



Florida Department of Environmental Protection

Bob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

December 30, 2008

Electronic Mail - Received Receipt Requested

david.jellerson@mosaicco.com

Mr. David B. Jellerson
Assistant Vice President - Environmental
Mosaic Fertilizer, LLC.
Post Office Box 2000
Mulberry, Florida 33860

Re: DEP File No. 1050059-061-AC
Best Achievable Retrofit Technology Exemption Application
Mosaic – New Wales Plant

Dear Mr. Jellerson:

On December 8, 2008, the Department received a response to the October 31, 2008 request for additional information (RAI) for the Best Available Retrofit Technology (BART) exemption request for the New Wales Facility. This existing facility is located in Polk County at 3095 Highway 640, Mulberry.

Pursuant to Rules 62-296.340, 62-4.055, and 62-4.070 F.A.C., Permit Processing, the Department requests submittal of additional information prior to processing the application. Should your response to the below item require new calculations, please submit the new calculations, assumptions, reference material and appropriate revised pages of the application form.

1. The Department in the first RAI requested information on how the reduction in emissions of particulate matter (PM), sulfur dioxide (SO₂), nitrogen oxides (NO_x) and sulfuric acid mist (SAM) with the shut down of Multifos A and B Kilns and their respective coolers were accounted for.

The applicant indicated that PM emissions from Emission Unit (EU) Nos. 032 and 033 are 2.14 lb/hr while the emission rate of EU 036 blending operation is 10.0 lb/hr. Please provide to the Department information on how these PM mass emission rates for EU 032, 033 and 036 (blending operation) were arrived at. The permit indicates that EU 032 and 033 has to comply with 20 percent opacity limit only.

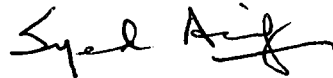
The applicant indicated that SO₂ emission rate for EU 036 was 316 lb/hr in the original BART application submitted in January 2007 but was later revised as 177.5 lb/hr based on more recent test data. The response is still ambiguous in what value of SO₂ emissions reduction is being used for this BART exemption application. If SO₂ emission reduction of 316 lb/hr is being used, then explain why the revised emission of 177.5 lb/hr was neglected.

The applicant indicated that NO_x and SAM emissions are based on Table A-6 in Appendix A and the table is attached for convenience. The applicant failed to include the table with the response.

We will forward any comments received from other agencies as soon as we receive them. 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. Permit applicants are advised that Rule 62-4.055(1), F.A.C. 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. I may be contacted at 850/921-9528.

Sincerely,



Syed Arif, P.E.
New Source Review Section

/sa

cc: Kathleen Forney, EPA Region 4 (forney.kathleen@epa.gov)
David Turley, Mosaic Fertilizer (david.turley@mosaicco.com)
Catherine Zhang-Torres, DEP-SWD (cindy.zhang-torres@dep.state.fl.us)
David Buff, P.E., Golder Associates Inc. (dbuff@golder.com)
Vicki Gibson, DEP-BAR (victoria.gibson@dep.state.fl.us) (for read file)

Livingston, Sylvia

From: Jellerson, David - Pierce [David.Jellerson@mosaicco.com]
Sent: Friday, January 02, 2009 9:36 AM
To: Livingston, Sylvia
Subject: RE: DEP File No. 1050059-061-AC

I received the RAI regarding the New Wales BART application.

David



David Jellerson | Assistant Vice President, Environmental
Mosaic Fertilizer, LLC | P.O. Box 2000 | 5000 Old Hwy 37 S. | Mulberry, Florida 33860
P: 863.428.6480 | C: 813.781.2029 | E: david.jellerson@mosaicco.com | W: www.mosaicco.com

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From: Livingston, Sylvia [mailto:Sylvia.Livingston@dep.state.fl.us]
Sent: Tuesday, December 30, 2008 2:29 PM
To: Jellerson, David - Pierce
Cc: Forney.kathleen@epa.gov; Turley, Charles D - New Wales; dbuff@golder.com; Gibson, Victoria; Arif, Syed; Walker, Elizabeth (AIR)
Subject:

Dear Sir/Madam:

Please send a "reply" message verifying receipt of the attached document(s); this may be done by selecting "Reply" on the menu bar of your e-mail software, *noting that you can view the documents*, and then selecting "Send". We must receive verification of receipt and your reply will preclude subsequent e-mail transmissions to verify receipt of the document(s).

The document(s) may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible.

The document is in Adobe Portable Document Format (pdf). Adobe Acrobat Reader can be downloaded for free at the following internet site: <http://www.adobe.com/products/acrobat/readstep.html> .

The Bureau of Air Regulation is issuing electronic documents for permits, notices and other correspondence in lieu of hard copies through the United States Postal System, to provide greater service to the applicant and the engineering community. Please advise this office of any changes to your e-mail address or that of the Engineer-of-Record.

Thank you,

Sylvia Livingston
Bureau of Air Regulation
Division of Air Resource Management (DARM)
850/921-9506
sylvia.livingston@dep.state.fl.us

Livingston, Sylvia

From: Turley, Charles D - New Wales [David.Turley@mosaicco.com]
Sent: Monday, January 05, 2009 11:32 AM
To: undisclosed-recipients
Subject: Read:
Attachments: ATT1291773.txt

Your message

To: Jellerson, David - Pierce
Cc: Forney.kathleen@epa.gov; Turley, Charles D - New Wales;
dbuff@golder.com; Gibson, Victoria; Arif, Syed; Walker, Elizabeth (AIR)
Subject:
Sent: Tue, 30 Dec 2008 14:29:16 -0500

was read on Sun, 4 Jan 2009 11:43:46 -0500