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JUL 07 2003

BUREAU OF AIR REGULATION

July 3, 2003

Mr. Syed Arif, PE
New Source Review Section
Bureau of Air Regulation
State of Florida DEP
Twin Towers Office Building
2600 Blair Stone Rd., MS 5505
Tallahassee, FL 32399-2400

Dear Mr. Arif,

Per your request, enclosed you will find the affidavit of publishing which has been running in The Ledger. Should you have any questions, please feel free to contact me.

Sincerely,

Taylor D. Abel
Superintendent,
Environmental, Health & Safety

TDA/jh

Enclosure

File 60.07.04.B.

AFFIDAVIT OF PUBLICATION

THE LEDGER

Lakeland, Polk County, Florida

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JUL 07 2003

BUREAU OF AIR REGULATION

Case No

STATE OF FLORIDA)
COUNTY OF POLK)

Before the undersigned authority personally appeared Sandra Heath, who on oath says that she is Assistant Classified Advertising Manager of The Ledger, a daily newspaper published at Lakeland in Polk County, Florida; that the attached copy of advertisement, being a

Public Notice of Intent

in the matter of Dep file. 1050053-034-AC

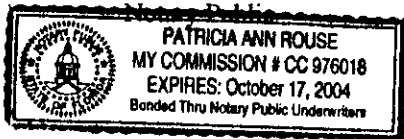
in the Court, was published in said newspaper in the issues of 6-25; 2003

Affiant further says that said The Ledger is a newspaper published at Lakeland, in said Polk County, Florida, and that the said newspaper has heretofore been continuously published in said Polk County, Florida, daily, and has been entered as second class matter at the post office in Lakeland, in said Polk County, Florida, for a period of one year next preceding the first publication of the attached copy of advertisement; and affiant further says that she has neither paid nor promised any person, firm or corporation any discount, rebate, commission or refund for the purpose of securing this advertisement for publication in the said newspaper.

Signed *Sandra Heath*
Sandra Heath
Assistant Classified Advertising Manager
Who is personally known to me.

Sworn to and subscribed before me this 25TH day of June A.D. 2003

Patricia Ann Rouse



(Seal) My Commission Expires Oct 17, 2004

Attach Notice Here

PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
DEP File No. 1050053-034-AC

Cargill Fertilizer, Inc.
Green Bay Facility
Polk County

The Department of Environmental Protection (Department) gives notice of its intent to issue an air construction permit to Cargill Fertilizer, Inc. for modifying the existing South Diammonium Phosphate (DAP) Fertilizer Plant so that it can alternatively produce Monoammonium Phosphate (MAP) at the Green Bay Facility located at 4390 C.R. 640 West, Bartow, Polk County, Florida. A determination of Best Available Control Technology pursuant to Rule 62-212.400, F.A.C. was not required at this time. The applicant's name and address are: Cargill Fertilizer, Inc., 8813 Highway 41 South, Riverview, Florida 33569.

The Department is currently reviewing another Prevention of Significant Deterioration (PSD) application for the same plant which requests an increase in the production rates for both DAP and MAP production.

Due to extreme market pressures, as well as product quality considerations, Cargill is requesting interim approval to produce MAP at their South DAP Fertilizer Plant while the Department is still reviewing the PSD application. In light of this, Cargill has submitted this air construction permit application. The decrease in potential fluoride and particulate matter emissions from the current operating permit due to the issuance of this air construction permit will be 84 and 83 percent, respectively. Fluoride emissions will be reduced from 52.7 tons per year (TPY) to 8.33 TPY. Particulate Matter emissions will be reduced from 205 TPY to 35.5 TPY.

The difference in current actual emissions and future potential emissions resulting from this modification of the South DAP Fertilizer to alternatively allow the production of MAP, will be below PSD significant emission rates for all criteria pollutants. The only physical change to the existing South DAP Fertilizer Plant necessary to also produce MAP is the addition of a phosphoric acid feed pipe to the granulator to redirect a portion of the phosphoric acid fed to the reactor when processing DAP.

The Department will issue the FINAL Permit, in accordance with the conditions of the DRAFT Permit, unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The Department will accept written comments concerning the proposed permit issuance action for a period of 14 (fourteen) days from the date of publication of this Public Notice of Intent to Issue Air Construction Permit. Written comments should be provided to the Department's Bureau of Air Regulation at 2600 Blair Stone Road, Mail Station #5505, Tallahassee, FL 32399-2400. Any written comments filed shall be made available for public inspection. If comments received result in a significant change in the proposed agency action, the Department shall revise the proposed permit and require, if applicable, another Public Notice.

The Department will issue the permit with the attached conditions 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. Mediation is not available in this proceeding.

A person whose substantial interests are affected by the proposed permitting decision 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 fourteen 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 fourteen days of publication of the public notice of intent. Under section 120.60(3), however, any person who asked the Department for notice of agency action may file a petition within fourteen 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 petitioner 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 on 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.

A complete project file is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

Department of Environmental Protection
Bureau of Air Regulation
111 S. Magnolia Drive, Suite 4
Tallahassee, Florida 32301
Telephone: 850/488-0114
Fax: 850/922-6979

Department of Environmental Protection
Southwest District Office
3804 Coconut Palm Drive
Tampa, Florida 33619-8218
Telephone: 813/744-6100
Fax: 813/744-6084

The complete project file includes the application, technical evaluations, Draft Permit, and the information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Program Administrator, New Resource Review Section at 111 South Magnolia Drive, Suite 4, Tallahassee, Florida 32301, or call 850/488-0114, for additional information.

1045 - 6-25; 2003

Gibson, Victoria

From: Gibson, Victoria
Sent: Friday, June 20, 2003 2:36 PM
To: 'Taylor_Abel@cargill.com'
Cc: Vielhauer, Trina; Arif, Syed
Subject: Public Notice of Intent to Issue Air Construction Permit - Cargill Fertilizer, Inc. - Green Bay Facility - 1050053-034-AC

Importance: High

Good afternoon.

Please find the attached public notice that you had requested.



Cargill Green Bay
Public Notic...

Have a great weekend.

Vickie

Victoria Gibson, Administrative Secretary
Bureau Chief's Office
DEP/Bureau of Air Regulation
victoria.gibson@dep.state.fl.us
850-921-9504

Gibson, Victoria

From: Taylor_Abel@cargill.com
Sent: Friday, June 20, 2003 2:46 PM
To: Vielhauer, Trina; Gibson, Victoria
Cc: Arif, Syed
Subject: RE: Public Notice of Intent to Issue Air Construction Permit - Cargill Fertilizer, Inc. - Green Bay Facility - 1050053-034-AC

I received the notice. Thank you.
Sincerely,
Taylor Abel

-----Original Message-----

From: Trina.Vielhauer@dep.state.fl.us
Sent: Friday, June 20, 2003 2:37 PM
To: Victoria.Gibson@dep.state.fl.us; Abel, Taylor /rview
Cc: Syed.Arif@dep.state.fl.us
Subject: RE: Public Notice of Intent to Issue Air Construction Permit - Cargill Fertilizer, Inc. - Green Bay Facility - 1050053-034-AC

Please note: the Public Notice is attached. However, the draft permit itself will not go out until Monday.

> -----Original Message-----

> **From:** Gibson, Victoria
> **Sent:** Friday, June 20, 2003 2:36 PM
> **To:** 'Taylor_Abel@cargill.com'
> **Cc:** Vielhauer, Trina; Arif, Syed
> **Subject:** Public Notice of Intent to Issue Air Construction Permit - Cargill Fertilizer, Inc. - Green Bay Facility - 1050053-034-AC
> **Importance:** High

> Good afternoon.

> Please find the attached public notice that you had requested.

> << File: Cargill Green Bay Public Notice.doc >>

> Have a great weekend.

> Vickie

> Victoria Gibson, Administrative Secretary
> Bureau Chief's Office
> DEP/Bureau of Air Regulation
> victoria.gibson@dep.state.fl.us
> 850-921-9504

Gibson, Victoria

From: Arif, Syed
Sent: Thursday, June 19, 2003 3:06 PM
To: 'Taylor_Abel@cargill.com'
Cc: Gibson, Victoria
Subject: RE: Cargill Green Bay minor permit

Taylor -

I have asked Vickie to fax you a copy of the public notice tomorrow if Trina has reviewed and approved it. You can give her a call after lunch tomorrow to get the status on that. If Trina doesn't get the time to approve the public notice, it will probably be Monday before I can e-mail or fax it to you. Syed

-----Original Message-----

From: Taylor_Abel@cargill.com [mailto:Taylor_Abel@cargill.com]
Sent: Thursday, June 19, 2003 1:46 PM
To: Arif, Syed
Subject: Cargill Green Bay minor permit

Hello Syed,

I wanted to see if Vicki Gibson (or maybe Al Linero) could email the public notice to me after Trina reviews it. Unfortunately, it takes the newspaper three to four days to publish it.

Please let me know.
Best Regards,
Taylor

Taylor Abel, P.E.
Environmental, Health & Safety Superintendent
Phosphate Production
Green Bay Facility
863-519-1371 work
863-581-0725 mobile
863-533-8793 fax

Address:
4390 CR 640 W.
Bartow, FL 33830

Confidentiality Note: This message is intended only for the named recipient and may contain confidential, proprietary or legally privileged information. Unauthorized individuals or entities are not permitted access to this information. Any dissemination, distribution, or copying of this information is strictly prohibited. If you have received this message in error, please advise the sender by reply e-mail, and delete this message and any attachments. Thank you

Golder Associates Inc.

6241 NW 23rd Street, Suite 500
Gainesville, FL 32653-1500
Telephone (352) 336-5600
Fax (352) 336-6603



June 6, 2003

0337506

Florida Department of Environmental Protection
Division of Air Resources Management
2600 Blair Stone Road, MS 5500
Tallahassee, FL 32399-2400

RECEIVED

JUN 09 2003

Attention: Mr. Syed Arif, P. E.

BUREAU OF AIR REGULATION

RE: CARGILL FERTILIZER INC., GREEN BAY FACILITY
FACILITY ID 1050053
REQUEST FOR APPROVAL TO MANUFACTURE MAP

Dear Mr. Arif:

Cargill Fertilizer Inc. (CFI) recently submitted a minor source application to the Department to modify the South Diammonium Phosphate (DAP) at the Green Bay facility to also produce monoammonium phosphate (MAP). Based on my recent conversation with you, Cargill is providing the following additional information regarding this permit application.

The maximum production rate of MAP after the change will be 92 tons per hour (TPH). The phosphorous pentoxide (P_2O_5) content of MAP can vary between 50 and 52 percent. Based on a maximum P_2O_5 input rate of 46 TPH and using the minimum 50 percent P_2O_5 content, the maximum MAP production rate becomes:

$$46 \text{ TPH } P_2O_5 \div 0.50 \text{ tons } P_2O_5/\text{ton MAP} = 92.0 \text{ TPH MAP}$$

Since allowable emissions from the South DAP plant are based on P_2O_5 input, and the P_2O_5 content of the fertilizer product can vary somewhat, we ask that any reference to DAP or MAP production rates in the construction permit be stated as approximate tons. Suggested permit wording is as follows:

2. Capacity

- a. The hourly input rate of material to the reactor, expressed as 100% P_2O_5 , shall not exceed 46 tons per hour (TPH) (equivalent to approximately 100 TPH DAP and 92 TPH MAP).
- b. The annual input rate of material to the reactor, expressed as 100% P_2O_5 , shall not exceed 277,667 tons per year.

At your request, we have revised the baseline particulate matter (PM) and PM_{10} emissions for the existing South DAP Plant to reflect MAP production. The adjustment is based on the ratio of MAP product to DAP product produced from 46 TPH per ton of P_2O_5 input (= 92 TPH/100 TPH = 0.92). As shown in Table 1 of the application, baseline PM/PM_{10} emissions were 24.15 TPY and 22.41 TPY, respectively. The revised PM/PM_{10} baseline emissions are 22.22 TPY and 20.62 TPY, respectively. The revised future PM/PM_{10} emission rate to avoid PSD review then becomes

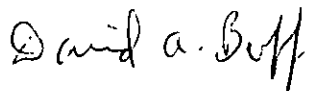
35.50 TPY. Refer to the revised Table 1 attached. The revised future lb/ton P₂O₅ limit then becomes:

$$35.5 \text{ TPY PM/PM}_{10} \times 2000 \text{ lb/ton} \div 277,667 \text{ TPY P}_2\text{O}_5 = 0.256 \text{ lb/ton P}_2\text{O}_5$$

Revised application pages reflecting these changes are attached. Please call if you have any questions concerning this additional information.

Sincerely,

GOLDER ASSOCIATES INC.



David A. Buff, P.E., Q.E.P.
Principal Engineer

DB/db/jkw

Enclosures

cc: S. McCann
D. Jellerson
T. Abel

P:\Projects\2003\0337506 Cargill - Green Bay\4\4.1\060603\L060603.doc

Table 1. PSD Applicability Analysis for South DAP Plant Project, Cargill Green Bay (revised 6/06/2003)

Source Description	Pollutant Emission Rate (TPY)								
	SO ₂	NO _x	CO	PM	PM ₁₀	VOC	TRS	SAM	Fluoride
Future Potential Emissions from Modified South DAP Fertilizer Plant	13.82	38.93	22.08	35.50	35.50	1.45	--	0.23	8.33
Actual Emission for Existing South DAP Fertilizer Plant ^a	0.03	7.37	2.94	22.22 ^c	20.62 ^c	0.25	--	--	5.44 ^b
TOTAL CHANGE DUE TO PROPOSED PROJECT	13.79	31.56	19.15	13.28	14.88	1.20	0.00	0.23	2.89
PSD SIGNIFICANT EMISSION RATE	40	40	100	25	15	40	10	7	3
PSD REVIEW TRIGGERED?	No	No	No	No	No	No	No	No	No

Footnotes:

^a Based on the actual emissions for calendar years 2002 and 2001 presented below:

	Pollutant Emission Rate (TPY)								
	SO ₂	NO _x	CO	PM	PM ₁₀	VOC	TRS	SAM	Fluoride
Calendar Year 2001	0.04	9.07	1.10	25.48	22.00	0.18	--	--	7.31
Calendar Year 2002	0.03	5.67	4.77	22.82	22.82	0.31	--	--	5.18
Average	0.03	7.37	2.94	24.15 ^c	22.41 ^c	0.25	--	--	6.25 ^b

^b Fluoride emissions reported in the 2001 and 2002 Annual Operating Reports are representative of DAP production only. The amount of fluoride contained in the phosphoric acid fed to the process is different depending on whether DAP or MAP is being produced. To calculate fluoride emissions from MAP production, the average annual fluoride emission rate for DAP production, of 6.25 TPY was multiplied by the ratio of fluoride in the phosphoric acid when producing MAP versus DAP of 71.5/82.2, as follows: 6.25 TPY x 71.5/82.2 = 5.44 TPY

^c PM/PM₁₀ emissions reported in the 2001 and 2002 Annual Operating Reports are representative of DAP production only. The PM/PM₁₀ emissions contained from MAP production is expected to be less than from MAP production since less product is produced per ton of P₂O₅ input. To calculate emissions from MAP production, the average annual emission rate for DAP production was multiplied by the ratio of MAP to DAP product of 92/100, as follows: 24.15 TPY x 92/100 = 22.22 TPY

4. Professional Engineer Statement:

I, the undersigned, hereby certify, except as particularly noted herein, that:*

(1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this Application for Air Permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; and

(2) To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application.

If the purpose of this application is to obtain a Title V source air operation permit (check here [], if so), I further certify that each emissions unit described in this Application for Air Permit, when properly operated and maintained, will comply with the applicable requirements identified in this application to which the unit is subject, except those emissions units for which a compliance schedule is submitted with this application.

If the purpose of this application is to obtain an air construction permit for one or more proposed new or modified emissions units (check here [X], if so), I further certify that the engineering features of each such emissions unit described in this application have been designed or examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application.

If the purpose of this application is to obtain an initial air operation permit or operation permit revision for one or more newly constructed or modified emissions units (check here [], if so), I further certify that, with the exception of any changes detailed as part of this application, each such emissions unit has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with all provisions contained in such permit.

David A. Buff
Signature

6/6/03
Date

(seal)

* Attach any exception to certification statement.

G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION

(Regulated Emissions Units -

Emissions-Limited and Preconstruction Review Pollutants Only)

Potential/Fugitive Emissions

1. Pollutant Emitted: PM		2. Total Percent Efficiency of Control:	
3. Potential Emissions: 11.78 lb/hour		4. Synthetically Limited? <input checked="" type="checkbox"/> [X]	
		35.5 tons/year	
5. Range of Estimated Fugitive Emissions: [] 1 [] 2 [] 3 _____ to _____ tons/year			
6. Emission Factor: 0.256 lb/ton P₂O₅ Reference: Proposed Limit		7. Emissions Method Code: 0	
8. Calculation of Emissions (limit to 600 characters): 0.256 lb/ton P₂O₅ x 46 ton/hr P₂O₅ = 11.78 lb/hr 277,667 TPY P₂O₅ x 0.256 lb/ton P₂O₅ x 1 ton/2000 lb = 35.5 TPY			
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): Represents total emissions from Stacks A and B combined.			

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: ESC PSD		2. Future Effective Date of Allowable Emissions:	
3. Requested Allowable Emissions and Units: 0.256 lb/ton P₂O₅		4. Equivalent Allowable Emissions: 11.78 lb/hour 35.5 tons/year	
5. Method of Compliance (limit to 60 characters): Annual Stack Emission Test using EPA Method 5.			
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters):			

G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION**(Regulated Emissions Units -****Emissions-Limited and Preconstruction Review Pollutants Only)****Potential/Fugitive Emissions**

1. Pollutant Emitted: PM₁₀	2. Total Percent Efficiency of Control:
3. Potential Emissions: 11.78 lb/hour	4. Synthetically Limited? [<input checked="" type="checkbox"/>] 35.5 tons/year
5. Range of Estimated Fugitive Emissions: [] 1 [] 2 [] 3 _____ to _____ tons/year	
6. Emission Factor: 0.256 lb/ton P₂O₅ Reference: Proposed Limit	7. Emissions Method Code:
8. Calculation of Emissions (limit to 600 characters): 0.256 lb/ton P₂O₅ x 46 ton/hr P₂O₅ = 11.78 lb/hr 277,667 TPY P₂O₅ x 0.256 lb/ton P₂O₅ x 1 ton/2000 lb = 35.5 TPY	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): Represents total emissions from Stacks A and B combined.	

Allowable Emissions Allowable Emissions _____ of _____

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance (limit to 60 characters):	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters):	