



Florida Department of Environmental Protection

Bob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

March 30, 2010

Electronic Mail - Received Receipt Requested

Mr. Rama Iyer,
Permitting Engineer
Mosaic Fertilizer, LLC
Post Office Box 2000
Mulberry, Florida 33860

Re: DEP File No. 1050059-066-AC
Multifos C Kiln – Methods of Operation
New Wales Plant

Dear Mr. Iyer:

The above referenced project for the methods of operation of Multifos C Kiln was received by the Department on October 27, 2009. A waiver of 30-day and 90-day periods for this project was submitted by Koogler & Associates on behalf of the applicant. The 30-day review period ends on March 31, 2010.

Pursuant to Rules 62-296.340, 62-4.055 and 62-4.070 F.A.C., Permit Processing, the Department requests submittal of additional information prior to processing the application. Should your response to any of the below items require new calculations, please submit the new calculations, assumptions, reference material and appropriate revised pages of the application form.

1. Please provide detailed NO_x emissions history for the Multifos C Kiln from installation until now. The original project went through a PSD review, but the applicant accepted a synthetic minor source status for Multifos C Kiln at a later date. The Department is interested in the NO_x emissions from Multifos C Kiln when it initially went through PSD review (Was NO_x a PSD pollutant?) and later when it became a synthetic minor source and accepted 39.9 tons per year (tpy) for NO_x emissions. Please provide the necessary stack tests, documents to support your NO_x emission numbers.
2. Please explain why the Department should not consider the implication of source obligation rule as codified in Rule 62-212.400(12)(b), F.A.C. The kiln was restricted to 39.9 tpy of NO_x and the modification is requesting additional 4 tpy of NO_x emissions which will put it above the 40 tpy threshold of being a PSD pollutant.
3. Please provide pictures showing the dump chute method of operation.

4. The application indicates re-establishing the minimum indicator value on successful completion of each required annual compliance test. Please explain what reasonable assurance the Department has that the applicant was in compliance throughout the previous year if the minimum indicator value this year is higher compared to the previous year.
5. The data (6/26/08) of NOx measurements during dump chute activity submitted with the application indicates that the higher mass NOx emissions correlate with lower C Kiln oxygen numbers. Please explain the reasons for lower oxygen numbers compared to other runs and how could this be rectified to keep NOx emissions to a minimum.
6. Please provide the actual mixed feed rate in tons per hour for the August 12, 2009 stack test. The synthetic minor source permit issued in August 2004 restricts the mixed feed rate to 12.1 tons per hour; please provide stack test results for the test that was operated close to the permitted rate of 12.1 tons per hour.
7. Please provide calculations for NOx emissions from Kiln C on an annual basis based on fuel usage. Please include natural gas as primary fuel as well as fuel oil as back-up fuel in your calculations.
8. Please provide a marked up version of the existing synthetic minor source permit with the changes requested in this application.

The Department will resume processing this application after receipt of the requested information. Rule 62-4.050(3), F.A.C. requires that all applications for a Department permit must be certified by a professional engineer registered in the State of Florida. This requirement also applies to responses to Department requests for additional information of an engineering nature. A new certification statement by the authorized representative or responsible official must accompany any material changes to the application. Rule 62-4.055(1), F.A.C. now requires applicants to respond to requests for information within 90 days.

If you have any questions regarding this matter, please call me at 850/921-9528.

Sincerely,



Syed Arif, P.E.

New Source Review Section

cc: Rama Iyer, Mosaic Fertilizer, LLC: rama.iyer@mosaicco.com
Cindy Zhang-Torres, P.E., Southwest District: cindy.zhang-torres@dep.state.fl.us
Pradeep Raval, Koogler & Associates, Inc.: praval@kooglerassociates.com
Vickie Gibson, DEP-BAR (victoria.gibson@dep.state.fl.us) (for read file)

Livingston, Sylvia

From: Livingston, Sylvia
Sent: Tuesday, March 30, 2010 10:29 AM
To: 'rama.iyer@mosaicco.com'
Cc: Zhang-Torres; 'praval@kooglerassociates.com'; Gibson, Victoria; Arif, Syed; Walker, Elizabeth (AIR)
Subject: Request for Additional Information: Mosaic Fertilizer, LLC - New Wales Plant (1050059-066-AC)
Attachments: RAI 1050059-066-AC.pdf

Dear Sir/Madam:

Please send a "reply" message verifying receipt of the attached document(s); this may be done by selecting "Reply" on the menu bar of your e-mail software, *noting that you can view the documents*, and then selecting "Send". We must receive verification of receipt and your reply will preclude subsequent e-mail transmissions to verify receipt of the document(s).

The document(s) may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible.

The document is in Adobe Portable Document Format (pdf). Adobe Acrobat Reader can be downloaded for free at the following internet site: <<http://www.adobe.com/products/acrobat/readstep.html>> .

The Bureau of Air Regulation is issuing electronic documents for permits, notices and other correspondence in lieu of hard copies through the United States Postal System, to provide greater service to the applicant and the engineering community. Please advise this office of any changes to your e-mail address or that of the Engineer-of-Record.

Thank you,

Sylvia Livingston
Bureau of Air Regulation
Division of Air Resource Management (DARM)
Department of Environmental Protection
850/921-9506
sylvia.livingston@dep.state.fl.us

Livingston, Sylvia

From: Iyer, Rama - FishHawk [Rama.Iyer@mosaicco.com]
Sent: Tuesday, March 30, 2010 1:32 PM
To: Livingston, Sylvia
Subject: RE: Request for Additional Information: Mosaic Fertilizer, LLC - New Wales Plant (1050059-066-AC)

Sylvia,
I got it and can view it.
Thanks,
/Rama Iyer,
Mosaic

From: Livingston, Sylvia [mailto:Sylvia.Livingston@dep.state.fl.us]
Sent: Tuesday, March 30, 2010 10:29 AM
To: Iyer, Rama - FishHawk
Cc: Zhang-Torres; praval@kooglerassociates.com; Gibson, Victoria; Arif, Syed; Walker, Elizabeth (AIR)
Subject: Request for Additional Information: Mosaic Fertilizer, LLC - New Wales Plant (1050059-066-AC)

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Thank you,

Sylvia Livingston
Bureau of Air Regulation
Division of Air Resource Management (DARM)
Department of Environmental Protection
850/921-9506
sylvia.livingston@dep.state.fl.us

The Department of Environmental Protection values your feedback as a customer. DEP Secretary Michael W. Sole is committed to continuously assessing and improving the level and quality of services provided to you. Please take a few minutes to comment on the quality of service you received. Simply click on [this link to the DEP Customer Survey](#). Thank you in advance for completing the survey.

Livingston, Sylvia

From: Pradeep Raval [praval@kooglerassociates.com]
Sent: Tuesday, March 30, 2010 10:41 AM
To: Livingston, Sylvia; rama.iyer@mosaicco.com
Cc: Zhang-Torres; Gibson, Victoria; Arif, Syed; Walker, Elizabeth (AIR)
Subject: RE: Request for Additional Information: Mosaic Fertilizer, LLC - New Wales Plant (1050059-066-AC)

Hi Sylvia, I got it.

Pradeep Raval

Koogler and Associates, Inc.

4014 NW 13th Street

Gainesville, FL 32609

tel: 352-377-5822

cell: 352-317-8635

fax: 352-377-7158

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From: Livingston, Sylvia [mailto:Sylvia.Livingston@dep.state.fl.us]
Sent: Tuesday, March 30, 2010 9:29 AM
To: rama.iyer@mosaicco.com
Cc: Zhang-Torres; praval@kooglerassociates.com; Gibson, Victoria; Arif, Syed; Walker, Elizabeth (AIR)
Subject: Request for Additional Information: Mosaic Fertilizer, LLC - New Wales Plant (1050059-066-AC)

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