

Date: 4/6/98 3:25:00 PM
From: Steve Marks
Subject: Cargill Rock Mill No 7 PSD - Regional Haze Updates
To: holladay_c@dep.state.fl.us
CC: Dave Buff

Cleve,

Please see attached an updated Table 7-3 that supersedes both Tables 7-2 and 7-3 in the submitted air modeling analysis. The attached results are based on Mesopuff II results while the tables in the report are based on ISC results. Footnotes in Table 7-3 explain where each data entry comes from. The referenced Mesopuff II input/output files were included on the disk that was sent to you with the ISCST3 printout. Note that I did not provide a hard copy of the Mesopuff II files for regional haze.

Steve

Table 7-3. Estimated Change in Deciview Due to the Cargill Riverview Project

Pollutant	Value	Reference
<u>Maximum Emission Rates (lb/hr)</u>		
SO ₂	19.80	
NO _x	5.60	
PM10	5.80	
<u>Highest Predicted 24-Hour Concentrations (µg/m³)</u>		
SO ₂	---	
NO _x	---	
PM10	0.0116	(1)
SO ₄	0.0032	(2)
NO ₃	0.0011	(2)
(NH ₄) ₂ SO ₄	0.0045	(3)
NH ₄ NO ₃	0.0014	(4)
Average RH (percent)	86	(5)
RH factor, f(RH)	5.9	(6)
<u>Extinction Coefficients (km⁻¹)</u>		
Background: (bextb)	0.0602	(7)
Source: (bexts)		
(NH ₄) ₂ SO ₄	0.00008	(8)
NH ₄ NO ₃	0.00003	(8)
PM10	0.000035	(9)
Total (bexts)	0.000139	
<u>Deciview Change</u>		
total delta dv =	0.0230	(10)

- (1) Highest predicted PM10 concentration (as SO₄) in Mesopuff II model without chemistry for 1 year meteorological record from Tampa for 1986
- (2) Highest predicted concentration from SO₂ and NO_x emissions from Mesopuff II model with chemistry for 1 year meteorological record from Tampa for 1986
- (3) (NH₄)₂ SO₄ = SO₄ times 1.375 from IWAQM Appendix B
- (4) NH₄ NO₃ = NO₃ times 1.29 from IWAQM Appendix B
- (5) Based on meteorological data collected at the National Weather Service station in Tampa for February 6, 1986 (worst day).
- (6) From IWAQM Figure B-1. Based on average of hourly computed RH factors
- (7) bextb = 3.912 / 65 where background visual range is 65 km.
- (8) values = 0.003 * compound concentration * f(RH) from IWAQM Appendix B
- (9) PM10 = 0.003 * compound concentration. f(RH) set = 1 for fine PM
- (10) Delta DV = 10 * ln (1 + bexts/bextb)



Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

April 7, 1998

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. David B. Jellerson
Environmental Superintendent
Cargill Fertilizer, Inc.
8813 Highway 41 South
Riverview, Florida 33569

Re: DEP File No. 0570008-024-AC (PSD-FL-247)
No. 7 Phosphate Rock Grinding/Drying System

Dear Mr. Jellerson:

The Bureau of Air Regulation received the above-referenced application today. We have the following preliminary question which may need to be supplemented by additional questions as the 30-day completeness review period progresses:

It is stated that Cargill's proposed BACT limit of 0.016 gr/dscf is equivalent to the NSPS emission limit of 0.06 lb/ton for the dryer plus 0.012 lb/ton for the grinder. Reference is made to other BACT determinations for "Dryers of Aggregates/Non-Metallic Minerals" and the fact the most recent BACT limit under that classification is 0.02 gr/dscf and that Cargill's proposed BACT limit is below that figure. A quick review of other BACT determinations done by this Department reveals that there have been more stringent limits required than is being proposed by Cargill. To assist us in arriving at a realistic BACT limit, please provide copies of test reports more recent than 1983 showing actual emissions of the No. 5 and No. 9 Raymond Mills (rock dryers/grinders) and provide the air-to-cloth ratios for those units.

If you have any questions regarding this matter, please call John Reynolds at 850/921-9536.

Sincerely,

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

AAL/jr

cc: Brian Beals, EPA
John Bunyak, NPS
Bill Thomas, SWD
Joe King, Polk Co
John Koogler, K&A

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PS Form 3800, April 1995
 6570008-DXL-AC
 OSD-FL-247

Golder Associates Inc.

6241 NW 23rd Street, Suite 500
Gainesville, FL 32653-1500
Telephone (352) 336-5600
Fax (352) 336-6603



April 22, 1998

Mr. A. A. Linero, P.E.
New Source Review Section
Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2400

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APR 24 1998

BUREAU OF
AIR REGULATION

RE: Cargill Fertilizer, Inc.
No. 7 Phosphate Rock Grinding/Drying System
DEP File No. 0570008-024-AC (PSD-FL-247)

Dear Mr. Linero:

The purpose of this correspondence is to respond to the Department's letter dated April 7, 1998, concerning the above referenced request, and in follow up to our recent conversations. Provided in the attached table is a summary of the recent (and only) compliance test data conducted on the No. 5 and No. 9 Rock Mills since the recent modifications were implemented.

During the compliance testing, the total wet rock feed rate to the two mills was 39.23 tons/hr (TPH), or 19.615 TPH to each mill. Each mill has a baghouse with a total filter area of 6,900 sq. ft., and the design air flow is 24,000 acfm per mill, resulting in an actual air-to-cloth ratio of 3.5:1. Note that the production rate during testing was only about 80% of the design rate of 50 TPH, wet feed, and the volumetric air flow was similarly about 80% of design.

As shown in the table, the PM emissions from the two rock mills varied. The No. 5 Rock Mill emitted at an average rate of 1.4 lb/hr, 0.0101 gr/dscf and 0.071 lb/ton of wet rock feed. The No. 9 Rock Mill emitted PM at an average rate of 0.7 lb/hr, 0.0054 gr/dscf, and 0.036 lb/ton of feed. The reasons for this variation in emissions is unknown at this time, but it is recognized that this single test represents a very limited data set.

The test data demonstrate that PM emissions could range up to Cargill's proposed PM limit for the No. 7 Rock Mill of 0.072 lb/ton of wet feed. The actual test data from the No. 5 Rock Mill demonstrated actual emissions of 0.071 lb/ton of feed. Cargill will be installing a larger baghouse for the new No. 7 Rock Mill (air-to-cloth ratio of 3.1:1) in order to provide a greater degree of emission reduction. However, the level of emission control will not be known until actual compliance testing is conducted.

Based on the above information, it is requested that the BACT limit for the new No. 7 Rock Mill be established at the NSPS level of 0.072 lb/ton of wet rock feed. In conversations with the Department, it was indicated that the Department has issued BACT determinations at levels lower than those proposed by Cargill. However, no specific examples were provided. It is possible that these other BACT determinations are from similar, albeit different, types of processes other than phosphate rock grinding/drying, and therefore may not be directly applicable to Cargill's proposed project. The

Table 1. Summary of PM Stack Test Data, No. 5 and No. 9 Rock Mills, Cargill Riverview

Mill No. 5:					Permit Limit
	Run 1	Run 2	Run 3	Average	
Moisture	8.4	11.3	9.4	9.7	
Temperature	165	162	163	163	
Flow Rate (acfm)	20,810	21,370	21,007	21,062	
Flow Rate (dscfm)	16,104	16,091	16,130	16,108	
Emissions:					
PM (lb/hr)	1.5	1.5	1.2	1.4	2.59
PM (gr/DSCF)	0.0109	0.0109	0.0087	0.0101	0.02
PM (lb/ton) (a)	0.076	0.076	0.061	0.071	0.26
 Mill No. 9:					Permit Limit
	Run 1	Run 2	Run 3	Average	
Moisture	6.5	11.1	11.6	9.7	
Temperature	166	168	169	168	
Flow Rate (acfm)	19,501	19,666	20,432	19,866	
Flow Rate (dscfm)	15,379	14,699	15,162	15,080	
Emissions:					
PM (lb/hr)	0.9	0.3	0.9	0.7	2.59
PM (gr/DSCF)	0.0068	0.0024	0.0069	0.0054	0.02
PM (lb/ton) (a)	0.046	0.015	0.046	0.036	0.26

(a) Based on total wet rock input rate of 39.23 ton/hr, or 19.615 ton/hr each mill.

Mr. A. A. Linero, P.E.

Page 2

April 22, 1998

grinding operation could lead to the generation of smaller particles, which are harder to control compared to other processes where just drying or cooling is involved.

Thank you for considering this information. If you require anything further, please do not hesitate to call.

Sincerely,

David A. Buff

David A. Buff, P.E.

Principal Engineer

Florida P.E. #19011

S E A L

DB/arz

cc: David Jellerson, Cargill
Kathy Edgemon, Cargill
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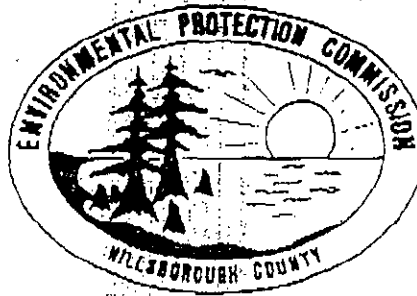
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 TELEPHONE (813) 272-7104

MEMORANDUM

DATE: April 23, 1998
 TO: John Reynolds, DEP
 THROUGH: Jerry Campbell *JC*
 FROM: Noel Morera *NM*
 SUBJECT: Cargill Proposed Mill #7

On April 6, 1998, the EPC received a construction application for a No. 7 Phosphate Rock Drying/Grinding operation (AIRS No. 0570008-024-AC)(PSD-FL-247). The EPC has reviewed the application and has the following questions for consideration in the Department's completeness determination:

1. On page PSD-11 Cargill stated that the baghouse could meet a maximum particulate emission rate of 2.10 lb/hr and 9.18 tons per year. Our interpretation of 40 CFR 60.402 is that since the rock grinder and the dryer have one emission point then the most stringent particulate emission standard of .012 lb/ton for rock grinding will apply to the common exhaust of these two sources.
2. The NSPS interpretation is that at 25 TPH dry rock throughput, the emissions would equate to $(25 \text{ tons/hr} \times .012 \text{ lb/ton} \times 7000 \text{ gr/lb} \times \text{hr}/60 \text{ min}) \div 15,200 \text{ dscfm} = .002 \text{ gr/dscf}$. What assurance does the applicant have that the proposed baghouse could meet this .002 gr/dscf particulate emission rate.
3. NSPS requires the operator to install a measuring device capable of measuring the throughput within 5% accuracy to "any affected dryer" for the test. Cargill has proposed to weigh the rail cars and we would need assurance that method meets the NSPS accuracy requirements.
4. We feel that the material handling in the rail cars, Mills 5, 9, 7, and the equipment located after the mills are all subject to a 0% opacity standard [40 CFR 60.402(5)]. Cargill should provide assurance.
5. The permits for the raymond mills 5 & 9 allow for .06 lb/ton of particulate matter emissions. Since they are grinding and drying together they should meet the more stringent .012 lb/ton emission rate for rock grinding 40 CFR 60.402(4). Perhaps we can use this modification of the phosphate rock plant (mills 5 and 9 and all the material handling sources) to correct it.



John Reynolds, DEP

April 22, 1998

Page 2

6. With the 25 TPH dry rock process rate, the new mill will produce 219,000 tons of rock in a year. What are the actual emissions going to be from the sources down stream of the mills (Map Plants 3 & 4, DAP plant 5, GTS/DAP plant, etc.)? What are the additional emissions from the sulfuric and phosphoric acid plants to process this amount of rock? Cargill would need to include these additional emissions in their PSD analysis and propose BACT level controls for any affect emission unit.
7. What contemporaneous increases have been made in the last 5 years to the facility? Have these increases been included in the PSD analysis? If the recent modifications to their acid plants are part of this expansion, then Cargill needs to acknowledge it and revise this application accordingly.

We are concerned that this application appears to have completely missed the scope of this project and the required controls. Either we are misreading the rules or Cargill has a lot of work to do before the Department can take final action on their project. Please copy us on all your correspondence and notify us if you plan to meet with the applicant or their consultant. Because of the scope of this project, we will give it a priority and make every effort to fully participate.

Thanks for your cooperation.

Attachment (September 11, 1997, Memorandum from Campbell to Reynolds)

cag



Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

April 28, 1998

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. David B. Jellerson
Environmental Superintendent
Cargill Fertilizer, Inc.
8813 Highway 41 South
Riverview, Florida 33569

Re: DEP File No. 0570008-024-AC (PSD-FL-247)
No. 7 Phosphate Rock Grinding/Drying System

Dear Mr. Jellerson:

The Bureau of Air Regulation received supplemental information on April 24 pursuant to an incompleteness letter dated April 7. Cargill provided a summary of additional test results but did not indicate the date of the test, nor were copies of the actual test reports provided as requested. Opacity readings should have been provided along with the PM data. Please correct these deficiencies and also provide the additional information requested by the Environmental Protection Commission of Hillsborough County in its letter dated April 23, 1998 (attached).

There is no apparent justification for establishing an "additive" standard by combining the separate limits for rock drying and grinding when these operations are performed in a single piece of equipment. The NSPS limits are not based on a combined system such as Cargill has proposed in this application and therefore are not entirely relevant to this BACT determination.


It is stated in Cargill's response that no specific examples of more stringent BACT limits were provided in recent discussions with Bureau staff, however, Bureau staff pointed out that a recent BACT determination for IMC-Agrico's DAP Plant No. 2 (1050059-020-AC/PSD-FL-241) included a PM/PM10 limit based on 0.010 gr/scf for a DAP cooler. In the absence of information showing that phosphate rock dust is finer than DAP dust, the presumption is that Cargill's proposed level of 0.016 gr/scf may not be representative of a current BACT limit. This presumption is reinforced by the test data submitted in Cargill's April 22 letter (0.010 and 0.005 gr/sfc). If Cargill believes that additional testing of the No. 5 and No. 9 units would show higher emissions, then the testing should be done as soon as possible and a waiver of the 90 day permitting clock provided.

Mr. David B. Jellerson
Page 2 of 2
April 28, 1998

The application shows the PM/PM10 emission changes associated with a previous modification of the No. 5 and No. 9 mills that are contemporaneous with the currently proposed project, but does not address contemporaneous changes for other pollutants such as NOx.

Please address the above and if there are any questions, please call John Reynolds at 850/921-9536.

Sincerely,



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

AAL/JR

Attachments

cc: Brian Beals, EPA
John Bunyak, NPS
Bill Thomas, SWD
Joe King, Polk Co.
~~John Koogler, K&A~~ Buff, D., Golder Assoc.

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PS Form 3800, April 1995
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 PSD-FL-247



**CARGILL
FERTILIZER, INC.**

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MAY 20 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

May 15, 1998

CERTIFIED MAIL: P 204 942 217

Mr. A. A. Linero, P.E.
New Source Review Section
Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 323992400

RE: Cargill Fertilizer, Inc.
No. 7 Phosphate Rock Grinding/Drying System
DEP File No. 0570008024AC (PSDFL247)

Dear Mr. Linero:

The purpose of this correspondence is to respond to the Department's letter dated April 28, 1998, concerning the above referenced application, and in follow up to recent conversations. We have also reviewed the Hillsborough Co. Environmental Protection Commission's (HCEPC), and provide responses to their comments.

In regards to the testing for the Nos. 5 and 9 Rock Mills, a complete test report is attached. The report also contains opacity readings, which for No. 5 Rock Mill averaged 3.8%, and for the No. 9 Rock Mill averaged 0.3%.

Before discussing the Department's comments concerning an additive NSPS standard, it is first appropriate to discuss the applicability of the NSPS, Subpart NN, to Cargill's proposed operation. Cargill agrees with the Department's position that the NSPS limits are not relevant to this BACT determination. Review of the Background Information Document (BID) for the proposed Subpart NN standards revealed that phosphate rock plants were to be excluded from regulation if the plant was located at a fertilizer plant (see attached excerpt from the BID). The BID states the following:

"The definition of phosphate rock plant implicitly excludes fertilizer plants."

As a result, Subpart NN should not be applicable to the proposed No. 7 Rock Mill, since it will be located at the Riverview fertilizer plant. [Note that this conclusion would also apply to the recently modified Nos. 5 and 9 Rock Mills]

In addition, the Subpart NN standards apply to phosphate rock "dryers" and "grinders". In Cargill's case, the unit is not a standalone "dryer" nor a standalone "grinder". It is an integral grinder/dryer which performs both functions in a single unit. Review of the BID for the proposed



recycled paper

Mr. A. Linero

May 15, 1998

Page 2

and final Subpart NN standards indicates that such an integral unit was neither envisioned nor evaluated in the rule development. Dryers and grinders as distinct process units were evaluated, and the rules promulgated on the basis of standalone units. Therefore, Subpart NN should not apply to the No. 7 Rock Mill since it is an integral grinder/dryer. [Note that this conclusion would also apply to the recently modified Nos. 5 and 9 Rock Mills]

If it were concluded that the NSPS Subpart NN standards would apply to the No. 7 Rock Mill, we disagree with the Department's statement that there is no apparent justification for establishing an "additive" standard by combining the separate NSPS limits for phosphate rock grinding and drying. Two EPA applicability determinations are attached which support this position, as discussed below:

1. The first determination addresses a situation similar to Cargill's: a cement kiln and clinker cooler which both vent to a common control device, and which both have standards based on mass per unit of production (i.e., lb/ton of clinker). EPA concludes that adding the two individual limits together to provide a combined allowable limit is acceptable.
2. The second case is again similar to Cargill: two facilities (units) in question are part of the same production line, their individual emission limits are expressed on a mass of emissions per mass of product basis, and they both vent to a common system. EPA states that the applicable standard would be the sum of the individual limits for the two facilities.

In addition, the Department recently approved a "combined" emission limit for the No.5/No. 9 Rock Mills, where the NSPS was applied to the rock drying and the State of Florida standard applied to the rock grinding. It was recognized that two distinct operations are being conducted, while integrated into one operation with one control device.

The No. 7 Rock Mill rock grinding/drying operation is similar to the above cited examples. The "grinding" of the phosphate rock occurs totally in the rock grinder. However, drying of the rock only begins in the dryer, while continuing to take place throughout the entire system (ducts, cyclones, etc.), up to and including within the baghouse. There is one common control, a baghouse, for both operations.

Also of importance is the fact that PM/PM10 emissions due to grinding alone or drying alone are expected to be higher than either operation individually. This fact is reflected in the magnitudes of the two NSPS: 0.012 lb/ton for grinding as opposed to 0.06 lb/ton for drying. It is not logical from an engineering standpoint to expect the rock drying operation to be able to meet the more stringent NSPS for rock grinding simply because the two operations have one emission point.. Both grinding and drying are still being conducted, so it is logical to expect that PM/PM10 emissions will be generated from both processes.

In regards to Cargill's proposed BACT limit equivalent to 0.016 gr/dscf, the ground/dried phosphate rock is indeed much finer than dust from a DAP cooler. Based on production measurements, 50% of DAP product is of size 3 mm or greater with 96% of the product being between 2 mm and 4 mm, while for ground phosphate rock, 50% is less than 0.05 mm. The grinding operation leads to the generation of smaller particles, which are harder to control compared to other processes where just drying or cooling is involved. In addition, the rock dust being manufactured in the grinding/drying operation is physically and chemically different than



DAP. Other than the size, another significant difference for this discussion is the hygroscopic nature of the DAP material. This feature of DAP causes it to be tacky and to agglomerate. Due to these fundamental differences between DAP and ground, dry phosphate rock, the BACT determination should not be based on DAP facilities. It should also be noted that the selection of the proposed baghouse control equipment is partially driven by the need to minimize product loss and water balance problems which would be created by the use of wet scrubbers such as are used for control of emissions from DAP coolers.

Although the PM test data from the No. 5 and No. 9 Rock Mills show emissions lower than 0.016 gr/dscf, the data also show the potential variability of such emissions, and based on the limited amount of test data, Cargill's proposed limit is reasonable. On a lb/ton basis, the test data demonstrate that PM emissions could range up to Cargill's proposed PM limit for the No. 7 Rock Mill of 0.072 lb/ton of wet feed. The actual test data from the No. 5 Rock Mill demonstrated actual emissions of 0.071 lb/ton of feed.

The previous contemporaneous changes for pollutants other than PM/PM10 would be the net change in emissions due to the No. 5 and No. 9 Rock Mills project. The change is based on the No. 5/No. 9 Rock Mills actual emissions before the change, and the post-modification maximum emissions. Actual emissions from the mills prior to the modification are shown in Table 1, based on actual fuel usage for 1995/1996. The post-modification maximum emissions for the mills are obtained from the permit application for the mills. The net changes are shown in Table 2.

HCEPC's comments are addressed below, in the same order as they appear in the HCEPC letter.

1. As discussed above, the NSPS Subpart NN should not be applicable to No. 7 Rock Mill, but if it were, additive standards would apply as per long-standing EPA applicability determinations.
2. There is certainly no justification for a 0.002 gr/dscf PM emission limit. Further, we are unaware of any cost effective control system capable of meeting such a limit in this application.
3. Cargill will utilize a state certified scale for measurement of the railcars. The scale will be certified to better than 1% accuracy, which meets the NSPS requirement of accuracy within 5%.
4. As discussed above, the NSPS Subpart NN does not apply. However, if the NSPS did apply, the NSPS 0% opacity standard only applies to ground phosphate rock storage and handling systems. It should also be noted that the wet rock delivered to the mills by railcar is not ground rock.
5. The No. 5 and No. 9 Rock Mills are already permitted and operating; revising any permit limits is not appropriate for this application for the No. 7 Rock Mill. However, since the NSPS should not have been applied for the No. 5 and No. 9 Mills, it may be appropriate for Cargill to submit a separate permit application for modification of the subject permit.
6. As discussed in the application, the reasons for installation of this new mill is that the No. 5 and No. 9 Rock Mills have not been able to reach their expected production capacity. The new No. 7 Mill will be used to make up for this deficiency, as well as supply ground rock to the new desulfation unit. No additional sulfuric or phosphoric acid will be produced due to the installation

Mr. A. Linero
May 15, 1998
Page 4

of the new mill, beyond that already envisioned under the No. 5 and No. 9 Rock Mill permit. In any event, as the HCEPC should know, such downstream units would only be considered in determining PSD source applicability. PSD review is already triggered for PM/PM10 emissions by the new rock mill project. The PSD regulations require that BACT be applied only to those emission units that are physically modified, or for which there is a change in the method of operation, due to the proposed project. Therefore, BACT would not be imposed on any other emissions units as a result of the proposed project.

7. No other contemporaneous increases/decreases in PM/PM10 emissions have occurred at the facility since the issuance of the last PSD permit for PM/PM10 issued in 1996.

Thank you for considering this information. If you require anything further, please do not hesitate to call.

Sincerely,



David B. Jeilerson, P.E.
Environmental Superintendent
Florida P.E. #- 38676

SEAL 5/18/98

DB/db

cc: David Buff, Golder
Kathy Edgemon, Cargill
Jerry Campbell, HCEPC
File (2)

J. Reynolds, BAR
EPA
NPS
SWD
POLIC CO.



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Table 1. Summary of Emissions from Fuel Oil Combustion for 1995 and 1996, Nos. 5 and 9 Raymond Mills

Parameter						
OPERATING DATA						
Operating Time (hr/yr)		6,227		6,227		
Heat Input Rate (MMBtu/hr)		9.0		9.0		
Fuel Oil Use (gal/hr) ^a		64.3		NA		
Fuel Oil Use (gal/yr)		0		NA		
Maximum Sulfur Content (Wt %)		0.5		NA		
Natural Gas Use (scf/hr)		NA		9,000		
Natural Gas Use (MMscf/yr)		NA		56.04		
Pollutant	Emission Factor ^b	No. 2 Fuel Oil		Natural Gas		Total TPY
		lb/hr	TPY	lb/hr	TPY	
EMISSIONS DATA						
SO ₂ : Fuel Oil	142*S lb/Mgal	4.6	0.0	0.0054	0.017	0.02
Natural Gas	0.6 lb/MMft ³					
NO _x : Fuel Oil	20 lb/Mgal	1.3	0.0	1.26	3.92	3.92
Natural Gas	140 lb/MMft ³					
CO: Fuel Oil	5 lb/Mgal	0.32	0.0	0.32	0.98	0.98
Natural Gas	35 lb/MMft ³					
NMVOC: Fuel Oil	0.2 lb/Mgal	0.013	0.00	0.025	0.08	0.08
Natural Gas	2.80 lb/MMft ³ d					

Note: NA = not applicable.

Operating hours based on the average of the No. 5 and No. 9 mills for 1995 and 1996.

1996: No. 5 - 5,721 hours and No. 9 - 6,227 hours

1995: No. 5 - 6,263 hours and No. 9 - 6,696 hours

a Based on 140,000 Btu/gal for 0.5% S oil; 1000 BTU/SCF for Natural Gas.

b Emission factors based on AP-42.

c "S" denotes the weight % sulfur in fuel oil; max sulfur content = 0.5%

d Based on methane comprises 52% of total VOC



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Table 2. Summary of Proposed Maximum Emissions from Fuel Combustion and Net Change
5, 9 and 7 Raymond Mills

Parameter	No. 2 Fuel Oil	Natural Gas
OPERATING DATA		
Operating Time (hr/yr)	400	8,760
Combined Heat Input Rate (MMBtu/hr)	39.00	39.00
Fuel Oil Use (gal/hr) ^a	278.6	NA
Fuel Oil Use (gal/yr)	111,429	NA
Maximum Sulfur Content (Wt %)	0.5	NA
Natural Gas Use (scf/hr)	NA	39,000
Natural Gas Use (MMscf/yr)	NA	341.64

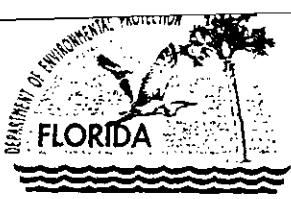
Pollutant	Emission Factor ^b	No. 2 Fuel Oil lb/hr	Natural Gas lb/hr	Maximum Annual Emissions (TPY) ^c	
				400 hr/yr fuel oil and Natural Gas	100% Natural Gas
EMISSIONS DATA					
SO ₂ : Fuel Oil	142* S lb/Mgal	19.78	0.023	4.05	0.10
Natural Gas	0.6 lb/MMft ³				
NO _x : Fuel Oil	20 lb/Mgal	5.57	5.46	23.94	23.91
Natural Gas	140 lb/MMft ³				
CO: Fuel Oil	5 lb/Mgal	1.39	1.37	5.98	5.98
Natural Gas	35 lb/MMft ³				
NMVOC: Fuel Oil	0.2 lb/Mgal	0.056	0.11	0.47	0.48
Natural Gas	2.8 lb/MMft ³ ^d				

Emission Scenario	Emission Rate (TPY)			
	SO ₂	NO _x	CO	NMVOC
1995 and 1996 Actual Emissions (a) Nos. 5 and 9 Raymond Mills	0.02	3.92	0.98	0.08
Proposed Maximum Emissions (c) Nos. 5, 9 and 7 Raymond Mills	4.05	23.94	5.98	0.48
Total Net Increase	4.0	20.0	5.0	0.4

Note: NA = not applicable.
These emissions are discharged through the mill stacks 5 and 9.
TPY = tons per year.

- ^a Based on 140,000 Btu/gal for 0.5% S oil; 1000 BTU/SCF for Natural Gas.
- ^b Emission factors based on AP-42.
- ^c "S" denotes the weight % sulfur in fuel oil; max sulfur content = 0.5%
- ^d Methane comprises 52% of total VOC





Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

June 19, 1998

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. David B. Jellerson
Environmental Superintendent
Cargill Fertilizer, Inc.
8813 Highway 41 South
Riverview, Florida 33569

Re: DEP File No. 0570008-024-AC (PSD-FL-247)
No. 7 Phosphate Rock Grinding/Drying System

Dear Mr. Jellerson:

The Bureau of Air Regulation received additional questions (enclosed) today from the Environmental Protection Commission of Hillsborough County regarding the referenced project.

Please address their questions and if further clarification is needed, please call John Reynolds at 850/921-9536.

Sincerely,

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

AAL/JR

Enclosures

cc: Brian Beals, EPA
John Bunyak, NPS
Bill Thomas, SWD
Rick Kirby, EPCHC
David Buff, Golder Assoc.

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	3. Article Addressed to: David B. Jellison, ES Casile Fertilizer 6613 Hwy 41 South Riverview, FL 33569	4a. Article Number P265 659 376	4b. Service Type <input type="checkbox"/> Registered <input checked="" type="checkbox"/> Certified <input type="checkbox"/> Express Mail <input type="checkbox"/> Insured <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> COD
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Postage	\$		
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Special Delivery Fee			
Restricted Delivery Fee			
Return Receipt Showing to Whom & Date Delivered			
Return Receipt Showing to Whom, Date, & Addressee's Address			
TOTAL Postage & Fees	\$		
Postmark or Date		<i>6-19-95</i>	
		<i>0570008-024-AC</i>	
		<i>P30-FL-247</i>	

PS Form 3800, April 1995

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 TELEPHONE (813) 272-7104

MEMORANDUM

DATE: June 18, 1998
 TO: John Reynolds, DEP
 THROUGH: Richard Kirby, IV, P.E. *RK*
 FROM: Noel Morera *NM*
 SUBJECT: Cargill Proposed Mill #7

On May 19, 1998, the EPC received your response to our comments on the construction application for a No. 7 Phosphate Rock Drying/Grinding operation (AIRS No. 0570008-024-AC)(PSD-FL-247). The EPC has reviewed the response and has the following questions for consideration in the Department's completeness determination:

1. We have been unable to get a copy of the Background Information Document for NSPS subpart NN. Cargill should submit the documents supporting their view that subpart NN does not apply to their facility.
2. We believe that the railcar weight would contribute to error when the rock is weighed. How will the weight of the rock be determined? For instance, will the railcar be weighed before and after unloading or will its weight be estimated. How much does a railcar weigh and how much rock can it carry?
3. The EPC believes that the actual production of phosphoric acid can increase due to the increased rock production of the proposed Mill No. 7. This will lead to actual emissions increases downstream of the rock plants. Cargill has submitted a PSD Permit to increase the maximum production capacity of the MAP Plant on June 5, 1998, project #0570008-026-AC. On April 28, 1998 Cargill applied to increase the production of the No. 7 sulfuric acid plant project #0570008-025-AC (PSD-FL-250) and on February 3, 1998 Cargill also applied to increase production of sulfuric acid plants 8 & 9 (AC29-241660) (PSD-FL-209). Based on these proposed projects the EPC believes that the emission increase from these sources should be taken into account in their PSD analysis and propose BACT level controls for all effected emission unit.



John Reynolds, DEP

June 18, 1998

Page 2

4. The EPC believes that by increasing the actual throughput of ground rock, the actual emissions for the sources upstream and downstream will increase (phosphoric acid plants, MAP plants 3 & 4, DAP plant 5, GTSP/DAP plant, etc.) These contemporaneous increases should be included in the PSD analysis.

Thanks for your cooperation.

mjh



CARGILL FERTILIZER, INC.

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

June 22, 1998

CERTIFIED MAIL: P 204 942 243

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JUN 26 1998

**BUREAU OF
AIR REGULATION**

Mr. A. A. Linero, P.E.
New Source Review Section
Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 323992400

RE: Cargill Fertilizer, Inc.
File No. 0570008-024-AC (PSD-FL-247)
Riverview No. 7 Phosphate Rock Grinding/Drying System

Dear Mr. Linero:

The purpose of this correspondence is to respond to the Department's letter dated June 19, 1998, concerning the above referenced request. The Department's letter consisted entirely of comments received by FAX from the Hillsborough County Environmental Protection Commission (HCEPC). These comments are responded to below, in the same order as they appear in the letter.

1. The FDEP determined in its letter of April 28, 1998 that subpart NN does not apply to Cargill's facility. Cargill agrees with this determination but is unaware of all documents the Agency relied upon to make it. The Background Information Document for NSPS subpart NN referenced by Cargill is a publicly available document and can be ordered from the EPA website (<http://www.epa.gov/>)
2. The issue of determining the weight of rock was previously addressed in the letter dated May 15, 1998 (see response to comment #4). Rock rail cars are weighed both before and after unloading. As stated in our previous letter, this method meets the NSPS requirement of accuracy within 5%.
3. Cargill notes that this comment is substantially the same as the county's comments #6 and 7 in its April 23, 1998 letter. This issue was addressed in the May 15, 1998 letter, see response to comment #6. The separate projects reference by the County are addressed in separate PSD permit applications and appropriate BACT determinations have been or will be made by the Agency in the course of issuing the permits.



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4. Cargill notes that this comment is substantially the same as the county's comments #6 and 7 in its April 23, 1998 letter. This issue was addressed in the May 15, 1998 letter, see response to comment #6.

Cargill believes that the County's most recent comments do not take into account the additional information Cargill provided on May 15, 1998 or information in the application, correspondence or public record. Although not the county's intent, we are concerned that such duplicative requests filed on the last day of the comment period only unduly delay permit issuance and serve no public benefit. Cargill is committed to working with the FDEP in any way possible to address any information requirements and allow for the prompt issuance of the permit. To this end, please advise me if there is anything else Cargill can do to facilitate permit review. We also respectfully request that the FDEP exercise discretion when evaluating whether a public comment, such as the county's, warrants a formal information request and delay in the permit issuance timetable.

Sincerely,



David Jellerson, P.E.
Florida P.E. #38676

6/23/98

SEAL

DB/db

cc: David Buff, Golder
Kathy Edgemon, Cargill
Tom MacLeod, Cargill
Rick Kirby, HCEPC

File (2)

cc: J. Reynolds, BAR
EPA
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ADMINISTRATIVE OFFICES, LEGAL &
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1900 - 9TH AVENUE
TAMPA, FLORIDA 33605
TELEPHONE (813) 272-5960
FAX (813) 272-5157

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**ENVIRONMENTAL PROTECTION COMMISSION
OF HILLSBOROUGH COUNTY**

FAX TRANSMITTAL SHEET

DATE: 6-18-98

TO: John Reynolds, DEP

FAX PHONE: (850) 922-6979 VOICE PHONE: sun com 278-1344

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: Noel Morena

(CIRCLE APPLICABLE SECTION BELOW)

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 TELEPHONE (813) 272-5530

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June 30, 1988 ~~1998~~

Mr. Brian Beals, Chief
 Preconstruction/Hazardous Air Pollution Section
 Environmental Protection Agency - Region IV
 61 Forsythe Street
 Atlanta, GA 30303

RE: New Source Review (NSR)

Dear Mr. Beals:

For project reviews for expansions at major facilities triggering NSR, the Environmental Protection Commission (EPC) routinely provides comment to the State who ultimately issues or denies the permit. More recently our comments are being challenged by the applicant regarding two fundamental issues. These deal with including increased emissions from processes which are upstream and downstream of the particular unit or operation for which modifications are being sought, and the extent to which any BACT level controls apply. Because the applicant is taking issue with our interpretation of this federal program, we are seeking your input.

The approach we have taken to determining the net emission increase is to first evaluate emission increases from the individual unit to be modified. Then the amount of increase in production or materials handled is evaluated for resulting emission increases both upstream (i.e. raw material processing) and downstream (i.e. finished product manufacturing, storage, and handling). The increase in emissions from these upstream and downstream processes, are then included in evaluating whether the emission increase for any affected pollutant is significant.

This appears to be consistent with the EPA guidance and the draft NSR manual put out in October of 1990. On pages A.37 and A.46, the draft manual defines emission increases and it includes "other plant-wide emissions increase (e.g. debottlenecking increases) that will occur as a result of the proposed modification." This was confirmed in the Lynchburg Foundry project commented on by the EPA in 1993 and now listed in the NSR guidance notebook.

The applicant's confusion on this seems to be that the actual emission increases on the upstream and the downstream emission units will not exceed their current allowable annual caps. In effect, the permits they hold for these other emission units exceed their potential emissions given the



Mr. Brian Beals
June 30, 1998
Page 2

physical capability of the facility. Because some of these facilities produce multiple products, determining the potential of an individual piece of equipment is often difficult. At any rate, we would like some confirmation that these actual increases (even though they do not exceed the current allowables) count towards the net increase under PSD.

The second issue relates to the extent or coverage of the BACT determination once it is decided that there is a significant net increase. It is our understanding that any emission unit that contributes to the significant net increase would be included in the BACT determination. Applicants tend to favor an interpretation which only requires BACT level controls for the new/modified emission unit which debottlenecked the operation in the first place. The PSD rule requires that BACT be applied to the proposed modification and we have contended that it applies to the upstream and the downstream emission units inclusively. Again your guidance on this matter will be appreciated.

Also regarding the extent of the BACT coverage, we have seen projects proposed which attempt to expand a process but only apply the newer standards to the new equipment. For example, an applicant proposes to add a third rock crusher to two existing units to expand the rock processing plant. All three crushers will use common equipment to handle the rock, and the final product from all three crushers is mixed. We have interpreted this to mean they are proposing to expand the rock crushing facility, and if there is a significant net increase all three crushers and common equipment at the facility would need to meet BACT. Once again your thoughts on this would be most helpful.

As always thanks for your assistance. Please call me if you need to discuss these issues further.

Sincerely,



Jerry Campbell, P.E.
Assistant Director
Air Management Division

Attachments

cc: Al Linero, P.E., FDEP

FACSIMILE TRANSMISSION

GOLDER ASSOCIATES INC.

6241 NW 23RD STREET
GAINESVILLE, FLORIDA 32653 USA

TELEPHONE No. (352) 336-5600
FAX No. (352) 336-6603

Date: July 9, 1998
FAX No.: 850-922-6979
TO: Al Linder - FDEP 5011
ATTN:
FR: David Buff
RE:

Project No.:
9837526-0300

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Office of Air Quality Planning and Standards
Research Triangle Park, North Carolina 27711

18 SEP 1989

MEMORANDUM

SUBJECT: Request for Clarification of Policy Regarding
the "Net Emissions Increase"

FROM: John Calcagni, Director
Air Quality Management Division (MD-15)

TO: William B. Hathaway, Director
Air, Pesticides, and Toxics Division (6T)

This is in response to your August 10, 1989 memorandum regarding guidance on several issues related to the calculation of "net emissions increase" (as defined in 40 CFR 52.21(b)(3)(i)) for prevention of significant deterioration (PSD) applicability purposes. These issues arose from a PSD pre-application package submitted to Region VI by Conoco Inc. of Westlake, Louisiana.

As was discussed in an August 17, 1989 conference call between Region VI staff and members of the New Source Review Section, our response provides general guidance on the four basic netting questions raised in your memorandum, as opposed to a more detailed response specific to the Conoco application.

Question 1:

Which of the following approaches is correct for determining if a contemporaneous net emissions increase has occurred at an existing major source?

- A. Not including contemporaneous emissions unless the project emissions exceed PSD significance levels for a pollutant.
- B. Using a literal interpretation of the definition of "net emissions increase" as contained in 40 CFR 52.21(b)(3)(i) which suggests that, even if the project's emissions do not exceed the PSD significance levels, a series of less than significant changes would still be accumulated.

Response:

Although the definition of "net emissions increase" could be interpreted differently, the Environmental Protection Agency's (EPA's) historic policy has been not to consider accumulated emissions from a series of small (i.e., less than significant) emissions increases if the emissions increase from the proposed modification to the source is, standing alone without regard to any

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decreases, less than significant. In other words, the netting calculus (the summation of contemporaneous emissions increases and decreases) is not triggered unless there will be a significant emissions increase associated with the proposed modification. This policy was discussed in detail in a 1983 EPA memorandum (copy attached) titled "Net Emission Increases Under PSD." In October 1988 the Policy and Guidance Section of the Stationary Source Compliance Division (SSCD) sent a memorandum (copy attached) to Region V restating the policy and indicating that it applied only to applicability determinations made under PSD and did not apply to nonattainment rules. The memorandum also indicated that SSCD was reconsidering the policy as it applies to PSD. We have, however, discussed this matter with SSCD and understand that there are no plans to revise the policy.

This office has reviewed the considerations (as discussed in the 1983 memorandum) which led to the policy and continue to find them to be reasonable and appropriate. For example, it would not be sensible to subject a small increase (e.g., 2 tons per year [tpy]) to a full PSD review because of an unrelated 39 tons per year increase 3 years earlier. The PSD reviews of such small emissions could place a significant resource burden on both applicants and review agencies and would likely result in minimal, if any, emissions reductions or air quality benefits from the application of BACT. Consequently, I reaffirm that EPA's current policy is not to aggregate less than significant increases at a major source when the emissions increase from a proposed modification is less than significant. Of course, attempts by applicants to avoid PSD review by splitting a modification into two or more minor modifications constitutes circumvention of the PSD requirements. Two or more related minor changes over a short period of time should be studied for possible circumvention.

Question 2:

Once PSD review is triggered for one pollutant, does the triggering mechanism (i.e., as described in question 1) remain the same for other pollutants or is the net contemporaneous emissions increase for these other pollutants compared to the PSD significance levels? In other words, if PSD review is triggered for one pollutant, is the source then required to consider all contemporaneous emissions changes for the other pollutants when determining applicability, even if new emissions from the proposed project will be less than significant?

Response:

No. The criteria used to determine if a significant net emissions increase has occurred from a proposed modification at an existing major source are applied on a pollutant-by-pollutant basis.

For example, a major source experienced insignificant increases of NO_x (30 tpy) and SO₂ (15 tpy) 2 years ago, and a decrease of SO₂ (50 tpy) 3 years ago. The source now proposes to add a new process unit with an associated emissions increase of 35 tpy NO_x and 80 tpy SO₂. For SO₂, the proposed 80 tpy increase from the modification by itself (before any netting) is significant,

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so we then determine the contemporaneous net emissions change, the algebraic sum of $(-50)+(15)+(80)$, which equals +45 tpy. Therefore, the proposed modification is major and a PSD review for SO_2 is required. However, the NO_x increase from the proposed modification is by itself less than significant. Consequently, netting is not performed for NO_x even though the modification is major for SO_2 .

Question 3:

Is the approach of comparing new, allowable emissions to old, actual emissions still appropriate for determining PSD applicability?

Response:

Under the PSD regulations, whether a physical change or change in the method of operation at a source will result in a "net emissions increase" requires a comparison of the "actual emissions" of the source before and after the change. For an existing emissions unit at a source, "actual emissions" before the change equal the average rate in tons per year at which the unit actually emitted the pollutant during the 2-year period (or more representative period) which precedes the change [see 40 CFR 52.21(b)(21)(ii)]. Where the change will affect the normal operations of an existing emissions unit (as in the case of a change which could result in increased use of the unit), "actual emissions" after the change must be assumed to be equal to "potential to emit." The PSD regulations are quite clear regarding such circumstances [40 CFR 52.21(b)(21)(iv)]:

For any emissions unit that has not yet begun normal operations on the particular date, actual emissions shall equal the potential to emit of the unit on that date. (Emphasis added.)

Where "allowable emissions" are the same as or less than the "potential to emit" for an emissions unit, "allowable emissions" may be used to define the "actual emissions" of that unit after the change. Consequently, for determining PSD applicability, the comparison of prior "actual" versus new "potential" emissions (or "allowable" where appropriate) is the correct methodology to use.

The comparison of prior "actual" to future "potential" emissions is made on a unit-by-unit basis for all emissions units at the source that will be affected by the change. It is done for the emissions unit(s) undergoing the physical change or change in the method of operation and also for any other units at which normal operations could be affected by the change at the source. This, for example, includes a review for possible emissions increases at process-related emissions units due to a physical change which removed a bottleneck at only one of the units.

Question 4:

When determining contemporaneous increases and decreases, are all emissions points at the source reviewed, or only those emissions points that

4

have had emissions changes incorporated into State permits, in terms of actual emissions changes at the beginning and end of the contemporaneous period to determine the contemporaneous emissions changes?

Response:

Generally all emissions points at the source (including fugitive emissions where applicable) are reviewed for emissions changes, including those points with emissions changes that have not been incorporated into permits. The PSD regulations at 40 CFR 52.21(b)(3)(i)(b) require that "any other increases and decreases in actual emissions at the source that are contemporaneous with the particular change and are otherwise creditable" be included in the calculation of "net emissions increase." (Emphasis added.)

In regard to emissions changes incorporated into permits, the regulations at 40 CFR 52.21(b)(3)(iii) provide that a contemporaneous increase or decrease (to the extent the decrease is federally enforceable) is creditable only if the relevant reviewing authority has not relied on it in issuing a PSD permit for the source, and the permit is still in effect when the increase in actual emissions from the particular change occurs. A reviewing authority relies on an increase or decrease when, after taking the increase or decrease into account, it concludes that the proposed project would not cause or contribute to a violation of an increment or ambient standard. In other words, an emissions change at an emissions point which was considered in the issuance of a PSD permit for the source is not available to be used in subsequent netting calculations. For example, an emission change incorporated in a source's PSD permit (State or Federal) would not be available to be used as a contemporaneous increase or decrease in a subsequent netting calculation.

On the other hand, where an emissions change was not relied upon in issuing a PSD permit for the source, the regulations make no distinction between an emissions point with an emissions change incorporated into a State permit and any other emissions point at the source when defining an otherwise creditable contemporaneous change. Consequently, except for emissions changes considered in issuing a PSD permit, all emissions points at the source are reviewed in terms of actual emissions changes to determine the contemporaneous emissions changes at a source, including those emissions points that have not had emissions changes incorporated into State permits. Although emissions changes incorporated into State permits do not affect which emissions points must be considered, conditions in State permits (if federally enforceable) may be used to define an emissions unit's "allowable emissions."

If you have any questions in regard to this matter, please contact David Solomon of the New Source Review Section at FTS 629-5375.

Attachments

cc: NSR Contacts

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

JUL 28 1983

OFFICE OF
AIR, NOISE AND RADIATION

SUBJECT: PSD Applicability Pulp and Paper Mill

FROM: Director
Stationary Source Compliance Division
Office of Air Quality Planning and Standards

TO: Michael M. Johnston, Chief
Air Operations Section - Region X

Your request dated July 6, 1983, to Mike Trutna concerning a PSD applicability issue has been forwarded to my office for response. Your request concerns a pulp and paper company that is proposing to install a bleaching plant and a larger digester. While the construction of these units does not by itself cause increased emissions, emissions from the recovery boiler as a result of this construction activity will increase above the significance levels, but remain below the maximum design permit levels. Your question, is whether this a major modification under the PSD requirements.

The PSD rules at 40 CFR 52.21 (b) (2) define major modifications as "any physical change in or change in the method of operation of a major stationary source that would result in a significant net emissions increase of any pollutant subject to regulation under the Act." Net emissions increase is defined as:

"the amount by which the sum of the following exceeds zero: Any increase in actual emissions from a particular physical change or change in method of operation at a stationary source; and Any other increases and decreases in actual emissions at the source that are contemporaneous with the particular change and are otherwise creditable."

Major modifications are, therefore, determined by examining changes in actual emission levels. Actual emissions are defined as:

-2-

"the actual rate of emissions of a pollutant from an emissions unit, as determined in accordance with subparagraph (ii)-(iv) below

- (ii) In general, actual emissions as of a particular date shall equal the average rate, in tons per year, at which the unit actually emitted the pollutant during a two-year period which precedes the particular date and which is representative of normal source operation. The Administrator shall allow the use of a different time period upon a determination that it is more representative of normal source operation. Actual emissions shall be calculated using the units actual

operating hours, production rates and types of materials processed, stored, or combusted during the selected time period.

- (iii) The Administrator may presume that source specific allowable emissions for the unit are equivalent to the actual emissions of the unit.
- (iv) For any emissions unit which has not begun normal operations on the particular date, actual emissions shall equal the potential to emit of the unit on that date."

Since this source has been in operation for some time, subparagraph (iv) does not apply. Your memo indicates that the recovery boiler is subject to a permit limit. Ray Nye of your staff has informed my staff that this permit limit binds the recovery boiler to a level of 0.1 gr/dscf, but does not provide any discussion on the unit's operating rate. The recovery boiler has operated in the past at a rate of 450 tons/day, consistent with existing digester capacity. Although the regulations provide a presumption for the use of allowable emissions when source specific limits are established, the preamble at 45 FR 52718 (August 7, 1980 states that:

"The presumption that Federally enforceable source specific requirements correctly reflect actual operating conditions should be rejected by EPA or a State, if reliable evidence is available which shows that actual emissions differ from the level established in the SIP or permit."

-3-

Therefore, since the recovery boiler could not have operated at a level higher than that provided by the existing digester capacity, any increase in actual emissions at the recovery boiler which will result from the increased capacity provided by the larger digester must be considered for the purposes of PSD applicability.

Once it is determined whether there is a significant net emissions increase (summing the emission increases from the larger digester, new bleaching plant and the increased operation of the recovery boiler) in conjunction with any contemporaneous emission increases and decreases, the PSD requirements should be applied, including BACT and air quality analyses. The regulations at 40 CFR 52.21(j)(3) require that:

"A major modification shall apply best available control technology for each pollutant subject to regulation under the Act for which it would result in a significant net emissions increase at the source. This requirement applies to each proposed emissions unit at which a net emissions increase in the pollutant would occur as a result of a physical change or change in the method of operation in the unit."

Since the recovery boiler itself will not be undergoing a physical change or change in the method of operation, it will not have to apply BACT. However, all emissions increases must undergo air quality analysis and will consume applicable air quality increments.

This response has been prepared with the concurrence of CGC and CPDD. Should you have any questions concerning it, please contact Rich Biondi at 382-2831.

Edward E. Reich

cc: Mike Trutna
Peter Wyckoff
Dave Rochlin

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region 10, Seattle, Washington 98101

DATE: JUL 6 1983

SUBJECT: PSD Applicability

FROM: Michael M. Johnston, Chief
Air Operations Section

TO: Mike Trutna, Chief
New Source Review Office

A pulp and paper company is in the process of transferring the mill to a new owner. The new owner is proposing to install a bleaching plant and a larger digester to accommodate market demand for bleached pulp. While the construction of these units do not by itself cause increased emissions, emission from the recovery boiler as a result of this construction activity will increase above the significant levels, but remain below the maximum design permit limits. The company contends that PSD is triggered only if the net emissions increase from the specific modifications alone exceeds the threshold levels thereby releasing the project from review.

Region 10 has interpreted the term "net emissions increase" as any significant increase in actual emissions from a physical change or change in the method of operation at a stationary source. In this case, do we look at emissions from the specific modifications themselves or do we look at the overall change in actual emissions from the entire facility? The recovery boiler throughput was limited due to the size of the digester. Although the recovery boiler can accommodate the larger digester, we feel that the physical change and change in method of operation constitutes a modification.

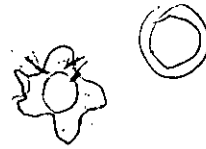
If you have any questions please feel free to contact me or Ray Nye of my staff at (RTS) 399-7154.

Meeting of 7/20/98

AGENDA

#7 Mill Project

- Project Review
- PSD/BACT Applicability
- BACT for Mill
- NSPS Applicability
- Action Plan



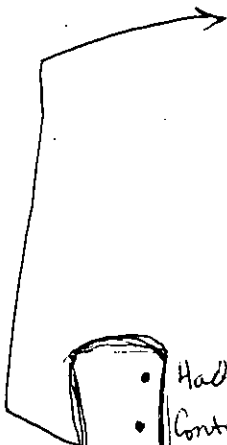
#7 Sulfuric Acid Plant Expansion

- Project Review
- Responses to DEP's 7/10/98 letter
- BACT for plant (acid mist)
- Action Plan

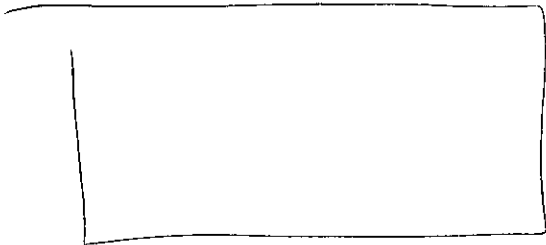
Polk

Other

- EPC Comments
- 8&9 Sulfuric Acid Plants *Today*
- MAP Plant Expansion Project *→ Granulated material*
- Bartow Plant Expansion
 - #3 Fertilizer Plant *Engineering Dept. never had an A/C.*
 - New PA Reactor
 - #4 SAP Catalyst *✓. Calcium do some on #3. Expires 10/21/98*



- Had proposed that acid scrubbers are not pollution control devices.
- Control device - in spite of any emission limits.
- Value of ammonia far exceeds. NH₃ recovery exceeds scrubber costs.
- Economically operate scrubber. ΔP across scrubber plus pressure traps multiple.
- Have tail gas scrubbers. Operation + maintenance problem.
- Justified as pollution control devices.



#7 Mill Project Permitting

<u>DATE</u>	<u>ITEM</u>	<u>MAJOR ISSUES</u>
9/2/97	Pre-application meeting with DEP	
9/3/97	Pre-application meeting with HCEPC	
4/1/98	Application	
4/7/98	Incompleteness Letter	BACT Limit, emission history
4/22/98	Cargill Response	
4/23/98	HCEPC Comment FAXed to DEP	NSPS Standard, PSD Analysis, BACT Applicability
4/28/98	DEP Incompleteness Letter with EPC comments	EPC comments and DEP questions re. BACT level
5/15/98	Cargill Response	
6/18/98	HCEPC Comment FAXed to DEP	PSD Analysis, BACT Applicability questions identical to their 4/23/98 comments.
6/19/98	DEP Incompleteness Letter with EPC comments	Only requested response to EPC Fax
6/23/98	Cargill Response	

Date	GTSP Production TPH, daily average
6/11/96	85.7
4/7/97	83.6
4/11/97	83.8
6/17/97	86.4
7/1/97	88.9
8/15/97	85.3
8/29/97	86.7
12/18/97	90.3
12/25/97	91.5
2/23/98	86.9
5/30/98	83.8

Golder Associates Inc.

6241 NW 23rd Street, Suite 500
Gainesville, FL 32653-1500
Telephone (352) 336-5600
Fax (352) 336-6603

RECEIVED

JUL 22 1998

BUREAU OF
AIR REGULATION



July 21, 1998

Mr. A. A. Linero, P.E.
New Source Review Section
Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2400

RE: Cargill Fertilizer, Inc.
No. 7 Phosphate Rock Grinding/Drying System
DEP File No. 0570008-024-AC (PSD-FL-247)
REQUEST FOR DEPARTMENT TO PROCESS APPLICATION

Dear Mr. Linero:

On behalf of Cargill Fertilizer, Inc., the purpose of this correspondence is to request that the Department continue to process the above referenced permit application, based on the information Cargill and its consultant, Golder Associates, has provided to date to the Department. Cargill believes that it has addressed all questions and issues raised by the Department and the Hillsborough County Environmental Protection Agency (HCEPC) in the Department's letters dated April 7, April 28, and June 19, 1998. Cargill believes that the Department's June 19 letter, which was responded to by Cargill on June 22, did not raise any new questions which have not previously been addressed by Cargill. As a result, please proceed with processing this permit application. As you know, it is critical to Cargill to obtain this permit by September 15, 1998.

Please do not hesitate to call if you have any questions concerning this request.

Sincerely,

A handwritten signature in cursive script that reads 'David A. Buff'.

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

DB/arz

cc: David Jellerson, Cargill
Kathy Edgemon, Cargill
File (2)

9737578A/03

COMMISSION

DOTTIE BERGER
 JOE CHILLURA
 CHRIS HART
 JIM NORMAN
 JAN FLATT
 THOMAS SCOTT
 ED TURANCHIK

EXECUTIVE DIRECTOR

ROGER P. STEWART



ADMINISTRATIVE OFFICES, LEGAL &
 WATER MANAGEMENT DIVISION
 1900 - 5TH AVENUE
 TAMPA, FLORIDA 33605
 TELEPHONE (813) 272-5960
 FAX (813) 272-5157

AIR MANAGEMENT DIVISION
 TELEPHONE (813) 272-5580
 WASTE MANAGEMENT DIVISION
 TELEPHONE (813) 272-5788

WETLANDS MANAGEMENT DIVISION
 TELEPHONE (813) 272-7104

MEMORANDUM

DATE: July 29, 1998
 TO: John Reynolds, DEP
 THROUGH: Richard Kirby, IV, P.E. *RR*
 FROM: Noel Morera *N.M.*
 SUBJECT: Cargill Proposed Mill #7

RECEIVED
 JUL 29 1998
 BUREAU OF
 AIR REGULATION

On June 24, 1998, the EPC received Cargill's response (dated June 22, 1998) to our comments on the construction application for a No. 7 Phosphate Rock Drying/Grinding operation (AIRS No. 0570008-024-AC)(PSD-FL-247). The EPC has reviewed the June 22, 1998 response and has the following comments:

1. Regarding Cargill's comment No. 1, a copy of page 2-8 of the BIDs document (EPA-450/3-79-0017b Phosphate Rock Plants - Background Information for Promulgated Standards) was sent to EPA Region 4. The EPC asked if it was EPA policy to exempt phosphate rock plants located at a fertilizer manufacturing facility from 40 CFR 60 Subpart NN. Region 4 personnel contacted EPA headquarters and determined that just because a phosphate rock plant is located at a fertilizer manufacturing facility, the phosphate rock plant is not automatically exempted from 40 CFR 60 Subpart NN. Region 4 personnel agreed that 40 CFR 60 Subpart NN did apply to Cargill's phosphate rock plant.
2. Comment No. 2: Cargill has not sufficiently proven that the scale can meet the accuracy requirement of 5% required by NSPS since the weight of the railcar introduces error into the weight measurements. Cargill never answered the question of how much rock a railcar can carry and how much a railcar weighs.
3. The following comments are regarding comments 3 and 4 of Cargill's letter dated June 22, 1998, that pertained to our comments 3 and 4 of our June 18 memo.



John Reynolds, DEP

July 29, 1998

Page 2

Cargill's confusion on these matters seems to be that the actual emission increases on the upstream and the downstream emission units will not exceed their current allowable annual caps. In affect, the permits they hold for these other emission units exceed their potential emissions given the physical capability of the facility. The actual increases (even though they do not exceed the current allowables) count towards the net increase under PSD.

The second issue relates to the extent or coverage of the BACT determination once it is decided that there is a significant net increase. Any emission unit that contributes to the significant net increase would be included in the BACT determination. The PSD rule requires that BACT be applied to the proposed modification. All units upstream and downstream which are affected by the modification should meet BACT.

Also regarding the extent of the BACT coverage, Cargill is proposing to expand their process by adding a third rock crusher to two existing units to expand the rock processing plant, but to only apply the newer standards to the new number 7 mill.

All three crushers will use common equipment to handle the rock and the final product from all three crushers is mixed. It seems clear that Cargill is proposing to expand the rock crushing facility, and if there is a significant net increase all three crushers and common equipment at the facility would need to meet BACT.

Since Cargill has requested in their letter dated July 21, 1998, that the permit be processed under Rule 62-4.055(4), F.A.C. and the EPC feels that the three issues listed above have not been resolved, the EPC recommends that the permit be denied based on the unresolved issues.



Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

July 30, 1998

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. David B. Jellerson
Environmental Superintendent
Cargill Fertilizer, Inc.
8813 Highway 41 South
Riverview, Florida 33569

Re: DEP File No. 0570008-024-AC (PSD-FL-247)
No. 7 Phosphate Rock Grinding/Drying System

Dear Mr. Jellerson:

On July 21 we received via FAX your request to process the referenced application based on the belief that Cargill addressed in previous communications the incompleteness issues raised by the Environmental Protection Commission of Hillsborough County (EPCHC). Per Rule 62-4.055(5), the referenced application is being processed by the Department. We will address the issues raised by the EPCHC in the Rule Applicability Section of the Technical Evaluation and Preliminary Determination to be issued with the Department's Intent and Public Notice package.

Attached are the EPCHC's most recent comments regarding the application. Please take note of their recommendation to deny the request. If you have any questions, please call me at 850/921-9523 or John Reynolds at 850/921-9536.

Sincerely,

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

AAL/JR

Enclosures

cc: Brian Beals, EPA
John Bunyak, NPS
Bill Thomas, SWD
Rick Kirby, EPCHC
David Buff, Golder Assoc.

Fold at line over top of envelope to return address

SENDER:

- Complete items 1 and 2 for additional services.
- Complete items 3, 4a, and 4b.
- Print your name and address on the reverse of this form so we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

Also wish to receive the following services (for an extra fee):

- Addressee's Address
- Restricted Delivery

Consult postmaster for fee.

Is your RETURN ADDRESS completed on the reverse side?

3. Article Addressed to: David B. Jellison, ES Carjel Fertilizer 8813 Hwy 41 South Riverview, FL 33568	4a. Article Number P 265 659 397
5. Received By: (Print Name)	4b. Service Type <input type="checkbox"/> Registered <input checked="" type="checkbox"/> Certified <input type="checkbox"/> Express Mail <input type="checkbox"/> Insured <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> COD
6. Signature: (Addressee or Agent) X <i>[Signature]</i>	7. Date of Delivery 8/2/98
	8. Addressee's Address (Only if requested and fee is paid)

PS Form 3811, December 1994 102595-97-B-0179 Domestic Return Receipt

Thank you for using Return Receipt Service.

P 265 659 397

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Receipt for Certified Mail
 No Insurance Coverage Provided.
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Street & Number	Carjel Fertilizer
Post Office, State, & ZIP Code	Riverview FL
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	\$
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PS Form 3800, April 1995



Department of Environmental Protection

Lawton Chiles
Governor

Virginia B. Wetherell
Secretary

August 11, 1998

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. David B. Jellerson, P.E.
Environmental Superintendent
Cargill Fertilizer, Inc.
8813 Highway 41 South
Riverview, Florida 33569

Re: Cargill's July 21 Request to Process Application
No. 7 Rock Grinding/Drying System (0570008-024-AC/PSD-FL-247)

Dear Mr. Jellerson:

The Department began processing the referenced application upon receipt on July 22, 1998 of Cargill's request to process it without additional information. Per our discussion yesterday, the Department requires reasonable assurance regarding control of potentially significant fluoride emissions at the desulfation operation to satisfy the Standards for Issuing or Denying Permits as described in Rule 62-4.070(1), F.A.C.

Information received today confirms that Cargill will replace the existing low energy venturi scrubber with a new packed bed scrubber for the desulfation reaction. The design will be submitted to the Department for approval prior to construction. Cargill also proposes that the three rock mills (Nos. 5, 7 & 9) be included in the BACT determination and be limited in total to an average of 52 TPH. A provision is to be included for processing up to 75 TPH on a short term basis when maintenance requirements dictate that the 1,000 ton rock storage bin must be refilled as rapidly as possible.

To provide a small amount of additional time to review this new information and establish appropriate BACT emission limits for the new scrubber, please resubmit your July 21 letter but with the date changed to the current date. If you have any questions regarding this matter, please contact John Reynolds at (850) 921-9536.

Sincerely,

A. A. Linero, P.E. Administrator
Bureau of Air Regulation

AAL/aal

cc: Brian Beals, EPA
John Bunyak, NPS
Bill Thomas, SWD
Jerry Campbell, EPCHC
David Buff, Golder Associates

"Protect, Conserve and Manage Florida's Environment and Natural Resources"

P 265 659 406

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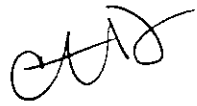
Sent to	
David Jellison	
Street Number	
Carroll Jct.	
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Riverview, FL	
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TOTAL Postage & Fees	\$
Postmark or Date	8-12-98
#7	
PSD-F1-747	


PS Form 3800, April 1995

Memorandum

Florida Department of Environmental Protection

TO: Larry George

THRU: Clair Fancy 

FROM: A. A. Linero  8/25

DATE: August 25, 1998

SUBJECT: Modeled SO₂ Violations in Hillsborough County

During the permitting of a proposed modification to Cargill Fertilizer's existing sulfuric acid plant (SAP No. 7), the applicant indicated several modeled violations of short-term SO₂ standards with and without the project. We determined that the project will not *significantly contribute* to those exceedances.

Per the Draft EPA New Source Review Workshop Manual, Page C.52 we have interpreted the term "will not cause or *contribute* to a violation of any ambient air quality standard" to mean "will not cause or *significantly contribute*." [Rule 62-212.400(5)(d)]. This allowed us to seal the Technical Evaluation for this project. Consistent with this interpretation from the Manual, however, the "agency must also take remedial action through the applicable provisions of the state implementation plan to address the predicted violation(s)."

Although Title IV will require reductions in SO₂ at power plants (such as nearby Gannon) these are on a corporate-wide basis and a 30 day rolling average. Unless some reductions are required for short-term averaging periods, the modeled exceedances will continue to appear and we will not be able to continue approving projects in the immediate area.

Attached is the cover letter we sent Cargill on the matter. Let me know how we can help. Perhaps we should jointly develop a strategy to address the matter.

CHF/aal

RECEIVED

SEP 10 1998

BUREAU OF
AIR REGULATION



September 4, 1998

Mr. A. A. Linero, P.E.
New Source Review Section
Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2400

RE: Cargill Fertilizer, Inc.
No. 7 Phosphate Rock Grinding/Drying System
DEP File No. 0570008-024-AC (PSD-FL-247)
REQUEST FOR DEPARTMENT TO PROCESS APPLICATION

Dear Mr. Linero:

On behalf of Cargill Fertilizer, Inc., the purpose of this correspondence is to respond to the Department's letter dated August 11, 1998, concerning the above referenced application. It is requested that the Department continue to process the above referenced permit application, based on the information Cargill and its consultant, Golder Associates, has provided to date to the Department. Cargill believes that it has addressed all questions and issues raised by the Department and the Hillsborough County Environmental Protection Agency (HCEPC) in the Department's letters dated April 7, April 28, June 19, and August 11, 1998. Cargill believes that the Department's June 19 letter, which was responded to by Cargill on June 22, did not raise any new questions which have not previously been addressed by Cargill. Additional information was provided by Cargill on August 11. As a result, please proceed with processing this permit application. As you know, it is critical to Cargill to obtain this permit by September 15, 1998.

Please do not hesitate to call if you have any questions concerning this request.

Sincerely,

A handwritten signature in cursive script that reads "David A. Buff".

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

DB/db

cc: David Jellerson, Cargill
Kathy Edgemon, Cargill
File (2)