

Golder Associates Inc.

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Gainesville, FL 32653-1500
Telephone (352) 336-5600
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RECEIVED



**Golder
Associates**

APR 09 2004

BUREAU OF AIR REGULATION

0437551-0100

April 8, 2004

Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Attention: A.A. Linero, P.E., Bureau of Air Regulation

RE: DEP FILE NO. 0570008-042-AC; PSD-FL-315C
CARGILL FERTILIZER, INC. - RIVERVIEW FACILITY, NO. 5 DIAMMONIUM
PHOSPHATE PLANT
COMMENTS ON DRAFT PERMIT

Dear Mr. Linero:

Cargill Fertilizer, Inc. (Cargill) and Golder Associates Inc. (Golder) have received Draft Permit No. 0570008-042-AC; PSD-FL-315C for the No. 5 Diammonium Phosphate (DAP) Plant at the Riverview phosphate complex. After review of the draft permit, we have several comments and concerns. These are addressed in the following paragraphs.

Draft Permit

Page 2 of 3, Subsection G.

Condition 1. – It is requested that the production rate limit, as well as the emission limits in Condition 5, be expressed in terms of tons per day (TPD) of product. While the P_2O_5 content of the products may vary significantly, the total production rate in TPD will not vary significantly. Ammoniated phosphate products Cargill currently produces at its various facilities can vary from 33% P_2O_5 to 52% P_2O_5 . However, emissions of particulate matter (PM) and fluorides (F) are not dependent on the P_2O_5 process rate, but more on the total production rate. PM emissions are dependent upon the total amount of solids moving through the system (granulator, dryer, cooler, materials handling system). F emissions are dependent upon the liquid-vapor equilibrium reached in the scrubbers, since the scrubbers operate at equilibrium conditions. If the emission limits are expressed in terms of P_2O_5 input, the allowable emissions in terms of pounds per hour (lb/hr) becomes proportionately higher as P_2O_5 content is increased, while actual emissions do not increase. Conversely, the allowable emissions in terms of lb/hr becomes proportionately lower as P_2O_5 content is reduced, while actual emissions do not decrease. This can make it much more difficult to meet the emission limits on an ongoing basis.

The production limit for the plant, expressed in terms of product, is 3,758 TPD (156.6 tons/hr).

Condition 5. – As discussed above, it is requested that the pounds per ton (lb/ton) emission limits be expressed in terms of tons of product. Thus the limits would become: 0.070 lb/ton for PM, and 0.016 lb/ton for F. Note that this change would in no way change the maximum allowable lb/hr or tons per year (TPY) limits for the plant.

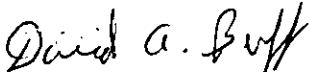
Condition 6. – It is requested that the allowable visible emission (VE) limit be set at 20% opacity. Cargill will be producing different products than are now produced in the No. 5 DAP Plant, and therefore VE may change in character, making a 10% VE limit difficult to meet at all times. The PM mass emission limit is already the lowest in the industry. It is also noted that the VE limit in the final PSD permit recently issued for the No. 6 Granulation Plant at Riverview contains a VE limit of 20%.

Condition 10. – Cargill requests that this condition be clarified. Cargill will be producing a range of products in the modified plant. Some products may be produced for less than 1 month duration. Therefore it is not clear what would be required “under each mode of operation”. Cargill proposes to test initially while producing DAP, and while producing MAP, and allow this testing to determine the need for future testing, which would be incorporated into the operating permit.

Thank you for considering these comments in issuing the final PSD permit. If you have any questions concerning this information, please call me at (352) 336-5600 or David Jellerson, Cargill, at (813) 671-6297.

Sincerely,

GOLDER ASSOCIATES INC.



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

DAB/sep

cc: D. Ahrens, Cargill
F. Bergen, Golder
A. Harmon, HCEPC
D. Jellerson, Cargill
G. Kissel, FDEP SW District

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CERTIFIED MAIL: 7002 2030 0000 6693 8097

April 1, 2004

Ms. Trina L. Vielhauer, Chief
Bureau of Air Regulation
Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Subject: Proof of Publication - Notice of Intent to Issue PSD Permit Modification -
No. 5 Diammonium Phosphate Plant - Permit No. 0570008-042-AC (PSD-FL-315C)

Dear Ms. Vielhauer:

You will find attached Proof of Publication of the Notice of Intent to Issue Permit as outlined in the subject of this letter, as required by Florida Department of Environmental Protection.

Should you have any questions, please contact me at: (813) 671-6297 or
via e-mail: david_b_jellerson@cargill.com .

Sincerely,

David B. Jellerson, P.E
Environmental Manager

/dh

Enclosure

x.c. D. Ahrens
P. Kucera
H. Thorpe
Files: P-30-33-1
D. Ault
D. Nelson
A. Hariman, EPC
G. Watson, SWP
B. Staley, EPA
G. Bouslogh, APS

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APR 05 2004

THE TAMPA TRIBUNE

Published Daily

Tampa, Hillsborough County, Florida

State of Florida }
County of Hillsborough } ss.

BUREAU OF AIR REGULATION

Before the undersigned authority personally appeared C. Pugh, who on oath says that she is the Advertising Billing Supervisor 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 MARCH 28, 2004

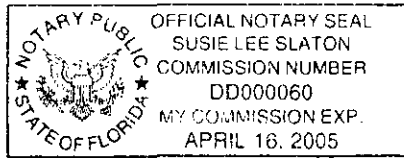
Affiant further says that the said The Tampa Tribune is a newspaper published at Tampa in said Hillsborough County, Florida, and that the said newspaper has heretofore been continuously published in said Hillsborough County, Florida, each day and has been entered as second class mail matter at the post 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.

C. Pugh

Sworn to and subscribed by me, this 29 day of MARCH, A.D. 20 04

Personally Known or Produced Identification
Type of Identification Produced

Susie Lee Slaton



TO ISSUE PSD PERMIT MODIFICATION
STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
PEP File No. 05/0008-04Z-AC
(PSD-FL-315C)
Riverview Facility Fertilizer, Hillsborough County

The Department of Environmental Protection (Department) gives notice of its intent to issue a PSD permit modification to Cargill Fertilizer, Inc., a phosphate fertilizer manufacturing facility located in Riverview, Florida. In November 2001, the Department approved an expansion of the Cargill Riverside Facility including the manufacture of sulfuric acid, phosphoric acid, diammonium phosphate (DAP), granulated triple super phosphate, and animal feed ingredients. The applicant's name and address (also facility address) are Cargill Fertilizer, Inc., 8813 U.S. Highway 91, South, Riverview, Florida 33585.

Cargill has requested revisions to the permit based on some changes to the control equipment configuration for the No. 5 DAP plant, which was later re-designated to No. 5 Ammoniated Phosphate (AP) plant. Cargill has now requested that the No. 5 AP plant remain at No. 5 Granulation Plant. The key changes to the No. 5 Granulation Plant include installation of a new ammonia vaporizer and a new stack vaporizer and a scrubber for the reactor and granulator exhaust gases and a new venturi scrubber for the cooler exhaust gases. Cargill is also requesting addition of micronutrients and sulfur to the reactor granulator to allow for production of sulfur and nutrient rich DAP grades and expansion of the No. 5 Granulation plant building. Granulation room for micronutrient unloading and storage. Cargill is not proposing any changes to the current permitted production rate. The emission rates for fluorides and particulate matter will be lowered by the Department based on a recent BACT determination.

An air quality impact analysis was performed. The analysis showed that emissions from the facility will not significantly contribute to or cause a violation of any state or federal ambient air quality standards.

The Department will issue the Final PSD Permit Modification in accordance with the conditions of the Draft PSD Permit Modification unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions. The permitting authority has determined that a PSD Permit Modification is required.

The Department will accept written comments concerning the proposed permit issuance action for a period of 14 (fourteen) days from the date of publication of "PUBLIC NOTICE OF INTENT TO ISSUE PSD PERMIT MODIFICATION." Written comments 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.

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, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and (g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the agency to take with respect to the agency's proposed action.

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, F.A.C.

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:

Dept. of Environmental Protection
Bureau of Air Regulation
Suite 4, 111 S. Magnolia Dr.
Tallahassee, Florida, 32301
Telephone: 850/488-0114
Fax: 850/922-6979

Dept. of Environmental Protection
Southwest District
3804 Coconut Palm Dr.
Tampa, Florida 33619-8218
Telephone: 813/744-6100
Fax: 813/744-6084

Hillsborough County
Environmental Protection Commission
1900 Ninth Avenue
Tampa, Florida 33605
Telephone: 813/272-5960
Fax: 813/272-5157

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 Program Administrator, Permitting South Section at 111 South Magnolia Drive, Suite 4, Tallahassee, Florida 32301, or call 850/488-0114, for additional information.

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