

## Department of Environmental Protection

Jeb Bush Governor Twin Towers Office Building 2600 Blair Stone Road Tallahassee. Florida 32399-2400

Colleen M. Castille Secretary

July 27, 2006

## CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Jeff Stewart, Environmental Superintendent Mosaic Fertilizer, LLC 8813 U.S. Highway 41 South Riverview, Florida 33569

Re: DEP File No. 0570008-053-AC; PSD-FL-315G Animal Feed Ingredient Plant Modification

Dear Mr. Stewart:

The Department has received the response on June 28, 2006, for our initial request for additional information regarding proposed modifications to the Animal Feed Ingredient (AFI) No. 1 and No. 2 Plants at the Riverview facility. The modification will allow the plants to achieve their permitted production rate of 832,200 tons per year. Based on our review of the responses, we have determined that additional information is needed in order to continue processing this modification request. Please submit the information requested below to the Department's Bureau of Air Regulation:

1. The process flow diagram (Attachment MF-EU6-11) submitted with the response does not reflect the authorized modifications in Air Construction Permit No. 0570008-043-AC; PSD-FL-315D issued in February 2004. Specifically, the following is not reflective in the process flow diagram:

## AFI Plant No. 1

 Maintain the use of a Venturi scrubber system to control emissions from the granulation and material handling systems. Mosaic had originally proposed a baghouse to control emissions from the material handling system.

## AFI Plant No. 2

- Construction of two new Venturi scrubbers to control emissions from the granulation system and material handling system (Mosaic had originally proposed a Venturi scrubber to control emissions from the granulation system and a baghouse to control emissions from the material handling system).
- Maintain a single common stack for the two scrubbers controlling emissions from the granulation and material handling systems. Mosaic had originally requested installation of two stacks, one for each scrubber.

Please re-submit the correct flow diagram which represents the modifications allowed in PSD-FL-315D.

2. The Department requested a PE sealed statement assuring that the current modifications to the crossflow packed scrubber will be sufficient to meet the increased load and to meet the established emission limits

"More Protection, Less Process"

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for the acid defluorination system. This was not provided. The fresh water usage to the demister pad has been decreased from 60 gpm in the original design to 40 gpm as shown in the modification diagram submitted with the response. Please explain what affect this will have on the overall fluoride control. Also, explain if the third stage pond water flow of around 240 gpm comes from the first or second stage or is it independent of the first two stages. Additionally, submit a PE sealed statement that can provide reasonable assurance to the Department that the modified scrubber will comply with the permit emission limits for fluoride.

3. Please provide some engineering estimates of fluoride emissions from a defluorinated acid storage tank. Show all the calculations and assumptions used in developing that estimate.

The Department will resume processing this modification request 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.

Bureau of Air Regulation

/sa

cc: Mara Nasca, DEP-SWD
Diana Lee, HCEPC
Scott McCann, P.E., Golder Associates, Inc.

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
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1. Article Addressed to:  Mr. Jeff Stewart  Mosaic Fertilizer, LLC 8813 Highway 41 South Riverview, Florida 33569	If YES, enter delivery address below: No  No  3. Service Type Certified Mail
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