



CF Industries, Inc.
Bartow Phosphate Complex

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December 2, 2004

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. James K. Pennington, P.E.
Florida Department of Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400

**RE: CF Industries, Inc. (CFI) Bartow Phosphate Complex
Draft Title V Air Operating Permit Renewal Project No. 1050052-008-AV
Draft Air Construction Permit Project No. 1050052-009-AC**

Dear Mr. Pennington:

Pursuant to CFI's receipt of the referenced draft operating and construction Title V permit on November 12, 2004, this letter is to provide written comments for the Department's consideration in final permit issuance.

Section III, Subsection C, page C1 of C3

CFI recommends that the following condition be deleted as we believe there is no applicable standard for the emission limitation:

*C.4. Particulate Matter Emissions from boiler No. 1 shall not exceed 0.5 lb/hr and 2.1 tpy.
[Rule 62.296.406, F.A.C.]*

Section III, Subsection D, page D1 of D2

Please note that the proposed truck unloading/transfer operation will occur inside the product storage warehouse. Product will be directly unloaded from (or directly loaded to) trucks while inside the warehouse building and with all entrances and exits closed or curtained. Accordingly, there are no exterior transfer points. Therefore, no fugitive emissions will be generated, and visible emissions testing should not be required for the enclosed truck transfer operation. Note also that, although the description of the emissions unit states "unloading and transfer" and not specifically "loading", truck loading is presumed to be included in the term "transfer" as clearly discussed in all information previously submitted to the Department. With these points in mind, CFI recommends the following changes to Section III, Subsection D, which are presented in strike-through/underline format for clarity.

<u>E.U. ID No.</u>	<u>Brief Description</u>
-031	DAP/MAP/GTSP Railcar/Truck Unloading and <u>Transfer Operation</u>

The Diammonium Phosphate/Monoammonium Phosphate/Granulated Triple Super Phosphate (DAP/MAP/GTSP) Railcar/Truck Unloading and Transfer Operation has an unloading and transfer rate of ~~80.0~~ 130 tons per hour of DAP/MAP/GTSP. The operation consists of receiving by railcar or truck DAP/MAP/GTSP which has been treated with a dust suppressant. DAP/MAP/GTSP is transferred by rail to a hopper located below the railcar/truck, and from the railcar/truck hopper the DAP/MAP/GTSP is transferred to a conveyor system which conveys the material to a warehouse for storage. For truck transfer, DAP/MAP/GTSP is unloaded directly from or loaded directly into the truck while inside the enclosed storage warehouse.

{Permitting note(s): This emissions unit is regulated under Rule 62-296.700, F.A.C., RACT Particulate Matter; Rule 62-296.320, F.A.C., General Pollutant Emission Limiting Standards. If this operation commences construction or modification after October 22, 1974, it is subject to NSPS Subpart X (40 CFR 60.240) for GTSP Storage Facilities if GTSP is manufactured on-site or if the facility receives fresh GTSP (i.e., GTSP produced within the preceding 72 hours).}

The following specific conditions apply to the emissions unit(s) listed above:

Essential Potential to Emit (PTE) Parameters

D.1. Capacity. The unloading and transfer rate for the DAP/MAP/GTSP Railcar/Truck Unloading and Transfer Operation shall not exceed 130.0 tons per hour and 700,800 tons total operations and 300,000 tons for the trucking operation per 12 consecutive month period.

[Rule 62-4.160(2), F.A.C. and Rule 62-210.200, Definitions - (PTE), F.A.C., Air Construction Permit No. AC53-246837, 1050052-006-AC, and 1050052-009-AC]

Emission Limitations and Standards

D.2. All material transferred from the DAP/MAP/GTSP Railcar/Truck Unloading and Transfer Operation (i.e., DAP, MAP, GTSP) shall be coated with a dust suppressant material. As an indicator of the effectiveness of this control measure, visible emissions from each material transfer point shall not exceed an opacity of 5%. This shall not apply to the transfer of material to or from trucks conducted inside the enclosed product storage warehouse. 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 curtained during any truck transfer operations.

[Rule 62-296.320(4)(a), F.A.C. and 1050052-009-AC]

Test Methods and Procedures

D.3. Each material transfer point associated with the DAP/MAP/GTSP railcar/~~truck~~ unloading and transfer operation shall be tested for visible emissions annually on or during the 60 day period prior to July 7.

[Rules 62-297.310(7)(a), 62-4.070(4), F.A.C., and 1050052-009-AC]

D.4. Compliance with the visible emission limitation of Condition D.2 shall be determined using EPA Method 9 contained in 40 CFR 60, Appendix A and adopted by reference in Chapter 62-297, F.A.C. The minimum requirements for stationary point source emission test procedures and reporting shall be in accordance with Chapter 62-297, F.A.C. and 40 CFR 60 Appendix A.

[Chapter 62-297, F.A.C.]

Please call Craig Kovach or me if you have any questions or if you need additional information.

Sincerely,



John M. Doran
Manager
Bartow Phosphate Complex

Enclosures

cc: Bobby Bull, FDEP
Pradeep Raval, Koogler & Associates, Inc.

Dist: M. L. Vadelund
J. P. Bunch
C. A. Kovach
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