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TO:	PHONE #:	FAX #:
Bruce Mitchell Department of Environmental Protection	850-413-9198	850-921-9533

<p>From : Margo T. Valenti, Paralegal Email Address : mvalenti@foley.com Sender's Direct Dial : 813.225.4110 Date : September 28, 2004 Client/Matter No : 024139-0116 User ID No : 2582</p>
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MESSAGE:

Attached please find a Statement of Compliance – Title V Source for each facility. If you have any questions or need additional information, please do not hesitate to give me a call.

If there are any problems with this transmission or if you have not received all of the pages, please call 813.229.2300.

Operator:	Time Sent:	Return Original To: Margo T. Valenti
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CONFIDENTIALITY NOTICE: THE INFORMATION CONTAINED IN THIS FACSIMILE MESSAGE IS INTENDED ONLY FOR THE PERSONAL AND CONFIDENTIAL USE OF THE DESIGNATED RECIPIENTS NAMED ABOVE. THIS MESSAGE MAY BE AN ATTORNEY-CLIENT COMMUNICATION, AND AS SUCH IS PRIVILEGED AND CONFIDENTIAL. IF THE READER OF THIS MESSAGE IS NOT THE INTENDED RECIPIENT OR ANY AGENT RESPONSIBLE FOR DELIVERING IT TO THE INTENDED RECIPIENT, YOU ARE HEREBY NOTIFIED THAT YOU HAVE RECEIVED THIS DOCUMENT IN ERROR, AND THAT ANY REVIEW, DISSEMINATION, DISTRIBUTION OR COPYING OF THIS MESSAGE IS STRICTLY PROHIBITED. IF YOU HAVE RECEIVED THIS COMMUNICATION IN ERROR, PLEASE NOTIFY US IMMEDIATELY BY TELEPHONE AND RETURN THE ORIGINAL MESSAGE TO US BY MAIL. THANK YOU.



Department of Environmental Protection

Division of Air Resource Management

STATEMENT OF COMPLIANCE - TITLE V SOURCE

REASON FOR SUBMISSION (Check one to indicate why this statement of compliance is being submitted)

<input type="checkbox"/> Annual Requirement	<input checked="" type="checkbox"/> Transfer of Permit	<input type="checkbox"/> Permanent Facility Shutdown
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REPORTING PERIOD*	REPORT DEADLINE**
January 1 through May 31 of 2004 (year)	August 26, 2004

*The statement of compliance must cover all conditions that were in effect during the indicated reporting period, including any conditions that were added, deleted, or changed through permit revision.

**See Rule 62-213.440(3)(a)2, F.A.C.

Facility Owner/Company Name: Cargill Fertilizer, Inc.

Site Name: Green Bay Facility Facility ID No. 1050063 County: Polk

COMPLIANCE STATEMENT (Check only one of the following three options)

A. This facility was in compliance with all terms and conditions of the Title V Air Operation Permit and, if applicable, the Acid Rain Part, and there were no reportable incidents of deviations from applicable requirements associated with any malfunction or breakdown of process, fuel burning or emission control equipment, or monitoring systems during the reporting period identified above.

B. This facility was in compliance with all terms and conditions of the Title V Air Operation Permit and, if applicable, the Acid Rain Part; however, there were one or more reportable incidents of deviations from applicable requirements associated with malfunctions or breakdowns of process, fuel burning or emission control equipment, or monitoring systems during the reporting period identified above, which were reported to the Department. For each incident of deviation, the following information is included:

1. Date of report previously submitted identifying the incident of deviation.
2. Description of the incident.

C. This facility was in compliance with all terms and conditions of the Title V Air Operation Permit and, if applicable, the Acid Rain Part, EXCEPT those identified in the pages attached to this report and any reportable incidents of deviations from applicable requirements associated with malfunctions or breakdowns of process, fuel burning or emission control equipment, or monitoring systems during the reporting period identified above, which were reported to the Department. For each item of noncompliance, the following information is included:

1. Emissions unit identification number.
2. Specific permit condition number (note whether the permit condition has been added, deleted, or changed during certification period).
3. Description of the requirement of the permit condition.
4. Basis for the determination of noncompliance (for monitored parameters, indicate whether monitoring was continuous, i.e., recorded at least every 15 minutes, or intermittent).
5. Beginning and ending dates of periods of noncompliance.
6. Identification of the probable cause of noncompliance and description of corrective action or preventative measures implemented.
7. Dates of any reports previously submitted identifying this incident of noncompliance.

For each incident of deviation, as described in paragraph B. above, the following information is included:

1. Date of report previously submitted identifying the incident of deviation.
2. Description of the incident.

STATEMENT OF COMPLIANCE - TITLE V SOURCE

RESPONSIBLE OFFICIAL CERTIFICATION

I, the undersigned, am a responsible official (Title V air permit application or responsible official notification form on file with the Department) of the Title V source for which this document is being submitted. With respect to all matters other than Acid Rain program requirements, I hereby certify, based on the information and belief formed after reasonable inquiry, that the statements made and data contained in this document are true, accurate, and complete.

David B. Jellerson
(Signature of Title V Source Responsible Official)

8-26-04
(Date)

Name: David B. Jellerson

Title: Environmental Manager

DESIGNATED REPRESENTATIVE CERTIFICATION (only applicable to Acid Rain source)

I, the undersigned, am authorized to make this submission on behalf of the owners and operators of the Acid Rain source or Acid Rain units for which the submission is made. I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment.

(Signature of Acid Rain Source Designated Representative)

(Date)

Name: _____

Title: _____

(Note: Attachments, if required, are created by a responsible official or designated representative, as appropriate, and should consist of the information specified and any supporting records. Additional information may also be attached by a responsible official or designated representative when elaboration is required for clarity. This report is to be submitted to both the compliance authority (DEP district or local air program) and the U.S. Environmental Protection Agency (EPA) (U.S. EPA Region 4, Air and EPCRA Enforcement Branch, 61 Forsyth Street, Atlanta GA 30303).)

Cargill Fertilizer, Green Bay Facility
Title V Annual Statement of Compliance
January 1, 2004 through May 31, 2004
Attachment 1 of 8

1. Emissions unit identification number: 007
2. Specific permit condition number: ILD.17
3. Description of the requirement of the permit condition: Parametric Monitoring Record keeping requirements
4. Basis for determination of noncompliance (for monitored parameters, indicate whether monitoring was continuous, i.e. recorded at least every 15 minutes, or intermittent): The monitoring system did not permanently record the continuous measurements of one or more scrubber parameters. Data was manually recorded intermittently throughout the day, however, the 15-minute block averages were not permanently recorded on a continuous basis.
5. Beginning and ending dates of periods of noncompliance: February 25, 2004 through February 29, 2004 and March 24, 2004 through March 31, 2004.
6. Identification of the probable cause of noncompliance and description of corrective action or preventative measures implemented: The electronic data became corrupted and improper backup procedures exacerbated the problem. This network has been totally restructured, with daily redndant backups.
7. Dates of any reports previously submitted identifying this incident of noncompliance: July 30, 2004 in the Monitoring Report.

**Cargill Fertilizer, Green Bay Facility
Title V Annual Statement of Compliance
Attachment 2 of 8**

1. Emissions unit identification number: 0016
2. Specific permit condition number: III.H.9.
3. Description of the requirement of the permit condition: Scrubber parameter limits
4. Basis for determination of noncompliance (for monitored parameters, indicate whether monitoring was continuous, i.e. recorded at least every 15 minutes, or intermittent): The scrubber parameter for liquid flow to the scrubber was below the minimum; although pressure drop and fan amps were in normal operating range.
5. Beginning and ending dates of periods of noncompliance: February 19, 2004.
6. Identification of the probable cause of noncompliance and description of corrective action or preventative measures implemented: Operator increased flow to the scrubber.
7. Dates of any reports previously submitted identifying this incident of noncompliance: July 30, 2004 in the Monitoring Report.

Cargill Fertilizer, Green Bay Facility
Title V Annual Statement of Compliance
Attachment 3 of 8

1. Emissions unit identification number: 013, 016, & 017
2. Specific permit condition number: III.F.12.; III.H.12.; III.I.12.
3. Description of the requirement of the permit condition: Parametric Monitoring Record keeping requirements
1. Basis for determination of noncompliance (for monitored parameters, indicate whether monitoring was continuous, i.e. recorded at least every 15 minutes, or intermittent): The monitoring system did not permanently record the continuous measurements of one or more scrubber parameters. Data was manually recorded intermittently throughout the day, however, the 15-minute block averages were not permanently recorded on a continuous basis.
4. Beginning and ending dates of periods of noncompliance: February 12 & 13, 2004, March 13 (EU 017 only), April 9 (EU017 only), and May 1 & 2, 2004.
5. Identification of the probable cause of noncompliance and description of corrective action or preventative measures implemented: The electronic data became corrupted and improper backup procedures exacerbated the problem. This network has been totally restructured, with daily redundant backups.
6. Dates of any reports previously submitted identifying this incident of noncompliance: July 30, 2004 in the Monitoring Report.

Cargill Fertilizer, Green Bay Facility
Title V Annual Statement of Compliance
Attachment 4 of 8

1. Emissions unit identification number: 0017
2. Specific permit condition number: III.9.
3. Description of the requirement of the permit condition: Scrubber parameter limits
4. Basis for determination of noncompliance (for monitored parameters, indicate whether monitoring was continuous, i.e. recorded at least every 15 minutes, or intermittent): The scrubber parameter for fan amps was below the minimum, although pressure drop and flow were in normal operating range.
5. Beginning and ending dates of periods of noncompliance: January 1 through January 15, 2004 and March 20 & 21, 2004.
6. Identification of the probable cause of noncompliance and description of corrective action or preventative measures implemented: Operator changed fan settings.
7. Dates of any reports previously submitted identifying this incident of noncompliance: July 30, 2004 in the Monitoring Report.

**Cargill Fertilizer, Green Bay Facility
Title V Annual Statement of Compliance
Attachment 5 of 8**

1. Emissions unit identification number: 029
2. Specific permit condition number: IIIM.19
3. Description of the requirement of the permit condition: Scrubber parameter limits
4. Basis for determination of noncompliance (for monitored parameters, indicate whether monitoring was continuous, i.e. recorded at least every 15 minutes, or intermittent): A scrubber parameter was beyond its limit.
5. Beginning and ending dates of periods of noncompliance: January 10, 14, 16-21, 26; February 6-8, 13-18, 23, 24; March 24, 31; April 1, 2, 4-7, 10, 11; May 16, 20-23, 2004
6. Identification of the probable cause of noncompliance and description of corrective action or preventative measures implemented: The operations unit had the incorrect parameter limit for two parameters (accounting for 31 episodes). Corrective action was to post the correct limits. The other episodes were either incorrect scrubber flow or pressure drop. In these cases the operator adjusted the scrubber operations to be within the limit. In all cases the other scrubbers were in normal operating range.
7. Dates of any reports previously submitted identifying this incident of noncompliance: July 30, 2004 in the Monitoring Report.

**Cargill Fertilizer, Green Bay Facility
Title V Annual Statement of Compliance
Attachment 6 of 8**

1. Emissions unit identification number: 0029
2. Specific permit condition number: III.M.22
3. Description of the requirement of the permit condition: Parametric Monitoring Record keeping requirements
4. Basis for determination of noncompliance (for monitored parameters, indicate whether monitoring was continuous, i.e. recorded at least every 15 minutes, or intermittent): The monitoring system did not permanently record the continuous measurements of one or more scrubber parameters. Data was manually recorded intermittently throughout the day; however, the 15-minute block averages were not permanently recorded on a continuous basis.
5. Beginning and ending dates of periods of noncompliance: February 13 through April 21 and May 1&2, 2004.
6. Identification of the probable cause of noncompliance and description of corrective action or preventative measures implemented: The electronic data became corrupted and improper backup procedures exacerbated the problem. This network has been totally restructured, with daily redundant backups.
7. Dates of any reports previously submitted identifying this incident of noncompliance: July 30, 2004 in the Monitoring Report.

**Cargill Fertilizer, Green Bay Facility
Title V Annual Statement of Compliance
Attachment 7 of 8**

1. Emissions unit identification number: 020
2. Specific permit condition number: II.23
3. Description of the requirement of the permit condition: Retain records for five years on scrubber operational data.
4. Basis for determination of noncompliance (for monitored parameters, indicate whether monitoring was continuous, i.e. recorded at least every 15 minutes, or intermittent):
Records review at the end of the period.
5. Beginning and ending dates of periods of noncompliance: January 1, 2004 to January 31 and February 9 to February 18 2004.
6. Identification of the probable cause of noncompliance and description of corrective action or preventative measures implemented: Log sheets were accidentally discarded during an office renovation. As a result, we are changing the process by inputting the data directly to a computer that is stored on the central computer server for the business that is backed up daily.
7. Dates of any reports previously submitted identifying this incident of noncompliance:
This occurrence is being initially submitted in this report.

**Cargill Fertilizer, Green Bay Facility
Title V Annual Statement of Compliance
Attachment 8 of 8**

1. Emissions unit identification number: 020
2. Specific permit condition number: 1.9
3. Description of the requirement of the permit condition: Record scrubber operational data every shift.
4. Basis for determination of noncompliance (for monitored parameters, indicate whether monitoring was continuous, i.e. recorded at least every 15 minutes, or intermittent): Records review.
5. Beginning and ending dates of periods of noncompliance: Sixty three days between February 2 and May 31, 2004.
6. Identification of the probable cause of noncompliance and description of corrective action or preventative measures implemented: An operator of a different production unit records the data; however, the requirement was not completely understood and the data was not regularly recorded. In fact, the scrubber was in operation, as well as, dedusting agent (coating oil) was applied to all of the fertilizer that was loaded out during this time period which acted as pollution control. Corrective action was to:
 - a. Have the Storage & Shipping Unit personnel ensure the data is recorded.
 - b. Submit a construction application to utilize dedusting agent (coating oil) as pollution control.
7. Dates of any reports previously submitted identifying this incident of noncompliance: This occurrence is being initially submitted in this report.