

Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Lawton Chiles, Governor

Carol M. Browner, Secretary

July 12, 1991

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Ozzie Morris, Environmental Manager
Cargill Fertilizer, Inc.
8813 Highway 41 South
Riverview, Florida 33569

Dear Mr. Morris:

Re: Permit Application AC 29-196763, No. 5 DAP Plant Expansion

The following issues remain from the preliminary review of the above application:

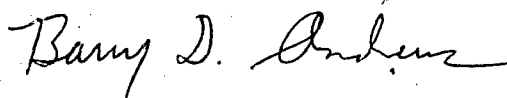
1. The Phos Acid utilization rate is still in question. Assuming 54% P₂O₅ content, the utilization rate given on page 4 is 212,500 lbs/hr x 0.54/2000 = 57.4 TPH P₂O₅ input. Elsewhere in the application the utilization rate is stated as 67.16 TPH P₂O₅ (292,000 x 0.46/2000), which is an output (production) figure. The 46 percent P₂O₅ analysis is on a dry basis and cannot be used with the wet basis production as was done on page B-1. Please revise the application to show the corrected input rate and corrected emission estimates.
2. Cargill may petition EPA for a different interpretation, however our rule (F.A.C. Rule 17-2.500(2)(e)) states that offsets are creditable if the Department or EPA has not relied on them in a prior PSD permit or if the Department has not relied on them in issuing a permit under the RACT rule (F.A.C. Rule 17-2.650). Since the Department relied on the TSP offsets in issuing a modification permit in 1987, and EPA relied on them in issuing their modified PSD permit conditions (PSD-FL-026) in 1988, any offsets would be creditable now only to the extent that they have not been relied on previously. Please provide the necessary revisions for the fluoride and PM PSD analyses. Also, revised analyses for the MAP plant expansion are required since that project will be affected by the revised offsets.

The revised PSD analyses should include air dispersion modeling analyses for both PM and fluoride emissions from the DAP plant expansion. These analyses must also include the impacts of the contemporaneous increases and decreases not relied on previously. In order for Cargill to consider the projected short-term PM emissions from the DAP plant expansion as a

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decrease from 20 lbs/hr to 15 lbs/hr, justification needs to be provided showing that short-term emissions have actually been 20 lbs/hr during some time period within the last two years. However, since there is a proposed significant annual increase in PM emissions from the DAP plant expansion from 24.0 tons per year to 65.7 tons per year, annual average modeling of these increased emissions is required regardless of whether EPA considers the 1987 and 1988 PM decreases creditable.

Sincerely,


C. H. Fancy, P.E.
Chief
Bureau of Air Regulation

CHF/JR/plm

c: W. Thomas, SWD
S. Kukier, EPA
D. Buff, KBN