

Jeb Bush
Governor

Department of Environmental Protection

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

Colleen M. Castille
Secretary

November 8, 2005

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Doug Belle, Plant Manager
Mosaic Fertilizer, LLC
4390 County Road 640
Bartow, Florida 33830

Re: DEP File No. 1050053-041-AC (PSD-FL-359)
Green Bay Facility – Modification of South AP and North MAP/DAP Plants

Dear Mr. Belle:

The Department has received your consultant's letter dated November 3, 2005, requesting approval for scrubber changes. In our last letter to you dated October 31, 2005, we had indicated the changes that you were planning for the tail gas scrubber of the South AP Plant. Additional changes to the North and South venturi/cyclonic scrubbers for the cooler and screen/mills by installing venturi plates for additional PM control will be welcomed by the Department.

The Department will keep this application incomplete to provide the time you need to receive the components and to perform the engineering tests. We understand the engineering tests will be completed in February 2006. The Department would request that engineering tests for both PM and F be conducted. Once the test results are submitted to the Department, we will consider the results of that test as well as the previous compliance tests submitted with the application in arriving at a BACT limit for both PM and F.

If you have any questions, I can be contacted at 850/921-9528.

Sincerely,

Syed Arif, P.E.
Bureau of Air Regulation

/sa

cc: Mara Nasca, DEP-SWD
Dave Buff, P.E., Golder Associates, Inc
Gregg Worley, EPA Region 4
John Bunyak, NPS

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Mr. Doug Belle, Plant Manager Mosaic Fertilizer, LLC 4390 County Road 640 Bartow, Florida 33830		

PS Form 3800, January 2001

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1. Article Addressed to:

Mr. Doug Belle, Plant Manager
 Mosaic Fertilizer, LLC
 4390 County Road 640
 Bartow, Florida 33830

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Golder Associates Inc.

6241 NW 23rd Street, Suite 500
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Telephone (352) 336-5600
Fax (352) 336-6603
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BUREAU OF AIR REGULATION

November 3, 2005

0537573

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

Attention: Mr. Syed Arif, P. E.

RE: MOSAIC FERTILIZER, LLC, GREEN BAY FACILITY
DEP FILE NO. 1050053-041-AC/PSD-FL-359
MODIFICATION OF SOUTH AP AND NORTH MAP/DAP PLANTS
REQUEST TO MODIFY SCRUBBERS

Dear Mr. Arif:

As we discussed verbally last week, Mosaic Fertilizer, LLC (Mosaic) has investigated, at the Department's request, additional changes they could make in the existing scrubbing system on the South AP and North MAP/DAP Plants at the Green Bay facility. This investigation was performed in response to the Department's concerns and to hopefully move the permitting process along.

The cross-flow scrubbers on the two plants are designed to remove particulate matter (PM) from the exhaust gases coming from the dryer, screens and mills for each plant. These are final tailgas scrubbers which follow two primary venturi/cyclonic or wet scrubbers on each plant (refer to flow diagrams included in the October 6, 2005, response letter from Golder Associates).

The cross-flow scrubbers have a series of water spray nozzles which deliver scrubbing water to the scrubber. Mosaic believes that by changing the design of the spray nozzles in the scrubbers to achieve a finer mist, greater PM removal in the scrubbers will result. Therefore, Mosaic proposes to change the spray nozzles on the cross-flow scrubbers on both plants.

In addition, Mosaic desires to install venturi plates in two of the venturi/cyclonic scrubbers on the South AP Plant (those that serve the cooler and the screens/mills). The purpose of the plates is to increase the velocity of the gas stream in the throat of the venturi. The plates will act to decrease the open area of the throat causing a localized increase in the gas velocity. This will increase the pressure drop. The intent is to improve PM removal. PM removal is proportional to pressure drop. The higher pressure drop across the venturi will result in a greater fraction of increasingly smaller diameter particles being removed. Some evacuation gas flow may be lost due to this change, and are therefore Mosaic is proposing to only attempt this change on the screen and mill and cooler venturis

On the North MAP/DAP Plant, on the venturi/cyclonic scrubber serving the cooler, Mosaic is proposing to remove the box that previously held actuated blades that were used to increase the pressure drop. The removal of the box is to remove a section of turbulence that does not contribute to emission reduction but causes build up in the area and impacts air flow. Mosaic will install venturi plates in this scrubber, similar to the South AP Plant.

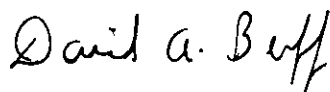


Mosaic believes these changes to the scrubbing system will result in improved PM removal. However, in order to determine the improvement, Mosaic requests permission to implement the changes and perform engineering tests to determine the extent of improvement, if any.

It will require approximately two months to order and to receive the components. The engineering tests could then be performed within about one month of receiving the equipment. Therefore, the engineering tests would be completed sometime in February 2006.

Please call if you have any questions concerning this request or need additional information. Mosaic anticipates that a letter would be issued by the Department granting approval to proceed with the scrubber changes.

Sincerely,
GOLDER ASSOCIATES INC.



David A. Buff, P.E., Q.E.P.
Principal Engineer
Florida P. E. #19011

DB/all

Enclosures

cc: L. Foeller, Mosaic
D. Jellerson, Mosaic

0537573/4.1/L110305

activities (including, as applicable, calibration checks and required zero and span adjustments), you must conduct all monitoring in continuous operation at all times that the unit is operating. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.

(3) For purposes of calculating data averages, you must not use data recorded during monitoring malfunctions, associated repairs, out of control periods, or required quality assurance or control activities. You must use all the data collected during all other periods in assessing compliance. Any period for which the monitoring system is out-of-control and data are not available for required calculations constitutes a deviation from the monitoring requirements.

(4) Determine the 3-hour block average of all recorded readings, except as provided in paragraph (c)(3) of this section.

(5) Record the results of each inspection, calibration, and validation check.

(d) If you have an operating limit that requires the use of a flow measurement device, you must meet the requirements in paragraphs (c) and (d)(1) through (4) of this section.

(1) Locate the flow sensor and other necessary equipment in a position that provides a representative flow.

(2) Use a flow sensor with a measurement sensitivity of 2 percent of the flow rate.

(3) Reduce swirling flow or abnormal velocity distributions due to upstream and downstream disturbances.

(4) Conduct a flow sensor calibration check at least semiannually.

(e) If you have an operating limit that requires the use of a pressure measurement device, you must meet the requirements in paragraphs (c) and (e)(1) through (6) of this section.

(1) Locate the pressure sensor(s) in a position that provides a representative measurement of the pressure.

(2) Minimize or eliminate pulsating pressure, vibration, and internal and external corrosion.

(3) Use a gauge with a minimum tolerance of 1.27 centimeters of water or a transducer with a minimum tolerance of 1 percent of the pressure range.

(4) Check pressure tap pluggage daily.

(5) Using a manometer, check gauge calibration quarterly and transducer calibration monthly.

(6) Conduct calibration checks any time the sensor exceeds the

manufacturer's specified maximum operating pressure range or install a new pressure sensor.

(f) If you have an operating limit that requires the use of a pH measurement device, you must meet the requirements in paragraphs (c) and (f)(1) through (3) of this section.

(1) Locate the pH sensor in a position that provides a representative measurement of scrubber effluent pH.

(2) Ensure the sample is properly mixed and representative of the fluid to be measured.

(3) Check the pH meter's calibration on at least two points every 8 hours of process operation.

(g) If you have an operating limit that requires the use of equipment to monitor voltage and secondary current (or total power input) of an electrostatic precipitator (ESP), you must use voltage and secondary current monitoring equipment to measure voltage and secondary current to the ESP.

(h) If you have an operating limit that requires the use of equipment to monitor sorbent injection rate (e.g., weigh belt, weigh hopper, or hopper flow measurement device), you must meet the requirements in paragraphs (c) and (h)(1) through (3) of this section.

(1) Locate the device in a position(s) that provides a representative measurement of the total sorbent injection rate.

(2) Install and calibrate the device in accordance with manufacturer's procedures and specifications.

(3) At least annually, calibrate the device in accordance with the manufacturer's procedures and specifications.

(i) If you elect to use a fabric filter bag leak detection system to comply with the requirements of this subpart, you must install, calibrate, maintain, and continuously operate a bag leak detection system as specified in paragraphs (i)(1) through (8) of this section.

(1) You must install and operate a bag leak detection system for each exhaust stack of the fabric filter.

(2) Each bag leak detection system must be installed, operated, calibrated, and maintained in a manner consistent with the manufacturer's written specifications and recommendations and in accordance with the guidance provided in EPA-454/R-98-015, September 1997.

(3) The bag leak detection system must be certified by the manufacturer to be capable of detecting particulate matter emissions at concentrations of 10 milligrams per actual cubic meter or less.

(4) The bag leak detection system sensor must provide output of relative or absolute particulate matter loadings.

(5) The bag leak detection system must be equipped with a device to continuously record the output signal from the sensor.

(6) The bag leak detection system must be equipped with an alarm system that will sound automatically when an increase in relative particulate matter emissions over a preset level is detected. The alarm must be located where it is easily heard by plant operating personnel.

(7) For positive pressure fabric filter systems that do not duct all compartments of cells to a common stack, a bag leak detection system must be installed in each baghouse compartment or cell.

(8) Where multiple bag leak detectors are required, the system's instrumentation and alarm may be shared among detectors.

§ 63.7530 How do I demonstrate initial compliance with the emission limits and work practice standards?

(a) You must demonstrate initial compliance with each emission limit and work practice standard that applies to you by either conducting initial performance tests and establishing operating limits, as applicable, according to § 63.7520, paragraph (c) of this section, and Tables 5 and 7 to this subpart OR conducting initial fuel analyses to determine emission rates and establishing operating limits, as applicable, according to § 63.7521, paragraph (d) of this section, and Tables 6 and 8 to this subpart.

(b) New or reconstructed boilers or process heaters in one of the liquid fuel subcategories that burn only fossil fuels and other gases and do not burn any residual oil must demonstrate compliance according to § 63.7506(a).

(c) If you demonstrate compliance through performance testing, you must establish each site-specific operating limit in Tables 2 through 4 to this subpart that applies to you according to the requirements in § 63.7520, Table 7 to this subpart, and paragraph (c)(4) of this section, as applicable. You must also conduct fuel analyses according to § 63.7521 and establish maximum fuel pollutant input levels according to paragraphs (c)(1) through (3) of this section, as applicable.

(1) You must establish the maximum chlorine fuel input (C_{input}) during the initial performance testing according to the procedures in paragraphs (c)(1)(i) through (iii) of this section.

(i) You must determine the fuel type or fuel mixture that you could burn in

your boiler or process heater that has the highest content of chlorine.

(ii) During the performance testing for HCl, you must determine the fraction of the total heat input for each fuel type burned (Q_i) based on the fuel mixture that has the highest content of chlorine, and the average chlorine concentration of each fuel type burned (C_i).

(iii) You must establish a maximum chlorine input level using Equation 5 of this section.

$$Cl_{input} = \sum_{i=1}^n [(C_i)(Q_i)] \quad (\text{Eq. 5})$$

Where:

Cl_{input} = Maximum amount of chlorine entering the boiler or process heater through fuels burned in units of pounds per million Btu.

C_i = Arithmetic average concentration of chlorine in fuel type, i , analyzed according to § 63.7521, in units of pounds per million Btu.

Q_i = Fraction of total heat input from fuel type, i , based on the fuel mixture that has the highest content of chlorine. If you do not burn multiple fuel types during the performance testing, it is not necessary to determine the value of this term. Insert a value of "1" for Q_i .

n = Number of different fuel types burned in your boiler or process heater for the mixture that has the highest content of chlorine.

(2) If you choose to comply with the alternative TSM emission limit instead of the particulate matter emission limit, you must establish the maximum TSM fuel input level (TSM_{input}) during the initial performance testing according to the procedures in paragraphs (c)(2)(i) through (iii) of this section.

(i) You must determine the fuel type or fuel mixture that you could burn in your boiler or process heater that has the highest content of TSM.

(ii) During the performance testing for TSM, you must determine the fraction of total heat input from each fuel burned (Q_i) based on the fuel mixture that has the highest content of total selected metals, and the average TSM concentration of each fuel type burned (M_i).

(iii) You must establish a baseline TSM input level using Equation 6 of this section.

$$TSM_{input} = \sum_{i=1}^n [(M_i)(Q_i)] \quad (\text{Eq. 6})$$

Where:

TSM_{input} = Maximum amount of TSM entering the boiler or process heater

through fuels burned in units of pounds per million Btu.

M_i = Arithmetic average concentration of TSM in fuel type, i , analyzed according to § 63.7521, in units of pounds per million Btu.

Q_i = Fraction of total heat input from based fuel type, i , based on the fuel mixture that has the highest content of TSM. If you do not burn multiple fuel types during the performance test, it is not necessary to determine the value of this term. Insert a value of "1" for Q_i .

n = Number of different fuel types burned in your boiler or process heater for the mixture that has the highest content of TSM.

(3) You must establish the maximum mercury fuel input level ($Mercury_{input}$) during the initial performance testing using the procedures in paragraphs (c)(3)(i) through (iii) of this section.

(i) You must determine the fuel type or fuel mixture that you could burn in your boiler or process heater that has the highest content of mercury.

(ii) During the compliance demonstration for mercury, you must determine the fraction of total heat input for each fuel burned (Q_i) based on the fuel mixture that has the highest content of mercury, and the average mercury concentration of each fuel type burned (HG_i).

(iii) You must establish a maximum mercury input level using Equation 7 of this section.

$$Mercury_{input} = \sum_{i=1}^n [(HG_i)(Q_i)] \quad (\text{Eq. 7})$$

Where:

$Mercury_{input}$ = Maximum amount of mercury entering the boiler or process heater through fuels burned in units of pounds per million Btu.

HG_i = Arithmetic average concentration of mercury in fuel type, i , analyzed according to § 63.7521, in units of pounds per million Btu.

Q_i = Fraction of total heat input from fuel type, i , based on the fuel mixture that has the highest mercury content. If you do not burn multiple fuel types during the performance test, it is not necessary to determine the value of this term. Insert a value of "1" for Q_i .

n = Number of different fuel types burned in your boiler or process heater for the mixture that has the highest content of mercury.

(4) You must establish parameter operating limits according to paragraphs (c)(4)(i) through (iv) of this section.

(i) For a wet scrubber, you must establish the minimum scrubber effluent

pH, liquid flowrate, and pressure drop as defined in § 63.7575, as your operating limits during the three-run performance test. If you use a wet scrubber and you conduct separate performance tests for particulate matter, HCl, and mercury emissions, you must establish one set of minimum scrubber effluent pH, liquid flowrate, and pressure drop operating limits. The minimum scrubber effluent pH operating limit must be established during the HCl performance test. If you conduct multiple performance tests, you must set the minimum liquid flowrate and pressure drop operating limits at the highest minimum values established during the performance tests.

(ii) For an electrostatic precipitator, you must establish the minimum voltage and secondary current (or total power input), as defined in § 63.7575, as your operating limits during the three-run performance test.

(iii) For a dry scrubber, you must establish the minimum sorbent injection rate, as defined in § 63.7575, as your operating limit during the three-run performance test.

(iv) The operating limit for boilers or process heaters with fabric filters that choose to demonstrate continuous compliance through bag leak detection systems is that a bag leak detection system be installed according to the requirements in § 63.7525, and that each fabric filter must be operated such that the bag leak detection system alarm does not sound more than 5 percent of the operating time during a 6-month period.

(d) If you elect to demonstrate compliance with an applicable emission limit through fuel analysis, you must conduct fuel analyses according to § 63.7521 and follow the procedures in paragraphs (d)(1) through (5) of this section.

(1) If you burn more than one fuel type, you must determine the fuel mixture you could burn in your boiler or process heater that would result in the maximum emission rates of the pollutants that you elect to demonstrate compliance through fuel analysis.

(2) You must determine the 90th percentile confidence level fuel pollutant concentration of the composite samples analyzed for each fuel type using the one-sided z-statistic test described in Equation 8 of this section.

$$P_{90} = \text{mean} + (\text{SD} \times t) \quad (\text{Eq. 8})$$

Where:

P_{90} = 90th percentile confidence level pollutant concentration, in pounds per million Btu.

mean = Arithmetic average of the fuel pollutant concentration in the fuel samples analyzed according to § 63.7521, in units of pounds per million Btu.

SD = Standard deviation of the pollutant concentration in the fuel samples analyzed according to § 63.7521, in units of pounds per million Btu.

t = t distribution critical value for 90th percentile (0.1) probability for the appropriate degrees of freedom (number of samples minus one) as obtained from a Distribution Critical Value Table.

(3) To demonstrate compliance with the applicable emission limit for HCl, the HCl emission rate that you calculate for your boiler or process heater using Equation 9 of this section must be less than the applicable emission limit for HCl.

$$HCl = \sum_{i=1}^n [(C_{i90})(Q_i)(1.028)] \quad (\text{Eq. 9})$$

Where:

HCl = HCl emission rate from the boiler or process heater in units of pounds per million Btu.

C_{i90} = 90th percentile confidence level concentration of chlorine in fuel type, i, in units of pounds per million Btu as calculated according to Equation 8 of this section.

Q_i = Fraction of total heat input from fuel type, i, based on the fuel mixture that has the highest content of chlorine. If you do not burn multiple fuel types, it is not necessary to determine the value of this term. Insert a value of "1" for Q_i .

n = Number of different fuel types burned in your boiler or process heater for the mixture that has the highest content of chlorine.

1.028 = Molecular weight ratio of HCl to chlorine.

(4) To demonstrate compliance with the applicable emission limit for TSM, the TSM emission rate that you calculate for your boiler or process heater using Equation 10 of this section must be less than the applicable emission limit for TSM.

$$TSM = \sum_{i=1}^n [(M_{i90})(Q_i)] \quad (\text{Eq. 10})$$

Where:

TSM = TSM emission rate from the boiler or process heater in units of pounds per million Btu.

M_{i90} = 90th percentile confidence level concentration of TSM in fuel, i, in units of pounds per million Btu as calculated according to Equation 8 of this section.

Q_i = Fraction of total heat input from fuel type, i, based on the fuel mixture that has the highest content of total selected metals. If you do not burn multiple fuel types, it is not necessary to determine the value of this term. Insert a value of "1" for Q_i .

n = Number of different fuel types burned in your boiler or process heater for the mixture that has the highest content of TSM.

(5) To demonstrate compliance with the applicable emission limit for mercury, the mercury emission rate that you calculate for your boiler or process heater using Equation 11 of this section must be less than the applicable emission limit for mercury.

$$\text{Mercury} = \sum_{i=1}^n [(HG_{i90})(Q_i)] \quad (\text{Eq. 11})$$

Where:

Mercury = Mercury emission rate from the boiler or process heater in units of pounds per million Btu.

HG_{i90} = 90th percentile confidence level concentration of mercury in fuel, i, in units of pounds per million Btu as calculated according to Equation 8 of this section.

Q_i = Fraction of total heat input from fuel type, i, based on the fuel mixture that has the highest mercury content. If you do not burn multiple fuel types, it is not necessary to determine the value of this term. Insert a value of "1" for Q_i .

n = Number of different fuel types burned in your boiler or process heater for the mixture that has the highest mercury content.

(e) You must submit the Notification of Compliance Status containing the results of the initial compliance demonstration according to the requirements in § 63.7545(e).

Continuous Compliance Requirements

§ 63.7535. How do I monitor and collect data to demonstrate continuous compliance?

(a) You must monitor and collect data according to this section and the site-specific monitoring plan required by § 63.7505(d).

(b) Except for monitor malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), you must monitor continuously (or collect data at all required intervals) at all times that the affected source is operating.

(c) You may not use data recorded during monitoring malfunctions,

associated repairs, or required quality assurance or control activities in data averages and calculations used to report emission or operating levels. You must use all the data collected during all other periods in assessing the operation of the control device and associated control system. Boilers and process heaters that have an applicable carbon monoxide work practice standard and are required to install and operate a CEMS, may not use data recorded during periods when the boiler or process heater is operating at less than 50 percent of its rated capacity.

§ 63.7540. How do I demonstrate continuous compliance with the emission limits and work practice standards?

(a) You must demonstrate continuous compliance with each emission limit, operating limit, and work practice standard in Tables 1 through 4 to this subpart that applies to you according to the methods specified in Table 8 to this subpart and paragraphs (a)(1) through (10) of this section.

(1) Following the date on which the initial performance test is completed or is required to be completed under §§ 63.7 and 63.7510, whichever date comes first, you must not operate above any of the applicable maximum operating limits or below any of the applicable minimum operating limits listed in Tables 2 through 4 to this subpart at all times except during periods of startup, shutdown and malfunction. Operating limits do not apply during performance tests. Operation above the established maximum or below the established minimum operating limits shall constitute a deviation of established operating limits.

(2) You must keep records of the type and amount of all fuels burned in each boiler or process heater during the reporting period to demonstrate that all fuel types and mixtures of fuels burned would either result in lower emissions of TSM, HCl, and mercury, than the applicable emission limit for each pollutant (if you demonstrate compliance through fuel analysis), or result in lower fuel input of TSM, chlorine, and mercury than the maximum values calculated during the last performance tests (if you demonstrate compliance through performance testing).

(3) If you demonstrate compliance with an applicable HCl emission limit through fuel analysis and you plan to burn a new type of fuel, you must recalculate the HCl emission rate using Equation 9 of § 63.7530 according to paragraphs (a)(3)(i) through (iii) of this section.



Jeb Bush
Governor

Department of Environmental Protection

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

Colleen M. Castille
Secretary

October 31, 2005

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Doug Belle, Plant Manager
Mosaic Fertilizer, LLC
4390 County Road 640
Bartow, Florida 33830

Re: DEP File No. 1050053-041-AC (PSD-FL-359)
Green Bay Facility - Modification of South AP and North MAP/DAP Plants

Dear Mr. Belle:

The Department has come to find out through your consultant Golder Associates that some spray modifications will be done in the tail-gas cross flow scrubber for the South AP Plant to determine any increased efficiency for PM and F controls due to the new spray pattern. Our understanding is that you will be submitting a letter request to be able to perform the test runs with the new spray pattern. If the testing shows promising results, the same modification can be done to the tail-gas cross flow scrubber of the North AP Plant.

Until such time as the request for special testing is submitted and the results of the testing are received by the Department, we will consider this application incomplete. If you have any questions, I can be contacted at 850/921-9528.

Sincerely,

Syed Arif, P.E.
Bureau of Air Regulation

/sa

cc: Mara Nasca, DEP-SWD
Dave Buff, P.E., Golder Associates, Inc
Gregg Worley, EPA Region 4
John Bunyak, NPS

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Mr. Doug Belle, Plant Manager
 Mosaic Fertilizer, LLC
 4390 County Road 640
 Bartow, Florida 33830

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Mr. Doug Belle, Plant Manager
 Mosaic Fertilizer, LLC
 4390 County Road 640
 Bartow, Florida 33830