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Executive Director
Richard D. Garrity, Ph.D.

Administrative Offices,
Legal & Water Management Division
The Roger P. Stewart Environmental Center
1900 - 9th Ave. • Tampa, FL 33605
Ph. (813) 272-5960 • Fax (813) 272-5157
Air Management Fax 272-5605
Waste Management Fax 276-2256
Wetlands Management Fax 272-7144
1410 N. 21st Street • Tampa, FL 33605

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OCT 21 2002

MEMORANDUM

BUREAU OF AIR REGULATION

DATE: October 16, 2002

TO: Syed Arif, P.E.

FROM: Ron Dennis, P.E. *R.D.*

Thru: Sterlin Woodard, P.E. *S.W.*

SUBJECT: CARGILL FERTILIZER, INC. – RIVERVIEW FACILITY
PERMIT NO. 0570008-036-AC; PSD-FL-315; AFI PLANT NO. 2

The Hillsborough County Environmental Protection Commission has completed its review of Cargill Fertilizer, Inc.'s proposed changes to its construction application, Permit No. 0570008-036-AC, that it received on September 23, 2002. The EPC would like to have Cargill address the following incompleteness items:

1. In your previous permit (Permit No. 0570008-036-AC), you proposed to control fluoride emissions from the defluorination system by venting the emissions to a venturi scrubber and packed cross-flow scrubber system. Your current proposal is to vent these emissions to just a packed cross-flow scrubber. How does the control efficiency of the new packed cross-flow scrubber compare with both the existing packed cross-flow scrubber, and the permitted venturi scrubber and packed cross-flow scrubber system with respect to design parameters. Please provide reasonable assurance that the proposed scrubber system is as efficient as the permitted system and is capable of meeting the 2.11 lb/hr fluoride emission limit.
2. In your previous permit (Permit No. 0570008-036-AC), you proposed to control the particulate emissions from the material handling equipment of the AFI Plant No. 2 by venting the emissions to a baghouse. Your current proposal is to vent these emissions to a venturi scrubber. Please provide reasonable assurance that the proposed venturi scrubber is as efficient as the permitted baghouse and is

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capable of meeting the 0.012 gr/dscf particulate emission limit. Why was the baghouse dropped as the control equipment on the material handling equipment and replaced with a venturi scrubber when the BACT determination by the Department stated, "no other technology is capable of achieving lower PM/PM₁₀ levels than the proposed baghouse."

3. In your previous permit (Permit No. 0570008-036-AC), you proposed to control the particulate emissions from the material handling equipment of the AFI Plant No.1 by venting the emissions to a baghouse. However, it appears that the baghouse was never constructed, and the emissions are currently being vented to the venturi scrubber that controls the granulation train. Is the existing venturi scrubber on the granulation train's process equipment capable of handling the additional PM/PM₁₀ emissions from the material handling equipment? In addition, please provide reasonable assurance that the existing venturi scrubber that controls both the granulation train and material handling equipment is as efficient as the permitted venturi scrubber and baghouse system that separately control these emissions units, and is capable of meeting their respective particulate emission limits.
4. In Table 2-7a. Summary of Pollution Control Equipment and Allowable Emission Rates for the AFI Plant (Revised 9/11/02), the Total Emissions from the Modified AFI Plants No. 1 and 2 should be 125.78 TPY instead of 68.21 TPY.