

# CF Industries

CF Industries, Inc.  
Plant City  
Phosphate Complex  
P.O. Drawer L  
Plant City, Florida 33564  
813-782-1591  
[www.cfifl.com](http://www.cfifl.com)

# RECEIVED

JAN 12 2009

BUREAU OF AIR REGULATION

January 8, 2009

Ms. Trina Vielhauer  
Chief, Bureau of Air Regulation  
Department of Air Regulation  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

SUBJECT: CF Industries, Inc. (CFI)  
Plant City Phosphate Complex  
Permit No. 057005-017AV  
“C” & “D” Sulfuric Acid Plants  
Second Semi-annual 2008 SO<sub>2</sub> CEM/Production Data Report

Dear Ms. Vielhauer:

In accordance with Specific Condition, “Subsection A.21.” contained in the facility Title V Construction Permit No. 0570005-026-AC, enclosed is the Second Semi-annual 2008 SO<sub>2</sub> and Production Data Report for the “C” & “D” Sulfuric Acid Plants. Permit No. 0570005-026-AC authorized a 2962 tons per day (100% sulfuric acid produced) production limit for both the “C” & “D” Sulfuric Acid Plants. The permit was effective on February 28, 2008.

Please note that the excess emissions that occurred for a 5-hour period at the “C” Sulfuric Acid Plant on September 4, 2008, were reported to you in the “Revised Continuous Monitoring Report”, dated November 18, 2008.

If you have any questions concerning this submittal, please contact Frank Dlugos at (813)364-5639.

Sincerely,



Ronald L. Brunk  
Superintendent, Environmental  
Affairs

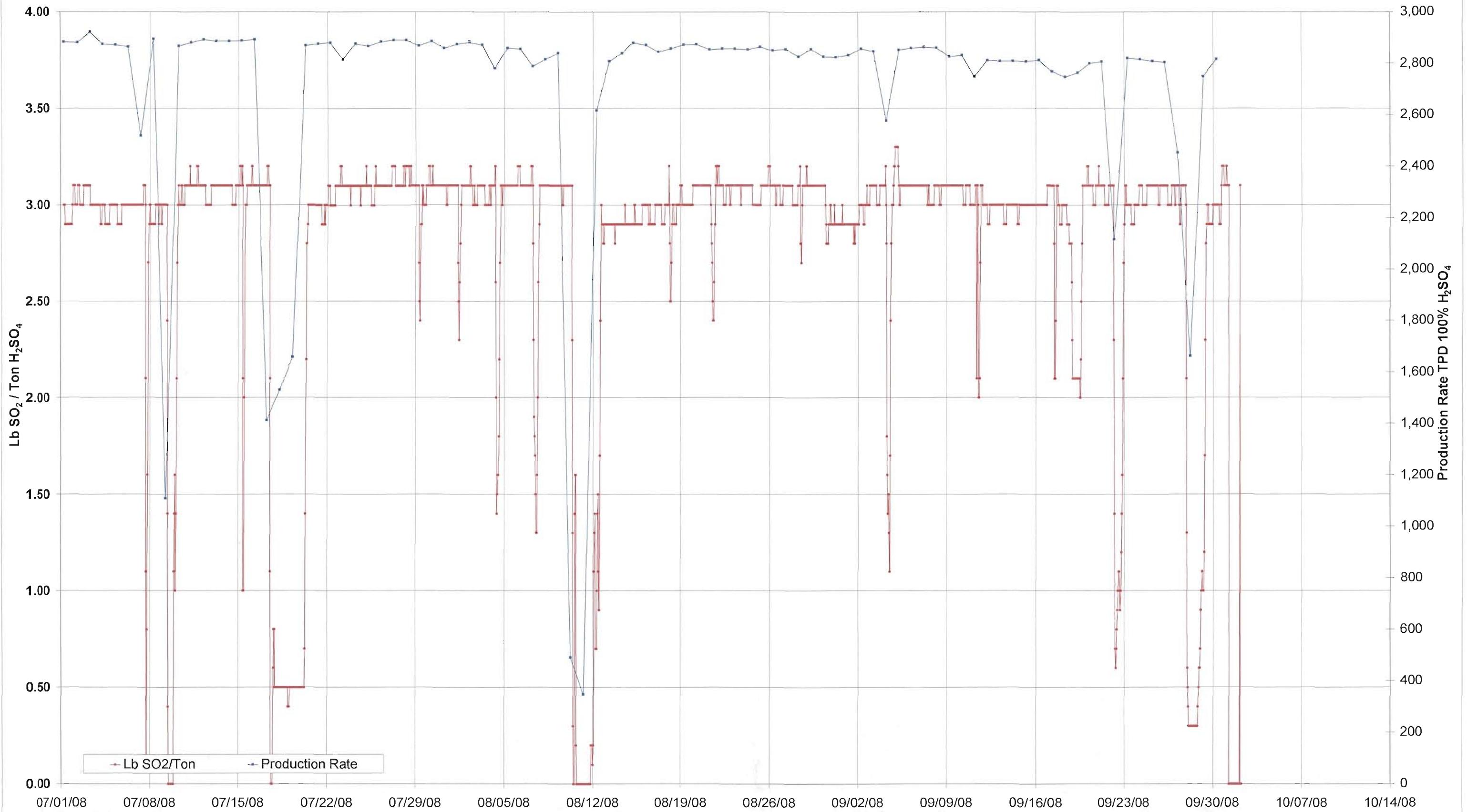
RLB/FJD/gem

CC: Danielle Henry/FDEP  
Syed Arif/FDEP  
Jason Waters/HCEPC  
F.J. Dlugos/Envir. Files





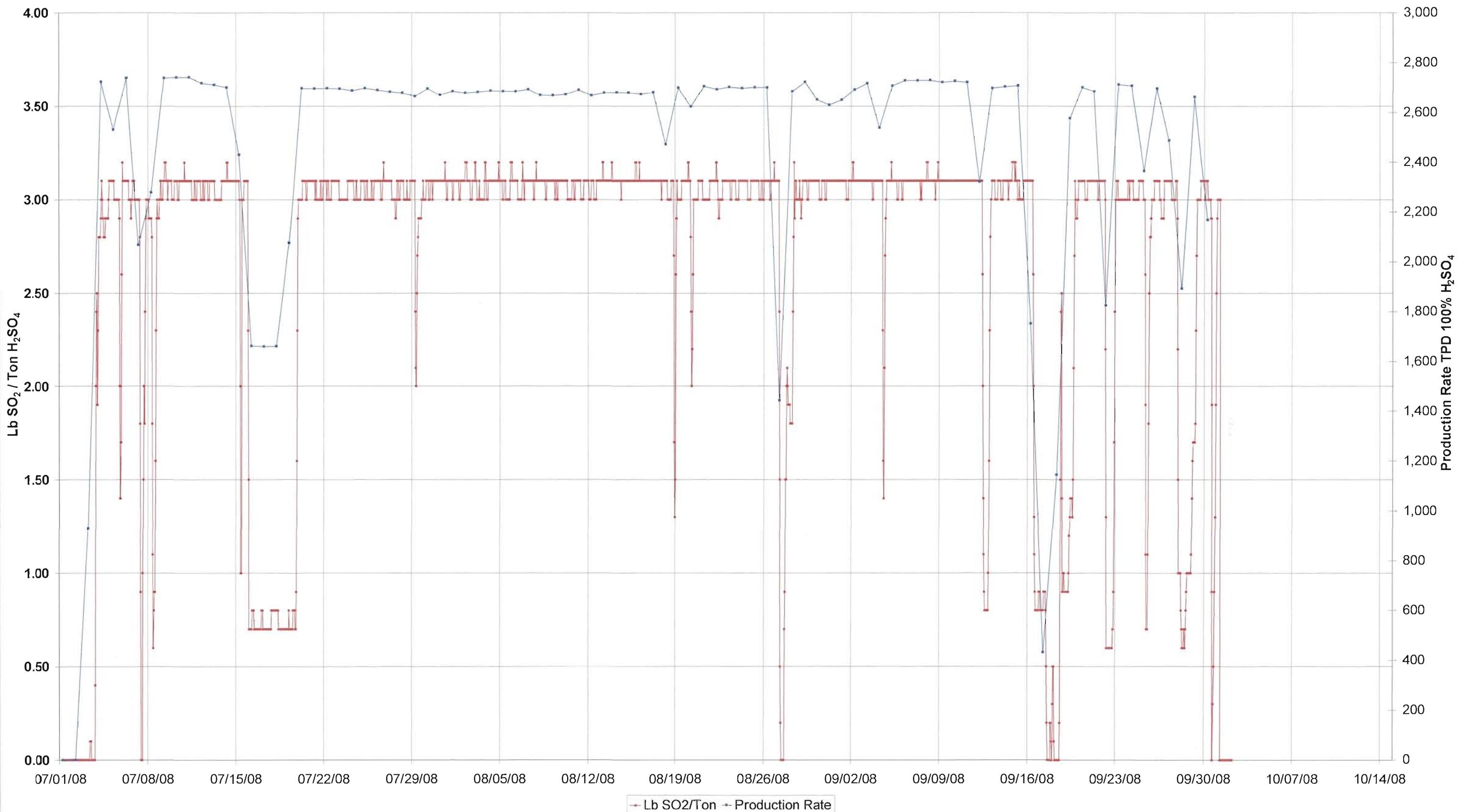
**CF Industries Plant City Phosphate Complex**  
**C-SAP Quarterly Report, Hourly CEM Data - 3 Hr Rolling Avg**







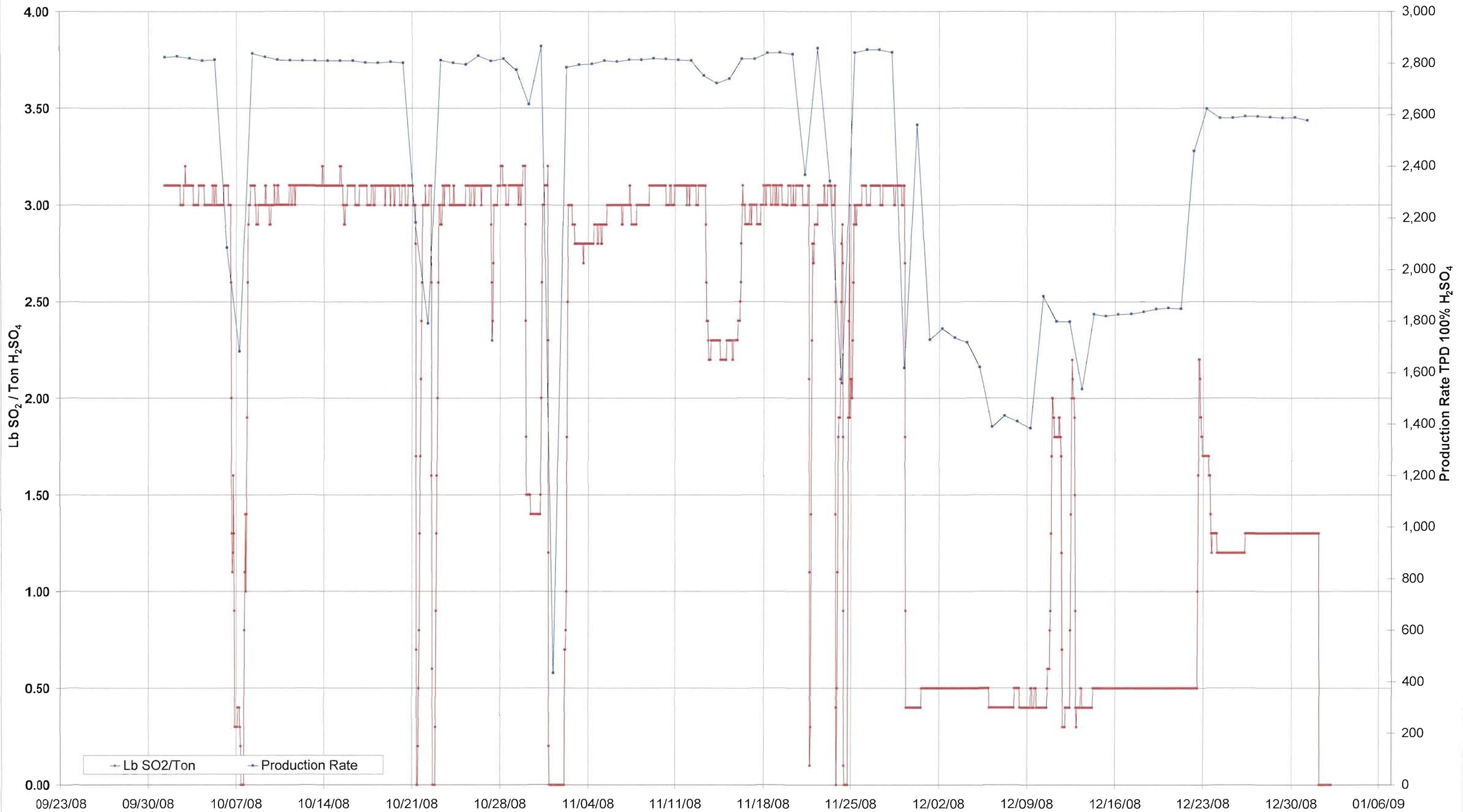
**CF Industries Plant City Phosphate Complex**  
**D-SAP Quarterly Report, Hourly CEM Data - 3 Hr Rolling Avg**







**CF Industries Plant City Phosphate Complex**  
**C-SAP Quarterly Report, Hourly CEM Data - 3 Hr Rolling Avg**

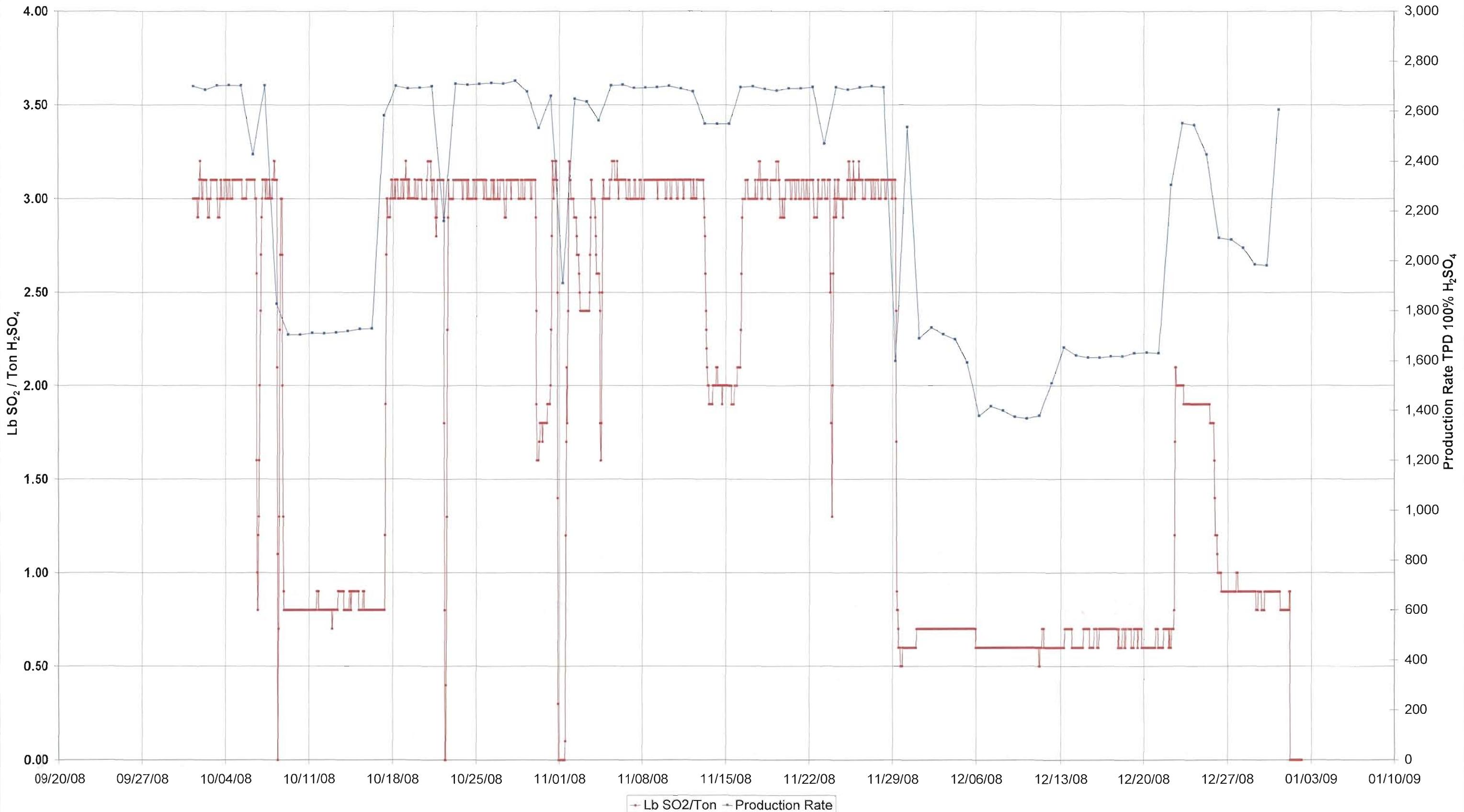






# CF Industries Plant City Phosphate Complex

## D-SAP Quarterly Report, Hourly CEM Data - 3 Hr Rolling Avg



INSTRUMENT MAINTENANCE PROCEDURE  
ENVIRONMENTAL MONITORING

39614-M

Page 1

ASSIGNED TO: Tommy Quick DATE: 7/28/08

EMISSION TEST GAS SPAN TEST C & D SULFURIC ACID PLANT  
CRITICAL PM QUARTERLY

PRIOR TO TEST, order the following concentrations of test gas.

3.5 % O<sub>2</sub>; 5 % O<sub>2</sub>; 10% % O<sub>2</sub>, BALANCE NITROGEN

250 PPM SO<sub>2</sub>; 550 PPM SO<sub>2</sub>; 900 PPM SO<sub>2</sub> BALANCE NITROGEN

O<sub>2</sub> and SO<sub>2</sub> bottles to be tested should be in place with regulators and tubing hooked up to sample line to enable switching from one gas bottle to the next without disconnecting.

TEST PROCEDURE

1. Start test as you would an ordinary emissions span test in period 8 or 16 on the Ametek Analyzer. This test procedure MUST be done three (3) times and the results averaged.
  - a. Beginning with the lowest O<sub>2</sub> concentration test gas, open the valve. At period 18, the O<sub>2</sub> will start sampling.
  - b. Stop the timer at this point by arrowing down on analyzer display to "stop timer." Enter "5"; enter password "2222." Allow the reading to stabilize for five (5) minutes.
  - c. Close the low O<sub>2</sub> gas valve and open the medium concentration O<sub>2</sub> gas valve and allow this reading to stabilize, again, at approximately five (5) minutes.
  - d. Close the medium O<sub>2</sub> gas valve and open the high concentration O<sub>2</sub> gas valve.
  - e. Start the analyzer timer, close the high O<sub>2</sub> valve when the sampling period ends.
  - f. Open the low concentration SO<sub>2</sub> valve. Sampling of SO<sub>2</sub> begins at period 20.
  - g. Stop the timer again for stabilization (5 minutes).
  - h. Close the low SO<sub>2</sub> valve and open the medium concentration SO<sub>2</sub> valve. Allow 5 minutes for stabilization.
  - i. Close the medium SO<sub>2</sub> valve and open the high concentration SO<sub>2</sub>. Start timer, allow analyzer to time out.
  - j. Push Flush/Zero button to exit calibration mode.
2. At the WDPF console, open the SO<sub>2</sub>/O<sub>2</sub> Trends. Right "click" on GROUPS, right "click" on DISPLAY. Left "click" on HISTORICAL TRENDS. Change Start/Stop time to cover test period time. Record stabilized reading results, test time and any other pertinent information in the SO<sub>2</sub> book and on the following page.

Approved By: Superintendent Environmental Affairs K. K. H. Date: 11-28-08  
F:\doc\pm\_ins\39614-M 11/29/07 Rev. 2 Approved By: DWP GAO Date: 12-4-07

INSTRUMENT MAINTENANCE PROCEDURE  
ENVIRONMENTAL MONITORING

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BEGIN TIME:

11:07

OXYGEN TEST 1

| Requested Concentration Oxygen | Actual Concentration Oxygen | Yokogawa Analyzer Display | WDPF Reading |
|--------------------------------|-----------------------------|---------------------------|--------------|
| 3.5%                           | 3.53 %                      | 3.58 %                    | 3.55 %       |
| 5.0%                           | 5.00 %                      | 4.98 %                    | 4.98 %       |
| 10.0%                          | 10.03 %                     | 10.00 %                   | 10.03 %      |

OXYGEN TEST 2

| Requested Concentration Oxygen | Actual Concentration Oxygen | Yokogawa Analyzer Display | WDPF Reading |
|--------------------------------|-----------------------------|---------------------------|--------------|
| 3.5%                           | 3.53 %                      | 3.57 %                    | 3.63 %       |
| 5.0%                           | 5.00 %                      | 5.01 %                    | 4.98 %       |
| 10.0%                          | 10.03 %                     | 10.04 %                   | 10.02 %      |

OXYGEN TEST 3

| Requested Concentration Oxygen | Actual Concentration Oxygen | Yokogawa Analyzer Display | WDPF Reading |
|--------------------------------|-----------------------------|---------------------------|--------------|
| 3.5%                           | 3.53 %                      | 3.50 %                    | 3.50 %       |
| 5.0%                           | 5.00 %                      | 4.95 %                    | 4.95 %       |
| 10.0%                          | 10.03 %                     | 10.00 %                   | 9.97 %       |

INSTRUMENT MAINTENANCE PROCEDURE  
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SO<sub>2</sub> TEST 1

| Requested Concentration SO <sub>2</sub> | Actual Concentration SO <sub>2</sub> | Ametek Analyzer Display | WDPF Reading |
|---|--------------------------------------|-------------------------|--------------|
| 250PPM                                  | 258 PPM                              | 255 PPM                 | 255 PPM      |
| 550PPM                                  | 542 PPM                              | 554 PPM                 | 554 PPM      |
| 900PPM                                  | 881 PPM                              | 892 PPM                 | 892 PPM      |

SO<sub>2</sub> TEST 2

| Requested Concentration SO <sub>2</sub> | Actual Concentration SO <sub>2</sub> | Ametek Analyzer Display | WDPF Reading |
|---|--------------------------------------|-------------------------|--------------|
| 250PPM                                  | 258 PPM                              | 258 PPM                 | 259 PPM      |
| 550PPM                                  | 542 PPM                              | 558 PPM                 | 559 PPM      |
| 900PPM                                  | 881 PPM                              | 895 PPM                 | 898 PPM      |

SO<sub>2</sub> TEST 3

END TIME:

14:46

| Requested Concentration SO <sub>2</sub> | Actual Concentration SO <sub>2</sub> | Ametek Analyzer Display | WDPF Reading |
|---|--------------------------------------|-------------------------|--------------|
| 250PPM                                  | 258 PPM                              | 259 PPM                 | 259 PPM      |
| 550PPM                                  | 542 PPM                              | 557 PPM                 | 559 PPM      |
| 900PPM                                  | 881 PPM                              | 898 PPM                 | 899 PPM      |

INSTRUMENT MAINTENANCE PROCEDURE  
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AVERAGES

| Requested Concentration Oxygen | Actual Concentration Oxygen | Yokogawa Analyzer Display | WDPF Reading |
|--------------------------------|-----------------------------|---------------------------|--------------|
| 3.5%                           | 3.53 %                      | 3.50 %                    | 3.56 %       |
| 5.0%                           | 5.0 %                       | 4.98 %                    | 4.97 %       |
| 10.0%                          | 10.03 %                     | 10.01 %                   | 10.01 %      |

| Requested Concentration SO2 | Actual Concentration SO2 | Ametek Analyzer Display | WDPF Reading |
|-----------------------------|--------------------------|-------------------------|--------------|
| 250PPM                      | 258 PPM                  | 258 PPM                 | 258 PPM      |
| 550PPM                      | 542 PPM                  | 556 PPM                 | 557 PPM      |
| 900PPM                      | 881 PPM                  | 895 PPM                 | 896 PPM      |

TEST GAS

| Requested Concentrations | Actual Test Gas | Bottle Serial Number |
|--------------------------|-----------------|----------------------|
| 3.5% Oxygen              | 3.53            | CC234187             |
| 5.0% Oxygen              | 5.00            | CC209786             |
| 10.0% Oxygen             | 10.03           | CC207988             |
| 250 PPM SO2              | 258             | CC253899             |
| 550 PPM SO2              | 542             | CC284007             |
| 900 PPM SO2              | 881.3           | CC48246              |

NOTES AND COMMENTS OF INSPECTION

OK @ this time

Completed By: T. Merich Date: 7-28-08  
(Mechanic's Signature)

Reviewed By: det Date: 7-30-08  
(Supervisor's Signature)

INSTRUMENT MAINTENANCE PROCEDURE  
ENVIRONMENTAL MONITORING

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Page 1

ASSIGNED TO: TChuter Steve Carter DATE: 10-29-09

EMISSION TEST GAS SPAN TEST C & D SULFURIC ACID PLANT  
CRITICAL PM QUARTERLY

PRIOR TO TEST, order the following concentrations of test gas.

3.5 % O<sub>2</sub>; 5 % O<sub>2</sub>; 10% % O<sub>2</sub>, BALANCE NITROGEN

250 PPM SO<sub>2</sub>; 550 PPM SO<sub>2</sub>; 900 PPM SO<sub>2</sub> BALANCE NITROGEN

O<sub>2</sub> and SO<sub>2</sub> bottles to be tested should be in place with regulators and tubing hooked up to sample line to enable switching from one gas bottle to the next without disconnecting.

TEST PROCEDURE

1. Start test as you would an ordinary emissions span test in period 8 or 16 on the Ametek Analyzer. This test procedure MUST be done three (3) times and the results averaged.
  - a. Beginning with the lowest O<sub>2</sub> concentration test gas, open the valve. At period 18, the O<sub>2</sub> will start sampling.
  - b. Stop the timer at this point by arrowing down on analyzer display to "stop timer." Enter "5"; enter password "2222." Allow the reading to stabilize for five (5) minutes.
  - c. Close the low O<sub>2</sub> gas valve and open the medium concentration O<sub>2</sub> gas valve and allow this reading to stabilize, again, at approximately five (5) minutes.
  - d. Close the medium O<sub>2</sub> gas valve and open the high concentration O<sub>2</sub> gas valve.
  - e. Start the analyzer timer, close the high O<sub>2</sub> valve when the sampling period ends.
  - f. Open the low concentration SO<sub>2</sub> valve. Sampling of SO<sub>2</sub> begins at period 20.
  - g. Stop the timer again for stabilization (5 minutes).
  - h. Close the low SO<sub>2</sub> valve and open the medium concentration SO<sub>2</sub> valve. Allow 5 minutes for stabilization.
  - i. Close the medium SO<sub>2</sub> valve and open the high concentration SO<sub>2</sub>. Start timer, allow analyzer to time out.
  - j. Push Flush/Zero button to exit calibration mode.
2. At the WDPF console, open the SO<sub>2</sub>/O<sub>2</sub> Trends. Right "click" on GROUPS, right "click" on DISPLAY. Left "click" on HISTORICAL TRENDS. Change Start/Stop time to cover test period time. Record stabilized reading results, test time and any other pertinent information in the SO<sub>2</sub> book and on the following page.

Approved By: Superintendent Environmental Affairs Kirkland Date: 10-29-09  
F:\doc\pm\_insp\39614-M 11/29/07 Rev. 2 Approved By: DWP GAO Date: 12-4-07

INSTRUMENT MAINTENANCE PROCEDURE  
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| BEGIN TIME:   | Requested Concentration Oxygen | Actual Concentration Oxygen | Yokogawa Analyzer Display | WDPF Reading |
|---------------|--------------------------------|-----------------------------|---------------------------|--------------|
| OXYGEN TEST 1 | 3.5%                           | 3.53 %                      | 3.5 %                     | 3.5 %        |
|               | 5.0%                           | 5.0 %                       | 4.9 %                     | 4.84 %       |
|               | 10.0%                          | 10.03 %                     | 9.8 %                     | 9.8 %        |
| OXYGEN TEST 2 | 3.5%                           | 3.53 %                      | 3.42 %                    | 3.4 %        |
|               | 5.0%                           | 5.0 %                       | 4.84 %                    | 4.84 %       |
|               | 10.0%                          | 10.03 %                     | 9.8 %                     | 9.73 %       |
| OXYGEN TEST 3 | 3.5%                           | 3.53 %                      | 3.42 %                    | 3.42 %       |
|               | 5.0%                           | 5.0 %                       | 4.82 %                    | 4.8 %        |
|               | 10.0%                          | 10.03 %                     | 9.8 %                     | 9.7 %        |

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| SO2 TEST 1 | Requested<br>Concentration<br>SO2 | Actual<br>Concentration<br>SO2 | Ametek<br>Analyzer<br>Display | WDPF Reading |
|------------|-----------------------------------|--------------------------------|-------------------------------|--------------|
|            | 250PPM                            | 249 PPM                        | 258 PPM                       | 262 PPM      |
|            | 550PPM                            | 554 PPM                        | 566 PPM                       | 564 PPM      |
|            | 900PPM                            | 902 PPM                        | 915 PPM                       | 916 PPM      |

| SO2 TEST 2 | Requested<br>Concentration<br>SO2 | Actual<br>Concentration<br>SO2 | Ametek<br>Analyzer<br>Display | WDPF Reading |
|------------|-----------------------------------|--------------------------------|-------------------------------|--------------|
|            | 250PPM                            | 249 PPM                        | 262 PPM                       | 263 PPM      |
|            | 550PPM                            | 554 PPM                        | 568 PPM                       | 566 PPM      |
|            | 900PPM                            | 902 PPM                        | 917 PPM                       | 917 PPM      |

| SO2 TEST 3<br><hr/> END TIME: | Requested<br>Concentration<br>SO2 | Actual<br>Concentration<br>SO2 | Ametek<br>Analyzer<br>Display | WDPF Reading |
|-------------------------------|-----------------------------------|--------------------------------|-------------------------------|--------------|
|                               | 250PPM                            | 249 PPM                        | 262 PPM                       | 263 PPM      |
|                               | 550PPM                            | 554 PPM                        | 568 PPM                       | 563 PPM      |
|                               | 900PPM                            | 902 PPM                        | 916 PPM                       | 914 PPM      |

INSTRUMENT MAINTENANCE PROCEDURE  
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AVERAGES

| Requested Concentration Oxygen | Actual Concentration Oxygen | Yokogawa Analyzer Display | WDPF Reading |
|--------------------------------|-----------------------------|---------------------------|--------------|
| 3.5%                           | 3.53%                       | 3.44%                     | 3.44%        |
| 5.0%                           | 5.0%                        | 4.85%                     | 4.82%        |
| 10.0%                          | 10.03%                      | 9.8%                      | 9.74%        |

| Requested Concentration SO2 | Actual Concentration SO2 | Ametek Analyzer Display | WDPF Reading |
|-----------------------------|--------------------------|-------------------------|--------------|
| 250PPM                      | 249 PPM                  | 260 PPM                 | 262 PPM      |
| 550PPM                      | 556 PPM                  | 567 PPM                 | 564 PPM      |
| 900PPM                      | 902 PPM                  | 916 PPM                 | 915 PPM      |

TEST GAS

| Requested Concentrations | Actual Test Gas | Bottle Serial Number |
|--------------------------|-----------------|----------------------|
| 3.5% Oxygen              | 3.53            | CC234187             |
| 5.0% Oxygen              | 5.0             | CC209786             |
| 10.0% Oxygen             | 10.03           | CC207985             |
| 250 PPM SO2              | 249             | CC253899             |
| 550 PPM SO2              | 556             | CC67247              |
| 900 PPM SO2              | 902             | CC118701             |

NOTES AND COMMENTS OF INSPECTION

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Completed By: Tony Clutter Date: 10-29-08  
 (Mechanic's Signature)

Reviewed By: Jeff Date: 11-18-08  
 (Supervisor's Signature)