



Department of Environmental Protection

Jeb Bush
Governor

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619-1352

Colleen M. Castille
Secretary

FACSIMILE TRANSMISSION SHEET

DATE _____

TO:

Bobby Bull
Department _____
Phone _____ Fax _____

FROM:

Jason Waters
DEP Southwest District Office – Air Program
Phone: (813) 744-6100 (SunCom 512-1042) Ext. _____

OPERATOR: _____

SUBJECT:

BACT ?

Total Number of Pages, Including Cover Page: 5

DEP SWD AIR PROGRAM FAX NUMBERS: (813) 744-6458
(SunCom) 512-1073

State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

INTEROFFICE MEMORANDUM

For Routing To District Offices And/Or To Other Than The Addressee		
To: _____	Locn.: _____	
To: _____	Locn.: _____	
To: _____	Locn.: _____	
From: _____	Date: _____	
Reply Optional []	Reply Required []	Info. Only []
Date Due: _____	Date Due: _____	

TO: District, Subdistrict and Local Program Air Engineers
FROM: Ed Palagyi, BACT Coordinator
DATE: January 2, 1981
SUBJ: BACT as determined for W.R. Grace and Company, Shipping
Facilities, Polk County, Florida.

Attached please find one copy of the BACT as determined by
the Florida Department of Environmental Regulation for the
subject applicant.

Should you have any questions regarding this BACT, please
contact me at (904) 488-1344 or Suncom 278-1344.

EP:dav

D.E.R.

JAN 7 1981

SOUTHWEST DISTRICT
TAMPA

Best Available Control Technology (BACT) Determination

W.R. Grace & Company

Polk County

The proposed facility is the installation of surge bins and supporting equipment to size and load ammonium phosphate fertilizers into railroad cars and trucks at a design rate of 300 tons per hour. The plant is located near Bartow, Florida.

BACT Determination Requested by the Applicant:

Particulate emission limit - 0.03 grains/SCF (15.5 lb./hr. - 31 TPY) using a wet venturi scrubber and cyclonic mist eliminator.

Date of Receipt of a Complete BACT Application:

December 6, 1980

Date of Publication in the Florida Administrative Weekly:

December 12, 1980

Study Group:

John Svec, FDER, BAQM
Tim Powell, FDER, BAQM
Carl Bock, FDER, BAQM
Bob Garrett, FDER, Southwest District, Tampa

Study Group Recommendations:

Pollutant	Emission Limit			
	<u>Svec</u>	<u>Powell</u>	<u>Bock</u>	<u>Garrett</u>
Particulate	15.5 lb./hr.	0.03 gr./SCF	15.5 lb./hr.	15.5 lb./hr.
Visual Emissions	10% Opacity			

BACT Determination by FDER:

Pollutant	Maximum Emission
Particulate	0.03 grains/SCF 15.5 lb./hr.
Visual Emissions	Less than 20% opacity

Page Two

Justification of FDER Determination:

The proposed emission control installation is two separate wet venturi scrubber systems discharging through a common stack. One unit will control dust emissions from the belt conveyor drop points, bin vents and loading valves in the product shipping area. The second unit will control dust emissions from bucket elevators, crushers, vibrating sizing screens and belt conveyor drop points in the product storage area.

The flow of product varies throughout the system and to quantify emissions at every point would be difficult and not feasible. The dust is hygroscopic and emission control using a wet scrubber is an approved system. The 0.03 grains/SCF emission limit is also the proposed RACT for this type of facility.

The plant is within the area of influence of that portion of Hillsborough County classified nonattainment for particulate matter. Air modeling of the proposed facility predicts no violation of ambient air quality standards within the non-attainment area.

Details of the Analysis May be Obtained by Contacting:

Edward Palagyi, BACT Coordinator
Department of Environmental Regulation
Bureau of Air Quality Management
2600 Blair Stone Road
Tallahassee, Florida 32301

Recommended by:

Steve Smallwood
Steve Smallwood, Chief, BAQM

Date: Jan 2, 1981

Approved by:

Jacob D. Vann
Jacob D. Vann, Secretary

Date: Jan 2, 1981

State of Florida

DEPARTMENT OF ENVIRONMENTAL REGULATION

INTEROFFICE MEMORANDUM

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And/Or To Other Than The Addressee

To: _____	Locn.: _____
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To: _____	Locn.: _____
From: _____	Date: _____

TO: Ed Palagyi, BAQM, Tallahassee

FROM: Bob Garrett, S.W. District *118*

DATE: January 6, 1981

SUBJECT: BACT Recommendation for W.R. Grace and Company
DAP Loading, Screening, & Handling Scrubber System

W.R. Grace has asked for a permit for car/truck loading, screening, and handling of DAP to handle increased production of ammonium phosphate production. I concur with their requested limit of 0.03 grains/SCFM or 15.5 to 16.2 TSP/hr emissions.

I feel this is justified based on the proposed RACT regulations. 0.03 g/SCFM is the limit set for "miscellaneous mfg. process operations". Should they be classified under Diammonium Phosphate, they would be allowed 0.03 lbs/ton of product or 90 lbs/hr for the entire process, the chemical end of which is a small portion of this limit. Although, the request is double previous BACT determinations for storage & shipping, the addition of screening and handling is by far the dustiest process.

The process weight table would allow 43.1 #/hr at 300 TPH, far greater than 16 #/hr recommended.

RRG/rkt



Jeb Bush
Governor

Department of Environmental Protection

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619-1352

Colleen M. Castille
Secretary

FACSIMILE TRANSMISSION SHEET

DATE 5/7/04

TO:

Bobby Bull

Department _____

Phone _____

Fax _____

FROM:

Jason Waters

DEP Southwest District Office – Air Program

Phone: (813) 744-6100 (SunCom 512-1042) Ext. 107

OPERATOR:

JW

SUBJECT:

Per Your Request

JW

Total Number of Pages, Including Cover Page: 3

DEP SWD AIR PROGRAM FAX NUMBERS: (813) 744-6458
(SunCom) 512-1073



CARGILL FERTILIZER, INC.

P.O. Box 9002 • Bartow, Florida 33831 • Telephone 863-534-9610 • FAX 863-534-9680



September 18, 2003

Certified Mail: 7002 0460 0002 7683 6551

Mr. Robert Soich
Air Compliance Inspector
Florida Department of Environmental Protection
3804 Coconut Palm Drive
Tampa, Florida 33619

Dear Mr. Soich:

RE: CARGILL FERTILIZER – MULBERRY FACILITY
SECOND RESPONSE TO INCIDENT OF JULY 9, 2003

This is in response to your letter addressed to Mr. Ozzie Morris, dated September 4, 2003 regarding the ammonium sulfate cloud that formed over the Cargill Fertilizer Mulberry facility on July 9, 2003. Our initial written response letter dated August 25, 2003 outlined actions to be taken by Cargill to prevent a reoccurrence of the incident. The purpose of this letter is to further clarify the plan as requested.

1. In order to be sure that no shift in wind direction during a Sulfuric Acid plant start up could potentially cause a reoccurrence of this situation, Cargill is proposing that the water treatment sprays will be shut down prior to plant start ups and will remain down until the startup is completed and the plant is operating normally. Normal shut down of a sulfuric acid plant does not create excess SO₂ emissions and therefore is not included in this requirement. A plant shut down caused by upset conditions is included in item 2.
2. If a plant upset condition occurs, the water treatment sprays will be shut down during the entire duration of the upset condition.
3. Operations logs at the sulfuric acid control room and the lime plant will include notation for the date and time of notification (and operator's initials or signature) of startup or upset conditions that would prompt water treatment spray shutdown.

We hope this information satisfies your request to ensure best operational practices are being used. If you need any additional information please do not hesitate to contact me at (863) 534-9615.

Sincerely,

Debra R. Waters

Debra R. Waters
Environmental Superintendent

XC: O. Morris, D. Jellerson, T. Miller, B. Davis, C. MacConnell, File M60-01



STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION
SOUTHWEST DISTRICT

CONVERSATION RECORD

Phosphate
TV
(Polk Co.)Date 7/16/02

Subject _____

Time _____

Permit No. _____

County _____

Ms Debbie Water

Telephone No. _____

Representing _____

Cargill, which purchased Mulberry Phosphates☒ Telephoned Me☐ Was Called☐ Scheduled Meeting☐ Unscheduled Meeting

Other Individuals Involved in Conversation/Meeting _____

Summary of Conversation/Meeting

Cargill purchased Mulberry Phosphates* in Polk
& will be sending us transfer papers. Closing
was yesterday. Plants been shutdown for at least
a few years.

*has been closed down & will be reopening sulfuric
acid plant only.

There are cooling ponds, which will be drained. No
applicable MACT units.

She's researching SAP must eliminate as to whether its
specifically referenced/described in TV permit or appln. They want to
replace w/ better one. Told her we could probably do w/ admin.

Correction if not detailed in TS permit?
 (continue on another sheet, if necessary)

Signature

She'll research & send us letter
about its

Title

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

In the matter of:)	Bartow Facility
)	
Cargill Fertilizer, Inc.)	
)	
Petitioner.)	File No.: 03-C-AP

ORDER ON REQUEST
FOR
ALTERNATE PROCEDURES AND REQUIREMENTS

Pursuant to Rule 62-297.620, Florida Administrative Code (F.A.C.), and Title 40 of the Code of Federal Regulations Part 63, section 63.8 (40 CFR 63.8), Cargill Fertilizer, Inc., located in Polk County, has petitioned for approval of alternate monitoring methods for scrubbers at the Bartow facility. The Petitioner requested approval to monitor fan amperage in lieu of establishing an upper limit on pressure drop across each scrubber. The basis for this request is the Petitioner's assertion that certain technical aspects would make limiting pressure drop in the scrubbers at this facility impractical. Petitioner agreed to continue to monitor pressure drop, liquid flow rate, and fan amperage for each scrubber. Petitioner also agreed to establish allowable ranges for liquid flow rate and fan amperage and to establish a minimum allowable pressure drop.

Having considered Petitioner's written request and all supporting documentation, the following Findings of Fact, Conclusions of Law, and Order are entered:

FINDINGS OF FACT

1. 40 CFR 63, Subparts AA and BB require all phosphate fertilizer and phosphoric acid manufacturing plants that are major sources of hazardous air pollutants to monitor liquid flow rate to each scrubber and pressure drop across each scrubber used to control hydrogen fluoride emissions. Additionally, each affected facility must establish allowable ranges for these parameters by submitting upper and lower values for approval or by accepting the default range of $\pm 20\%$ of the baseline value as specified in Subparts AA and BB. Petitioner's Bartow facility is a major source of hazardous air pollutants. Specifically, Petitioner's Bartow facility emits 10 tons per year or more of HF. Therefore, Petitioner's Bartow facility is subject to these requirements.

2. On February 10, 2003, the Department received Petitioner's request for approval of an alternate monitoring plan for the Bartow facility. The alternate monitoring plan was requested for scrubbers subject to 40 CFR 63, Subparts AA and BB: Phosphoric Acid Plant (Emission Unit (EU) 010), No. 3 Fertilizer Plant (EU 001), and No. 4 Fertilizer Plant (EU 021).

3. On March 10, 2003, the Department requested additional information from Petitioner.

4. On May 12, 2003, the Department received Petitioner's response to the March 10, 2003 request for additional information.

5. On July 1, 2003, the Department sent a second request for additional information to Petitioner.
6. On August 20, 2003, Department staff met with representatives of Petitioner and Petitioner's consultant, Golder Associates, in Tallahassee to discuss unresolved issues.
7. On October 28, 2003, the Department received Petitioner's response to the second request for additional information as well as information requested during the August 20 meeting.
8. On November 4, 2003, Department staff met with representatives of Petitioner and Golder Associates at the Petitioner's Riverview facility to discuss remaining issues with the Petitioner's request. During that meeting, Petitioner agreed to provide the department with additional data.
9. On December 3, 2003, the Department received the additional information requested during the November 4 meeting.
10. Data submitted by Petitioner demonstrates that typical pressure drops across its scrubbers can vary by more than the $\pm 20\%$ range allowed by 40 CFR 63, Subparts AA and BB.
11. Emissions data submitted by Petitioner demonstrates that fluoride emissions rates for most units at the facility are less than 50% of the standard. Data submitted by Petitioner also shows a poor correlation between pressure drop and fluoride emissions.
12. As a result of the correspondence and meetings listed above, Petitioner ultimately proposed to establish an allowable range for fan amperage in lieu of establishing an upper limit on pressure drop across each scrubber. Petitioner also agreed to establish a minimum allowable pressure drop for each scrubber and an allowable range for liquid flow rate to each scrubber.

CONCLUSIONS OF LAW

1. The Department has jurisdiction to consider Petitioner's request pursuant to Section 403.061, Florida Statutes (F.S.), Rule 62-297.620, F.A.C., and 40 CFR 63.8.
2. Petitioner has provided reasonable justification that establishing an upper limit on pressure drop in scrubbers at this facility is impractical due to the wide variability of this parameter encountered during normal operation.
3. Petitioner has provided reasonable justification that monitoring fan amperage in lieu of establishing a maximum pressure drop is no less an effective indicator of scrubber operation than that achieved by monitoring pursuant to 40 CFR 63, Subparts AA and BB.

ORDER

Having considered Petitioner's written request and supporting documentation, it is hereby ordered that for the Phosphoric Acid Plant (Emission Unit (EU) 010), No. 3 Fertilizer Plant (EU 001), and No. 4 Fertilizer Plant (EU 021):

1. Petitioner shall not be required to establish an upper limit on the pressure drop across each scrubber.
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.
3. Petitioner shall establish minimum and maximum acceptable fan amperages for each fan in the scrubbing systems pursuant to the requirements in 40 CFR 63, Subparts AA and BB and shall submit such values to the department for approval.
4. Petitioner shall establish minimum and maximum acceptable values for liquid flow rate to each scrubber pursuant to the requirements in 40 CFR 63, Subparts AA and BB and shall submit such values to the department for approval.
5. Petitioner shall continuously monitor pressure drop and liquid flow rate for each scrubber and shall continuously monitor fan amperage for each fan in the scrubbing systems.
6. Except as provided by this order, Petitioner shall comply with all applicable provisions of 40 CFR 63, Subparts AA and BB.
7. This Order shall expire on January 7, 2014.

PETITION FOR ADMINISTRATIVE REVIEW

The Department's proposed agency action will become final upon expiration of the petition period described below unless a timely petition for an administrative hearing is filed pursuant to Sections 120.569 and 120.57 F.S., before the deadline for filing a petition. The procedures for petitioning for a hearing are set forth below.

A person whose substantial interests are affected by the proposed agency action may petition for an administrative proceeding (hearing) under Sections 120.569 and 120.57 of the Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station 35, Tallahassee, Florida, 32399-3000. Petitions filed by the permit applicant or any of the parties listed below must be filed within twenty-one days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3) of the Florida Statutes must be filed within twenty-one days of publication of the public notice or within twenty-one days of receipt of this notice, whichever occurs first. Under Section 120.60(3), however, any person who asked the Department for notice of agency action may file a petition within twenty-one 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 will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205 of the Florida Administrative Code.

A petition that disputes the material facts on which the Department'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 how and when petitioner received notice of the agency action or proposed action;
- (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate;
- (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; and
- (g) A statement of the relief sought by the petitioner, stating precisely the action 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 Department'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.

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

Mediation is not available in this proceeding.

NOTICE OF APPEAL RIGHTS

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 thirty days after this order is filed with the clerk of the Department.

DONE AND ORDERED this _____ day of _____, 2004 in Tallahassee,
Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION

MICHAEL G. COOKE, Director
Division of Air Resource Management
Mail Station 5500
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400
(850) 488-0114

Clerk Stamp

FILING AND ACKNOWLEDGMENT

FILED, on this date, pursuant to §120.52, Florida
Statutes, with the designated Department Clerk, receipt
of which is hereby acknowledged.

(Clerk)

(Date)



CARGILL FERTILIZER, INC.

file
D.E.P.
MAY 20 2002
Southwest District Tampa

P.O. Box 9002 • Bartow, Florida 33831 • Telephone 863-534-9610 • FAX 863-534-9680

May 16, 2002

Certified Mail

7099 3220 0007 3016 7840

Al Linero, PE
New Source Review Section
Florida Department of Environmental Protection
2600 Blair Stone Rd
Tallahassee, Florida 32399-2400

Dear Mr. Linero:

RE: CARGILL FERTILIZER – BARTOW FACILITY
WITHDRAWAL OF REQUEST FOR EXTENSION TO #3 FERTILIZER PLANT
CONSTRUCTION PERMIT
NO. 1050046-008-AC PSD-FL-255
TITLE V OPERATING PERMIT NO. 1050046-003-AV

In a letter to you dated January 31, 2002, Cargill Fertilizer requested an extension to the above referenced PSD construction permit for the #3 Fertilizer Plant at our Bartow facility. Upon further review and assessment of the operating controls with regard to process inputs and operating rates, we feel that no additional construction will be necessary in order to meet the production goals at that facility. Therefore we are withdrawing our previous request for an extension.

The application to modify the Title V Operating Permit to include the #3 Fertilizer Plant was submitted December 21, 2002 to the FDEP Southwest District Office. This letter also serves as notification to that office to please proceed with processing that application.

If you need any additional information, please do not hesitate to call me at (863) 534-9615 or email debbie_waters@cargill.com.

Sincerely,

Debra R. Waters
Environmental Superintendent

XC: Jellerson, Royster, MacConnell, Lulf, Dennis, File 60-07-06A
Gerry Kissel – FDEP, SW District



recycled paper

May 11, 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 Information Regarding the Inclusion of Cargill Mulberry Plant into the Cargill Bartow Plant
Renewal Application

Dear Mr. Morris,

The department was contacted by Fawn Bergen of Golder Associates that Cargill Fertilizer, Inc. intends to combine their Bartow Plant and Mulberry Plant under the Bartow Title V permit. The Bartow Plant is currently in the renewal permit process. Mulberry Plant Title V renewal application is due on June 15th. The Department will need all information regarding the Mulberry plant to be submitted to deem the application complete. Specifically, the following items are requested and information provided to be verified:

1. Ms. Bergen stated that Mr. E.O. Morris will remain the Responsible Official for the Bartow Plant and the Mulberry Plant under the Title V permit.
2. Per conversations between Jerry Kissel, DEP Southwest District, and Debra Waters on July 16, 2002, the only processes that will operate at the Mulberry Plant will be the Sulfuric Acid Plant (SAP). In order to combine the Mulberry Plant emission units into the Bartow Plant Title V renewal permit, please indicate which emission units will be operating to support the Mulberry SAP by submitting additional application pages for the Mulberry Plant emission units to be included in the renewal application that is currently under review for the Bartow Plant
3. Our current records for the Mulberry Plant show that:
 - a. EU #002 (DC/DA Sulfuric Acid Plant), EU #013 (Molten Sulfur Storage Tank- North Vent), EU #014 (Molten Sulfur Storage Tank- Southeast Vent), EU #015 (Molten Sulfur Storage Tank- Southwest Vent), and EU #016 (Molten Sulfur Storage Tank- Middle Vent) are currently active, and Annual Operating Reports have been submitted in 2002 for each unit. Please indicate if you intend to continue to operate any of these emission units.
 - b. EU #003, 005, 009-012, 019-030 and 032-044 have not reported emissions since 1999. Please indicate if there is any intention to operate any of these emission units in the future.

Mr. E. O. Morris
April 13, 2004
Page 2 of 2

c. EU #006, 017, and 018 last reported emissions in 1993, have not operated since that time, and are inactive. If this is incorrect, please let us know. If this is correct, these emission units can not be included in the renewal permit.

d. EU #026 and 031 are inactive. Please indicate if these unregulated units will be part of the renewal permit.

4. Per the July 16, 2002 conversation between Jerry Kissel and Debra Waters, she indicated that the Mulberry Plant cooling ponds were going to be drained. Please indicate the current status of the cooling ponds.

5. Please submit any additional other pertinent information regarding the Mulberry plant which needs to be included in the Title V renewal application for the Bartow Plant. For instance, do you want the combined plant to be known as the "Bartow Plant"?

Please submit all requested information by June 15th to me at FDEP Bureau of Air Regulation, MS 5505, 2600 Blair Stone Road, Tallahassee, FL 32399-2400. If you have any questions regarding this request for additional information, please contact me at Robert.Bull@dep.state.fl.us or (850) 921-9585.

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