



**CARGILL
FERTILIZER, INC.**

RECEIVED
OCT 01 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 343 040 677

September 29, 1998

Florida Department of Environmental Protection
Bureau of Air Regulation
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

To Whom It May Concern:

Re: Proof of Publication - Notice of Intent to Issue Air Construction Permit
DEP File No. 0570008-024-AC
Facility - Cargill Fertilizer Phosphate Rock Drying/Grinding System - located at
8813 Highway 41 South, Riverview, Hillsborough County

You will find attached Proof of Publication of the Notice of Intent to Issue subject air construction permit as required by Florida Department of Environmental Protection.

If you have any questions or require additional information, please call me at (813) 671-6369.

Sincerely,

Kathy Edgemon
Environmental Engineer

cc: Pinney
Morris
Jellerson
File P-30-32-3

cc: J. Reynolds, BAR
SWD
Hillsboro Co.



recycled paper

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 _____
 SEPTEMBER 24, 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

 24

Sworn to and subscribed before me, this _____ day
 of _____ SEPTEMBER, A.D. 19⁹⁸

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. 0570008-024-AC
 (PSD-FL-247)**

**Cargill Fertilizer No. 7
 Phosphate Rock
 Drying/Grinding System
 Hillsborough County**

The Department of Environmental Protection (Department) gives notice of its intent to issue an air construction permit to Cargill Fertilizer, Inc. to add a third 25 tons per hour phosphate rock drying and grinding system (No. 7 Rock Mill) at its fertilizer facility located on 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 three drying and grinding mills (Nos. 5, 7 & 9) will provide phosphate rock primarily to the granular triple superphosphate process (GTSP). A smaller portion of the dried and ground rock will be used to further purify clarified phosphoric acid at the facility. This permit covers all three rock drying/grinding mills and new equipment for reacting ground phosphate rock with clarified phosphoric acid to remove impurities from the acid.

The permit will increase the allowable rock drying rate from 50 to an average of 52 tons per hour with a provision for up to 75 tons per hour during infrequent periods of 'fast recharging' of the rock storage bin. The new mill was required because the recently installed mills Nos. 5 & 9 did not meet the plants requirement for ground rock. The No. 7 mill will allow the GTSP plant to operate at the capacity permitted by its most recent BACT determination and PSD permit (under which it still operates). The Department has determined that, besides the rock mills, only the clarified acid purification unit requires PSD review and a BACT determination.

Control of particulate emissions is accomplished by high-efficiency baghouses capable of achieving 0.012 grains per dry standard cubic foot and 5 percent opacity. Emissions from the acid purification step will be controlled by a packed bed scrubber designed to achieve over 99 percent removal of fluorides.

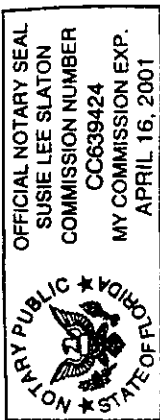
An air quality impact analysis was conducted. Emissions from the facility will not significantly contribute to or cause a violation of any state or federal ambient air quality standards. The maximum predicted PM10 PSD Class increments consumed by all sources in the area, including this project, will be as follows:

For Averaging Times of 24-hour and Annual, the Allowable Increment (mg/m³) will be 30 and 17 respectively; the Increment Consumed (mg/m³) will be 11 and 0.2 respectively; and Percent Consumed will be 37 and 1 respectively.

The project has no significant impact on the PSD Class 1 / Chassahowitzka National Wilderness Area.

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 com-



Cargill

0570008-024-AC

PSD-FI-247

ments 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.

1. 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 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.

4079 9/24/98

Golder Associates Inc.

3730 Chamblee Tucker Road
Atlanta, GA USA 30341
Telephone (770) 496-1893
Fax (770) 934-9476

RECEIVED

OCT 22 1998

**BUREAU OF
AIR REGULATION**



October 21, 1998

973-7578

Florida Department of Environmental Protection
New Source Review Section
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Attention: Mr. A. A. Linero, P.E.

RE: CARGILL FERTILIZER, INC. NO. 5, 7 AND 9 PHOSPHATE ROCK GRINDING/
DRYING MILLS DRAFT PERMIT NO. 0570008-024-AC (PSD-FL-247)

Dear Mr. Linero:

The purpose of this correspondence is to provide comments to the Department regarding the draft air construction permit for the No. 5, 7 and 9 Phosphate Rock Grinding/Drying Mills and associated equipment. The draft permit was issued by the Department on September 21, 1998, and Cargill published the public notice on September 24, 1998. It is understood that, upon issuance of the final permit, the previous construction permit for the No. 5 and 9 Rock Mills will be superseded by this new permit. The following comments are based on a conversation between John Reynolds and Kathy Edgemon:

Section II. Emission Unit(s) General Requirements

6. It is our understanding that the expiration date will be changed to March 31, 2001.

Section III. Emission Unit(s) Specific Conditions

3. It is our understanding that this condition will be reworded as follows:
"The production rate of each Rock Mill shall not exceed 25 tons of dry (1% moisture) phosphate rock per hour except that the total production rate of the three mills combined shall not exceed 52 tons per hour (daily average). During periods for which it is necessary to avoid depletion of the capacity of the 1,000 ton phosphate rock storage bin, the three mills may be operated at a combined rate of 75 tons per hour until the bin capacity is sufficient for the operation of the GTSP plant at its normal capacity."

7. It is our understanding that the 0% opacity limit in this condition will be removed. The mills do not operate as stand alone rock grinders, whether processing dry or wet rock. When processing "dry" rock, the burners operate and moisture is removed from the rock.

Appendix BD

It is our understanding that the reference to "fast recharging" will be removed and the word "sulfation" will be reworded to "desulfation."

It would be appreciated if the following comments were also addressed:

Section I. Facility Information - Facility Description

With the production rate restrictions of 75 TPH (maximum hourly) and 52 TPH (daily average), there is no need to complicate the permit further by defining an additional operating mode of "fast recharging". It is confusing, burdensome (because of additional record keeping requirements) and unnecessary. It is requested that all references to "fast recharging" be deleted from the permit.

Section I. Facility Information - Regulatory Classification

The statement under "Regulatory Classification" seems to be incorrect. Based on the definitions of "emissions unit", "major source of air pollution", and "Title V source" contained in Rule 62-210.200(178), the No. 5, 7 and 9 Rock Mills are "emissions units", and not themselves major sources of air pollution or Title V sources. The terms "major source" and "Title V source" relate to the entire facility, not specific emissions units. Moreover, the definitions of "potential emissions" and "potential to emit" include air pollution control equipment. The statement provided should be revised to reflect the regulatory definitions.

Section III. Emission Unit(s) Specific Conditions

Table listing emission unit names and ID's - Please provide an ID number for the No. 7 Rock Mill.

11. Cargill believes that it is unnecessary to require notification "in writing".
20. As discussed above, please eliminate the reference to "fast recharge" mode for refilling the 1,000 ton rock bin; therefore this record keeping requirement is no longer necessary.

Appendix BD

In the first paragraph on page BD-1, and in the table under Process Emissions, fluoride is shown as being subject to PSD review. Fluoride is not subject to PSD review for this project. Please correct accordingly. BACT is required for fluoride emissions based on Rule 62-296.403(1)(i).

On page BD-3, under Fluorides, it is stated that a fluoride emissions limit will be established following completion of the performance tests. However, BACT can be a design, equipment, work practice or operational standard. Cargill would like to retain these options at this time, since if very low Fluorides emission rates are measured through the source testing requirements, it may be economically burdensome to require stack sampling in the future, and an equipment or other standard may be more appropriate.

On page BD-4, remove opacity limit for dry rock grinding; set a single VE limit for all rock processing of 5% opacity.

Thank you for consideration of these comments. Please call if you have any questions.

Sincerely,

GOLDER ASSOCIATES INC.

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

DB/tds

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

9737578A/04

cc: SWD

I reviewed and have a couple of comments:

- Specific Condition 7 still has the 0% Opacity requirement, this should be deleted,
- from conversations with David Buff, the classification of this source as a major source or Title V source is inaccurate, maybe David could expand.

Thank you for emailing the draft, please let me know if these will be changed or any other comments you have.

Kathy

Reply Separator

Subject: No. 7 Rock Mill

Author: LINERO.A at rview-unix-mime/DD.RFC-822=LINERO_A@dep.state.fl.us

Date: 10/30/98 9:18 AM

Kathy. I believe this is the most recent version of the permit for the Rock Mill. Can you and the others promptly reply to John Reynolds E-Mail is: Reynolds_J@dep.state.fl.us

EPC is satisfied with PSD applicablity issues but still wants to see 0.05% sulfur fuel oil. I might have said something different in my phone message to you.

John will be in this weekend to finalize this one. If it is really important, you know what to do. John is on vacation.

Al Linero.