

**Golder Associates Inc.**

6241 NW 23rd Street, Suite 500  
Gainesville, FL 32653-1500  
Telephone (352) 336-5600  
Fax (352) 336-6603



March 23, 2008

063-7643

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

**RECEIVED**

MAR 24 2009

Attention: Scott M. Sheplak, P.E.

**RE: DRAFT PERMIT NO. 0570008-061-AC  
BART EXEMPTION PROJECT  
MOSAIC FERTILIZER, LLC, RIVERVIEW FACILITY**

**BUREAU OF AIR REGULATION**

Dear Mr. Sheplak:

Mosaic Fertilizer, LLC (Mosaic) has received Florida Department of Environmental Protection's (FDEP) draft permit for the best available retrofit technology (BART) exemption project. We have reviewed the draft permit in detail and have developed several comments. The comments are presented below.

Page 6, Condition 1: The current TV permit is permit No. 0570008-051-AV.

Page 8 of 13: Under descriptions for the EUs, the current catalyst loadings for No. 7 SAP do not correspond to the BART exemption application, which shows 102,000 liters in the 1<sup>st</sup> pass, 112,000 liters in the 2<sup>nd</sup> pass, 155,000 liters in the 3<sup>rd</sup> pass, and 209,000 liters in the 4<sup>th</sup> pass, for a total of 578,000 liters. Also, in the paragraph under Stack Parameters, the second sentence should read "SAP Nos. 7, 8, and 9" (SAP No. 7 is left out).

Page 9, Condition 5: Condition 5 references that future catalyst loadings should be stated as "approximately", per the BART exemption application. The permit should also allow higher catalyst loadings if these are necessary in order to meet the BART emission limits.

Page 10, Condition 6: The wording of this condition does not necessarily have to be changed, but Mosaic would like to clarify that this condition does not mean that a specific supplier (i.e., Haldor Topsoe) must be used unless written approval is obtained from FDEP. A specific catalyst supplier should not be specified in the permit. The condition should only refer to the specific catalyst loadings and type of catalyst (i.e., vanadium or cesium-enhanced catalyst).

Page 10, Conditions 9 and 10. It should be clarified that the 24-hour (daily) block average can start and end at a time selected by the permittee (i.e., the block does not have to be from midnight to midnight; another 24-hour block, i.e., 6 am to 6 am, may be selected).

Page 12, Condition 19: It should be clarified that the final compliance date for complying with the sulfur dioxide (SO<sub>2</sub>), sulfuric acid mist (SAM), and visible emission limits is June 30, 2013, coinciding with the permit expiration date. Condition C.19 states that the new SAM limits must be met by April 1, 2012 (since initial compliance testing must be conducted); Condition C.21 states that all construction must be completed by December 31, 2012; and Condition C.9 states that the permittee must comply with the new SO<sub>2</sub> limit using continuous emission monitoring systems, but it

does not state when. The compliance deadline should be after all construction is complete. Therefore, it is suggested that the initial compliance testing, completion of construction, and compliance with the new limits all be specified as June 30, 2013, which is when the construction permit expires.

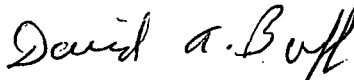
Page 13, Condition 21. There is no date specified for when the Construction Plan has to be submitted. Also, it is not specified when exactly the Progress Reports are due each year.

And as discussed previously, Condition 19 requires that SAM testing be performed prior to April 12, 2012, which would require construction to be completed in order to do the testing, but Condition 21.b requires completion of construction by December 31, 2012. These need to be reconciled. It is suggested all these dates be stated as June 30, 2013.

Thank you for consideration of these comments. If you have any questions, or would like to discuss this information further, please do not hesitate to call me at (352) 336-5600.

Sincerely,

**GOLDER ASSOCIATES INC.**



David A. Buff, P.E., Q.E.P.  
Principal Engineer

DB/tlc

cc: Jeff Stewart  
David Turley  
Diana Jaigella  
Rama Iyer  
Robert Manning  
Sal Mohammad

L032309\_643