



December 19, 1994

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Bureau of
Air Regulation

Mr. John Brown, P.E.
Air Permitting and Standards
Florida Department of Environmental Protection
111 South Magnolia, Suite 4
Tallahassee, FL 32301

Re: Cargill Fertilizer, Inc.
AC29-241660
PSD-FL-209
Riverview Nos. 8 & 9 Sulfuric Acid Plants

Dear Mr. Brown:

On behalf of Cargill Fertilizer, I am commenting on the Technical Evaluation and Preliminary Determination (TE&PD) and draft permit issued by the Department on November 14, 1994, in regards to the above referenced permit application. The sole comment I have is in regards to Specific Condition 4 of the draft permit.

Specific Condition 4 of the draft permit places a limit upon NO_x emissions from the sulfuric acid plants, in terms of lb/ton 100 percent sulfuric acid produced, lb/hr and tons/year. It is requested that this condition be deleted since there is no regulatory basis for any limit for NO_x . The estimated NO_x emissions are low, i.e., less than 100 TPY from each plant. PSD review was not triggered for NO_x the modification, nor was any synthetic limitation taken in order to avoid PSD review for NO_x . There are no state or federal emission limiting standards for NO_x emissions from sulfuric acid plants.

During the application preparation process, a meeting was held with FDEP, and it was requested that NO_x emission estimates be provided in the application. Emission estimates were provided based on very limited test data from one sulfuric acid plant operated by another company. However, it was certainly not anticipated that NO_x limits would be imposed on the facility based on the limited information available, and without any regulatory basis for imposing such limit.

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KBN ENGINEERING AND APPLIED SCIENCES, INC.

6241 Northwest 23rd Street,
Suite 500
Gainesville, Florida 32653-1500
904-336-5600 FAX 904-336-6603

5405 West Cypress Street,
Suite 215
Tampa, Florida 33607
813-287-1717 FAX 813-287-1716

1801 Clint Moore Road, Suite 105
Boca Raton, Florida 33487
407-994-0010
FAX 407-994-9393

7785 Baymeadows Way,
Suite 105
Jacksonville, Florida 32256
904-739-5600 FAX 904-739-7777

1616 P Street N.W., Suite 450
Washington, D.C. 20036
202-462-1100
FAX 202-462-2270

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To reiterate, Cargill requests that the NO_x emission limits contained in the draft permit be deleted. Please call if you have any questions concerning this information.

Sincerely,

Handwritten signature of David A. Buff.

David A. Buff, P.E.
Principal Engineer

cc: David Jellerson, Cargill
Bill Thomas, FDEP-SWD
File (2)

DB/mlb