

Department of Environmental Protection

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

David B. Struhs Secretary

June 28, 2001

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. E. O. Morris, Vice President of Environment, Health and Safety Cargill Fertilizer, Inc. 8813 Highway 41 South Riverview, Florida 33569

Re: DEP File No. 0570008-036-AC; PSD-FL-315

Riverview Plant Expansion

Dear Mr. Morris:

The Department received additional information in response to the request for information letters dated April 24, 2001 and April 26, 2001. Based on our review of this information, we have determined that additional information is needed in order to continue processing this application package. Please submit the information requested below to the Department's Bureau of Air Regulation:

- 1. Please respond to the attached U.S. Fish and Wildlife Service (USFWS) correspondence (e-mail).
- 2. The current fluorides BACT limits for granular MAP/DAP plants are established at 0.041 lb/ton P₂O₅ input. The application is requesting 0.045 lb/ton P₂O₅ input as a limit. The test data submitted with the application suggests that 0.041 lb/ton is achievable without going through any modifications. Since the plant is not undergoing any production increase, please explain the reasons for not accepting a 0.041 lb/ton fluoride limit.
- 3. In the original application an annual PM₁₀ background value of 26 ug/m³ from the Gardinier monitor (12-057-0083) was used in the ambient air quality analysis (AAQS). The annual PM₁₀ background value given in Tables 6-15 and 6-16 of the revised application is 23 ug/m³. No justification is given for this value. The updated annual PM₁₀ monitoring concentration for the year 2000 from the Gardinier PM₁₀ monitor is 25 ug/m³. This value may be used as the annual PM₁₀ background concentration for the PM₁₀ AAQS analysis. The total annual PM₁₀ concentration results in Tables 6-15 and 6-16 should reflect this background value.

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.

"More Protection, Less Process"

If you have any questions regarding this matter, please call Mr. Cleve Holladay at 850/921-8986, or Mr. Syed Arif, P.E., at 850/921-9528.

Sincerely,

for

A.A. Linero, P.E. Administrator New Source Review Section

AAL/sa

Enclosure

cc: G. Worley, EPA

J. Bunyak, NPS

B. Thomas, DEP-SWD

A. Harmon, HCEPC

D. Buff, P.E., Golder Associates, Inc.