



# Department of Environmental Protection

Lawton Chiles  
Governor

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

Virginia B. Wetherell  
Secretary

## PERMITTEE:

Cargill Fertilizer, Inc  
8813 U.S. Highway 41 South  
Riverview, Florida 33569

*Authorized Representative:*  
David B. Jellerson, P.E.  
Environmental Superintendent

<b>File No.</b>	0570008-024-AC
<b>Permit No.</b>	PSD-FL-247
<b>SIC No.</b>	2874
<b>Project:</b>	Nos. 5, 7 & 9 Rock Mills
<b>Expires:</b>	March 31, 2001

## PROJECT AND LOCATION:

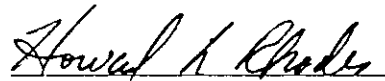
Permit for the construction/modification of the Nos. 5, 7 & 9 Phosphate Rock Drying/Grinding Mills and a Desulfation Unit for purifying clarified phosphoric acid at the Cargill facility, 8813 U.S. Highway 41 South, Riverview, Hillsborough County. UTM coordinates are Zone 17; 362.9 km E; 3082.5 km N.

## STATEMENT OF BASIS:

This construction permit is issued under the provisions of Chapter 403 of the Florida Statutes (F.S.), and the Florida Administrative Code (F.A.C.) Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297... The above named permittee is authorized to modify the facility in accordance with the conditions of this permit and as described in the application, approved drawings, plans, and other documents on file with the Department of Environmental Protection (Department).

## ATTACHED APPENDICES ARE MADE A PART OF THIS PERMIT:

Appendix BD      BACT Determination  
Appendix GC      Construction Permit General Conditions

  
Howard L. Rhodes, Director  
Division of Air Resources  
Management

## SECTION I. FACILITY INFORMATION

### FACILITY DESCRIPTION

The phosphate rock drying/grinding system presently consists of two separate process units designated as the Nos. 5 and 9 Raymond Mills, respectively, each with a permitted capacity of 25 tons of dry rock (1% moisture) per hour. This permit allows the construction of a third 25 tons per hour mill designated as the No. 7 mill. This permit increases the permitted capacity of the combined rock drying/grinding system (Nos. 5, 7 & 9 mills) from 50 to 75 tons per hour, however, the 24-hour average total rate for the three mills combined will be limited to 52 tons per hour except during periods when it is operationally necessary to avoid depletion of the 1,000 ton rock storage bin. During those "bin depletion" periods the mills may be operated at a total of 75 tons per hour. This permit also provides for the installation of a "desulfation" unit to react up to 8 tons per hour of phosphate rock produced by the new rock mill with clarified phosphoric acid to reduce impurities contained in the acid.

### REGULATORY CLASSIFICATION

The Nos. 5, 7 & 9 Rock Mills are classified as a "Major or Title V Source" per Rule 62-210.200, F.A.C., Definitions, because they have the potential to emit at least 100 tons per year of particulate matter when potential fugitive emissions are included with potential controlled emissions.

Phosphate rock processing plants are listed as a Major Facility Category in Table 62-212.400-1, F.A.C., "Major Facility Categories." Therefore, stack and fugitive emissions of over 100 TPY of a regulated pollutant are sufficient to classify the installation as a "Major Facility" per the definitions in **Rule 62-210.200, F.A.C.**, subject to the Significant Emission Rates given in Table 62-212.400-2, F.A.C. and the requirements of **Rule 62-212.400, F.A.C.**, Prevention of Significant Deterioration (PSD) and Best Available Control Technology (BACT).

### PERMIT SCHEDULE:

- 04-03-98: Date of Receipt of Application
- 09-08-98: Applicant Requested Processing of Application pursuant to Rule 62-4.055, F.A.C.
- 09-21-98: Intent issued

### RELEVANT DOCUMENTS:

The documents listed form the basis of the permit. They are specifically related to this permitting action. These documents are on file with the Department.

- Application received 04-03-98
- Department's incompleteness letters dated 04-07-98, 04-28-98, 06-19-98, 07-30-98
- Applicant's letters received 04-24-98, 05-20-98, 06-26-98, 07-22-98, 09-08-98
- Hillsborough County's letters received 04-23-98, 06-18-98, 06-30-98, 07-29-98
- Technical Evaluation and Preliminary Determination dated 09-21-98
- Best Available Control Technology determination (issued concurrently with permit)

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
NOTICE OF FINAL PERMIT

In the Matter of an  
Application for Permit by


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

DEP File No. 0570008-024-AC  
PSD-FL-247

Enclosed is the FINAL Permit Number PSD-FL-247 to install a third 25 TPH Rock Drying/Grinding Mill (No. 7) at Cargill Fertilizer Facility, Riverview, Hillsborough County. This permit is issued pursuant to Chapter 403, Florida Statutes and in accordance with Rule 62-212.400., F.A.C. - Prevention of Significant Deterioration (PSD) and Best Available Control Technology (BACT).

Any party to this order (permit) has the right to seek judicial review of the permit pursuant to Section 120.68, F.S., by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the Department of Environmental Protection in the Office of General Counsel, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida, 32399-3000, and by filing a copy of the Notice of Appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The Notice of Appeal must be filed within 30 (thirty) days from the date this Notice is filed with the Clerk of the Department.

Executed in Tallahassee, Florida.

  
C.H. Fancy, P.E., Chief  
Bureau of Air Regulation


CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this NOTICE OF FINAL PERMIT (including the FINAL permit) was sent by certified mail (\*) and copies were mailed by U.S. Mail before the close of business on 11-10-98 to the person(s) listed:

David B. Jellerson, Cargill\*  
Doug Neeley, EPA  
John Bunyak, NPS  
David Buff, P.E., Golder Assoc.  
Bill Thomas, DEP SWD  
Ivan Choronenko, EPCHC

Clerk Stamp

**FILING AND ACKNOWLEDGMENT FILED**, on this date, pursuant to §120.52, Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.

  
(Clerk) 11-10-98  
(Date)

FINAL DETERMINATION  
CARGILL FERTILIZER, INC.  
NOS. 5, 7 & 9 ROCK DRYING/GRINDING MILLS  
Permit No. 0570008-024-AC  
PSD-FL-247

An Intent to Issue Air Construction Permit to install a third 25 tons per hour Phosphate Rock Drying/Grinding Mill (No. 7) at the applicant's facility in Riverview, Hillsborough County, Florida was distributed on September 21, 1998. The proposed permit provided for the installation of a third phosphate rock mill and associated process equipment to increase the total permitted processing capacity from 50 to 75 tons per hour. However, the 24-hour average total rate for the three mills combined will be 52 tons per hour except during periods when it is operationally necessary to avoid depletion of the 1,000 ton rock storage bin. During those "bin depletion" periods the mills may be operated at a total of 75 tons per hour.

The Public Notice of Intent to Issue Air Construction Permit was published in the Tampa Tribune on September 24, 1998. Copies of the draft construction permit and related documents were available for public inspection at the Department's offices in Tallahassee and Tampa and at the Environmental Protection Commission of Hillsborough County (EPCHC) in Tampa. Comments received from the applicant and the EPCHC are addressed below:

- Whereas the application stated that the mills process "dry" rock in addition to wet rock, the applicant clarified that the dryer burners are operated even when the mills are processing "dry" rock. Therefore the 0% opacity requirement for grinders has been removed leaving the limit at 5% opacity for processing either wet or "dry" rock.
- The applicant requested that the 24-hour rolling average limit on production be changed to a daily average, which has been done. Also as requested, the language referring to "fast recharge" has been replaced with an equivalent reference to the condition under which the mills may exceed the daily average for intermittent periods as required to avoid depletion of the 1,000 ton rock storage bin.
- The applicant questioned the classification of the three mills as "major sources" vs. "emissions units". The three mills are being permitted together as three emissions units constituting a major source that is on the list of major source categories in Rule 62-210.200(177)(b), No. 12., "Phosphate Rock Processing Plants". Potential PM emissions from the emissions units are 20.5 TPY and fugitive PM emissions could exceed 80 TPY yielding a total exceeding 100 TPY.
- Concerning fluoride emissions, the applicant questioned the applicability of PSD for this project under Rule 62-212.400, F.A.C. vs. BACT applicability under Rule 62-296.403(1)(i), F.A.C. PSD applicability for fluoride emissions from this project is pursuant to Rule 62-212.400 because the estimated emissions based on reacting phosphoric acid with phosphate rock exceed the three tons per year significance threshold. The applicant also requested that an option be included for avoiding a testing requirement if test results show emissions to be minimal. This can be best handled by a minor modification of the permit if test results show very low emissions.
- The EPCHC requested that the emergency backup fuel oil be specified at 0.05% sulfur instead of 0.5%. This would have been done initially had the hours of firing fuel oil been greater than 400. However, since the hours of firing fuel oil are limited to 400, the same level at which some natural gas-fired boilers may be exempted from permitting when firing backup fuel oil containing up to 1.0% sulfur, this condition will remain unchanged.

The final action of the Department will be to issue the permit with the changes discussed above.

SECTION II. REQUIREMENTS

1. Regulating Agencies: All documents related to applications for permits to operate, reports, tests, minor modifications and notifications shall be submitted to the Department's Southwest District Office, 3804 Coconut Palm Drive, Tampa, Florida 33619-8218. All applications for permits to construct or modify an emissions unit(s) *subject to the Prevention of Significant Deterioration or Nonattainment (NA) review requirements* should be submitted to the Bureau of Air Regulation (BAR), Florida Department of Environmental Protection (FDEP), 2600 Blair Stone Road (MS 5505), Tallahassee, Florida 32399-2400 (phone number 850/488-0114).
2. General Conditions: The owner and operator is subject to and shall operate under the attached General Permit Conditions G.1 through G.15 listed in *Appendix GC* of this permit. General Permit Conditions are binding and enforceable pursuant to Chapter 403 of the Florida Statutes. [**Rule 62-4.160, F.A.C.**]
3. Terminology: The terms used in this permit have specific meanings as defined in the corresponding chapters of the Florida Administrative Code.
4. Forms and Application Procedures: The permittee shall use the applicable forms listed in Rule 62-210.900, F.A.C. and follow the application procedures in Chapter 62-4, F.A.C. [**Rule 62-210.900, F.A.C.**]
5. Expiration: This air construction permit shall expire on March 31, 2001 [**Rule 62-210.300(1), F.A.C.**]. The permittee may, for good cause, request that this construction permit be extended. Such a request shall be submitted to the Bureau of Air Regulation prior to 60 days before the expiration of the permit. However, the permittee shall promptly notify the Department's Southwest District Office of any delays in completion of the project which would affect the startup day by more than 90 days. [**Rule 62-4.090, F.A.C.**]
6. Application for Title V Permit: An application for a Title V operating permit, pursuant to Chapter 62-213, F.A.C., must be submitted to the Department's Southwest District Office. [**Chapter 62-213, F.A.C.**]

**SECTION III. EMISSION UNIT(S) SPECIFIC CONDITIONS**

The Specific Conditions listed in this section apply to the following emission units:

EMISSION UNIT NO.	EMISSION UNIT DESCRIPTION
034	Phosphate Rock Railcar Unloading System
100	Rock Mill No. 5
101	Rock Mill No. 9
106	Rock Mill No. 7
102	Ground Rock Handling/Storage System

1. Unless otherwise indicated, the construction and operation of the above emission units shall be in accordance with the capacities and specifications stated in the application or in updated submittals. **[Rule 62-210.300, F.A.C.]**
2. The subject emissions units shall comply with all applicable provisions of the 40 CFR 60 New Source Performance Standards for Phosphate Rock Plants, Subpart NN. **[Rule 62-204.800 F.A.C.]**
3. 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. **[Rule 62-210.200, F.A.C.]**
4. The subject emission units are allowed to operate continuously (8760 hours/year). **[Rule 62-210.200, F.A.C.]**
5. Fluoride emissions from the Desulfation Unit shall be determined following emission testing as required in Specific Condition 12 below. **[Rule 62-212.400, F.A.C.]**
6. Particulate matter emissions from each of the subject Rock Mills shall not exceed 1.56 lb/hr and 6.83 TPY based on 0.012 gr/dscf and 15,206 scfm as established in the BACT determination. **[Rule 62-212.400, F.A.C.]**
7. Visible emissions from each of the subject Rock Mills shall not exceed 5% opacity. **[Rule 62-212.400, F.A.C.]**
8. Visible emissions from the subject Railcar Unloading System and Ground Rock Handling/Storage System shall not exceed 0% opacity as required by the current permit for Mills 5 & 9. **[40CFR60.402(a)(5), Rule 62-204.800, F.A.C.]**
9. Each of the subject Rock Mills shall fire only natural gas except that No. 2 fuel oil with a maximum sulfur content of 0.5% sulfur by weight may be fired for up to 400 hours per year. The firing rate for each unit shall not exceed 13 million BTU per hour. The permittee shall maintain records of the fuel oil supplier's sulfur content analysis. **[Rule 62-210.200(227), F.A.C.]**
10. Within 60 days after achieving the maximum production rate at which these emission units will be operated, but no later than 180 days after initial startup and annually thereafter, the owner or operator shall conduct performance test(s) pursuant to 40CFR60.8, Subpart A, General Provisions and 40CFR60, Appendix A. **[Rules 62-204.800, 62-297.310, F.A.C.]**

**APPENDIX BD**  
**BEST AVAILABLE CONTROL TECHNOLOGY DETERMINATION (BACT)**

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**Cargill Fertilizer, Inc.**  
**No. 7 Rock Grinding/Drying System**  
**PSD-FL-247 / 0570008-024-AC**  
**Riverview, Hillsborough County**

Cargill Fertilizer, Inc. has applied to install a third 25 TPH phosphate rock grinding/drying system (No. 7) at its Riverview facility in Hillsborough County. The projected production from Cargill's two existing rock mills (Nos. 5 & 9) has not been realized as a result of unexpected changes in rock characteristics, resulting in the need for a third mill. The total permitted production rate for the three mills combined will be 75 tons of rock (dry basis @ 1% moisture) per hour during periods when it is operationally necessary to avoid depletion of the 1,000 ton rock storage bin capacity and 52 tons per hour (daily average) during other periods. Also included in this project is a "desulfation" unit which will improve phosphoric acid quality by reacting about half of the ground rock from the new mill with clarified phosphoric acid. The other half will be consumed in the granular triple super-phosphate process. The project is therefore subject to Prevention of Significant Deterioration (PSD) review for particulate matter (PM/PM<sub>10</sub>) and fluorides (F) in accordance with Rule 62-212.400, Florida Administrative Code (F.A.C.). A Best Available Control Technology (BACT) determination is part of the review required by Rules 62-212.400 and 62-296, F.A.C. Air pollution control equipment will consist of high efficiency bag collectors for PM/PM<sub>10</sub> from the rock mills and a packed bed scrubber for the desulfation unit.

**PROCESS EMISSIONS**

The following emissions are proposed by the applicant:

Pollutant	PSD Level <sup>1</sup>	Actual Emissions <sup>2</sup>	Current Allowables	Proposed Emissions <sup>3</sup>	Net Change <sup>4</sup>	Subject to PSD Review?
F	3	N/A	N/A	T.B.D. <sup>5</sup>	T.B.D. <sup>5</sup>	Yes
PM/PM <sub>10</sub>	25/15	8.3	20.2	31.2	22.9	Yes
NO <sub>x</sub>	40	3.9	N/A	23.9	20.0	No
SO <sub>2</sub>	40	0.02	N/A	4.1	4.0	No
CO	100	1.0	N/A	6.0	5.0	No
VOC	40	0.1	N/A	0.5	0.4	No
VE	N/A	N/A	10%	20%	N/A	N/A

<sup>1</sup> Tons per year (Rule 212.400, F.A.C.).

<sup>2</sup> Calculated based on July 17, 1997 compliance test on Nos. 5 & 9 for PM/PM<sub>10</sub> and 7800 hrs.; AP-42 emission factors and 1995/1996 operating hours for SO<sub>2</sub>, NO<sub>x</sub>, CO and VOC emissions.

<sup>3</sup> Proposed by applicant as additional allowable emissions.

<sup>4</sup> Applicant's proposed allowable facility emissions minus current actuals determined by DEP.

<sup>5</sup> To be determined.

**APPENDIX BD**  
**BEST AVAILABLE CONTROL TECHNOLOGY DETERMINATION (BACT)**

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**DATE OF RECEIPT OF COMPLETE BACT APPLICATION:**

August 11, 1998

**BACT DETERMINATION PROCEDURE:**

In accordance with Chapter 62-212.400, F.A.C., this BACT determination is based on the maximum degree of reduction of each pollutant emitted which the Department of Environmental Protection (Department), on a case by case basis, taking into account energy, environmental and economic impacts, and other costs, determines is achievable through application of production processes and available methods, systems, and techniques. In addition, the regulations state that, in making the BACT determination, the Department shall give consideration to:

- Any Environmental Protection Agency determination of BACT pursuant to Section 169, and any emission limitation contained in 40 CFR Part 60 - Standards of Performance for New Stationary Sources or 40 CFR Part 61 - National Emission Standards for Hazardous Air Pollutants.
- All scientific, engineering, and technical material and other information available to the Department.
- The emission limiting standards or BACT determination of any other state.
- The social and economic impact of the application of such technology.

The EPA currently stresses that BACT should be determined using the "top-down" approach. The first step in this approach is to determine, for the emission unit in question, the most stringent control available for a similar or identical emission unit or emission unit category. If it is shown that this level of control is technically or economically unfeasible for the emission unit in question, then the next most stringent level of control is determined and similarly evaluated. This process continues until the BACT level under consideration cannot be eliminated by any substantial or unique technical, environmental, or economic objections.

The air pollutant emissions from this facility can be grouped into categories based upon the control equipment and techniques that are available to control emissions from these emission units. Using this approach, the emissions can be classified as indicated below:

- *Fluorides* (primarily HF). Controlled generally by scrubbing with pond water.
- *Particulate Matter* (PM, PM<sub>10</sub>). Controlled generally by wet scrubbing or filtration.



**APPENDIX BD**  
**BEST AVAILABLE CONTROL TECHNOLOGY DETERMINATION (BACT)**

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- **Combustion Products** (SO<sub>2</sub>, NO<sub>x</sub>). NO<sub>x</sub> controlled generally by good combustion of clean fuels. SO<sub>2</sub> controlled generally by scrubbing when quantities are substantial.
- **Products of Incomplete Combustion** (CO, VOC). Controlled generally by proper combustion.

Grouping the pollutants in this manner facilitates the BACT analysis because it enables the pollutant control equipment and the corresponding energy, economic, and environmental impacts to be examined on a common basis. Although all of the pollutants addressed in the BACT analysis may be subject to a specific emission limiting standard as a result of PSD review, the control of "non-regulated" air pollutants is considered in imposing a more stringent BACT limit on a "regulated" pollutant (i.e., PM, SO<sub>2</sub>, H<sub>2</sub>SO<sub>4</sub>, fluorides, etc.), if a reduction in "non-regulated" air pollutants can be directly attributed to the control device selected as BACT for the abatement of the "regulated" pollutants.

**BACT EMISSION LIMITS PROPOSED BY APPLICANT:**

<b>POLLUTANT</b>	<b>EMISSION LIMIT</b>	<b>LIMIT BASIS</b>	<b>CONTROL TECHNOLOGY</b>
F	To be determined by test	To be determined by test	Packed scrubber using pond water
PM	2.10 lb/hr	0.72 lb/ton; 0.016 gr/scf	Fabric Filter
VE	10% opacity	40 CFR 60.402(a)(1)	Same as PM

**BACT DETERMINATION BY THE DEPARTMENT:**

**FLUORIDES (F)**

The sulfation unit reaction between phosphate rock and phosphoric acid resembles the triple superphosphate process with respect to fluoride emissions. This reaction releases fluoride, primarily as silicon tetrafluoride, due to the acidulation of the fluorapatite (Ca<sub>10</sub>(PO<sub>4</sub>)<sub>6</sub>F<sub>2</sub>) in the rock. Since the applicant has agreed to install a packed bed scrubber for fluoride emission control and will submit the scrubber design to the Department for approval prior to installation, there is no need for a top-down analysis of fluoride control options. The fluoride emission limit will be established following completion of the performance tests.

**PARTICULATE MATTER (PM/PM<sub>10</sub>) AND VISIBLE EMISSIONS (VE)**

The sources of PM/PM<sub>10</sub> and VE are the rock mills and associated handling and conveying equipment. The applicant has proposed that baghouses be considered as BACT. Since it is widely accepted that baghouses are the most effective control devices for PM/PM<sub>10</sub> emissions, there is no need for a top-down analysis of control options. The following emission limits are established for each rock mill (Nos. 5, 7 & 9) based on recent test data for the Nos. 5 & 9 mills:

**APPENDIX BD  
BEST AVAILABLE CONTROL TECHNOLOGY DETERMINATION (BACT)**

POLLUTANT	EMISSION LIMIT	LIMIT BASIS	CONTROL TECHNOLOGY
PM/PM <sub>10</sub>	1.56 lb/hr	0.012 gr/scf	Fabric Filter
VE	5% opacity	BACT - wet rock processing	Same as PM/PM <sub>10</sub>

**COMPLIANCE**

Compliance with the fluoride limit shall be in accordance with the EPA Reference Method 13A or 13B as contained in 40 CFR 60, Appendix A.

Compliance with the PM/PM<sub>10</sub> limit shall be in accordance with the EPA Reference Method 5 as contained in 40 CFR 60, Appendix A.


Compliance with the visible emission limit shall be in accordance with the EPA Reference Method 9 as contained in 40 CFR 60, Appendix A.

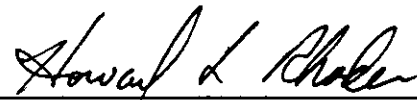
**DETAILS OF THE ANALYSIS MAY BE OBTAINED BY CONTACTING:**

John Reynolds, Permit Engineer  
Department of Environmental Protection  
Bureau of Air Regulation - MS 5505  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Recommended By:

Approved By:

  
\_\_\_\_\_  
C. H. Fancy, P.E., Chief  
Bureau of Air Regulation

  
\_\_\_\_\_  
Howard L. Rhodes, Director  
Division of Air Resources Management

11/9/98  
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Date:

11/10/98  
\_\_\_\_\_  
Date:

**APPENDIX GC**  
GENERAL PERMIT CONDITIONS [F.A.C. 62-4.160]

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- G.1 The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.
- G.2 This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings or exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.
- G.3 As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey and vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit is not a waiver or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.
- G.4 This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.
- G.5 This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.
- G.6 The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.
- G.7 The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:
- (a) Have access to and copy and records that must be kept under the conditions of the permit;
  - (b) Inspect the facility, equipment, practices, or operations regulated or required under this permit, and,
  - (c) Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.
- Reasonable time may depend on the nature of the concern being investigated.
- G.8 If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:
- (a) A description of and cause of non-compliance; and
  - (b) The period of noncompliance, including dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

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**APPENDIX GC**  
**GENERAL PERMIT CONDITIONS [F.A.C. 62-4.160]**

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- G.9 In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by Sections 403.73 and 403.111, Florida Statutes. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.
- G.10 The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.
- G.11 This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 62-4.120 and 62-730.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.
- G.12 This permit or a copy thereof shall be kept at the work site of the permitted activity.
- G.13 This permit also constitutes:
- (a) Determination of Best Available Control Technology (X);
  - (b) Determination of Prevention of Significant Deterioration (X); and
  - (c) Compliance with New Source Performance Standards (X)
- G.14 The permittee shall comply with the following:
- (a) Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
  - (b) The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application or this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.
  - (c) Records of monitoring information shall include:
    - 1. The date, exact place, and time of sampling or measurements;
    - 2. The person responsible for performing the sampling or measurements;
    - 3. The dates analyses were performed;
    - 4. The person responsible for performing the analyses;
    - 5. The analytical techniques or methods used; and
    - 6. The results of such analyses.
- G.15 When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.


# Memorandum

# Florida Department of Environmental Protection

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TO: Howard Rhodes

THRU: Clair Fancy 

FROM: Al Linero  11/4

DATE: November 4, 1998

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

Attached is the final permit and BACT determination for the construction of a third phosphate rock grinding and drying system at Cargill Fertilizer in Riverview. The phosphate rock affected by this project is used primarily to react with phosphoric acid to make granular triple superphosphate. The emissions will be controlled by a baghouse.

We found a potentially significant source of fluoride emissions that was not addressed as a fluoride emitter in the initial application. Phosphoric acid from a clarifier tank will be reacted with phosphate rock from the new mill for the purpose of improving acid quality by desulfation, thereby generating fluoride emissions just like a triple superphosphate plant does. At our suggestion, Cargill agreed to install a packed bed scrubber on the desulfation unit to satisfy the BACT requirement.

I recommend your approval of this permit and BACT determination.

Is your RETURN ADDRESS completed on the reverse side?

**SENDER:**

- Complete items 1 and/or 2 for additional services.
- Complete items 3, 4a, and 4b.
- Print your name and address on the reverse of this form so that we can return this card to you.
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- 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.

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

- 1.  Addressee's Address
  - 2.  Restricted Delivery
- Consult postmaster for fee.

3. Article Addressed to:  
 David B. Jellerson, PE  
 Casill Fertilizer  
 8813 US Hwy 41 South  
 Riverview, FL  
 33569

4a. Article Number  
 Z 333 612 497

4b. Service Type  
 Registered  Certified  
 Express Mail  Insured  
 Return Receipt for Merchandise  COD

7. Date of Delivery

5. Received By: (Print Name)

8. Addressee's Address (Only if requested and fee is paid)

6. Signature: (Addressee or Agent)  
 X Kathy Smith

PS Form 3811, December 1994

102595-97-B-0179 Domestic Return Receipt

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US Postal Service  
**Receipt for Certified Mail**

No Insurance Coverage Provided.  
 Do not use for International Mail (See reverse)

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Street & Number	Casill Fert.
Post Office, State, & ZIP Code	Riverview FL
Postage	\$
Certified Fee	
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Return Receipt Showing to Whom & Date Delivered	
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TOTAL Postage & Fees	\$
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PS Form 3800, April 1995