

# Golder Associates Fax

To: Al Linero

Fax Number: 850-922-6979

Company: FDEP

Date: May 26, 1999

From: David Buff

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Our ref: 983-7580-0100

Voice Mail:

RE:

Total pages (including cover): 3

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## MESSAGE



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May 26, 1999

9837580-0100

Florida Department of Environmental Protection  
Bureau of Air Regulation  
New Source Review Section  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Attention: Mr. A. A. Linero, P.E.

RE: CARGILL FERTILIZER, INC.  
BARTOW NOS. 4 AND 5 SULFURIC ACID PLANTS

Dear Mr. Linero:

This correspondence is in response to the Department's letter dated December 14, 1998, regarding installation of cesium catalyst in the Nos. 4 and 5 Sulfuric Acid Plants at Bartow. Cargill has requested that the Department allow the use of cesium catalyst in the last mass at each of these sulfuric acid plants. Cargill's primary purpose in installing the cesium catalyst is to improve plant efficiency.

The Department states that the EPA has expressed concerns regarding the potential for increased production and emissions following catalyst changes in sulfuric acid plants. Although Cargill believes that some production increase may result from the cesium catalyst, this will be offset by lower SO<sub>2</sub> emissions, particularly during the time following turnarounds.

Cargill cannot accept a limitation on annual SO<sub>2</sub> emissions equal to the past 2 years of actual emissions, nor would it be appropriate to impose such a limit. This is because many other factors affect annual emissions, including plant operating days, periods of downtime or reduced production, market demand for phosphate products, time since last turnaround (some calendar years may have no turnaround), sulfuric acid plant operating variables, actual lb/ton emission rates, etc. Annual SO<sub>2</sub> emissions already vary from year to year based upon these factors and variations will continue from year to year. There would be no way to separate out the effects of the cesium catalyst alone on actual SO<sub>2</sub> emissions. If annual emissions from the two plants did increase in the future, it may be totally unrelated to the cesium catalyst. PSD regulations specifically exempt from PSD review increases in emissions due to increased production rates or operating hours, if such increases are due to increased demand, plant operating variations, etc.

Cargill is not requesting any increase in permitted sulfuric acid production rates for these two plants. Cargill already operates up to the permitted 2,600 TPD of acid production on a

Cargill Fertilizer, Inc.  
A. A. Linero, P.E.

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routine basis at both Nos. 4 and 5 Sulfuric Acid Plants. Thus, the plants are already able to achieve the permitted operating rate. The cesium catalyst will not allow production to increase on a short-term basis, since the plants are already restricted to 2,600 TPD by permit condition.

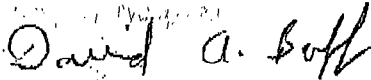
The Department has been advocating the use of Topsoe catalyst for some time due to its potential for lowering actual emissions. Cargill is proposing to use Topsoe catalyst in this project. This will be a distinct benefit to the environment since it is expected that SO<sub>2</sub> emissions will decrease on the basis of lb/ton of 100-percent acid produced. This project, if approved, could be a demonstration of the capabilities of this new catalyst. If the cesium catalyst is not installed in the Nos. 4 and 5 Sulfuric Acid Plants, Cargill will continue to produce and purchase acid from sulfuric acid plants where the acid is produced with no cesium catalyst, resulting in higher SO<sub>2</sub> emissions in terms of lb/ton of acid produced.

It is also noted that Cargill has no incentive to increase SO<sub>2</sub> emissions from the sulfuric acid plants. Higher SO<sub>2</sub> emissions means more potential sulfuric acid product being lost. Cargill will operate the sulfuric acid plants in the most efficient manner at all times to reduce potential SO<sub>2</sub> emissions, while meeting production demands.

In conclusion, Cargill believes the Department should allow Cargill to proceed immediately with this environmentally beneficial project, and this should not be a PSD issue. If you have any questions concerning this information, please call myself at 325-336-5600 or David Jellerson at 813-671-6297.

Sincerely,

GOLDER ASSOCIATES INC.



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

DB/db/jkk

Enclosures

cc: David Jellerson  
Deborah Waters  
Melody Russo

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