



Jeb Bush
Governor

Department of Environmental Protection

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

David B. Struhs
Secretary

April 11, 2001

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

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

Re: DEP File No. 0570008-036-AC; PSD-FL-315
Riverview Plant Expansion

Dear Mr. Morris:

The Department has received the application on March 13, 2001, and a letter providing additional information on March 27, 2001 for the Riverview plant expansion in Hillsborough County. Based on our initial review of the proposed project, we have determined that additional information is needed in order to continue processing this application package. Please submit the information requested below to the Department's Bureau of Air Regulation:

1. During the meeting on March 14, 2001, it was mentioned that the Department has recently issued permits to White Springs Agricultural Chemicals (WSAC) in White Springs (PSD-FL-297) and US Agrichem (USAg) in Ft. Meade (PSD-FL-278). The WSAC permit included modifications to their phosphoric acid plants as well as some other emission units. The USAg modification included sulfuric acid and phosphoric acid plants only. The BACT limits established by the Department for the sulfuric acid and the phosphoric acid plants were 3.5 lb/ton 100% H₂SO₄ (3-hr average) and 0.012 lb/ton P₂O₅ input respectively. The additional information letter of March 27, 2001, provided some costs information for increased amount of cesium catalyst needed to attain this BACT limit of 3.5 lb/ton over a three-hour period for this project. Please provide this information in terms of \$/ton of SO₂ removed. The test data submitted for the No. 9 H₂SO₄ plant operating with cesium-promoted catalyst shows an average of 2.1 lb/ton for the test. Explain, why 3.5 lb/ton (3-hr average) will not be attainable considering that the No. 9 plant's SO₂ test data is 67% less than the current BACT limit. If possible, submit CEM's data to corroborate this. Also, explain the additional changes required to bring down the suggested BACT limit from 0.0135 to 0.012 lb/ton P₂O₅ input for the Phosphoric acid plant.
2. Please provide more specific information on the approximate amounts of cesium-promoted catalyst to be introduced in the various converters for the No. 8 Sulfuric acid plant and how does it compare with the No. 9 acid plant. How much additional catalyst is required for each plant to attain the 3.5 lb/ton BACT limit.
3. Please provide the Department with reasonable assurance that the efficiency of the absorbers and the mist eliminators will not be degraded while operating at the higher process rates.

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4. Please provide information on the average production rates for the No. 8 and No. 9 sulfuric acid plants for the last five years.
5. The GTSP truck loading station is being permitted by the District with the understanding that only GTSP will be shipped from there. If, any of the ammoniated phosphate products is planned to be loaded from that station, it will require the baghouse to meet a BACT limit for PM/PM₁₀ instead of the RACT limit as proposed in the permit issued by the District.
6. The GTSP Plant will now be subject to the NSPS requirements due to this modification. Please explain the necessary modifications that the plant will have to make to meet the NSPS requirements in Subpart W.
7. Page 5-17 of the application refers to 0.045 lb/ton P₂O₅ input as the most stringent BACT limit for fluorides for MAP or DAP plants. The current BACT limits for granular MAP/DAP plants are established at 0.041 lb/ton P₂O₅ input. Please explain the additional steps needed to comply with this BACT limit of 0.041 lb/ton P₂O₅ input.

Additional modeling information was received on March 27, 2001. Therefore, after it is reviewed DEP may have additional questions on modeling. Any additional comments from EPA and the U.S. Fish and Wildlife Service will be forwarded to you after we receive them.

The Department will resume processing this application after receipt of the requested information. Rule 62-4.050(3), F.A.C. requires that all applications for a Department permit must be certified by a professional engineer registered in the State of Florida. This requirement also applies to responses to Department requests for additional information of an engineering nature. A new certification statement by the authorized representative or responsible official must accompany any material changes to the application. Rule 62-4.055(1), F.A.C. now requires applicants to respond to requests for information within 90 days.

We will be happy to meet and discuss the details with you and your staff. Mr. Syed Arif, P.E. is responsible for the technical review of the application. He may be contacted at 850/921-9528. You may discuss the modeling requirements with Mr. Cleve Holladay at 850/921-8689.

Sincerely,

Handwritten signature of A.A. Linero in cursive, followed by the date "4/11".

A.A. Linero, P.E. Administrator
New Source Review Section

-AAL/sa

cc: G. Worley, EPA
J. Bunyak, NPS
B. Thomas, DEP-SWD
A. Harmon, HCEPC
D. Buff, P.E., Golder Associates, Inc.

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<p>1. Article Addressed to:</p> <p>Mr. E.O. Morris, Vice President of Environment, Health and Safety Cargill Fertilizer, Inc. 8813 Highway 41 South Riverview, FL 33569</p>	<p>3. Service Type</p> <p><input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail</p> <p><input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise</p> <p><input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p>
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Mr. E. O. Morris

Street, Apt. No., or PO Box No.
8813 Highway 41 South

City, State, ZIP+4
Riverview, FL 33569

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