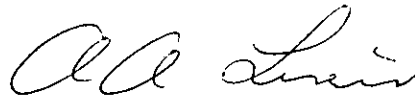


Certification

Application No. 0570008-013-AC / PSD-FL -234

I HEREBY CERTIFY that the engineering features described in the above referenced application and subject to the proposed permit conditions provide reasonable assurance of compliance with applicable provisions of Chapter 403, Florida Statutes, and Florida Administrative Code 62-209 through 62-297. However, I have not evaluated and I do not certify aspects of the proposal outside of my area of expertise (including but not limited to the electrical, mechanical, structural, hydrological, and geological features).



(signed)

10/8/96

(date)

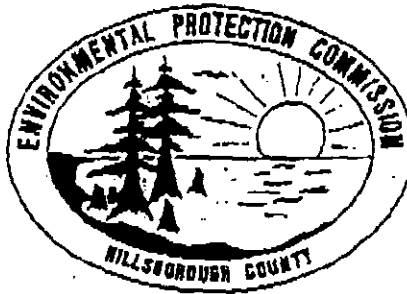
(seal)

068

10/8

COMMISSION

DOTTIE BERGER
PHYLLIS BUSANSKY
JOE CHILLURA
CHRIS HART
JIM NORMAN
ED TURANCHIK
SANDRA WILSON



ADMINISTRATIVE OFFICES, LEGAL &
WATER MANAGEMENT DIVISION
1900 - 9TH AVENUE
TAMPA, FLORIDA 33605
TELEPHONE (813)272-5960
FAX (813)272-5157

AIR MANAGEMENT DIVISION
TELEPHONE (813)272-5530

WASTE MANAGEMENT DIVISION
TELEPHONE (813)272-6788

ECOSYSTEMS MANAGEMENT DIVISION
TELEPHONE (813)272-7104

EXECUTIVE DIRECTOR

ROGER P. STEWART

**ENVIRONMENTAL PROTECTION COMMISSION
OF HILLSBOROUGH COUNTY**

FAX TRANSMITTAL SHEET

DATE: 10/7/96

TO: SYED ARIF / PSD-NSR Section

FAX PHONE: (904) 922-6979 VOICE PHONE:

TOTAL NUMBER OF PAGES INCLUDING THIS COVER PAGE: 7

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

FROM: CARLOS GONZALEZ
(CIRCLE APPLICABLE SECTION BELOW)

AIR DIVISION

-ENFORCEMENT

-ENGINEERING

-SUPPORT OPERATIONS

SPECIAL INSTRUCTIONS: As discussed earlier, the DEP/SWS scrubber
policy is reflected in the sample permit Specific Conditions 12, 18, 19
for the initial compliance test. Specific Conditions 20 and 21 could
be put in the operating permit later.
HAVE A NICE VACATION!

Kim - To Syed's Active
Cargill File -
Animal Feed Plant
PSD-FL-234

COMMISSION

DOTTE BERGER
 FIFELIS DUBANOV
 JOE CHILLURA
 CHRIS HART
 JIM NORMAN
 ED TURANCHIK
 SANDRA WILSON

EXECUTIVE DIRECTOR

ROGER P. STEWART



ADMINISTRATIVE OFFICES, LEGAL &
 WATER MANAGEMENT DIVISION
 1900 9TH AVENUE
 TAMPA, FLORIDA 33605
 TELEPHONE (813) 272-5700
 FAX (813) 272-5157

AIR MANAGEMENT DIVISION
 TELEPHONE (813) 272-5530

WASTE MANAGEMENT DIVISION
 TELEPHONE (813) 272-5788

WETLANDS MANAGEMENT DIVISION
 TELEPHONE (813) 272-7104

MEMORANDUM

DATE: October 1, 1996

TO: Al Linero, DARM

FROM: Carlos Gonzalez

THRU: Richard C. Kirby, IV, P.E.
Jerry Campbell, P.E.

SUBJECT: Cargill Fertilizer, Inc. - Animal Feed Ingredient (AFI) Plants, Draft Permit PSD-PL-234 and 0570008-013-AC

DRAFT

We have reviewed the recent draft permit. We thought that for the particulate emitting process equipment controlled by scrubber, the BACT would be more like 0.015 grains/DSCF. Since Cargill has recently conducted a series of 30-minute test runs for PM emissions at the No. 1 AFI plant and have (not so comfortably) met the more stringent requirement of 0.01 grains/DSCF given in the recent BACT, we offer the following comments:

These comments are from the Southwest District of the DEP scrubber policy and are circled in a sample permit (IMC Fertilizer / A053-192132). The test and control equipment information is more specific than in Specific Condition Nos. B.6 and C.2 of the draft permit.

Note: It should be noted that if any of the AFI plants emits 0.015 grains/DSCF or more, Cargill will be in violation of the PM limiting standard since the actual emission can be rounded off to 0.02 grains/DSCF. If the BACT was given as 0.010 gr/DSCF, the results provided demonstrate that the standard is not met. By contrast, in page 5-4 of the PSD application, Cargill makes reference to PM equivalents of 0.030 grains/DSCF and 0.071 grains/DSCF for an IMC Fertilizer AFI plant and a PCS Phosphate AFI plant, respectively.

bm

Attachments



CARGILL - 30-minute test runs on No. 1 AFI Plant

Scrubber Performance Evaluations (does not meet requirements of compliance method)

Date	PM lb/hr	PM gr/DSCF	Production TPH	PM lb/ton
03-Jul-96	5.35	0.011	19.9	0.27
01-Jul-96	4.39	0.009	19.0	0.23
26-Jun-96	5.30	0.011	19.8	0.27
17-May-96	3.66	0.007	18.5	0.19
13-May-96	3.39	0.008	18.3	0.19
12-May-96	2.84	0.006	17.6	0.16
11-May-96	3.49	0.009	17.5	0.20
08-May-96	2.87	0.006	13.6	0.21
01-May-96	4.95	0.010	16.9	0.28
29-Apr-96	2.70	0.005	10.1	0.27
22-Apr-96	4.20	0.009	15.0	0.28
16-Apr-96	3.50	0.008	12.7	0.27
22-Feb-96	1.29	0.003	15.0	0.09
Average	3.68	0.008	16.5	0.22
Min	1.29	0.003	10.1	0.09
Max	5.35	0.011	19.9	0.29
Standard Deviation	1.16	0.00	2.99	0.06

DRAFT

CARGILL No. 1 AFE Plant

Table 6-3. Summary of Pollution Control Equipment and PM and Fluoride Emissions

Source	Control Type	Manufacturer/Model	Design Capacity		Control Efficiency (percent)	Operating Hours	PM Emissions			Fluoride Emission (lb/ton P2O5)
			Value	Units			(gr/dscf)	(lb/hr)	(TPY)	
Defluorination Batch Tank	Defluorination Scrubber	BCI/Bihell CF4-4-3	9,000	acfm	99.95 (F)	8,780	NA	NA	NA	0.04
Reactor/Granulator/Materials Handling	Equipment Vents Cyclones ¹	Fisher-Kosterman/xq405-28	35,000	acfm	99.0 (PM)	8,300	0.004 ²	2.82	11.69	NA
	Dryer Cyclone ²	Fisher-Kosterman/xq405-31	50,000	acfm	99.0 (PM)					
	Dryer Scrubber	Fisher-Kosterman/vras 120C	65,000	acfm	99.99 (PM)					
DE Hopper Dust Collector Vent	Baghouse	MAC 39-AVRC21	518	dscfm	99.9	250	0.02	0.089	0.011	NA
Limestone Silo Dust Collector	Baghouse	MAC 39-AVRC 21	691	dscfm	99.9	3,500	0.02	0.12	0.21	NA
AFP Load Out System Dust Collector	Baghouse	MAC 144-MCF-255	17,290	dscfm	99.9	2,000	0.02	2.96	2.96	NA
							Total =		14.87	

Note: acfm = actual cubic feet per minute
 AFP = animal feed phosphate
 DE = diatomaceous earth
 dscfm = dry standard cubic foot per minute
 gr/dscf = grains per standard cubic foot
 lb/hr = pounds per hour
 scfm = standard cubic feet per minute
 TPY = tons per year

- ¹ Based on 223.6 tons P2O5 per batch run; assume 1 batch per day and 17 hours per batch, operating 365 days per year.
- ² The cyclones vent through the scrubbers before exiting through the common stack.
- ³ Represents gr/dscf. PM emissions of 2.8 lb/hr based on 82,230 acfm at 0.004 gr/dscf.

DRAFT

PERMITTEE:

IMC Fertilizer, Inc.
New Wales Operations
P.O. Box 1035
Mulberry, Florida 33860

PERMIT/CERTIFICATION

Permit No: A053-192132
County: Polk
Expiration Date: 04/25/96
Project: Phos Acid Train
No. 3 w/Scrubber

SPECIFIC CONDITIONS:

11. Compliance testing shall be conducted while operating within $\pm 10\%$ of the maximum permitted "equivalent P_2O_5 feed" rate of 2,366 tons per day. A compliance test submitted at an operating rate less than 90% of the maximum permitted rate will automatically constitute an amended permit at the lesser rate until another test demonstrating compliance at a higher rate is submitted. Failure to submit the "equivalent P_2O_5 feed" rate or operating at conditions during testing which do not reflect normal operating conditions may invalidate the test. [Rule 17-4.070(3), F.A.C.]

85 12. The following scrubber operating parameters shall be monitored during any compliance test and a summary of this data shall be included in any emissions test report. ~~{ACS-99100}~~

- (X) Water Pressure
- (X) Volumetric Liquid Water Flow Rate
- (X) Gas Pressure Drop

Rule 62-4.070(3)

13. IMC Fertilizer, Inc. shall notify the Southwest District Office of the Department at least 15 days prior to the date on which each formal compliance test is to begin of the date, time, and place of each such test, and the test contact person who will be responsible for coordinating and having such test conducted. [Rule 17-2.700(2)(a)9., F.A.C.]

14. IMC Fertilizer, Inc. shall install, calibrate, maintain, and operate a monitoring device which can be used to determine the mass flow of phosphorus-bearing feed material to the process. The monitoring device shall have an accuracy of $\pm 5\%$ over its operating range. [Rule 17-2.660, F.A.C. and 40 CFR 60.203(a)].

15. IMC Fertilizer, Inc. shall maintain a daily record of "equivalent P_2O_5 feed" according to the procedure specified in 40 CFR 60.203(b). [Rule 17-2.660, F.A.C. and 40 CFR 60.203(b)].

16. IMC Fertilizer, Inc. shall install, calibrate, maintain, and operate a monitoring device which continuously measures and permanently records the total pressure drop across the process scrubbing system. The monitoring device shall have an accuracy of $\pm 5\%$ over its operating range. [Rule 17-2.660, F.A.C. and 40 CFR 60.203(c)].

IMC Fertilizer, Inc.
New Wales Operations
P.O. Box 1035
Mulberry, Florida 33860

PERMIT/CERTIFICATION
Permit NO: A003-192132
County: Polk
Expiration Date: 04/25/96
Project: Phos Acid Train
No. 3 w/Scrubber

SPECIFIC CONDITIONS:

B1

Carroll

17. Records documenting compliance with specific conditions #5 and #6 shall be kept for a ~~minimum of 2 years~~ ^{maximum of 2 years} ~~from the date of measurement~~ ^{from the date of measurement}

B1

18. To provide reasonable assurance of continuous compliance with specific condition #4, IMC Fertilizer, Inc. shall create and keep a record log of the scrubber operating parameters. The record log shall contain, at a minimum, the volumetric liquid water flow rate, the gas pressure drop, the date and time of the measurements, and the person responsible for performing the measurements. A record log entry shall be made at least once for every 8 hour shift that the phosphoric acid train No. 3 operates. The record log shall be maintained at the facility and shall be retained at least three years from the date of measurement.

log

[Rules 17-4.070(3), 17-4.160(14)(b), and 17-4.160(14)(c), F.A.C.]

B7

19. IMC Fertilizer, Inc. may, at its option, substitute continuous monitoring and strip chart recordings for the manual recordkeeping required by specific condition #18. If this option is exercised, then all calibration and maintenance records and all original strip chart recordings shall be retained at least three years.

[Rules 17-4.070(3), 17-4.160(14)(b), and 17-4.160(14)(c), F.A.C.]

20. When phosphoric acid train No. 3 is operating, the volumetric liquid water flow rate to the scrubber shall not fall below 90% of the rate reported during the most recent satisfactory compliance test. [Rule 17-4.070(3), F.A.C.]

21. When phosphoric acid train No. 3 is operating, the gas pressure drop across the scrubber shall not fall below 90% of the rate reported during the most recent satisfactory compliance test. [Rule 17-4.070(3), F.A.C.]

22. Submit for this facility, each calendar year, on or before March 1, an emission report for the preceding calendar year containing the following information pursuant to Section 403.061(13), Florida Statutes.

- (A) Annual amount of materials and fuels utilized.
- (B) Annual emissions (note calculation basis).
- (C) Any changes in the information contained in the permit application.

were expressed in terms of lb/ton of material throughput, and the emission limits ranged from 0.12 to 0.60 lb/ton.

In addition to these previous BACT determinations, a review of currently operating animal feed plants in Florida was conducted. This review identified two such plants: PCS Phosphates located in White Springs, and IMC Fertilizer, located in Polk County. Through this review, it was revealed that IMC Fertilizer was issued a PSD permit for a new air classifier/bag collector at their existing animal feed ingredients plant in 1993 (AC53-222859; PSD-FL-199). The resulting BACT determination for PM was 0.015 gr/dscf, and the control device was a baghouse. However, IMC does not vent the dryer exhaust gases to this baghouse; the dryer is controlled by a separate venturi scrubber. Other emission sources, control technology, and emission rates associated with the IMC animal feed plant were identified as follows:

* Animal feed plant common stack (reactor, pug mill, granulator, dryer, screening system and cooler)

3 venturi/crossflow scrubbers, 1 venturi scrubber and 3 cyclones

Production rate = 120 TPH

Flow rate - 179,000 acfm; 141,000 dscfm

PM emission limit - 36.8 lb/hr; equivalent to 0.030 gr/dscf

Actual PM test data - 10 to 26 lb/hr; up to 0.018 gr/dscf

For the PCS Phosphates plant, the following information concerning their animal feed plant was obtained:

* Reactor/dryer/product handling system common stack

cyclonic/venturi scrubbers

Production rate = 40 TPH

Flow rate - 92,000 acfm; 76,000 dscfm

PM emission limit - 46.11 lb/hr based on process eight table; equivalent to 0.071 gr/dscf

Actual PM test data:- 7 to 10 lb/hr; up to 0.016 gr/dscf



**CARGILL
FERTILIZER, INC.**

RECEIVED

SEP 13 1996

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 204 939 097

September 10, 1996

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

RE: Cargill Fertilizer, Inc. - Tampa Plant - Application for Refund
for Phosphate Rock Drying/Grinding System
AIRS No. 0570008-011-AC, PSD-FL-234

Dear Mr. Fancy:

Enclosed is the completed application for refund form, as requested in your letter dated August 28, 1996.

Should additional information be required, please do not hesitate to call me at in Tampa at (813) 671-6297.

Sincerely,

Melody Russo
Environmental Superintendent

/dh

Enclosure

x.c. D. Jellerson
O. Morris
File: P-30-32-3

n:\user\private\env\refund.sam



recycled paper

APPLICATION FOR REFUND FORM

THE STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL PROTECTION

STATE OF FLORIDA, COUNTY OF HILLSBOROUGH

Pursuant to the provisions of Section 215.26, or Section _____*, Florida Statutes, I hereby apply for a refund and request that a State Warrant be drawn in favor of:

NAME: CARGILL FERTILIZER, INC.
ADDRESS: 8813 HIGHWAY 41 SOUTH RIVERVIEW, FL 33569-
FEID OR SS NUMBER:
AMOUNT: \$7,500.00 DEPOSIT DATE: 12-JUL-96 DEPOSIT: 370473
DOCUMENT NUMBER: SYS RECEIPT#: 93985
REV OBJECT CODE: 2222 AIR CONSTRUCT

which represents moneys I paid into the State Treasury subject to refund, and to substantiate such claim the following facts are submitted:

REASON FOR CLAIM: NO FEE DUE

CERTIFIED TRUE AND CORRECT this 9th day of September, 1996.

Applicant's Signature

*Must be completed if authority is other than Section 215.26, Florida Statutes.

(FOR AGENCY USE ONLY)

(1) Agency recommends denial of above claim based on the following facts, including statutory authority for collection:

OR

(2) Agency recommends approval of above claim and submits the following information to substantiate such claim. \$7,500.00 was originally deposited into the State Treasury, Receipt _____, dated _____.

NAME OF ACCOUNT:

SAMAS ACCOUNT CODE
3720252600137 00000000020000

Statutory Authority for Collection _____
It is requested that payment be made from:

NAME OF ACCOUNT:

SAMAS ACCOUNT CODE
3720252600137 00000022000000

CERTIFIED TRUE AND CORRECT this _____ day of _____, 19__.

Signature and Title of Authorized Person

SECTION 215.26 STATES, IN PART: "APPLICATION FOR REFUNDS AS PROVIDED BY THIS SECTION SHALL BE FILED WITH THE COMPTROLLER, EXCEPT AS OTHERWISE PROVIDED HEREIN, WITHIN 3 YEARS AFTER THE RIGHT TO SUCH REFUND SHALL HAVE ACCRUED ELSE SUCH RIGHT SHALL BE BARRED." Three years is interpreted as meaning three years from the date of payment into State Treasury.



IN REPLY REFER TO:

United States Department of the Interior

FISH AND WILDLIFE SERVICE

1875 Century Boulevard
Atlanta, Georgia 30345

August 29, 1996

Cargill -
(3A) animal feed
RECEIVED

SEP 3 1996

BUREAU OF
AIR REGULATION

Mr. C. H. Fancy
Chief, Bureau of Air Regulation
Department of Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road, MS 48
Tallahassee, Florida 32399-2400

Dear Mr. Fancy:

We have reviewed the Prevention of Significant Deterioration Application for the proposed expansion of the Cargill Fertilizer, Inc., animal feed ingredient facility in Riverview, Florida. The facility is located 86 km south of Chassahowitzka Wilderness Area, a Class I air quality area, administered by the Fish and Wildlife Service (FWS). Comments from the FWS Air Quality Branch follow:

Best Available Control Technology (BACT) Analysis

The Best Available Control Technology (BACT) analysis is complete for PM/PM10 and for fluorides. The BACT analysis for NO_x is incomplete, however. A more in-depth analysis is recommended including consideration of low-NO_x burners and flue gas recirculation. The absence of flue gas recirculation from the phosphate industry should not eliminate it from consideration in the BACT analysis.

A summary table of BACT determinations for NO_x similar to that submitted for PM (table 5-1) would facilitate our review of the completeness of the applicant's BACT analysis.

The air quality and air quality related values analyses are complete.

Thank you for giving us the opportunity to comment on this permit application. We appreciate your cooperation in notifying us of proposed projects with the potential to impact the air quality and related resources of our Class I air quality areas. If you have any questions, please contact Ms. Ellen Porter of our Air Quality Branch in Denver at 303/969-2617.

Sincerely yours,

Noreen K. Clough
Regional Director



Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

August 28, 1996

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. David B. Jellerson, P.E.
Environmental Superintendent
Cargill Fertilizer, Inc.
P.O. Box 9002
Bartow, Florida 33831

Re: Cargill Fertilizer, Inc. - Tampa Plant
Phosphate Rock Drying/Grinding System
AIRS No. 0570008-011-AC, PSD-FL-234

Dear Mr. Jellerson:

The Department has received the letter requesting withdrawal of the above-referenced PSD permit application and the return of the \$7,500 permit application fee. Enclosed is an application for refund form, which should be dated and signed in the Applicant's Signature block. Since the original application was submitted under Ms. Melody Russo's signature, she should be the person signing this block.

Please return the application for refund form to me at the letterhead address. The form will then be submitted to Finance and Accounting for further processing. If there are any questions, please call Syed Arif at (904) 488-1344.

Sincerely,

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

CHF/sa/a

Enclosure

cc: P. Comer, OGC
J. Campbell, HCEPC
J. Kissel, SWD

no green card 7/98
P 339 251 148

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TOTAL Postage & Fees	\$
Postmark or Date <i>828-96</i>	
<i>PSO-FI-234</i>	
<i>0570008-011-AC</i>	

PS Form 3800, April 1995



**CARGILL
FERTILIZER, INC.**

P.O. Box 9002 • Bartow, Florida 33831 • Telephone 941-534-9610 • FAX 941-534-9680

RECEIVED

AUG 22 1996

BUREAU OF
AIR REGULATION

Certified Mail: P013 142 527 and by FAX

August 20, 1996

Mr. Al Linero, P.E.
Bureau of Air Regulation
Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Dear Mr. Linero:

Re: Cargill Fertilizer, Inc. - Tampa Facility
Phosphate Rock Drying/Grinding System
AIRS No. 0570008-011-AC, PSD-FL-234

Pleased be advised that Cargill Fertilizer, Inc. is hereby withdrawing the above-referenced PSD permit application. After further evaluation of our business interests, we have decided that our non-PSD construction project is adequate for our needs.

We also request that the FDEP return the \$7,500 permit application fee to us. As you are aware, Cargill relied on FDEP when it submitted the application and fee. In light of Hillsborough County's challenge, FDEP should return the fee to Cargill.

If you have any questions please contact me by phone at (941) 534-9613 or e-mail at david_jellerson@cargill.com.

Sincerely,

David B. Jellerson, P.E.
Environmental Superintendent

cc: J. Kissel, Southwest District
Pat Comer
O. Morris
P-30-32-3



recycled paper



**CARGILL
FERTILIZER, INC.**

P.O. BOX 9002
BARTOW, FL 33831

PHONE 941/534-9613
FAX 941/534-9680

FACSIMILE TRANSMISSION

DATE: AUGUST 20, 1996

TO: Al Linero / Syed Arif

COMPANY: Florida DEP

FROM: David Jellerson

MESSAGE:

Al,

Attached is a letter being mailed to you today withdrawing the PSD application for our rock grinding operations. Give me a call if you have any questions.

David

NUMBER OF PAGES INCLUDING THIS COVER PAGE: 2

PLEASE CONTACT David Jellerson AT (813)534-9613 IF THERE IS DIFFICULTY WITH THIS TRANSMISSION.

Date: 8/6/96 11:55:50 AM
From: Patricia Comer TAL
Subject: Re: Cargill - Rock Dryer, permit 057008-008-AC
To: See Below

*****David Jellerson of Cargill called yesterday, and wanted to make the following points: The project is viable as permitted, without the PSD application. The equipment has not run over 6800 hours in the past three years which he checked, and the current permit allows 7800 hours. The PSD application requested 8760 hours (continuous operation) which is not that great an increase over 7800 and the actual total would be less.

*****He also stated that the change in airflows was a result of normal engineering design evolution, but to defuse that as an issue, they were planning to revise the PSD application to the original design, so that the only change from the current permit to the PSD application would be the increase in hours.

*****I passed along Clair Fancy's suggestion that, regardless of the validity of their position, that they might drop the PSD application and operate under their present permit, OR surrender their current permit and proceed to obtain the PSD permit. I also suggested that their attorney talk to the EPA attorney.

*****cc: D. Jellerson

Folks

I talked to Tom MacLeod, Cargill attorney, yesterday and today. He told me that Cargill's real problem is not with the overall production, but that the limitation on hours of operation sets up a requirement that when the unit will operate, it will have to be at high, near or at maximum, capacity. In other words, their flexibility to operate at low capacity is removed (I don't really pretend to understand exactly how). So they don't really want a PSD permit for any reason other than to retain the flexibility to run at low capacity (I hope you engineers understand my attempt here). They are willing to withdraw the PSD permit if they can figure some way to retain the same potential to emit but still be able to run at lower capacity. So I suggested that the Cargill engineers contact you guys in TPA for that. I also suggested that someone from Cargill immediately contact Clair or Al in PSD to have the processing of the PSD permit halted (NOTE- Clair, MacLeod mentioned that they'd like to not have to pay the processing fee for the PSD permit if they withdraw. I told him that a lot of resources had probably already been expended for completeness checking and he'd have to talk to you or Al about that-I made no agreement that a refund was available)

Lastly, MacLeod told me he spoke to David Savage of EPA, who told him that it was highly unusual for him (Savage) to be involved with this sort of thing but that no one else was around because of the Olympics. According to MacLeod, Savage has given the whole case over to Jewell Harper's program people for investigation, or whatever, which should have been what was done with it originally (and would have been but for the Olympics). MacLeod stated that Savage admitted that this was not a "classic case" and that he (Savage) didn't know what, if anything, would come from Jewell Harper's group. MacLeod also stated that Savage told him that, because this wasn't a classic case, probably EPA would drop it if the PSD permit were withdrawn.

It seems that Hillsborough county has issued a Warning Notice declaring the DEP permit invalid and requiring Cargill to turn the permit over. Does anyone besides me see a problem here? I don't know what authority Hillsborough claims for this action, but I certainly can see that a permittee could have heartburn over the claim of a county (especially one which participated during the permit processing and later waived its right to a 120.57 hearing) that it has the power to declare state permits invalid.

To: Gerald Kissel TPA
To: Doug Beason TAL
To: Clair Fancy TAL
CC: Jerry N. Campbell TPA
CC: Jim McDonald TPA



Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

July 29, 1996

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Ms. Melody Russo
Environmental Superintendent
Cargill Fertilizer, Inc.
8813 Highway 41 South
Riverview, Florida 33569

Re: Cargill Fertilizer, Inc. - Tampa Plant
Phosphate Rock Drying/Grinding System
AIRS No. 0570008-011-AC, PSD-FL-234

Dear Ms. Russo:

The Department has received the application for the modification of the existing phosphate rock drying/grinding system at Cargill Fertilizer in Hillsborough County. Based on our initial review of the proposed project, we have determined that additional information is needed in order to continue processing this application package. Please submit the information requested below to the Department's Bureau of Air Regulation:

1. As indicated in the application, 40 CFR 60.402(a)(1) limits the rock dryers to 0.06 lb/ton of phosphate rock feed. The grinders will have to meet 0.20 lb/ton of products as codified in the Florida RACT requirements of 62-296.705(2)(b). Please indicate if testing can be performed on the dryer and the grinder independently to demonstrate compliance with the individual emission limits as mentioned above.
2. CFR 60.403(a) requires the installation of a continuous emission monitoring system for opacity on rock dryers. The application asks for exemption under 40 CFR 60.13(i). Please indicate of the nine alternatives listed under 60.13(i), which alternative(s) will apply for this facility. Also, submit a copy of the request for an alternative monitoring method that was provided as part of a related minor source construction permit application.

3. Please indicate if provisions are being made to process both wet and dry rock simultaneously. In responding to this incompleteness, indicate how it will be accomplished from the unloading, storing and processing aspects of the process.
4. Please indicate the bottlenecks for not achieving 0.01 gr/dscf emission level with the proposed baghouse.
5. We note there is another permit (0570008-008-AC) to make a minor modification of the same emission unit. Please advise whether or not Cargill intends to make the modifications detailed in that permit. For example, it indicates that three baghouses will be installed compared with the two indicated in the present PSD permit application.

The Department will resume processing this application after we receive the requested information. Should you have any questions, please contact Syed Arif at 904-488-1344.

Sincerely,



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

AAL/sa/t

cc: B. Thomas, SWD
J. Campbell, HCEPC
J. Harper, EPA
J. Bunyak, NPS
D. Buff, KBN

P 339 251 126

US Postal Service
Receipt for Certified Mail
No Insurance Coverage Provided.
Do not use for International Mail (See reverse)

Sent to	
Melody Russo	
Street & Number	
Carroll Fert.	
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	\$
Postmark or Date	7-29-96
0570008-011-AC P50-FL-234	

PS Form 3800, April 1995

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):

- Addressee's Address
- Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:
Melody Russo, Env. Supt.
Carroll Fertileizer, Inc.
8813 Hwy 41 South
Riverview, FL 33569

4a. Article Number
P339 251 126

4b. Service Type

<input type="checkbox"/> Registered	<input type="checkbox"/> Insured
<input checked="" type="checkbox"/> Certified	<input type="checkbox"/> COD
<input type="checkbox"/> Express Mail	<input type="checkbox"/> Return Receipt for Merchandise

7. Date of Delivery
7-31-96

5. Signature (Addressee)
Richard Burnett

6. Signature (Agent)

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

Thank you for using Return Receipt Service.



Letter of Transmittal

Date: 07/16/96

Project No.: 9651074-0900

To: A.A. Linero, P.E.
FDEP
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Re: Cargill Fertilizer, Inc.
Animal Feed Ingredient Plant

The following items are being sent to you: with this letter under separate cover

<u>Copies</u>	<u>Description</u>
<u>4</u>	<u>PSD Application for above-referenced facility</u>
<u>2</u>	<u>Disk copies of application for electronic submittal</u>
<u>1</u>	<u>Cargill Fertilizer Inc. Check No. 577241616 for \$7,500.00</u>

These are transmitted:

- As requested
- For review
- For review and comment
- For approval
- For your information
- For submittal

Remarks: Additional copies are being submitted as follows:
FDEP Southwest District (Bill Thomas), Tampa--1 hard copy and
1 disk copy
HCEPC (Jerry Campbell), Tampa--1 hard copy, 1 disk copy, and a
Check for \$400

Sender: David A. Buff, P.E./vjp

Copy to: David Jellerson
Kathy Edgemon

9651074Y/F1/WP/2 (07/16/96)