



**CARGILL
FERTILIZER, INC.**

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Bureau of
Air Regulation

July 7, 1994

CERTIFIED MAIL: P 013 142 204

Mr. Jerry Kissel, P.E.
Florida Department of Environmental Protection
3804 Coconut Palm Dr.
Tampa, FL 33619

Subject: No. 9 Sulfuric Acid Plant Operation/Construction
AO29-157890, AC29-241660, PSD-FL-209

Dear Mr. Kissel,

As per our conversation today, this letter is to confirm that the construction permit application submitted on 11/18/93, in fact, also constitutes an application for renewal of the operating permit which expired on 1/21/94.

Cargill submitted the construction application on 11/18/93 with the specific intent of meeting the requirement of Specific Condition #12 of the operating permit AO29-157890 requiring submission of a renewal application at least 60 days prior to expiration of the permit. In accordance with Chapter 17-4.090, this timely application should automatically extend the existing operating permit until the Department takes final action.

It was our intent, and remains our expectation that the construction permit, when issued, will contain appropriate conditions governing the operation of the emission unit during the construction project. Past Department practice has been to accept construction permit applications as sufficient for operation permit renewals. As an example, on July 15, 1993 Cargill submitted a construction permit application for upgrades to our product handling/conveying system. The subsequent permit (AC29-234652) was issued to replace the existing operating permits. We would also like to point out that there would be no material difference between an application for construction and one for operation except that significantly greater detail is provided in the construction permit application. The Department Form 17-1.202(1) is used for both operation and construction permit applications with more information generally provided for construction projects.



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I trust that the above information is sufficient to assure that the construction permit application submitted on November 18, 1993 constitutes a sufficient and timely application and that the operating permit AO29-157890 remains in effect until final agency action.

Should you have any questions, or require additional information, please feel free to contact me at 813/534-9613.

Sincerely,



David B. Jellerson, P.E.
Environmental Superintendent

cc: Syed Arif, FDEP - Tallahassee
Jerry Campbell, EPCHC
David Buff, KBN
Daigle, Morris, Curran, Boyd
P-10-9

