

Permitting Application - Permit Detail and Log Permit									
<div style="text-align: right;">ARMS Facility</div>									
POINT	AIRS ID	1050046	STATUS	A	OFFICE	SWD	SW: TAMPA		
SITE NAME		MOSAIC FERTILIZER, LLC - BARTOW FACILITY			COUNTY	POLK			
OWNER/COMPANY		MOSAIC FERTILIZER, LLC							
Project									
AIR Permit #			Project #	036	CRA Reference #				
Permit Office	TAL (HEADQUARTERS)			Agency Action	Pending	OGC			
Project Name	AP235-ALLOWABLE PRESSURE DROP			Desc	establish minimum pressure drop across each scrubber.				
Type/Sub/Des	AC	M1	Minor Modification			Logged	06/27/2012		
Received	06/27/2012	Issued		Expires		Application Action	MODIFICATION		
Fee	0.00	Fee Recd		Dele		Override	TITLE V		
Related Party									
Role	APPLICANT			Begin	06/27/2012	End			
Name	GOLDWITZER, JEFFRY			Company	MOSAIC FERTILIZER, LLC				
Address	PO BOX 9002								
City	BARTOW			State	FL	Zip	33813	Country	U.S.A.
Phone	813-800-9277		Fax	813-534-2440					
Processors									
Processor	SHEPLAK, S			Active	06/27/2012	Inactive		Events	



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U.S. Environmental Affairs
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Scott Sheplah

June 20, 2012

RECEIVED

JUN 27 2012

DIVISION OF AIR
RESOURCE MANAGEMENT

Mr. Syed Arif, P.E.
Environmental Administrator
Minerals & Metals
DARM, FDEP
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Re: EU ID No. 001 No. 3 Fertilizer Plant
Scrubber Packing Pressure Drop
Bartow Facility ID No. 1050046

Project No: 1050046-036-AC
Moodle: AP235

Dear Mr. Arif:

I write to seek the Department's approval for a change to the permit for the emissions source referenced above. The basis for the request is set forth below.

Pursuant to air construction permit number 1050046-023-AC, Mosaic changed the scrubbing system in the referenced No. 3 Fertilizer (DAP/MAP) Plant to recirculate a portion of the effluent of the RGCv and Dryer tailgas scrubbers and the remainder as scrubbing liquid in the Cooler scrubber in addition to the DAP pond water and re-use water. The Cooler scrubber effluent now is returned to the DAP pond water instead of the process water pond and this eliminated the use of process pond water in the Cooler scrubber.

As a consequence of this change, the No. 3 Fertilizer Plant has had to forego relying on historical scrubber pressure drop ranges established via § 63.625(f)(2) and now uses the $\pm 20\%$ of stack test baseline value established per § 63.625(f)(1). In the case of the pressure drop, pursuant to the Alternate Monitoring Plan (AMP) File No. 03-C-AP for the Bartow facility, that compliance standard is a minimum, not maximum, allowable pressure drop (as the case is for the scrubber liquid flow and fan amps).

Achieving compliance by means of the minimum allowable pressure drop established during the last stack test has proven to be an intractable challenge when the scrubber packing material is either changed out completely or cleaned. In either of those circumstances, the pressure drop is low (beginning of run) compared to the last stack test (which otherwise would show higher pressure drops due to fouled packings conditions at the end of run). These very circumstances occurred in March 2011 when the scrubber packings were changed out and Mosaic necessarily informed the South West District FDEP staff about the situation and sought permission to test after the change out to demonstrate compliance. FDEP staff acknowledged that pressure drops will be low after such change outs and further acknowledged that any deviation from the compliance standard would not be an issue until the compliance test is completed. In our communications with FDEP regarding this situation, there was no explicit agreement about how to address such circumstances in the future.

June 20, 2011
Mr. Syed Arif, P.E., FDEP
Page 2

As we will be facing a similar situation within the next few weeks when granulator, screens and other changes are completed during the No. 3 Fertilizer Plant turnaround, we have discussed this concern with you and other South West District FDEP staff. Based on what we believe is a consensus view about how to address this issue going forward, we now propose that the pertinent paragraph in the AMP be modified as shown below.

From:

2. Petitioner shall establish a minimum allowable pressure drop across each scrubber pursuant to the requirements in 40 CFR 63. Subparts AA and BB and shall submit such values to the department for approval.

To:

2. Petitioner shall establish a minimum allowable pressure drop across each scrubber pursuant to the requirements in 40 CFR 63. Subparts AA and BB and shall submit such values to the Department for approval. The Department recognizes that pressure drop across a scrubber with new or clean packing can be lower than the minimum than the allowable minimums established by testing prior to such installation of new or clean packing. The Department will allow such installation of new or clean packing and the operation of such packing shall be considered in compliance with the standard provided a 15 day advance notification to the Department is made regarding such installation, along with the proposed schedule for testing to demonstrate compliance with the permit conditions. Once testing is complete, the new minimums will become immediately effective.

Mosaic thanks you for your prompt consideration in this matter and looks forward to an expeditious amendment to the AMP.

If you have any questions, please feel free to contact me at (813) 500-6478.

Sincerely,



Rama Iyer, P.E.
Sr. Engineer
Environmental Affairs

ec: J. Golwitzer, H. Thompson, S. David, P. van der Voorn / Mosaic
C. Zhang-Torres, Q. Noor, D. Henry, B. Schroeder / SWD FDEP