

Golder Associates Inc.

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



May 30, 1997

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

RECEIVED

JUN 02 1997

BUREAU OF
AIR REGULATION

Re: Cargill Fertilizer, Inc.
Animal Feed Plant - Revised Draft Permit 0570008-013-AC (PSD-FL-234)

Dear Mr. Linero:

Cargill has received the revised draft permit referenced above for the Animal Feed Ingredients (AFI) plants located at the Riverview facility. Based on our review of the revised draft permit, we have several comments concerning the Technical Evaluation and Preliminary Determination (TE&PD), draft permit conditions, and best available control technology (BACT) determination. The comments are presented below.

TE&PD

The comments presented below on the TE&PD are to correct certain inconsistencies in the document. None of these comments require a revision to the draft construction permit.

Section 4.2.3, pg. 5 - The last paragraph of this section refers to production rates based on a 17-hour day. Note that the daily production rate should be referenced as 1,160 TPD. Page 5 of the permit correctly reflects this production rate.

Section 6.1, pg. 8 - The emission summary table incorrectly lists the new allowable for fluorides from the common stack to be 0.53 lb/hr instead of 7.7 lbs/batch. However, Table 1 of the draft permit is correct.

Section 6.4.3, pg. 14 - Note that the stack height for the AFI plants will not be 250 feet. The stack height will be 136 feet, which is less than the GEP de minimis stack height of 213 feet (65 meters).

DRAFT PERMIT

SECTION II

2.2 Unconfined Emissions of Particulate Matter

In paragraph (b) of this specific condition, the word "shall" should be removed in order to conform to the wording in Rule 62-296.320(4)(c).

3.2 Changes/Modifications

The exclusions from a physical change or change in the method of operation due to an increase in the production rate or operating hours, described in Rule 62-210(185), should be added at the end of this section as items 2. and 3.

SECTION III

SUBSECTION A

This source is not subject to NSPS, and therefore the reference to the NSPS in the title to this subsection should be deleted.

SUBSECTION B

B.2 - This condition referring to excess emissions is redundant with Common Specific Condition 3.5 (pg. 6 of 15), and therefore should be deleted.

B.5 - Retaining of records should be for 5 years, consistent with Rule 62-213.440(1)(b)2.b., and Specific Condition C.5 (pg. 15 of 15).

B.6 - This section needs to be reworded to allow for digital logging of data without use of strip chart recorders. Suggested rewording is as follows:

Cargill may, at its option, substitute continuous monitoring and data logging or recordings for the manual record keeping required by this specific condition. If this option is exercised, then all calibration and maintenance records and logged or recorded data shall be retained at least three years.

Also, retaining of records should be for 5 years, consistent with Rule 62-213.440(1)(b)2.b., and Specific Condition C.5 (pg. 15 of 15).

B.10, B.11 - This condition cites 62-297.400, F.A.C., which has been repealed.

B.13 - It is understood that the initial compliance test will be used to obtain representative fluoride emissions data over the entire batch cycle. After the initial compliance test, testing will only be required during the initial part of the batch, when emissions are highest. It is requested that the last sentence of this condition be worded to read as follows:

After the initial compliance test, the test run frequency will be reduced to three runs to be completed within 5 hours of the completion of the addition of diatomaceous earth to the batch tank. Compliance with the fluoride emission limit in Table 1 will be demonstrated if average emissions over the three test runs do not exceed 2.8 lb/hr.

B.15 - It is requested that the phrase "in writing" be deleted from the second sentence. This notification requirement has already been stated in Specific Condition 5.3. It should be reworded to be consistent with Specific Condition 5.3.

B.19 - The requirement for advance notification for testing (auditing) of any instrumentation has been deleted from Specific Condition C.5 (pg. 15 of 15), and should be deleted here to be consistent. Calibration and maintenance records will be retained. However, advance notification for these activities should not be required.

SUBSECTION C

C.2 - This condition referring to excess emissions is redundant with Common Specific Condition 3.5 (pg. 6 of 15), and therefore should be deleted.

Table 1-1

The allowable emission limit in gr/dscf for AFI Plant No. 2 should be deleted, consistent with AFI Plant No. 1. Also, the lb/ton limit for fluorides for both AFI plants should be deleted. The correct limit for the plants is shown under the lb/hr and TPY columns. Also, it is understood that the NOx emission limit would be deleted from Table 1-1, since it is based on AP-42 emission factors; however, initial stack testing would be performed to verify the emission factor.

APPENDIX BD - BACT

BACT Determination Requested by Applicant

Note that Cargill withdrew the requested BACT limit for fluorides of 0.04 lb/ton. The requested limit is 7.70 lb/batch.

BACT Determination Procedure

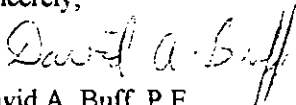
pg. BD-5: The fluoride BACT limit as reflected in the permit (Table 1-1) is 7.70 lb/batch and 1.63 TPY.

BACT Determination by DEP

pg. BD-6: The fluoride BACT limit as reflected in the permit (Table 1-1) is 7.70 lb/batch and 1.63 TPY.

Cargill appreciates your consideration of these comments. Please call if you have any questions or comments.

Sincerely,



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

cc: David Jellerson
Kathy Edgemon
File (2)

cc: S. Ariz, BAR
J. Campbell, Hillsboro
B. Thomas, SWD
EPA
NPS



**CARGILL
FERTILIZER, INC.**

RECEIVED

JUN 06 1997

**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 343 040 680

June 3, 1997

Florida
Department of Environmental Protection
Bureau of Air Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Subject: Proof of Publication - Notice of Intent to Issue Permit for Modified Project
Draft Permit No. 0570008-013-AC, (PSD-FL-234) Cargill Riverview Fertilizer
Facility - Animal Feed Ingredient Plants - located at 8813 U.S. Highway 41 South,
Riverview, Hillsborough County, FL 33569.

Gentlemen:

You will find attached Proof of Publication of the Notice of Intent to Issue subject permit modification as required by Florida Department of Environmental Protection. The original attempt to submit this proof was addressed to the S. Magnolia Drive location as noted in the "Notice of Intent to Issue Permit...", which was returned as undeliverable (copy attached).

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

Sincerely,

Melody D. Russo
Environmental Superintendent

/dh
Enclosure

x.c. Kathy Edgemon
File P-30-39-01





**CARGILL
FERTILIZER, INC.**

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

May 27, 1997

Florida
Department of Environmental Protection
Bureau of Air Regulation
111 S. Magnolia Drive , Suite 4,
Tallahassee, FL 32301-1344

Subject: Proof of Publication - Notice of Intent to Issue Permit for Modified Project
Draft Permit No. 0570008-013-AC, (PSD-FL-234) Cargill Riverview Fertilizer
Facility - Animal Feed Ingredient Plants - located at 8813 U.S. Highway 41 South,
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If there are any questions, please contact me at (813) 671-6297.

Sincerely,

Melody D. Russo
Environmental Superintendent

/dh

Enclosure

x.c. Florida Department of Environmental Protection
Hillsborough County Environmental Protection Commission
Don Clark
Ozzie Morris
Kathy Edgemon
File P-30-39-01



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 _____

NOTICE OF INTENT

was published in said newspaper in the issues of _____
 MAY 22, 1997

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

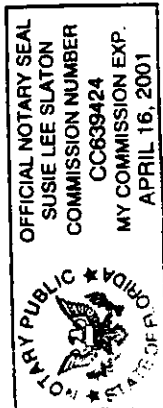
 22

Sworn to and subscribed before me, this _____ day
 of _____ MAY _____, A.D. 19 97

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

(SEAL)

Susie Lee Slaton



NOTICE OF INTENT TO ISSU
 PERMIT FOR MODIFIED
 PROJECT
 STATE OF FLORIDA
 DEPARTMENT OF
 ENVIRONMENTAL
 PROTECTION
 DRAFT Permit No.: 0570006
 013-AC (PSD-FL-234)
 Cargill Riverview Fertilizer
 Facility
 Animal Feed Ingredient Plant
 Hillsborough County
 The Department of Environ
 mental Protection (Depart
 ment) gives notice of its inter
 to issue a permit for modifi
 project to Cargill Fertilizer
 Inc., for a revision of the emis
 sion limits at a recently con
 structed animal feed ingredie
 nt (AFI) plant, and addition o
 a second 150,000 ton per yea
 AFI plant at the fertilizer ma
 nufacturing facility located at
 Highway 41 in Riverview
 Hillsborough County. This is
 revised public notice based o
 project modifications submit
 ted by Cargill since publica
 tion of the original notice o
 October 18, 1994. The revis
 ions exclude the scrubber fo
 the second AFI plant and mod
 ify the existing scrubber to
 support both AFI plants. The
 applicant's name and address
 are: Cargill Fertilizer, Inc.,
 8813 Highway 41 South, Riv
 erview, Florida 33569.

Emissions and impacts on
 ambient air quality pursuant
 to rules for the Prevention of
 Significant Deterioration
 were discussed in the previ
 ous notice. The modifications
 related to the scrubbers do
 not affect the previous deter
 mination.

The Department will issue
 the FINAL Permit, in accor
 dance with the conditions of
 the DRAFT Permit unless a
 response received in accor
 dance with the following pro
 cedures results in a differ
 ent decision or significant cha
 nge of terms or conditions.

The Department will accept
 written comments and req
 uests for public meetings
 concerning the proposed
 DRAFT Permit issuance ac
 tion for a period of 30 (thir
 ty) days from the date of pu
 blication of this Notice. W
 ritten comments and req
 uests for public meetings s
 hould be provided to the D
 epartment's Bureau of Air
 Regulation, 2600 Blair St
 one Road, Mail Station #
 5505, Tallahassee, Florid
 a 32399-2400. Any writte
 n comments filed shall be
 made available for public
 inspection. If written com
 ments received in this D
 RAFT Permit, the Depart
 ment shall issue a Revised
 DRAFT Permit and require,
 if applicable, another Pub
 lic Notice.

The Department will issue
 FINAL Permit with the con
 ditions of the DRAFT Per
 mit unless a timely petiti
 on for an administrative he
 aring is filed pursuant to
 Sections 120.569 and 120.5
 7 F.S. or a party req
 uests mediation as an alt
 ernative remedy under Sec
 tion 120.573 before the de
 adline for filing a petiti
 on. Choosing mediation w
 ill not adversely affect t
 he right to a hearing. If
 mediation does not result
 in a settlement. The pro
 cedures for petitioning f
 or a hearing are set forth
 below, followed by the p
 rocedures for requestin
 g mediation.

A person whose substan
 tial interests are affected
 by the Department's prop
 osed permitting decision
 may petition for an admin
 istrative hearing in accor
 dance with Sections 120.5
 69 and 120.57 F.S. The
 petition must contain th
 e information set forth b
 elow and must be filed (r
 eceived) in the Office of
 General Counsel of the D
 epartment, 3900 Common
 wealth Boulevard, Mail
 Station #35, Tallahassee,
 Florida 32399-3000, tele
 phone: 904-488-9370, fax:
 904/487-

4938. Petitions 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. A petitioner must mail a copy of the petition to the applicant of the address indicated above, at the time of filing. The failure of any person to file a petition (or a request for mediation, as discussed below) within the appropriate time period shall constitute a waiver of the 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 28-5.207 of the Florida Administrative Code.

A petition must contain the following information: (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Permit File Number and the county in which the project is proposed; (b) A statement of how and when each petitioner received notice of the Department's action or proposed action; (c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action; (d) A statement of the material facts disputed by petitioner, if any; (e) A statement of the facts that the petitioner contends warrant reversal or modification of the Department's action or proposed action; (f) A statement identifying the rules or statutes that the petitioner contends require reversal or modification of the Department's action or proposed action; and (g) A statement of the relief sought by the petitioner, stating precisely the action that the petitioner wants the Department to take with respect to the Department's action or proposed action addressed in this notice of intent.

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 of intent. 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 person whose substantial interests are affected by the Department's proposed permitting decision, may elect to pursue mediation by asking all parties to the proceeding to agree to such mediation and by filing with the Department a request for mediation and a written agreement of all such parties to mediate the dispute. The request and agreement must be filed in (received by) the Office of General Counsel of the Department, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000, by the same deadline as set forth above for the filing of a petition.

A request for mediation must contain the following information: (a) The name, address, and telephone number of the person requesting mediation and that person's representative, if any; (b) A statement of the preliminary agency action; (c) A statement of the relief sought; and (d) Either an explanation of how the requester's substantial interests will be affected by the action or proposed action addressed in this notice of intent

or a statement clearly identifying the petition for hearing that the requester has already filed, and incorporating it by reference.

The agreement to mediate must include the following: (a) The names, addresses, and telephone numbers of any persons who may attend the mediation; (b) The name, address, and telephone number of the mediator selected by the parties, or a provision for selecting a mediator within a specified time; (c) The agreed allocation of the costs and fees associated with the mediation; (d) The agreement of the parties on the confidentiality of discussions and documents introduced during mediation; (e) The date, time, and place of the first mediation session, or a deadline for holding the first session, if no mediator has yet been chosen; (f) The name of each party's representative who shall have authority to settle or recommend settlement; and (g) The signatures of all parties or their authorized representatives.

As provided in Section 120.573 F.S., the timely agreement of all parties to mediate will toll the time limitations imposed by Sections 120.569

and 120.57 F.S. for requesting and holding an administrative hearing. Unless otherwise agreed by the parties, the mediation must be concluded within sixty days of the execution of the agreement. If mediation results in settlement of the administrative dispute, the Department must enter a final order incorporating the agreement of the parties. Persons whose substantial interests will be affected by such modified final decision of the Department have a right to petition for a hearing only in accordance with the requirements for such petitions set forth above. If mediation terminates without settlement of the dispute, the Department shall notify all parties in writing that the administrative hearing processes under Sections 120.569 and 120.57 F.S. remain available for disposition of the dispute, and the notice will specify the deadlines that then will apply for challenging the agency action and electing remedies under those two statutes.

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.

Department of Environmental Protection

Bureau of Air Regulation
111 S. Magnolia Drive, Suite 4
Tallahassee, Florida 32301
Telephone: 904/488-1344
Fax: 904/922-6979

Department of Environmental Protection
Southwest District Office
3804 Coconut Palm Drive
Tampa, Florida 33619
Telephone: 813/744-6100
Fax: 813/744-6458
Hillsborough Co. Envir. Protect. Committee
Air Management Division
1410 North 21st Street
Tampa, Florida 33605
Telephone: 813/272-5690

The complete project file includes the application, technical evaluations, Draft Permit, and the information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Administrator, New Resource Review Section at 111 South Magnolia Drive, Suite 4, Tallahassee, Florida 32301, or call 904/488-1344, for additional information.

7057

5/22/97

Cargill Fert.
0570008-013-AC
PSD-FI-234
(Animal Feed)

Commitment To

Is your RETURN ADDRESS completed on the reverse side?

SENDER:

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

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:

Florida
 Department of Environmental Protection
 Bureau of Air Regulation
 111 S. Magnolia Drive, Suite 4,
 Tallahassee, FL 32301-1344

4a. Article Number

P 343 040 677

4b. Service Type

- Registered Insured
- Certified COD
- Express Mail Return Receipt for Merchandise

7. Date of Delivery

5. Signature (Addressee)

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

6. Signature (Agent)

PS Form 3811, December 1991 U.S. GPO: 1993-352-714 **DOMESTIC RETURN RECEIPT**

Thank you for using Return Receipt Service.

no delivery available at this address 5/29/88

Florida
 Department of Environmental Protection
 Bureau of Air Regulation
 111 S. Magnolia Drive, Suite 4
 Tallahassee, FL 32301-1344

RETURN RECEIPT REQUESTED

MAIL

P 343 040 677

CERTIFIED

Fold at line over top of envelope to the right of the return address.

8813 Highway 41 South
 Riverview, Florida 33569

