

MEMORANDUM

TO: Michael G. Cooke

THRU: Trina Vielhauer

FROM: James K. Pennington *JKP*

DATE: December 29, 2004

SUBJECT: FINAL Permit No. **1050052-009-AC**
CF Industries, Inc.
Bartow Phosphate Complex

Attached for approval and signature is a final air construction permit modification for the Bartow Phosphate Complex. The modification adds truck unloading and transfer operation to current railcar unloading and transfer operations for emissions unit 031 located at the Bartow facility.

This project is not subject to PSD because there will be no emissions changes associated with the modification. The facility will be subject to all current emissions limits. This construction permit is being processed concurrently with the Title V Renewal Permit, 1050052-008-AV.

Comments were received concerning the DRAFT Permit that was clerked on November 8, 2004. Comments were received during the public comment period from the facility, and incorporated into the specific conditions of the construction permit and Title V Renewal Permit 1050052-008-AV.

I recommend your approval and signature.

Attachment

TV/jkp/rlb

SENDER: COMPLETE

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:
Mr. John M. Doran
Manager
CF Industries, Inc.
Post Office Box 1480
Bartow, Florida 33831

A. Signature Agent
John M. Doran Addressee

B. Received by (Printed Name) *John M. Doran* C. Date of Delivery *1/3/05*

D. Is delivery address different from item 1? Yes
If YES, enter delivery address below: No

3. Service Type
 Certified Mail Express Mail
 Registered Return Receipt for Merchandise
 Insured Mail C.O.D.

4. Restricted Delivery? (Extra Fee) Yes

2. Article Number 700Q 167Q 0013 3109 9250
(Transfer from service label)

PS Form 3811, August 2001

Domestic Return Receipt

102595-02-M-1540

0526 601E E100 029T 0002

U.S. Postal Service
CERTIFIED MAIL RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)

Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$

Postmark
Here

Sent To
Mr. John M. Doran, Manager
CF Industries, Inc.
Post Office Box 1480
Bartow, Florida 33831

PS Form 3800, May 2000

See Reverse for Instructions

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
NOTICE OF FINAL PERMIT

In the Matter of an
Application for Permit by:


Mr. John M. Doran
Manager
CF Industries, Inc.
P.O. Box 1480
Bartow, Florida 33831

DEP File No. 1050052-009-AC
Bartow Phosphate Complex
Polk County

Enclosed is Final Permit Number 1050052-009-AC. This permit authorizes Bartow Phosphate Complex to add truck unloading and transfer to the current unloading and transfer operations at emissions unit 031, DAP/MAP/GTSP Railcar Unloading and Transfer Operation. This permit is issued pursuant to Chapter 403, Florida Statutes.

Any party to this order has the right to seek judicial review of it under section 120.68 of the Florida Statutes, by filing a notice of appeal under rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel, Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000, and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The notice must be filed within thirty days after this order is filed with the clerk of the Department.

Executed in Tallahassee, Florida.



Trina Vielhauer, Chief
Bureau of Air Regulation

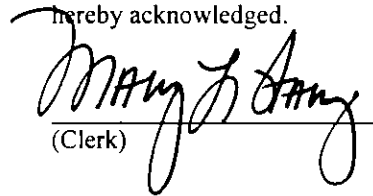
CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Notice of Final Permit (including the Final permit) was sent by certified mail (*) and copies were mailed by U.S. Mail before the close of business on 12/30/04 to the person(s) listed:

John M. Doran, Manager, CF Industries, Inc.
John B. Koogler, PhD., P.E., Koogler and Associates
Pradeep Raval, Consultant, Koogler and Associates
Gerald Kissel, FDEP- SWD
Jason Waters, FDEP- SWD
U.S. EPA, Region 4

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to §120.52, Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.



(Clerk)

12/30/04
(Date)

FINAL DETERMINATION

CF Industries, Inc.
Bartow Phosphate Complex
DEP File No. 1050052-009-AC

The Department distributed a public notice package on November 8, 2004 to allow the applicant to add truck unloading and transfer to the current railcar loading and transfer at emissions unit (EU) No. 031 located at the Bartow Phosphate Complex located at 2501 Bonnie Mine Road, Bartow, Polk County. The Public Notice of Intent to Issue was published in The Ledger on November 20, 2004.

COMMENTS/CHANGES

Comments were received from the applicant by letter dated December 2, 2004 and received on December 9, 2004.

The Department determined that minor corrections or changes must be made to the draft permit text to clarify the original requirements. The corrections or changes are summarized below. All corrections and changes are referenced to the Emissions Unit Specific Conditions of the permit.

Specific Condition 8 Visible Emissions:

Based upon comments received from the applicant Specific Condition 8 will be revised to reflect the control of fugitive emissions from the truck unloading and transfer operations at EU No. 031. To ensure no fugitive emissions will occur from the storage building, all doors shall remain closed or curtailed during any truck unloading and transfer operations.

Specific Condition 9 Monitoring of Operations

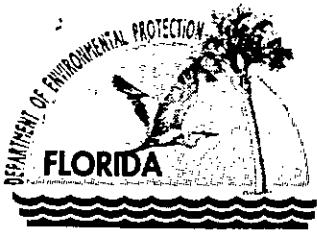
Based upon comments received from the applicant Specific Condition 9 will be removed from the permit. To ensure no fugitive emissions will occur from the storage building, all doors shall remain closed or curtailed during any truck unloading and transfer operations. This condition will not apply to the truck unloading and transfer operations.

Specific Condition 14 Visible Emissions Test Methods:

Based upon comments received from the applicant Specific Condition 14 will be removed from the permit. With the facility not allowing any fugitive emissions during the unloading or transfer operations, testing for fugitive emissions from the storage building will not be required. This condition will not apply to the truck unloading and transfer operations.

CONCLUSION

The final action of the Department is to issue the permit with the changes described above.



Jeb Bush
Governor

Department of Environmental Protection

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

Colleen M. Castille
Secretary

PERMITTEE:

CF Industries, Inc.
P.O. Box 1480
Bartow, FL 33831

FINAL Permit No.: 1050052-009-AC

County: Polk

Effective Date: December 28, 2004

Expiration Date: December 1, 2006

Project: Addition of Truck
Unloading and Transfer Operation

This FINAL permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 62-204 through 62-297 and 62-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans and other documents, attached hereto or on file with the department and made a part hereof and specifically described as follows:

For the modification of the Diammonium Phosphate/Monoammonium Phosphate/Granulated Triple Super Phosphate (DAP/MAP/GTSP) Railcar Unloading and Transfer Operation. **This modification is for the addition of Truck unloading and transfer operation.** This operation currently consists of receiving by railcar DAP/MAP/GTSP which has been treated with a dust suppressant. DAP/MAP/GTSP is transferred to a hopper located below the railcar. From the railcar hopper the DAP/MAP/GTSP is transferred via a conveyor system to a warehouse for storage. The addition of the truck operation would provide a new mode of product transfer. Both the Railcar and Truck operations will continue to operate under the current permit conditions and limitations.

Location: 2501 Bonnie Mine Road, West of Bartow, Polk County

Latitude: 27° 51' 59" Longitude: 81° 55' 46"

UTM: 17-408.3 E 3082.5 N

Facility ID No: 1050052

Emission Unit ID No: 031 - DAP/MAP/GTSP Railcar Unloading and Transfer Operation

Related Permit No.: 1050052-008-AV, Title V Renewal Permit

Note: Please reference the Permit No., Facility ID, and Emission Unit ID in all correspondence, test reports submittals, applications, etc.

SPECIFIC CONDITIONS:

1. A part of this permit is the attached 15 General Conditions.
[Rule 62-4.160, F.A.C.]
2. All applicable rules of the Department and design discharge limitations specified in the application must be adhered to. The permit holder may also need to comply with county, municipal, federal, or other state regulations.
[Rule 62-4.070(7), F.A.C.]
3. Issuance of this permit does not relieve the permittee from complying with applicable emission limiting standards or other requirements of Chapters 62-204, 62-210, 62-212, 62-296, and 62-297, F.A.C. or any other requirements under federal, state, or local law. This air construction permit is in addition to Air Construction permit 1050052-006-AC, and shall not supersede the conditions of permit 1050052-006-AC.
[Rule 62-210.300, F.A.C.]
4. The permittee shall not cause, suffer, allow or permit the discharge of air pollutants, which cause or contribute to an objectionable odor. [Rule 62-296.320, F.A.C.]
5. Capacity. The maximum DAP/MAP/GTSP railcar and truck unloading and transfer rate shall not exceed 130.0 tons per hour (daily average) and 700,800 tons total operations and 300,000 tons for the trucking operation per 12 consecutive month period.
[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.]
6. Hours of Operation. The hours of operation of the DAP/MAP/GTSP Railcar and Truck Unloading and Transfer Operation are not restricted.
[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.]
7. The owner or operators shall not cause, let, permit, suffer or allow the emissions of unconfined particulate matter from any source whatsoever, including, but not limited to, vehicular movement, transportation of materials, construction, alteration, demolition or wrecking, or industrially related activities such as loading, unloading, storing or handling, without taking reasonable precautions to prevent such emission. Reasonable precautions to prevent emissions of unconfined particulate matter at this facility shall include as a minimum, that only DAP/MAP/GTSP product treated with a dust suppressant shall be unloaded and the water application to the facility and unpaved areas as needed to prevent emissions.
[Rule 62-296.320(4)(c), F.A.C.]
8. To ensure that no fugitive emissions occur from the storage building during truck loading/unloading, all doors to the warehouse building shall remain closed or curtailed during

any truck transfer operations.

[Rule 62-4.070(7), F.A.C.]

9. [Reserved]

Recordkeeping and Reporting Requirements.

10. In order to document compliance with Specific Condition 5, the permittee shall maintain a daily record of the material unloading and transfer rate during operation (tons per hour on daily average basis) and the hours of process operations. In addition, the permittee shall maintain a monthly record of the total amount of material unloaded (tons per 12 consecutive month period) and the total hours of operation for the 12 consecutive month period. These records shall be recorded in a permanent form suitable for inspection by the Department upon request.

[Rules 62-213.440(1)(b)2.b, and 62-4.070(3), F.A.C.]

11. Daily records shall be completed within 5 business days and monthly records shall be completed by the end of the next month. These records shall be kept at the facility for at least 5 years and made available to the Department and applicable local program upon request.

[Rule 62-4.070(3), F.A.C.]

Test Methods and Procedures.

12. Each material transfer point associated with the railcar and truck unloading and transfer operation shall be tested for visible emissions within 30 days of achieving the maximum railcar and truck unloading and transfer rate of 130.0 tons per hour. The test reports shall be submitted within 45 days of testing to the Air Compliance Section of the Southwest District Office of the Department.

[Rules 62-297.310(7) and 62-297.310(8), F.A.C.]

13. Testing of emission must be conducted within 90-100% of the maximum permitted material unloading and transfer rate of 130.0 tons per hour. Failure to submit the material transfer rate (tons per hour), the type of material transferred (e.g. DAP, MAP or GTSP), documentation that dust suppressant was applied as well as the type of suppressant applied in each test report may invalidate the test and fail to provide reasonable assurance of compliance.

[Rules 62-070(3) and 62-297.310(8), F.A.C.]

14. [Reserved]

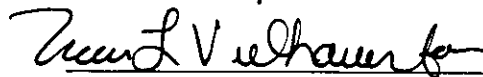
15. The permittee shall notify the Air Compliance Section of the Southwest District Office of the Department at least 15 days prior to the date on which each compliance test is to begin of the date, time, and place of each such test, and the test contact person who will be responsible for coordinating and having such test conducted.

[Rule 62-297.310(7)(a)9, F.A.C.]

PERMITTEE:
CF Industries, Inc.
Page 4 of 4

FINAL Permit No.: 1050052-009-AC
Project: Addition of Truck
Unloading and Transfer Operation

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION



Michael G. Cooke, Director
Division of Air Resource Management

MGC/jkp/rlb