


TO: Trina L. Vielhauer  
THRU: Al Linero   
FROM: Teresa Heron  
Syed Arif  
DATE: November 12, 2003  
SUBJECT: Cargill Fertilizer, Inc., Riverside Facility  
0570008-043-AC (PSD-FL-315 D)

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Attached is the Public Notice package for a modification at Cargill's phosphate fertilizer manufacturing facility located in Riverview, Hillsborough County.

In November 2001, we approved an expansion of the Cargill Riverside Facility including the manufacture of sulfuric acid, phosphoric acid, granulated triple super phosphate, and animal feed ingredients (AFI). The expansion was reviewed under the PSD rules and BACT determinations were made for each of the emissions units constructed or modified.

Cargill has requested revisions to the permit and the BACT determination based on some changes to the stack configuration and pollution control equipment on AFI Plants Nos. 1 and 2. The key changes on AFI Plant No. 1 include installation of a new packed scrubber to control emissions from the defluorination system and maintaining an existing venturi scrubber (instead of installing a baghouse) to control emissions from the granulation and materials handling system. The key changes on AFI Plant No. 2 include construction of two new venturi scrubbers to control emissions from the granulation and materials handling system instead of one venturi scrubber and a baghouse.

Overall the controls will be as stringent as the original controls. No increase in allowable/permitted emissions are requested although emissions are reallocated based on the new stack and control equipment configurations.

We already approved these changes through an unpublished permit modification issued in 2002. We handled the present modification as a letter modification of the existing permit. We made changes in the BACT determination for the AFI Plants to reflect the new design and attached these to the letter. We noted that the facility has a potential to emit HAPs greater than 10/25 tons per year and added the appropriate Subparts AA and BB.

We recommend your approval and signature.

AAL/sa/th

Attachments



Jeb Bush  
Governor

# Department of Environmental Protection

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

David B. Struhs  
Secretary

November 21, 2003

## CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. E. O. Morris  
Vice President of Environmental, Health and Safety  
Cargill Fertilizer, Incorporated  
8813 U.S. Highway 41 South  
Riverview, Florida 33569

Re: DEP File No. 0570008-043-AC; PSD-FL-315D  
Riverview Facility, Hillsborough County  
Animal Feed Ingredient Plants Nos. 1 and No. 2

Dear Mr. Morris:

Enclosed is one copy of the Draft Air Construction Permit Modification for the Riverview Facility, located at 8813 U.S. Highway 41 South, Riverview, Hillsborough County. The "PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT MODIFICATION" is also included.

The "PUBLIC NOTICE" must be published one time only, as soon as possible, in the legal advertisement section of a newspaper of general circulation in the area affected, pursuant to the requirements Chapter 50, Florida Statutes. Proof of publication, i.e., newspaper affidavit, must be provided to the Department's Bureau of Air Regulation office within seven days of publication. Failure to publish the notice and provide proof of publication may result in the denial of the permit.

Please submit any written comments you wish to have considered concerning the Department's proposed action to A. A. Linero, Program Administrator, New Source Review Section at the above letterhead address. If you have any other questions, please contact Mr. Linero at 850/921-9523.

Sincerely,

Trina L. Vielhauer, Chief,  
Bureau of Air Regulation

TLV/aal

Enclosures

"More Protection, Less Process"

Printed on recycled paper.

In the Matter of an  
Application for Permit by:

Mr. E. O. Morris, Vice President  
Environment, Health & Safety  
Cargill Fertilizer, Inc.  
8813 U.S. Highway 41 South  
Riverview, Florida 33569

DEP File No. 0570008-043-AC  
Draft Permit No. PSD-FL-315 D  
AFI Plants Nos. 1 and 2  
Riverview Facility  
Hillsborough County

### **INTENT TO ISSUE AIR CONSTRUCTION PERMIT MODIFICATION**

The Department of Environmental Protection (Department) gives notice of its intent to issue an air construction permit modification (copy of DRAFT Permit attached) for the proposed project, detailed in the application specified above and the attached Technical Evaluation and Preliminary Determination, for the reasons stated below.

The applicant, Cargill Fertilizer, Inc., submitted a complete application on October 3, 2003 to the Department for a modification of several permit specific conditions of air construction permit PSD-FL-315 issued on November 21, 2001 for the Animal Ingredients Plants at its phosphate fertilizer manufacturing facility. The plant is located at 8813 U.S. Highway 41 South, Riverview, Hillsborough County.

The Department has permitting jurisdiction under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, and 62-212. The above actions are not exempt from permitting procedures. The Department has determined an air construction permit modification is required for the proposed work.

The Department intends to issue this Air Construction Permit Modification based on the belief that reasonable assurances have been provided to indicate that operation of these emission units will not adversely impact air quality, and the emission units will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297, F.A.C.

Pursuant to Section 403.815, F.S., and Rule 62-110.106(7)(a)1., F.A.C., you (the applicant) are required to publish at your own expense the enclosed "PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT MODIFICATION." The notice shall be published one time only in the legal advertisement section of a newspaper of general circulation in the area affected. Rule 62-110.106(7)(b), F.A.C., requires that the applicant cause the notice to be published as soon as possible after notification by the Department of its intended action. For the purpose of these rules, "publication in a newspaper of general circulation in the area affected" means publication in a newspaper meeting the requirements of Sections 50.011 and 50.031, F.S., in the county where the activity is to take place. If you are uncertain that a newspaper meets these requirements, please contact the Department at the address or telephone number listed below. The applicant shall provide proof of publication to the Department's Bureau of Air Regulation, at 2600 Blair Stone Road, Mail Station #5505, Tallahassee, Florida 32399-2400 (Telephone: 850/488-0114; Fax 850/922-6979). You must provide proof of publication within seven days of publication, pursuant to Rule 62-110.106(5), F.A.C. No permitting action for which published notice is required shall be granted until proof of publication of notice is made by furnishing a uniform affidavit in substantially the form prescribed in section 50.051, F.S. to the office of the Department issuing the permit. Failure to publish the notice and provide proof of publication may result in the denial of the permit pursuant to Rules 62-110.106(9) & (11), F.A.C.

The Department will issue the Final Air Construction Permit Modification in accordance with the conditions of the attached Draft Air Construction 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 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 AIR CONSTRUCTION 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 Draft Air Construction Permit Modification, the permitting authority shall issue a Revised Draft Air Construction Permit Modification 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.

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.

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. Mediation is not available in this proceeding.

In addition to the above, a person subject to regulation has a right to apply for a variance from or waiver of the requirements of particular rules, on certain conditions, under Section 120.542 F.S. The relief provided by this state statute applies only to state rules, not statutes, and not to any federal regulatory requirements. Applying for a variance or waiver does not substitute or extend the time for filing a petition for an administrative hearing or exercising any other right that a person may have in relation to the action proposed in this notice of intent.

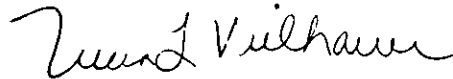
The application for a variance or waiver is made by filing a petition with the Office of General Counsel of the Department, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. The petition must specify the following information: (a) The name, address, and telephone number of the petitioner; (b) The name, address, and telephone number of the attorney or qualified representative of the petitioner, if any; (c) Each rule or portion of a rule from which a variance or waiver is requested; (d) The citation to the statute underlying (implemented by) the rule identified in (c) above; (e) The type of action requested; (f) The specific facts that would

justify a variance or waiver for the petitioner; (g) The reason why the variance or waiver would serve the purposes of the underlying statute (implemented by the rule); and (h) A statement whether the variance or waiver is permanent or temporary and, if temporary, a statement of the dates showing the duration of the variance or waiver requested.

The Department will grant a variance or waiver when the petition demonstrates both that the application of the rule would create a substantial hardship or violate principles of fairness, as each of those terms is defined in Section 120.542(2) F.S., and that the purpose of the underlying statute will be or has been achieved by other means by the petitioner.

Persons subject to regulation pursuant to any federally delegated or approved air program should be aware that Florida is specifically not authorized to issue variances or waivers from any requirements of any such federally delegated or approved program. The requirements of the program remain fully enforceable by the Administrator of the EPA and by any person under the Clean Air Act unless and until the Administrator separately approves any variance or waiver in accordance with the procedures of the federal program.

Executed in Tallahassee, Florida.



Trina L. Vielhauer, Chief  
Bureau of Air Regulation


**CERTIFICATE OF SERVICE**

The undersigned duly designated deputy agency clerk hereby certifies that this INTENT TO ISSUE AIR CONSTRUCTION PERMIT MODIFICATION (including the PUBLIC NOTICE, and the DRAFT permit modification) was sent by certified mail (\*) and copies were mailed by U.S. Mail before the close of business on 11/21/03 to the person(s) listed:

E. O. Morris, Cargill Fertilizer, Inc.\*  
Jim Little, EPA  
John Bunyak, NPS  
Gerald Kissel, DEP-SWD  
Jerry Campbell, HCEPC  
David Buff, Golder Associates, Inc.

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)

11/21/03  
(Date)

U.S. Postal Service  
**CERTIFIED MAIL RECEIPT**  
 (Domestic Mail Only: No Insurance Coverage Provided)

7000 2870 0000 7028 3505

OFFICIAL USE

Postage	\$	Postmark Here
Certified Fee		
Return Receipt Fee (Endorsement Required)		
Restricted Delivery Fee (Endorsement Required)		
Total Postage & Fees	\$	

Sent To  
 E. O. Morris  
 Street, Apt. No.; or PO Box No.  
 8813 US Hwy. 41 S.  
 City, State, ZIP+4  
 Riverview, FL 33569  
 PS Form 3800, May 2000 See Reverse for Instructions

**SENDER: COMPLETE THIS SECTION**

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:  
  
 Mr. E. O. Morris  
 Vice President  
 Environment, Health & Safety  
 Cargill Fertilizer, Inc.  
 8813 U.S. Highway 41 South  
 Riverview, FL 33569

**COMPLETE THIS SECTION ON DELIVERY**

A. Received by (Please Print Clearly) B. Date of Delivery  
 C. Signature *Kevin Summerall* 11/24/03  
 Agent  
 Addressee  
 D. Is delivery address different from item 1?  Yes  
 If YES, enter delivery address below:  No

3. Service Type  
 Certified Mail  Express Mail  
 Registered  Return Receipt for Merchandise  
 Insured Mail  C.O.D.

4. Restricted Delivery? (Extra Fee)  Yes

2. Article Number (Copy from service label)  
 7000 2870 0000 7028 3505

**PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT MODIFICATION**

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
DEP File No. 0570008-043-AC (PSD-FL-315 D)  
Riverview Facility  
Cargill Fertilizer, Incorporated  
Hillsborough County

The Department of Environmental Protection (Department) gives notice of its intent to issue an air construction permit modification to Cargill Fertilizer, Inc., a phosphate fertilizer manufacturing facility located in Riverview, Florida. A modification to the previously issued Best Available Control Technology (BACT) determination was required pursuant to Rule 62-212.400, F.A.C., Prevention of Significant Deterioration (PSD). The applicant's name and address (also facility address) are Cargill Fertilizer, Inc., 8813 U.S. Highway 41 South, Riverview, Florida 33569.

In November 2001, the Department approved an expansion of the Cargill Riverside Facility including the manufacture of sulfuric acid, phosphoric acid, granulated triple super phosphate, and animal feed ingredients (AFI). The expansion was reviewed under the PSD rules and BACT determinations were made for each of the emissions units constructed or modified.

Cargill has requested revisions to the permit and the BACT determination based on some changes to the stack configuration and pollution control equipment on AFI Plants Nos. 1 and 2. The key changes on AFI Plant No. 1 include installation of a new packed scrubber to control emissions from the defluorination system and maintaining an existing venturi scrubber (instead of installing a baghouse) to control emissions from the granulation and materials handling system. The key changes on AFI Plant No. 2 include construction of two new venturi scrubbers to control emissions from the granulation and materials handling system instead of one venturi scrubber and a baghouse.

An air quality impact analysis was not required. No increase in emissions and no increase in ambient impacts due to the proposed permit modification are expected. 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 Air Construction Permit Modification in accordance with the conditions of the Draft Air Construction 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 an Air Construction 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 AIR CONSTRUCTION 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.

**NOTICE TO BE PUBLISHED IN THE NEWSPAPER**

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 Drive Tallahassee, Florida, 32301 Telephone: 850/488-0114 Fax: 850/922-6979	Dept. of Environmental Protection Southwest District 3804 Coconut Palm Drive 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
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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 850/488-0114, for additional information.

**NOTICE TO BE PUBLISHED IN THE NEWSPAPER**



December YY, 2003

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. E. O. Morris, Vice President  
Environmental, Health & Safety  
Cargill Fertilizer, Inc.  
8813 Highway 41 South  
Riverview, Florida 33569

Re: DEP File No. 0570008-043-AC; PSD-FL-315D  
Animal Feed Ingredient Plants Nos. 1 and No. 2

Dear Mr. Morris:

The Department received the request submitted by Golder Associates to modify the current construction permit to reflect revisions to the original stack and air pollution control equipment configurations at Animal Feed Ingredient (AFI) Plants Nos. 1 and No. 2 at the Riverview Plant. The ongoing AFI projects were approved under permit PSD-FL-315 (DEP File 0570008-036-AC) and modified under permit PSD-FL-315B (DEP File 057008-041-AC).

The following changes to the permit were requested in addition to a request that the determination of Best Available Control Technology (BACT) also be updated to reflect the changes in the project.

**AFI Plant No. 1**

- Maintain a single stack for the AFI No. 1 defluorination system, granulation system, and milling, classification, and classification equipment (Cargill had previously requested installation of two new stacks).
- Use a new packed bed cross flow scrubber to control emissions from the defluorination system.
- Maintain the use of a venturi scrubber system to control emissions from the granulation system and the material handling system, which is the current plant configuration (Cargill had requested the installation of a baghouse to control emissions from the material handling system).

## **AFI Plant No. 2**

- Construction of two new venturi scrubbers to control emissions from the AFI Plant No. 2 granulation system and material handling system (Cargill had previously requested a venturi scrubber to control emissions from the AFI Plant No. 2 granulation system and a baghouse to control emissions from the material handling system).
- Maintain a single common stack for the AFI No. 2 granulation system and material handling system, which is the current plant configuration (Cargill had previously requested the installation of two new stacks).

The facility emits or has the potential to emit sufficient hazardous air pollutants such that a number of regulations promulgated by EPA pursuant to Section 112 of the Clean Air Act and adopted by the Department are applicable. The ones applicable to the units modified by the original permit PSD-FL-315 are included below.

The Department hereby modifies permit PSD-FL-315 as follows:

### **Section I - Regulatory Classification**

The Cargill Riverview Facility Plant is classified as a "Major or Title V Source" per Rule 62-210.200, Definitions, F.A.C., because it has the potential to emit at least 100 tons per year of particulate matter when potential fugitive emissions are included with potential controlled emissions.

The Cargill Riverview Facility is also classified as a "Major Source" per 40 CFR 63.2, Definitions (adopted and incorporated by reference by the Department at Paragraph 62-204.800(11)(d) because it consists of a group of stationary sources located within a contiguous area and under common control that emit or have the potential to emit considering controls, in the aggregate, 10 tons per year or more of any hazardous air pollutant or 25 tons per year or more of any combination of hazardous air pollutants.

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).

### **Appendix BD BACT Determination**

Revisions to Appendix BD (Referenced on the cover page of the original permit) are attached and made part of this permit modification.

### **Section III - Subsection A, Specific Condition 8 (New)**

8. Units 073, 007, 078-081, and 055 are subject to the provisions of 40 CFR 63, Subpart AA, and Subpart BB adopted by the Department at Paragraph 62-204.800(11)(b), F.A.C.

**Section III – Subsection F, Specific Condition 6 (Revised as follows)**

6. Emissions from the AFI Plants No. 1 and No. 2 shall not exceed the following [Rule 62-210.400, F.A.C.]:

Emission Unit	PM/PM <sub>10</sub>			Fluorides	
	Grains per DSCF	lb/hr	TPY	lb/hr	TPY
AFI Plant No. 1 Granulation System	N/A	8-13	35-58	N/A	N/A
Defluorination System	N/A	N/A	N/A	2-11	9.25
Milling, Classification, and Cooling Equipment Train No. 1	0.012	5	23	N/A	N/A
AFI Plant No. 2 Granulation System	N/A	8-13	35-58	N/A	N/A
Milling, Classification, and Cooling Equipment Train No. 2	0.012	5	23	N/A	N/A
DE Silo	0.012	0.053	0.23	N/A	N/A
Limestone Silo	0.012	0.32	1.40	N/A	N/A
Loadout System	0.012	2.06	9.01	N/A	N/A
<b>Total for AFI Plants No. 1 and 2</b>	N/A	<b>28.72</b>	<b>125.78</b>	<b>2.1</b>	<b>9.25</b>

A copy of this letter and attachments shall be filed with the referenced permit and shall become part of the permit. This permitting decision is issued pursuant to Chapter 403, Florida Statutes.

Any party to this permitting decision (order) has the right to seek judicial review of it under section 120.68 of the Florida Statutes, by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel, Mail Station #35, 3900 Commonwealth Boulevard, 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 must be filed within thirty days after this order is filed with the clerk of the Department.

Executed in Tallahassee, Florida.

\_\_\_\_\_  
 Michael G. Cooke, Director  
 Division of Air Resources  
 Management

**CERTIFICATE OF SERVICE**

The undersigned duly designated deputy agency clerk hereby certifies that this permit modification (order) was sent by certified mail (\*) and copies were mailed by U.S. Mail before the close of business on \_\_\_\_\_ to the person(s) listed:

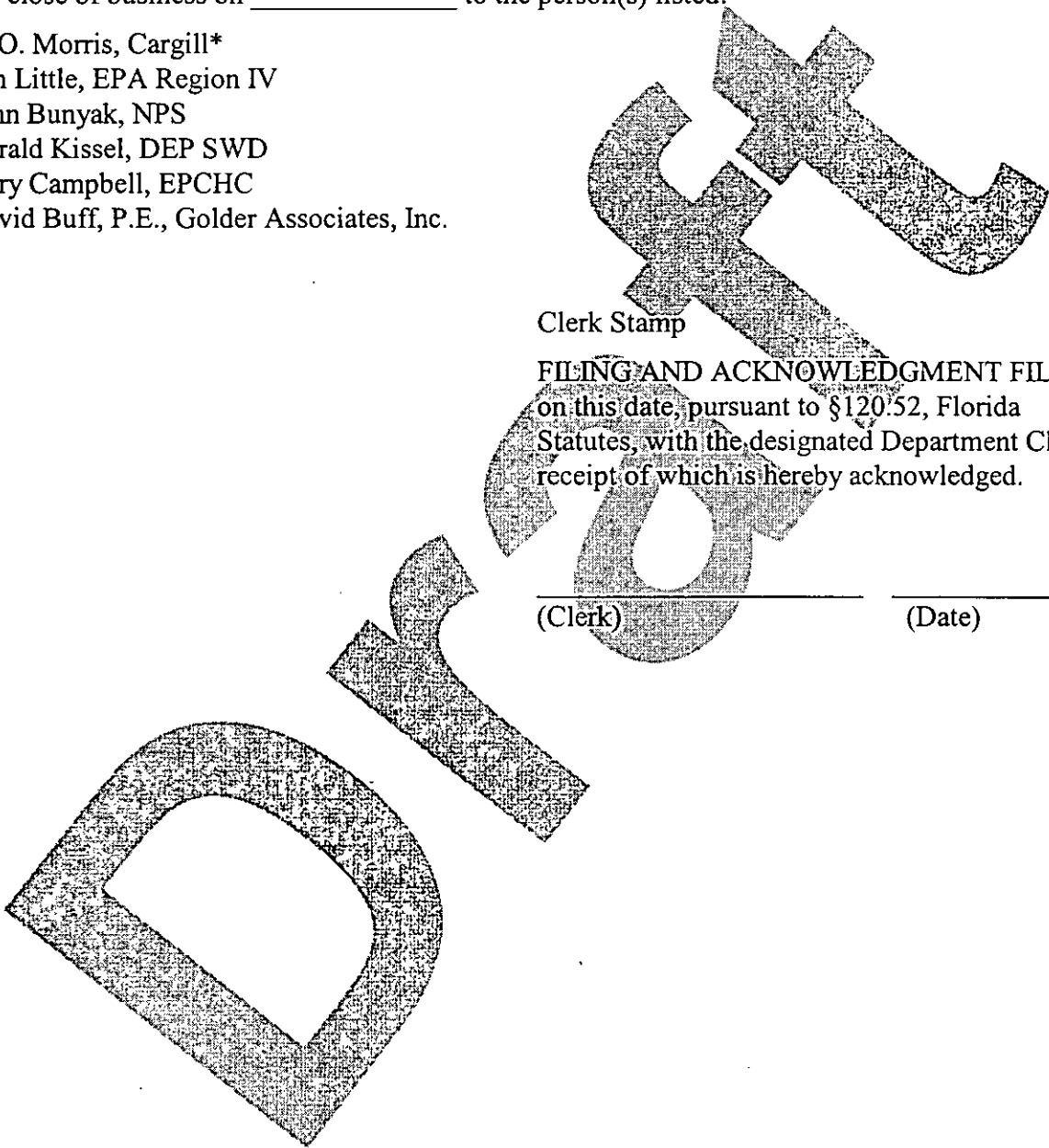
E. O. Morris, Cargill\*  
Jim Little, EPA Region IV  
John Bunyak, NPS  
Gerald Kissel, DEP SWD  
Jerry Campbell, EPCHC  
David Buff, P.E., Golder Associates, Inc.

Clerk Stamp

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

\_\_\_\_\_  
(Clerk)

\_\_\_\_\_  
(Date)



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

Following are the modifications to the original BACT determination that accompanied Air Construction Permit PSD-FL-315 (DEP File 0570008-036-AC). The modifications (underlined or struck) below are attached to and made part of Permit PSD-FL-315D (DEP File 0570008-043-AC)

**BACT DETERMINATION BY THE DEPARTMENT:**

**6. AFI Plants No. 1 and 2**

POLLUTANT	SO <sub>2</sub> /SAM	NO <sub>x</sub>	PM/PM <sub>10</sub>			Fluorides		
			Limit Basis	Emission Limit (lb/hr)	Control Technology	Limit Basis	Emission Limit (lb/hr)	Control Technology
AFI Plant No. 1 Granulation System	Good combustion practices	Good combustion practices	N/A	<u>8-13</u>	Venturi Scrubber	N/A	N/A	N/A
Defluorination System	N/A	N/A	N/A	N/A	N/A	0.5 lb/batch-hour	2.11	Venturi Scrubber and Packed Cross-flow Scrubber
Milling, Classification, and Cooling Equipment Train No. 1	N/A	N/A	0.012 grains/dscf	<u>5</u>	Baghouse	N/A	N/A	N/A
AFI Plant No. 2 Granulation System	Good combustion practices	Good combustion practices	N/A	<u>8-13</u>	Venturi Scrubbers (2)	N/A	N/A	N/A
Milling, Classification, and Cooling Equipment Train No. 2	N/A	N/A	0.012 grains/dscf	<u>5</u>	Baghouse	N/A	N/A	N/A
DE Silo	N/A	N/A	0.012 grains/dscf	0.053	Baghouse	N/A	N/A	N/A
Limestone Silo	N/A	N/A	0.012 grains/dscf	0.32	Baghouse	N/A	N/A	N/A
Loadout System	N/A	N/A	0.012 grains/dscf	2.06	Baghouse	N/A	N/A	N/A

The changes cited above are the result of project modifications as described below:

**AFI Plant No. 1**

- Maintain a single stack for the AFI No. 1 defluorination system, granulation system, and milling, classification, and cooling equipment (Cargill had previously requested installation of two new stacks).

## APPENDIX BD

### BEST AVAILABLE CONTROL TECHNOLOGY DETERMINATION (BACT)

- Use a new packed bed cross flow scrubber to control emissions from the defluorination system.
- Maintain the use of a venture scrubber system to control emissions from the granulation system and the material handling system, which is the current plant configuration (Cargill had requested the installation of a baghouse to control emissions from the material handling system).

#### AFI Plant No. 2

- Construction of two new venturi scrubbers to control emissions from the AFI Plant No. 2 granulation system and material handling system (Cargill had previously requested a venturi scrubber to control emissions from the AFI Plant No. 2 granulation system and a baghouse to control emissions from the material handling system).
- Maintain a single common stack for the AFI No. 2 granulation system and material handling system, which is the current plant configuration (Cargill had previously requested the installation of two new stacks).

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