: Opacity shall be less than 15%. The visible emissions test shall be conducted by a certified observer and be a minimum of thirty minutes in duration, unless otherwise specified. The test observation period shall include the period during which the highest opacity can reasonably be expected to occur. [Rule 62-296.320(4)(a)(2) and (b), F.A.C. and Air Construction Permit 1050046-008-AC]

#### MONITORING

4. Emissions Monitoring: Compliance with emissions monitoring during production without micronutrients remains as required through previous issued permits. Additional emissions monitoring during production with micronutrients shall be determined using EPA Methods 1, 2, 3, 4, 5, and 9. The minimum requirements for stack sampling facilities, source sampling and reporting, shall be in accordance with Chapter 62-297, F.A.C. and 40 CFR 60, Appendix A. [Chapter 62-297, F.A.C.; 40 CFR 63.626(b) and 63.630(a)]

#### RECORDKEEPING

5. Operational Records: The permittee shall maintain the following records in written operational logs: date, time and duration of production with and without micronutrients and quantity of the micronutrients input to the plant. [Rule 62-4.070(3), F.A.C.]

## SECTION 4. APPENDICES (DRAFT)

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### Contents

Appendix A. Citation Formats and Glossary of Common Terms

Appendix B. General Conditions

**SECTION 4. APPENDIX A (DRAFT)**  
**Citation Formats and Glossary of Common Terms**

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**CITATION FORMATS**

The following illustrate the formats used in the permit to identify applicable requirements from permits and regulations.

**Old Permit Numbers**

Example: Permit No. AC50-123456 or Permit No. AO50-123456

Where: “AC” identifies the permit as an Air Construction Permit  
“AO” identifies the permit as an Air Operation Permit  
“123456” identifies the specific permit project number

**New Permit Numbers**

Example: Permit Nos. 099-2222-001-AC, 099-2222-001-AF, 099-2222-001-AO, or 099-2222-001-AV

Where: “099” represents the specific county ID number in which the project is located  
“2222” represents the specific facility ID number for that county  
“001” identifies the specific permit project number  
“AC” identifies the permit as an air construction permit  
“AF” identifies the permit as a minor source federally enforceable state operation permit  
“AO” identifies the permit as a minor source air operation permit  
“AV” identifies the permit as a major Title V air operation permit

**PSD Permit Numbers**

Example: Permit No. PSD-FL-317

Where: “PSD” means issued pursuant to the preconstruction review requirements of the Prevention of Significant Deterioration of Air Quality  
“FL” means that the permit was issued by the State of Florida  
“317” identifies the specific permit project number

**Florida Administrative Code (F.A.C.)**

Example: [Rule 62-213.205, F.A.C.]

Means: Title 62, Chapter 213, Rule 205 of the Florida Administrative Code

**Code of Federal Regulations (CFR)**

Example: [40 CFR 60.7]

Means: Title 40, Part 60, Section 7

**GLOSSARY OF COMMON TERMS**

° F: degrees Fahrenheit

µg: microgram

AAQS: Ambient Air Quality Standard

acf: actual cubic feet

acfm: actual cubic feet per minute

ARMS: Air Resource Management System  
(Department’s database)

BACT: best available control technology

bhp: brake horsepower

Btu: British thermal units

CAM: compliance assurance monitoring

CEMS: continuous emissions monitoring system

cfm: cubic feet per minute

CFR: Code of Federal Regulations

## Citation Formats and Glossary of Common Terms

<b>CAA:</b> Clean Air Act	<b>NESHAP:</b> National Emissions Standards for Hazardous Air Pollutants
<b>CMS:</b> continuous monitoring system	<b>NO<sub>x</sub>:</b> nitrogen oxides
<b>CO:</b> carbon monoxide	<b>NSPS:</b> New Source Performance Standards
<b>CO<sub>2</sub>:</b> carbon dioxide	<b>O&amp;M:</b> operation and maintenance
<b>COMS:</b> continuous opacity monitoring system	<b>O<sub>2</sub>:</b> oxygen
<b>DARM:</b> Division of Air Resource Management	<b>Pb:</b> lead
<b>DEP:</b> Department of Environmental Protection	<b>PM:</b> particulate matter
<b>Department:</b> Department of Environmental Protection	<b>PM<sub>10</sub>:</b> particulate matter with a mean aerodynamic diameter of 10 microns or less
<b>dscf:</b> dry standard cubic feet	<b>ppm:</b> parts per million
<b>dscfm:</b> dry standard cubic feet per minute	<b>ppmv:</b> parts per million by volume
<b>EPA:</b> Environmental Protection Agency	<b>ppmvd:</b> parts per million by volume, dry basis
<b>ESP:</b> electrostatic precipitator (control system for reducing particulate matter)	<b>QA:</b> quality assurance
<b>EU:</b> emissions unit	<b>QC:</b> quality control
<b>F:</b> fluoride	<b>PSD:</b> prevention of significant deterioration
<b>F.A.C.:</b> Florida Administrative Code	<b>psi:</b> pounds per square inch
<b>F.A.W.:</b> Florida Administrative Weekly	<b>PTE:</b> potential to emit
<b>F.D.:</b> forced draft	<b>RACT:</b> reasonably available control technology
<b>F.S.:</b> Florida Statutes	<b>RATA:</b> relative accuracy test audit
<b>FGD:</b> flue gas desulfurization	<b>RBLC:</b> EPA's RACT/BACT/LAER Clearinghouse
<b>FGR:</b> flue gas recirculation	<b>SAM:</b> sulfuric acid mist
<b>ft<sup>2</sup>:</b> square feet	<b>scf:</b> standard cubic feet
<b>ft<sup>3</sup>:</b> cubic feet	<b>scfm:</b> standard cubic feet per minute
<b>gpm:</b> gallons per minute	<b>SIC:</b> standard industrial classification code
<b>gr:</b> grains	<b>SIP:</b> State Implementation Plan
<b>HAP:</b> hazardous air pollutant	<b>SNCR:</b> selective non-catalytic reduction (control system used for reducing emissions of nitrogen oxides)
<b>Hg:</b> mercury	<b>SO<sub>2</sub>:</b> sulfur dioxide
<b>I.D.:</b> induced draft	<b>TPD:</b> tons/day
<b>ID:</b> identification	<b>TPH:</b> tons per hour
<b>kPa:</b> kilopascals	<b>TPY:</b> tons per year
<b>lb:</b> pound	<b>TRS:</b> total reduced sulfur
<b>MACT:</b> maximum achievable technology	<b>UTM:</b> Universal Transverse Mercator coordinate system
<b>MMBtu:</b> million British thermal units	<b>VE:</b> visible emissions
<b>MSDS:</b> material safety data sheets	<b>VOC:</b> volatile organic compounds
<b>MW:</b> megawatt	

**General Conditions**

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The permittee shall comply with the following general conditions from Rule 624.160, F.A.C.

1. The terms, conditions, requirements, limitations and restrictions set forth in this permit, are “permit conditions” and are binding and enforceable pursuant to Sections 403.141, 403.727, or 403.859 through 403.861, F.S. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.
2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.
3. As provided in subsections 403.987(6) and 403.722(5), F.S., the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state, or local laws or regulations. This permit is not a waiver of or approval of any other department permit that may be required for other aspects of the total project which are not addressed in this permit.
4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.
5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.
6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed and used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.
7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at reasonable times, access to the premises where the permitted activity is located or conducted to:
  - a. Have access to and copy any records that must be kept under conditions of the permit;
  - b. Inspect the facility, equipment, practices, or operations regulated or required under this permit; and
  - c. Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules. Reasonable time may depend on the nature of the concern being investigated.
8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:
  - a. A description of and cause of noncompliance; and
  - b. The period of noncompliance, including dates and times; or, if not corrected, the anticipated time then noncompliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance. The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.
9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by Sections 403.111 and 403.73, F.S. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

General Conditions

10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance; provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules. A reasonable time for compliance with a new or amended surface water quality standard, other than those standards addressed in Rule 62-302.500, F.A.C., shall include a reasonable time to obtain or be denied a mixing zone for the new or amended standard.
11. This permit is transferable only upon Department approval in accordance with Rules 62-4.120 and 62-730.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.
12. This permit or a copy thereof shall be kept at the work site of the permitted activity.
13. This permit also constitutes:
  - a. Determination of Best Available Control Technology (NA);
  - b. Determination of Prevention of Significant Deterioration (NA); and
  - c. Compliance with New Source Performance Standards (NA).
14. The permittee shall comply with the following:
  - a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
  - b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.
  - c. Records of monitoring information shall include:
    - (a) The date, exact place, and time of sampling or measurements;
    - (b) The person responsible for performing the sampling or measurements;
    - (c) The dates analyses were performed;
    - (d) The person responsible for performing the analyses;
    - (e) The analytical techniques or methods used;
    - (f) The results of such analyses.
15. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

## Livingston, Sylvia

---

**From:** Livingston, Sylvia  
**Sent:** Tuesday, April 05, 2011 9:54 AM  
**To:** 'robert.larson@mosaicco.com'  
**Cc:** 'dbuff@golder.com'; Zhang-Torres; 'forney.kathleen@epa.gov'; 'abrams.heather@epa.gov'; Gibson, Victoria; Koletzke, Marilyn; Walker, Elizabeth (AIR)  
**Subject:** Mosaic Fertilizer, LLC - Bartow Facility; 1050046-029-AC/ PSD-FL-255A  
**Attachments:** 1050046-029-AC\_Intent.pdf

Dear Sir/ Madam:

Attached is the official **Notice of Intent to Issue** for the project referenced below. Click on the link displayed below to access the permit project documents and send a "reply" message verifying receipt of the document(s) provided in the link; 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".

*Note: We must receive verification that you are able to access the documents. Your immediate reply will preclude subsequent e-mail transmissions to verify accessibility of the document(s).*

**Click on the following link to access the permit project documents:**

[http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf\\_permit\\_zip\\_files/1050046.029.AC.D\\_pdf.zip](http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf_permit_zip_files/1050046.029.AC.D_pdf.zip)

**Owner/Company Name:** MOSAIC FERTILIZER, LLC  
**Facility Name:** MOSAIC FERTILIZER - BARTOW FACILITY  
**Project Number:** 1050046-029-AC / PSD-FL-255A  
**Permit Status:** DRAFT  
**Permit Activity:** CONSTRUCTION  
**Facility County:** POLK  
**Processor:** Marilyn Koletzke

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. Access these documents by clicking on the link provided above, or search for other project documents using the "*Air Permit Documents Search*" website at <http://www.dep.state.fl.us/air/emission/apds/default.asp>.

Permit project documents addressed in this email may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible, and verify that they are accessible. Please advise this office of any changes to your e-mail address or that of the Engineer-of-Record. If you have any problems opening the documents or would like further information, please contact the Florida Department of Environmental Protection, Bureau of Air Regulation

Thanks,

Sylvia Livingston  
Division of Air Resource Management (DARM)  
Department of Environmental Protection  
850/717-9043 (New Phone)  
[sylvia.livingston@dep.state.fl.us](mailto:sylvia.livingston@dep.state.fl.us)

## Livingston, Sylvia

---

**From:** Larson, Robert - Bartow [Robert.Larson@mosaicco.com]  
**Sent:** Tuesday, April 05, 2011 12:38 PM  
**To:** Livingston, Sylvia  
**Cc:** dbuff@golder.com; Zhang-Torres; forney.kathleen@epa.gov; abrams.heather@epa.gov; Gibson, Victoria; Koletzke, Marilyn; Walker, Elizabeth (AIR); Noor, Quaid; Cobb, Phil; Golwitzer, Jeff A - Bartow; Iyer, Rama - FishHawk; Graham, Brian - Bartow  
**Subject:** RE: Mosaic Fertilizer, LLC - Bartow Facility; 1050046-029-AC/ PSD-FL-255A

Sylvia,

I did receive the correct Draft AC for permit No. 1050046-029-AC, however, the permit modification language is incorrect as the modification was to limit the particulate matter (PM) on tons of product (fertilizer) produced instead of the current PM limit based from tons of P2O5 input.

- The maximum PM limit for the plant would remain unchanged 11.0 pounds per hour
- The AC was to limit the PM at **0.088 pounds per ton of fertilizer produced**, maximum limit for daily fertilizer production is 3,000 pounds per day ( $0.088 \times 3,000 \div 24\text{hrs} = 11.0$ )
- The current permit PM limit is based from P2O5 input at 0.18 lb per ton, maximum input limit for P2O5 is 61.25 ton per hour ( $0.18 \times 61.25 = 11.0$ )

The AC language has the PM limit as 0.088 pounds per ton of P2O5 input, which is not what Mosaic requested in the AC application.

I will call and discuss.

Regards,

**Rob Larson**

Mosaic LLC, Bartow-Mulberry-Green Bay

**From:** Livingston, Sylvia [mailto:Sylvia.Livingston@dep.state.fl.us]  
**Sent:** Tuesday, April 05, 2011 11:22 AM  
**To:** Larson, Robert - Bartow  
**Cc:** dbuff@golder.com; Zhang-Torres; forney.kathleen@epa.gov; abrams.heather@epa.gov; Gibson, Victoria; Koletzke, Marilyn; Walker, Elizabeth (AIR); Noor, Quaid; Cobb, Phil; Golwitzer, Jeff A - Bartow; Iyer, Rama - FishHawk  
**Subject:** RE: Mosaic Fertilizer, LLC - Bartow Facility; 1050046-029-AC/ PSD-FL-255A

Mr. Larson,

The correction has been made to the documents you received. Please click on the link below and verify that the documents are correct.

Thank you and sorry for the inconvenience.

Sylvia Livingston  
Division of Air Resource Management (DARM)  
Department of Environmental Protection  
850/717-9043 (New Phone)  
[sylvia.livingston@dep.state.fl.us](mailto:sylvia.livingston@dep.state.fl.us)

**From:** Larson, Robert - Bartow [mailto:Robert.Larson@mosaicco.com]  
**Sent:** Tuesday, April 05, 2011 10:45 AM  
**To:** Livingston, Sylvia  
**Cc:** dbuff@golder.com; Zhang-Torres; forney.kathleen@epa.gov; abrams.heather@epa.gov; Gibson, Victoria; Koletzke, Marilyn; Walker, Elizabeth (AIR); Noor, Quaid; Cobb, Phil; Golwitzer, Jeff A - Bartow; Iyer, Rama - FishHawk  
**Subject:** RE: Mosaic Fertilizer, LLC - Bartow Facility; 1050046-029-AC/ PSD-FL-255A

Sylvia,

I received your email, however, when I open the link provided it is for Cemex Construction Materials in Brooksville for permit No. 0530021-031-AC, while it should be for Mosaic Fertilizer, LLC permit No. 1050046-029-AC.

Could you please correct the link and resend?

Thanks,

Rob Larson

Mosaic LLC, Bartow-Mulberry-Green Bay

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

**Sent:** Tuesday, April 05, 2011 9:54 AM

**To:** Larson, Robert - Bartow

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

**Subject:** Mosaic Fertilizer, LLC - Bartow Facility; 1050046-029-AC/ PSD-FL-255A

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[http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf\\_permit\\_zip\\_files/1050046.029.AC.D\\_pdf.zip](http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf_permit_zip_files/1050046.029.AC.D_pdf.zip)

**Owner/Company Name:** MOSAIC FERTILIZER, LLC

**Facility Name:** MOSAIC FERTILIZER - BARTOW FACILITY

**Project Number:** 1050046-029-AC / PSD-FL-255A

**Permit Status:** DRAFT

**Permit Activity:** CONSTRUCTION

**Facility County:** POLK

**Processor:** Marilyn Koletzke

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Thanks,

Sylvia Livingston

Division of Air Resource Management (DARM)