



**CARGILL
FERTILIZER, INC.**

RECEIVED

SEP 09 1998
BUREAU OF
AIR REGULATION

RECEIVED

SEP 09 1998
BUREAU OF
AIR REGULATION

8813 Highway 41 South - Riverview, Florida 33569 - Telephone 813-677-9111 - TWX 810-876-0648 - Telex 52666 - FAX 813-671-6146

CERTIFIED MAIL: P 376 476 215

September 3, 1998

C.H. Fancy, P.E., Chief,
Bureau of Air Regulation
Department of Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Subject: Proof of Publication - Notice of Intent to Issue Air Construction Permit
DEP File No. 0570008-025-AC, Draft PSD Permit No. PSD-FL-250
No. 7 Sulfuric Acid Plant at Cargill Fertilizer, Inc., Tampa Plant,
8813 U.S. Highway 41 South, Riverview, Florida 33569 in Hillsborough
County.

Gentlemen:

You will find enclosed Proof of Publication of the Notice of Intent to Issue a Permit, as required by the Department, for the subject facility.

If there are any questions, please contact me at (813) 671-6297.

Sincerely,

David B. Jellerson
Environmental Superintendent

/dh

Enclosure

x.c. O. Morris
Files: P-10-7



recycled paper

Cargill
PSD-AI-250

The Department will issue the final permit with the attached conditions unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The Department will accept written comments concerning the proposed permit issuance action for a period of 30 (thirty) days from the date of publication of "Public Notice of Intent to Issue Air Construction Permit." Written comments should be provided to the Department's Bureau of Air Regulation at 2600 Blair Stone Road, Mail Station #5505, Tallahassee, FL 32399-2400. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in the proposed agency action, the Department shall revise the proposed permit and require, if applicable, another Public Notice.

The Department will issue the permit with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to Sections 120.569 and 120.57 F.S., before the deadline for filing a petition. The procedures for petitioning for a hearing are set forth below. Mediation is not available in this proceeding.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under Sections 120.569 and 120.57 of the Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida, 32399-3000. Petitions filed by the permit applicant or any of the parties listed below must be filed within fourteen days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3) of the Florida Statutes must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of this notice of intent, whichever occurs first. Under Section 120.60(3), however, any person who asked the Department for notice of agency action may file a petition within fourteen days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57 F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205 of the Florida Administrative Code.

A petition that disputes the material facts on which the Department's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner, the name, address, and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of how and when petitioner received notice of the agency action or proposed action; (d) A statement of all disputed issues of material fact. If there are none, the petition must so

indicate, (e) A concise statement of the ultimate facts alleged, as well as the rules and statutes which entitle the petitioner to relief and (f) A demand for relief.

A petition that does not dispute the material facts upon which the Department's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Department's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any such final decision of the Department on the application have the right to the petition to become a party to the proceeding, in accordance with the requirements set forth above.

A complete project file is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m. Monday through Friday, except legal holidays, at:
Department of Environmental Protection
Bureau of Air Regulation
111 S. Magnolia Drive Suite 4
Tallahassee, Florida 32301
Telephone: 850/488-0114
Fax: 850/922-6979

Department of Environmental Protection
Southwest District Office
3804 Coconut Palm Drive
Tampa, Florida 33619-8218
Telephone: 813/744-6100
Fax: 813/744-6084

Hillsborough County Environmental Protection Commission
1410 North 21 Street
Tampa, Florida 33605
Telephone: 813/272-5530
Fax 813/272-5605

The complete project file includes the Draft Permit, the application, and the information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the New Resource Review Section at 111 South Magnolia Drive, Suite 4, Tallahassee, Florida 32301, or call 850/488-0114, for additional information.
3477 8/29/98

THE TAMPA TRIBUNE
Published Daily
Tampa, Hillsborough County, Florida

State of Florida }
 County of Hillsborough } ss.

Before the undersigned authority personally appeared J. Rosenthal, who on oath says that she is Classified Billing Manager of The Tampa Tribune, a daily newspaper published at Tampa in Hillsborough County, Florida; that the attached copy of advertisement being a

LEGAL NOTICE

in the matter of _____

PUBLIC NOTICE OF INTENT

was published in said newspaper in the issues of _____

AUGUST 29, 1998

Affiant further says that the said The Tampa Tribune is a newspaper published at Tampa in said Hillsborough County, Florida, and that the said newspaper has heretofore been continuously published in said Hillsborough County, Florida, each day and has been entered as second class mail matter at the post office in Tampa, in said Hillsborough County, Florida for a period of one year next preceding the first publication of the attached copy of advertisement; and affiant further says that she has neither paid nor promised any person, this advertisement for publication in the said newspaper.

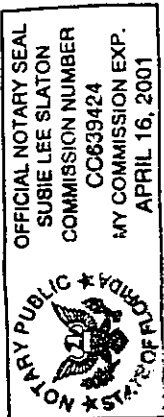
J. Rosenthal

Sworn to and subscribed before me, this _____ day
 of _____ SEPTEMBER, A.D. 19 98

Personally Known _____ or Product Identification _____
 Type of Identification Produced _____

(SEAL)

Susie Lee Slaton



PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
 DEP File No. 0570008-025-AC (PSD-FL-250);
 Cargill Fertilizer Sulfuric Acid Plant No. 7 Hillsborough County

The Department of Environmental Protection (Department) gives notice of its intent to issue an air construction permit to Cargill Fertilizer, Inc. to increase the capacity of the existing Sulfuric Acid Plant No. 7 located at an U.S. Highway 41 South in Riverview, Hillsborough County. The applicant's name and address are: Cargill Fertilizer, Inc., 8813 U.S. Highway 41 South, Riverview, Florida 33569.

The sulfuric acid plant produces the reagent used to acidulate phosphate rock to make fertilizers. Molten sulfur is the necessary raw material for sulfuric acid production. The project consists of: replacement of the drying tower and blower; installation of a new converter and boiler; increase in catalyst loading; and modifications to the existing sulfur burner, converter, interpass tower, final tower, boiler, superheaters, economizers, feedwater system, and steam system.

The project will increase the capacity of Plant No. 7 from 2,200 to 3,200 tons per day of sulfuric acid. The increase will reduce the need to purchase sulfuric acid from outside suppliers in order to operate the phosphoric acid plant at its maximum capacity. The Department has determined that PSD review and a BACT determination is not required for other emission units at the facility as a result of the modification of the sulfuric acid plant.

Control of SO₂ emissions is accomplished by the process itself which is based on the conversion of SO₂ to SO₃ and subsequent recovery as sulfuric acid product. The efficiency of the conversion and recovery is over 99.7 percent. The BACT emission limit for SO₂ was determined by the Department to be 3.5 pounds per ton of sulfuric acid produced on a 24-hour basis. Annual SO₂ emissions will be increased from 1,251 to 2,044 tons per year (TPY). The sulfuric acid mist BACT for this project was determined to be replacement of all mist eliminators with new ones and installation of additional ones to handle the increased production rate. This will meet a sulfuric acid mist emission limit of 0.12 pounds per ton of acid produced which is equal to 70 TPY. NDX emissions of 0.12 pounds per ton of acid produced and 70 TPY are inherently low and the increase is not significant with respect to PSD.

An air quality impact analysis was conducted. Emissions from the facility will not significantly contribute to or cause a violation of any state or federal ambient air quality standards. The maximum predicted SO₂ PSD Class II increments consumed by all sources in the area, including this project, will be as follows:
 For Averaging Times of 3-hour, 24-hour and Annual, the Allowable Increment (mg/m³) will be 512, 91 and 20 respectively; the Increment Consumed (mg/m³) will be 214, 56 and 0.5 respectively; and Percent Consumed will be .62, .3 and 2.5 respectively.

The project has no significant impact on the PSD Class I Chassahowitzka National Wilderness Area.

COMMISSION
WILLIAM
CHRIS BART
JIM NORMAN
JAN PLATT
THOMAS SCOTT
ED TERAICHIK



ADMINISTRATIVE OFFICE, LEGAL &
WATER MANAGEMENT DIVISION
TELEPHONE (813) 272-5530
FAX (813) 272-5530
AIR MANAGEMENT DIVISION
TELEPHONE (813) 272-5530
WASTE MANAGEMENT DIVISION
TELEPHONE (813) 272-5738
WETLANDS MANAGEMENT DIVISION
TELEPHONE (813) 272-7104

EXECUTIVE DIRECTOR
ROGER H. STEWART

ENVIRONMENTAL PROTECTION COMMISSION
OF HILLSBOROUGH COUNTY

FAX TRANSMITTAL SHEET

DATE: 10/8/98

TO: Al Leno

FAX PHONE: _____ VOICE PHONE: _____

TOTAL NUMBER OF PAGES INCLUDING THIS COVER PAGE: 3

EPC FAX TRANSMISSION LINE: (813) 272-5605
FOR RETRANSMISSION OR ANY FAX PROBLEMS, CALL: (813) 272-5530

FROM: Jerry Campbell

(CIRCLE APPLICABLE SECTION BELOW)

- AIR DIVISION
- ENFORCEMENT
- ENGINEERING
- SUPPORT OPERATIONS

SPECIAL INSTRUCTIONS: _____

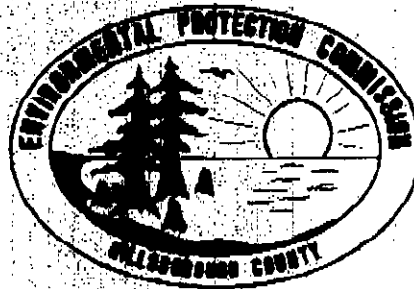


COMMISSION

DOTTE BERGER
 JOE CHILLURA
 CHRIS HART
 JIM NOEMAN
 JAN PLATT
 THOMAS SCOTT
 ED TURANCHIK

EXECUTIVE DIRECTOR

ROGER P. STEWART



ADMINISTRATIVE OFFICES, LEGAL &
 WATER MANAGEMENT DIVISION
 1900 9TH AVENUE
 TAMPA, FLORIDA 33606
 TELEPHONE (813) 272-5900
 FAX (813) 272-5157

AIR MANAGEMENT DIVISION
 TELEPHONE (813) 272-5530

WASTE MANAGEMENT DIVISION
 TELEPHONE (813) 272-3788

WETLANDS MANAGEMENT DIVISION
 TELEPHONE (813) 272-7104

MEMORANDUM

DATE: October 8, 1998
 TO: Al Linero, P.E.
 FROM: Rick Kirby, P.E. THRU: ^{JK} Jerry Campbell, P.E.
 SUBJECT: Cargill #7, Sulfuric Acid Plant (SAP), PSD-FL-250 and 0570008-025-AC

EPC reviewed the subject application and provided input on several occasions to FDEP's New Source Review Section. Subsequently, we have reviewed the draft construction permit/BACT evaluation and are in general agreement with their requirements. Issues of concern regarding this project are discussed as follows:

1. The SO₂ emission limit of 3.5 lb/ton on a 24 hour average is apparently the most restrictive BACT ever done on a sulfuric acid plant. Although we still contend that a scrubber would further reduce emissions and that a full economic analysis in terms of dollars per ton was not satisfactorily done, by the applicant, we will accept the Department's determination.
2. We performed an inspection of the facility on September 4, 1998. As part of the inspection, we reviewed the #7, #8 and #9 SAPs to determine if they could be considered one facility based on the EPA definition and, therefore require BACT for all 3 units. We found that other than the ability to pump liquid sulfur from one drop pit to others, the plants are continuous separate trains. Thus we agree that the units are separate and BACT should not be required of the other 2 units as a result of this modification.
3. Cargill has acknowledged that there are problems with modeled ambient concentrations of SO₂ in the area. They argued that they are not a significant contributor to the problem and that this issue should be dealt with outside of this permit review. EPC has decided not to challenge this permit but to pursue the SO₂ issue separately. We are encouraged by your acknowledgment of the problem in your letter of August 25, 1998 to David Jellerson, and we intend to make resolution of this issue a priority.
4. We determined that the frequency and the overall trend of citizen complaints in the area does not justify further restrictions in their permit.



Al Lino

October 7, 1998

Page 2

5. FDEP has established 10% as the opacity requirement for the plant as required in 40 CFR 60, Subpart H. We still contend that the rule which should control opacity is 62-296.712, F.A.C. and that 5% opacity should be required. This is based on the fact that the definition of particulate matter in the FAC includes aerosols. Although we have decided that this issue is not critical, we would appreciate your reconsideration of this issue.

Thank you for the opportunity to provide comments.

mjh

cc: David Jellerson