



# 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

August 9, 2007

ELECTRONIC MAIL - RECEIVED RECEIPT REQUESTED

[Tom.Fuchs@mosaicco.com](mailto:Tom.Fuchs@mosaicco.com)

Mr. Thomas W. Fuchs  
Plant Manager – New Wales  
Mosaic Fertilizer, LLC.  
Post Office Box 2000  
Mulberry, Florida 33860

Re: DEP File No. 1050059-055-AC  
Best Achievable Retrofit Technology Application  
Mosaic – New Wales Plant

Dear Mr. Fuchs:

The Department received on July 12, 2007, Golder Associates Inc. response submitted on your behalf to our request for additional information dated February 28, 2007. Based on our review of the submittal, 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 by September 15, 2007. The Department is requiring the information to be submitted by that date as the processing of this application is under time constraints. The Division of Air Resource Management has a goal to finalize all BART determinations by October 1, 2007. The Department must submit a state implementation plan (SIP) to EPA by December 17, 2007 identifying all BART determinations.

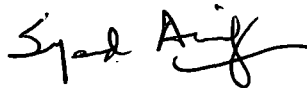
Pursuant to Rules 62.296.340, 62-4.055, and 62-4.070 F.A.C., Permit Processing, the Department requests submittal of additional information prior to processing the application. Should your response to any of the below items require new calculations, please submit the new calculations, assumptions, reference material and appropriate revised pages of the application form.

1. As indicated in your response letter, cesium-enhanced catalyst had been added to the 4<sup>th</sup> pass of each converter for production increase for the three SAPs. Please provide cost information for the addition of cesium-enhanced catalyst for each SAP. Also, provide cost effectiveness in \$/ton of SO<sub>2</sub> removed due to this modification where the emission limit for SO<sub>2</sub> was brought down from 4 lb/ton to 3.5 lb/ton. Please explain if there were additional parameters responsible for getting the emissions rate down, other than the addition of the cesium-enhanced catalyst in the 4<sup>th</sup> pass.
2. The graphical representation of SO<sub>2</sub> emissions for the three SAPs indicates that 3.5 lb/ton (3-hour average) is consistently being met for all the three SAPs. What additional changes can be done to the plants to provide some cushion in meeting the SO<sub>2</sub> emission limit of 3.5 lb/ton (3-hour rolling average) all the times?

3. As indicated in your response letter, #6 fuel oil usages for the AFI Granulation Plant in 2003 was 288 hours and none in 2002. The potential SO<sub>2</sub> emissions from burning #6 fuel oil are 619 tons per year. Is the facility willing to take a restriction in #6 fuel oil usage to keep the SO<sub>2</sub> emissions to a minimum? If not, provide the cost effectiveness in converting to a lower sulfur content distillate fuel oil (0.05 percent sulfur) keeping in mind that the lower distillate fuel oil can also be used in the MAP/DAP and the Multi fos plants.
4. In all the cost effectiveness calculations that were submitted with your response the project contingency was based on 25% of DCC +ICC. Please explain for using such a high percentage of 25% when the EPA Cost Manual uses 3% contingency figure. Additionally, explain the reasons for using contingency based on DCC+ICC and not on PEC.
5. Cost Effectiveness calculations for installing caustic scrubbers for the A and B kilns in Table G-1 and Table 5-4 of the response letter uses actual emissions from the A and B kilns as baseline SO<sub>2</sub> emissions. The baseline emissions should be based by discounting the current emissions control of sulfite solutions to A/B ducts as the caustic scrubber will replace the present setup. Please redo the cost effectiveness calculations taking this into account.

We will be happy to meet and discuss the details with you and your staff. I may be contacted at 850/921-9528. You may discuss the modeling requirements with Mr. Cleve Holladay at 850/921-8986.

Sincerely,



Syed Arif, P.E.  
North Permitting Section

/sa

cc: G. Worley, EPA ([worley.gregg@epa.gov](mailto:worley.gregg@epa.gov))  
D. Morse, NPS ([dee\\_morse@nps.gov](mailto:dee_morse@nps.gov))  
D. Turley, Mosaic Fertilizer ([david.turley@mosaicco.com](mailto:david.turley@mosaicco.com))  
C. Zhang-Torres, DEP-SWD ([cindy.zhang-torres@dep.state.fl.us](mailto:cindy.zhang-torres@dep.state.fl.us))  
D. Buff, P.E., Golder Associates Inc. ([dbuff@golder.com](mailto:dbuff@golder.com))

**Harvey, Mary**

---

**From:** Harvey, Mary  
**Sent:** Thursday, August 09, 2007 3:15 PM  
**To:** 'tom.fuchs@mosaicco.com'; 'worley.gregg@epa.gov'; 'Mr. Dee Morse, National Park Service'; 'david.turley@mosaicco.com'; Zhang-Torres; 'Mr. David Buff, Golder Associates'  
**Cc:** Arif, Syed; Adams, Patty; Gibson, Victoria  
**Subject:** Mosaic Fertilizer - DEP File #1050059-055  
**Attachments:** Ltr.-Mosaic Fertilizer - Project #1050059-055-AC.pdf

Tracking:	Recipient	Delivery	Read
	'tom.fuchs@mosaicco.com'		
	'worley.gregg@epa.gov'		
	'Mr. Dee Morse, National Park Service'		
	'david.turley@mosaicco.com'		
	Zhang-Torres	Delivered: 8/9/2007 3:15 PM	Read: 8/9/2007 3:37 PM
	'Mr. David Buff, Golder Associates'		
	Arif, Syed	Delivered: 8/9/2007 3:15 PM	Read: 8/9/2007 3:17 PM
	Adams, Patty	Delivered: 8/9/2007 3:15 PM	
	Gibson, Victoria	Delivered: 8/9/2007 3:15 PM	Read: 8/9/2007 3:29 PM

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<http://www.adobe.com/products/acrobat/readstep.html>.

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Thank you,

8/9/2007

**Harvey, Mary**

**From:** Harvey, Mary  
**Sent:** Thursday, August 09, 2007 3:25 PM  
**To:** 'Mr. Jason Goodwin, Calpine Corporation'; 'Ms. Heidi Whidden, Calpine Corporation'; 'Mr. Tomas Davis, ECT'; 'Mr. Mike Halpine,; Zhang-Torres; 'Ms. Kathleen Forney'; 'Mr. Jim Little, EPA Region 4'; 'Mr. Dee Morse, National Park Service'  
**Cc:** Thomas, Bruce X.; Adams, Patty; Gibson, Victoria  
**Subject:** Letter - Calpine Corporation - Jason Goodwin - Project #1050221-012-AC (PSD-FL-185)  
**Attachments:** Letter - Calpine Corporation - Project #1050221-012-AC.pdf

Tracking:	Recipient	Delivery	Read
	'Mr. Jason Goodwin, Calpine Corporation'		
	'Ms. Heidi Whidden, Calpine Corporation'		
	'Mr. Tomas Davis, ECT'		
	'Mr. Mike Halpine,'	Failed: 8/9/2007 3:25 PM	
	Zhang-Torres		Read: 8/9/2007 3:39 PM
	'Ms. Kathleen Forney'		
	'Mr. Jim Little, EPA Region 4'		
	'Mr. Dee Morse, National Park Service'		
	Thomas, Bruce X.		
	Adams, Patty		
	Gibson, Victoria		Read: 8/9/2007 3:30 PM

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Thank you,

8/9/2007

Harvey, Mary

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**From:** Arif, Syed  
**To:** Harvey, Mary  
**Sent:** Thursday, August 09, 2007 3:18 PM  
**Subject:** Read: Mosaic Fertilizer - DEP File #1050059-055

Your message

**To:** 'tom.fuchs@mosaicco.com'; 'worley.gregg@epa.gov'; 'Mr. Dee Morse, National Park Service'; 'david.turley@mosaicco.com'; Zhang-Torres; 'Mr. David Buff, Golder Associates'  
**Cc:** Arif, Syed; Adams, Patty; Gibson, Victoria  
**Subject:** Mosaic Fertilizer - DEP File #1050059-055  
**Sent:** 8/9/2007 3:15 PM

was read on 8/9/2007 3:17 PM.

Harvey, Mary

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**From:** Worley.Gregg@epamail.epa.gov  
**Sent:** Thursday, August 09, 2007 3:18 PM  
**To:** Harvey, Mary  
**Subject:** Re: Mosaic Fertilizer - DEP File #1050059-055

Gregg M. Worley  
Chief, Air Permits Section  
U.S. EPA Region 4  
(404) 562-9141  
fax (404) 562-9019

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vey, Mary

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**From:** Buff, Dave [DBuff@GOLDER.com]  
**To:** undisclosed-recipients  
**Sent:** Thursday, August 09, 2007 3:21 PM  
**Subject:** Read: Mosaic Fertilizer - DEP File #1050059-055

Your message

To: DBuff@GOLDER.com  
Subject:

was read on 8/9/2007 3:21 PM.

Harvey, Mary

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**From:** Dee\_Morse@nps.gov  
**Sent:** Thursday, August 09, 2007 6:10 PM  
**To:** Harvey, Mary  
**Subject:** Mosaic Fertilizer - DEP File #1050059-055

Return Receipt

Your Mosaic Fertilizer - DEP File #1050059-055  
document:

was Dee Morse/DENVER/NPS  
received  
by:

at: 08/09/2007 04:10:11 PM



Turley, Mary

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**From:** Turley, Charles D - New Wales [David.Turley@mosaicco.com]  
**Sent:** Thursday, August 09, 2007 3:48 PM  
**To:** undisclosed-recipients  
**Subject:** Read: Mosaic Fertilizer - DEP File #1050059-055  
  
**Attachments:** ATT536128.txt



ATT536128.txt  
(307 B)

Your message

**To:** Fuchs, Tom W - New Wales; worley.gregg@epa.gov; Mr. Dee Morse, National Park Service; Turley, Charles D - New Wales; Zhang-Torres; Mr. David Buff, Golder Associates  
**Cc:** Arif, Syed; Adams, Patty; Gibson, Victoria  
**Subject:** Mosaic Fertilizer - DEP File #1050059-055  
**Sent:** Thu, 9 Aug 2007 15:15:19 -0400

was read on Thu, 9 Aug 2007 15:26:18 -0400

Harvey, Mary

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**From:** Zhang-Torres  
**To:** Harvey, Mary  
**Sent:** Thursday, August 09, 2007 3:37 PM  
**Subject:** Read: Mosaic Fertilizer - DEP File #1050059-055

Your message

**To:** 'tom.fuchs@mosaicco.com'; 'worley.gregg@epa.gov'; 'Mr. Dee Morse, National Park Service'; 'david.turley@mosaicco.com'; Zhang-Torres; 'Mr. David Buff, Golder Associates'  
**Cc:** Arif, Syed; Adams, Patty; Gibson, Victoria  
**Subject:** Mosaic Fertilizer - DEP File #1050059-055  
**Sent:** 8/9/2007 3:15 PM

was read on 8/9/2007 3:37 PM.

ey, Mary

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**From:** Gibson, Victoria  
**To:** Harvey, Mary  
**Sent:** Thursday, August 09, 2007 3:29 PM  
**Subject:** Read: Mosaic Fertilizer - DEP File #1050059-055

Your message

**To:** 'tom.fuchs@mosaicco.com'; 'worley.gregg@epa.gov'; 'Mr. Dee Morse, National Park Service'; 'david.turley@mosaicco.com'; Zhang-Torres; 'Mr. David Buff, Golder Associates'  
**Cc:** Arif, Syed; Adams, Patty; Gibson, Victoria  
**Subject:** Mosaic Fertilizer - DEP File #1050059-055  
**Sent:** 8/9/2007 3:15 PM

was read on 8/9/2007 3:29 PM.

**Harvey, Mary**

---

**From:** Fuchs, Tom W - New Wales [Tom.Fuchs@mosaicco.com]  
**Sent:** Thursday, August 09, 2007 3:25 PM  
**To:** Harvey, Mary  
**Subject:** RE: Mosaic Fertilizer - DEP File #1050059-055

---

**From:** Harvey, Mary [mailto:Mary.Harvey@dep.state.fl.us]  
**Sent:** Thursday, August 09, 2007 3:15 PM  
**To:** Fuchs, Tom W - New Wales; worley.gregg@epa.gov; Mr. Dee Morse, National Park Service; Turley, Charles D - New Wales; Zhang-Torres; Mr. David Buff, Golder Associates  
**Cc:** Arif, Syed; Adams, Patty; Gibson, Victoria  
**Subject:** Mosaic Fertilizer - DEP File #1050059-055

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**Harvey, Mary**

---

**From:** Fuchs, Tom W - New Wales [Tom.Fuchs@mosaicco.com]  
**Sent:** Thursday, August 09, 2007 3:22 PM  
**To:** undisclosed-recipients  
**Subject:** Read: Mosaic Fertilizer - DEP File #1050059-055  
**Attachments:** ATT534776.txt



ATT534776.txt  
(303 B)

Your message

**To:** Fuchs, Tom W - New Wales; worley.gregg@epa.gov; Mr. Dee  
Morse, National Park Service; Turley, Charles D - New Wales; Zhang-Torres; Mr. David Buff,  
Golder Associates  
**Cc:** Arif, Syed; Adams, Patty; Gibson, Victoria  
**Subject:** Mosaic Fertilizer - DEP File #1050059-055  
**Sent:** Thu, 9 Aug 2007 15:15:19 -0400

was read on Thu, 9 Aug 2007 15:21:35 -0400

## Harvey, Mary

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**From:** Forney.Kathleen@epamail.epa.gov  
**Sent:** Tuesday, August 14, 2007 5:51 PM  
**To:** Harvey, Mary  
**Cc:** Worley.Gregg@epamail.epa.gov  
**Subject:** Fw: Mosaic Fertilizer - DEP File #1050059-055

**Attachments:** Ltr.-Mosaic Fertilizer - Project #1050059-055-AC.pdf



Ltr.-Mosaic  
Fertilizer - Proje...

Thanks for the letter  
Katy

-----  
Katy R. Forney  
Air Permits Section  
EPA - Region 4  
61 Forsyth St., SW  
Atlanta, GA 30024

Phone: 404-562-9130  
Fax: 404-562-9019

----- Forwarded by Kathleen Forney/R4/USEPA/US on 08/14/2007 05:50 PM  
-----

Gregg  
Worley/R4/USEPA/  
US

08/09/2007 03:18  
PM

To  
James Little/R4/USEPA/US@EPA,  
Kathleen Forney/R4/USEPA/US@EPA,  
Gracy Danois/R4/USEPA/US@EPA

cc

Subject  
Fw: Mosaic Fertilizer - DEP File  
#1050059-055

Gregg M. Worley  
Chief, Air Permits Section  
U.S. EPA Region 4  
(404) 562-9141  
fax (404) 562-9019

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