



Department of Environmental Protection

Jeb Bush
Governor

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Colleen M. Castille
Secretary

July 23, 2004

CERTIFIED MAIL- RETURN RECEIPT REQUESTED

Mr. E. O. Morris
Vice President
Cargill Fertilizer, Inc.
8813 Highway 41 South
Riverview, FL 33569

Re: Bartow Plant Title V Renewal DEP File No. 1050046-018-AV
Request for Additional Information Regarding CAM and Applicability to 40 CFR 63 Subpart ZZZZ

Dear Mr. Morris,

On June 15, 2004, the U.S. Environmental Protection Agency published the Final Rule for 40 CFR 63, Subpart ZZZZ, NESHAP for Stationary Reciprocating Internal Combustion Engines. The rule will be effective August 16, 2004. In the 112(j) notification that you submitted on May 15, 2002, you indicated that your facilities may be subject to Subpart ZZZZ.

Since the 40 CFR Part 63, Subpart ZZZZ requirements may be applicable to the Bartow Plant and with more than 3 (three) years left on the permit, as of the effective date of Subpart ZZZZ, the Department is required to open the Title V Permit for cause and install the applicable requirements in accordance with Rules 62-4.080(1) and 62-213.430(4), F.A.C., and 40 CFR 70.7(f). Since your permit is currently open for renewal, the Department wishes to incorporate all applicable requirements for subpart ZZZZ.

On June 30, 2004, the Department received your additional information of the Title V permit for Cargill Bartow Plant. The Application is still incomplete because not all of the information needed to process the application has been provided. Specifically, the following information remains outstanding:

1. Ammonium/Diammonium Phosphate Plant (EU 001) CAM is applicable for PM. EU 001 is subject to the conditions of 40 CFR 63 Subpart BB, Phosphate Fertilizer Production. The unit is not subject to 40 CFR 63 Subpart AA, Phosphoric Acid Manufacturing Plants. Subpart BB does not regulate PM; therefore EU 001 would be subject to CAM for PM. The choice of scrubber pressure drop and liquid flow rate through the scrubbers are acceptable indicators to monitor. However, indicator ranges must be clearly stated in the monitoring approach table. Per conversations with Debbie Waters, Cargill wishes to use the same parameters as the facility's alternate monitoring plan for compliance with the monitoring requirements of Subpart BB. This is acceptable if the parameters and indicator ranges are indicative of normal operating conditions. The selection of the indicator ranges must also be clearly justified and demonstrate that operation at those levels is protective of the allowable emissions limitations. Please provide a table of test data that correlates the chosen parameters (i.e., pressure differentials and water flow rates or fan amperages and water flow rates) to the tested PM emission levels. From this data, provide a justification of your choices and clearly indicate a maximum and minimum indicator range for the chosen indicators for each of the scrubbers that will assure compliance with the emission limits with a

"More Protection. Less Process"

Printed on recycled paper.

margin of safety that allows for corrective action to be taken before a permit limit is exceeded. The application can not be deemed complete until these numbers are provided and justified.

Your response, dated June 25, 2004, contained the following:

"Furthermore, based upon recent discussion between Dave Buff of Golder Associates Inc., and the Department, Cargill understands that for CAM purposes the Department has made the determination that acid scrubbers can be considered inherent process equipment since they do recover product and ammonia. Several of the scrubbers used to control emissions at Cargill's facility are acid scrubbers and, are therefore, exempt from CAM requirements."

The above stated determination was made for a specific facility. All exemptions from CAM must be made on a unit and pollutant specific basis. If Cargill wishes to have any control devices considered to be inherent process equipment, a thorough justification must be submitted. In presenting this justification, the following points should be addressed, as well as any other pertinent design information that may be available.

- A. Is the primary purpose of the equipment other than to control emissions relative to the applicable emissions limit (e.g., product recovery, worker safety)?
- B. Would the equipment be installed if there were no applicable emissions limit in place for the pollutant specific emissions unit?
- C. Is the efficiency at which the equipment is operated by design for purposes other than compliance with the applicable emissions limit more than sufficient to assure compliance with the applicable emissions limit (e.g., a significant margin of compliance)?

For CAM purposes, the averaging period should be changed from daily to a 3-hour period to match the requirements of the compliance test method.

2. No.4 Fertilizer Shipping Plant (EU 002) Cargill has confirmed that EU 002 is subject to CAM. However, the summary of test data submitted is insufficient for determining applicable parameters and indicator ranges. Please submit the test results for each of the indicator ranges tested. The choice of scrubber pressure drop and liquid flow rate through the scrubbers are acceptable indicators to monitor. However, indicator ranges must be clearly stated in the monitoring approach table. The selection of the indicator ranges must also be clearly justified and demonstrate that operation at those levels is protective of the allowable emissions limitations. Please provide a table of test data that correlates chosen parameters (i.e., the pressure differentials and water flow rates or fan amperages and water flow rates) to the tested PM emission levels. From this data, provide a justification of your choices and clearly indicate a maximum and indicator range for the chosen indicators for each of the scrubbers that will assure compliance with the emission limits with a margin of safety that allows for corrective action to be taken before a permit limit is exceeded. The application can not be deemed complete until these numbers are provided and justified.

For CAM purposes, the averaging period should be changed from daily to a 3-hour period to match the requirements of the compliance test method.

3. Diammonium Phosphate Fertilizer Plant (EU 021) CAM is applicable for PM. EU 001 is subject to the conditions of 40 CFR 63 Subpart BB, Phosphate Fertilizer Production. The unit is not subject to 40 CFR

63 Subpart AA, Phosphoric Acid Manufacturing Plants. Subpart BB does not regulate PM; therefore EU 001 would be subject to CAM for PM. The choice of scrubber pressure drop and liquid flow rate through the scrubbers are acceptable indicators to monitor. However, indicator ranges must be clearly stated in the monitoring approach table. Per conversations with Debbie Waters, Cargill wishes to use the same parameters as the facility's alternate monitoring plan for compliance with the monitoring requirements of Subpart BB. This is acceptable if the parameters and indicator ranges are indicative of normal operating conditions. The selection of the indicator ranges must also be clearly justified and demonstrate that operation at those levels is protective of the allowable emissions limitations. Please provide a table of test data that correlates the pressure differentials and flow rates to the tested PM and fluoride emission levels. From this data, provide a justification of your choices and clearly indicate a maximum and minimum pressure drop and water flow rate for each of the scrubbers that will assure compliance with the emission limits with a margin of safety that allows for corrective action to be taken before a permit limit is exceeded. The application can not be deemed complete until these numbers are provided and justified.

Your response, dated June 25, 2004, contained the following:

"Furthermore, based upon recent discussion between Dave Buff of Golder Associates Inc., and the Department, Cargill understands that for CAM purposes the Department has made the determination that acid scrubbers can be considered inherent process equipment since they do recover product and ammonia. Several of the scrubbers used to control emissions at Cargill's facility are acid scrubbers and, are therefore, exempt from CAM requirements."

The above stated determination was made for a specific facility. All exemptions from CAM must be made on a unit and pollutant specific basis. If Cargill wishes to have any control devices considered to be inherent process equipment, a thorough justification must be submitted. In presenting this justification, the following points should be addressed, as well as any other pertinent design information that may be available.

- A. Is the primary purpose of the equipment other than to control emissions relative to the applicable emissions limit (e.g., product recovery, worker safety)?
- B. Would the equipment be installed if there were no applicable emissions limit in place for the pollutant specific emissions unit?
- C. Is the efficiency at which the equipment is operated by design for purposes other than compliance with the applicable emissions limit more than sufficient to assure compliance with the applicable emissions limit (e.g., a significant margin of compliance)?

For CAM purposes, the averaging period should be changed from daily to a 3-hour period to match the requirements of the compliance test method.

Mr. E. O. Morris
July 23, 2004
Page 4 of 4

Please submit all requested information immediately to Mr. Bobby Bull at FDEP Bureau of Air Regulation, MS 5505, 2600 Blair Stone Road, Tallahassee, FL 32399-2400. In addition, please submit an electronic copy, Word format, along with your response. If you have any questions regarding this request for additional information, please contact Mr. Bull at Robert.Bull@dep.state.fl.us or (850) 921-9585. In the future, if there are any tests used to establish new parameter ranges, please submit a copy to Bobby Bull in addition to the required submittal to the Southwest District. To discuss the specific CAM requirements, please contact Mr. Jonathan Holtom, P.E., at (850) 921-9531 or Jonathan.Holtom@dep.state.fl.us.

Sincerely,



Bobby Bull, Engineer II
Bureau of Air Regulation

cc: Mr. Jason Waters, FDEP, SWD
Mr. David Buff, P.E., Golder Associates, Inc.
Ms. Debra Waters, Cargill Bartow Plant

7000 1670 0013 3109 9601

Postage	\$	Postmark Here
Certified Fee		
Return Receipt Fee (Endorsement Required)		
Restricted Delivery Fee (Endorsement Required)		
Total Postage & Fees	\$	

Sent to
Mr. E.O. Morris
Street, Apt. No., or PO Box No.
8813 Highway 41 South
City, State, ZIP+4
Riverview, Florida 33569

PS Form 3800, May 2000 See Reverse for Instructions

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<p>■ Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.</p> <p>■ Print your name and address on the reverse so that we can return the card to you.</p> <p>■ Attach this card to the back of the mailpiece, or on the front if space permits.</p> <p>1. Article Addressed to: Mr. E.O. Morris Vice President Cargill Fertilizer, Inc. 8813 Highway 41 South Riverview, Florida 33569</p>	<p>A. Signature <i>Betty Rees</i> <input type="checkbox"/> Agent <input type="checkbox"/> Address</p> <p>B. Received by (Printed Name) <i>Betty Rees</i> C. Date of Delivery <i>MA 97</i></p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If YES, enter delivery address below:</p>
	<p>3. Service Type <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p>
	<p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>
<p>2. Article Number (Transfer from service label) 7000 1670 0013 3109 9601</p>	
<p>PS Form 3811, August 2001 Domestic Return Receipt 102590-02-01-1540</p>	

U.S. Postal Service
CERTIFIED MAIL RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)

OFFICIAL USE

Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$

Postmark
Here

Sent To: Mr. E.O. Morris
Street, Apt. No., or PO Box No.
8813 Highway 41 South
City, State, ZIP+4
Riverview, Florida 33569

PS Form 3800, May 2000

See Reverse for Instructions

UNITED STATES POSTAL SERVICE



First-Class Mail™
Postage & Fees Paid
USPS
Permit No. G-10

RECEIVED
JUL 28 2004
BUREAU OF AIR REGULATION

Sender: Please print your name, address, and ZIP+4 in this box.

Dept. of Environmental Protection
Division of Air Resources Mgt.
Bureau of Air Regulation, NSR
2600 Blair Stone Rd., MS 5505
Tallahassee, FL 32399-2400

01

