

**KOOGLER & ASSOCIATES**  
**ENVIRONMENTAL SERVICES**

4014 NW THIRTEENTH STREET  
GAINESVILLE, FLORIDA 32609  
352/377-5822 • FAX/377-7158

KA 344-02-03

September 17, 2004

**RECEIVED**

**SEP 22 2004**

**BUREAU OF AIR REGULATION**

Mr. Jason Waters  
Florida Department of  
Environmental Protection  
Southwest District Office  
3804 Coconut Palm Drive  
Tampa, FL 33619-8318

US EPA Region 4  
Air and EPCRA Enforcement Branch  
Air Enforcement Section  
61 Forsyth Street  
Atlanta, GA 30303

Subject: Notice of Operating Change  
CF Industries, Inc., Bartow Phosphate Complex  
Air Permit No. 1050052-007-AV

Dear Mr. Waters:

In accordance with Rule 62-213.410, F.A.C., and related rules, this notification is submitted to the Department to allow CF Industries, Inc. (CFI) to load/unload fertilizer products by trucks at the CFI Bartow Phosphate Complex in addition to the currently permitted railcar unloading and shipping.

It is anticipated that the truck unloading will begin on or after September 27, 2004.

Current Operation

Emission Unit (EU) 031 currently includes railcar unloading and transfer operations of fertilizer products (DAP/MAP/GTSP) that have been treated with a dust suppressant. The permitted processing rate is 130 tons per hour. The only emissions limitation is for visible emissions not to exceed 5 percent opacity at material transfer points.

The railcar loading (shipping operation), which is not affected by the proposed change, is currently permitted under EU Nos. 002 and 025, Shipping Units 1 and 2.

September 17, 2004

Proposed Change

In addition to the current railcar unloading and shipping, CFI is proposing truck loading/unloading of the same fertilizer products (treated with a dust suppressant). The currently permitted operation rate will not change. There will also be no change in the annual processing rates.

Emission Change

Current fertilizer railcar unloading and shipping operations result in extremely low fugitive emissions due to the handling of only products coated with dust suppressant. As the truck loading/unloading will be conducted with coated products inside the existing enclosed storage building, the resulting fugitive particulate matter emissions are expected to be even lower when this method of operation is used. Consequently, truck loading/unloading is expected to result in an overall reduction in the potential fugitive particulate matter emissions from the emissions unit.

There is no source-specific emissions standard for the truck loading/unloading operation that is conducted inside the building. The visible emissions limitation applicable to the EU will not be exceeded as the operation will occur inside the building. The proposed truck loading/unloading operation, an insignificant/unregulated activity, is requested to be included in the Title V permit that is in the process of being renewed. It is anticipated there is no term or condition becoming applicable or not becoming applicable as a result of the proposed change.

The Responsible Official and Professional Engineer certifications are enclosed.

If you have any questions, please call me.

Very truly yours,

KOOGLER & ASSOCIATES



Pradeep Raval

Par.  
Encl.

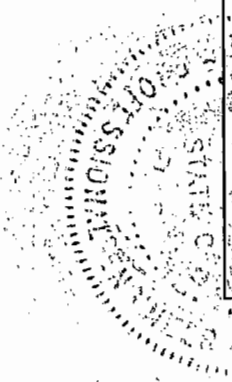
C: J. Doran, CFI Bartow  
L. Vadelund, CFI Bartow  
C. Kovach, CFI Bartow  
B. Bull, FDEP Tallahassee

**P.E. AND R.O. CERTIFICATION**

Professional Engineer Certification

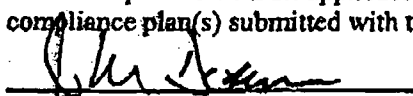
1. Professional Engineer Name: <b>John B. Koogler, Ph.D, P.E.</b> Registration Number: <b>12925</b>
2. Professional Engineer Mailing Address... Organization/Firm: <b>Koogler and Associates</b> Street Address: <b>4014 NW 13<sup>th</sup> Street</b> City: <b>Gainesville</b> State: <b>FL</b> Zip Code: <b>32609</b>
3. Professional Engineer Telephone Numbers... Telephone: <b>(352) 377-5822</b> ext. Fax: <b>(352) 377-7158</b>
4. Professional Engineer Email Address: <b>jkoogler@kooglerassociates.com</b>
5. Professional Engineer Statement: <i>I, the undersigned, hereby certify, except as particularly noted herein*, that:</i> <i>(1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this application for air permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; and</i> <i>(2) To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application.</i> <i>(3) If the purpose of this application is to obtain a Title V air operation permit (check here <input type="checkbox"/>, if so), I further certify that each emissions unit described in this application for air permit, when properly operated and maintained, will comply with the applicable requirements identified in this application to which the unit is subject, except those emissions units for which a compliance plan and schedule is submitted with this application.</i> <i>(4) If the purpose of this application is to obtain an air construction permit (check here <input type="checkbox"/>, if so) or concurrently process and obtain an air construction permit and a Title V air operation permit revision or renewal for one or more proposed new or modified emissions units (check here <input checked="" type="checkbox"/>, if so), I further certify that the engineering features of each such emissions unit described in this application have been designed or examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application.</i> <i>(5) If the purpose of this application is to obtain an initial air operation permit or operation permit revision or renewal for one or more newly constructed or modified emissions units (check here <input type="checkbox"/>, if so), I further certify that, with the exception of any changes detailed as part of this application, each such emissions unit has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with all provisions contained in such permit.</i>  Signature (seal) _____ Date <u>9/17/04</u>

\* Attach any exception to certification statement.



**Application Responsible Official Certification**

Complete if applying for an initial/revised/renewal Title V permit or concurrent processing of an air construction permit and a revised/renewal Title V permit. If there are multiple responsible officials, the "application responsible official" need not be the "primary responsible official."

1. Application Responsible Official Name: <b>John Doran, Manager</b>
2. Application Responsible Official Qualification (Check one or more of the following options, as applicable): <input checked="" type="checkbox"/> For a corporation, the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit under Chapter 62-213, F.A.C. <input type="checkbox"/> For a partnership or sole proprietorship, a general partner or the proprietor, respectively. <input type="checkbox"/> For a municipality, county, state, federal, or other public agency, either a principal executive officer or ranking elected official. <input type="checkbox"/> The designated representative at an Acid Rain source.
3. Application Responsible Official Mailing Address... Organization/Firm: <b>C.F. Industries, Inc.</b> Street Address: <b>P.O. Box 1480</b> City: <b>Bartow</b> State: <b>FL</b> Zip Code: <b>33831</b>
4. Application Responsible Official Telephone Numbers... Telephone: <b>(863) 533-0528</b> ext. Fax: <b>(863) 533-7097</b>
5. Application Responsible Official Email Address:
6. Application Responsible Official Certification: I, the undersigned, am a responsible official of the Title V source addressed in this air permit application. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof and all other applicable requirements identified in this application to which the Title V source is subject. I understand that a permit, if granted by the department, cannot be transferred without authorization from the department, and I will promptly notify the department upon sale or legal transfer of the facility or any permitted emissions unit. Finally, I certify that the facility and each emissions unit are in compliance with all applicable requirements to which they are subject, except as identified in compliance plan(s) submitted with this application.   Signature _____ Date <u>9/17/04</u>



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Mr. Jason Waters  
Florida Department of  
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Southwest District Office  
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US EPA Region 4  
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Air Permit No. 1050052-007-AV

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Mr. Jason Waters, P.E.  
Florida Department of  
Environmental Protection

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KOOGLER & ASSOCIATES



Pradeep Raval

Par.  
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**P.E. AND R.O. CERTIFICATION**



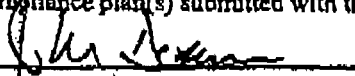
**Professional Engineer Certification**

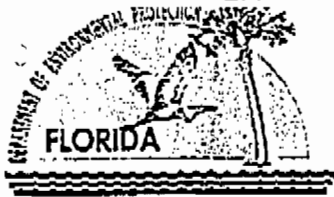
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\* Attach any exception to certification statement.

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<p>5. Application Responsible Official Email Address:</p>
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# Department of Environmental Protection

Jeb Bush  
Governor

Southwest District  
3804 Coconut Palm Drive  
Tampa, Florida 33619-1352

Colleen M. Castille  
Secretary

## FACSIMILE TRANSMISSION SHEET

DATE 9/20/04

TO: Bobby Bull  
Department \_\_\_\_\_  
Phone \_\_\_\_\_ Fax \_\_\_\_\_

FROM: Jason Waters  
DEP Southwest District Office - Air Program  
Phone: (813) 744-6100 (SunCom 512-1042) Ext. 107

OPERATOR: JW

SUBJECT: CF Bartow Reg.  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Total Number of Pages, Including Cover Page: 6

DEP SWD AIR PROGRAM FAX NUMBERS: (813) 744-6458  
(SunCom) 512-1073

CERTIFIED MAIL

Mr. John Doran, Manager  
C.F. Industries, Inc.  
P.O. Box 1480  
Bartow, FL 33831

Re: Letter dated September 17, 2004  
Notice of Operating Change-Truck Transfer  
Facility ID No. 1050052

Dear Mr. Doran:

On September 17, 2004, the Department received your "Notice of Operating Change" letter (dated September 17, 2004) pursuant to rule 62-213.410, F.A.C. to unload/load fertilizer with trucks in addition to railcars. As discussed with your consultant, Mr. Pradeep Raval of Koogler and Associates, earlier that week, the Department would require a PSD applicability analysis and an air construction permit application. This change constitutes a change in the method of operation. The facility is also one of the source categories that must account for fugitive emissions in PSD determinations. The increased truck traffic would cause an increase in emissions. Based upon this, the Department does not believe the September 17, 2004 notification is valid in this circumstance. Failure to obtain the proper permits and/or revisions prior to implementing this change may result in enforcement action by the Department.

If you have any questions, please call Mr. Jason Waters of my staff at (813) 744-6100 extension 107.

A person whose substantial interests are affected by this letter may petition for an administrative proceeding (hearing) under Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station 35, Tallahassee, Florida, 32399-3000. Petitions filed by the permit applicant or any of the parties listed below must be filed within **21** days of receipt of this notice. A petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an

administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the Department's action is based must contain the following information:

- (a) The name and address of each agency affected and each agency's file or identification number, if known;
- (b) The name, address, and telephone number of the petitioner, the name, address, and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination;
- (c) A statement of how and when petitioner received notice of the agency action or proposed action;
- (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate;
- (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's action; and
- (f) A statement of specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and
- (g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the agency to take with respect to the agency's proposed action.

A petition that does not dispute the material facts upon which the Department's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Department's final action may be different from the position taken by it in this authorization. Persons whose substantial interests will be affected by any such final decision of the Department on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation is not available in this proceeding.

In addition to the above, a person subject to regulation has a right to apply for a variance from or waiver of the requirements of particular rules, on certain conditions,

under Section 120.542, F.S. The relief provided by this state statute applies only to state rules, not statutes, and not to any federal regulatory requirements. Applying for a variance or waiver does not substitute or extend the time for filing a petition for an administrative hearing or exercising any other right that a person may have in relation to the action proposed in this notice.

The application for a variance or waiver is made by filing a petition with the Office of General Counsel of the Department, 3900 Commonwealth Boulevard, Mail Station 35, Tallahassee, Florida 32399-3000. The petition must specify the following information:

- (a) The name, address, and telephone number of the petitioner;
- (b) The name, address, and telephone number of the attorney or qualified representative of the petitioner, if any;
- (c) Each rule or portion of a rule from which a variance or waiver is requested;
- (d) The citation to the statute underlying (implemented by) the rule identified in (c) above;
- (e) The type of action requested;
- (f) The specific facts that would justify a variance or waiver for the petitioner;
- (g) The reason why the variance or waiver would serve the purposes of the underlying statute (implemented by the rule); and
- (h) A statement whether the variance or waiver is permanent or temporary and, if temporary, a statement of the dates showing the duration of the variance or waiver requested.

The Department will grant a variance or waiver when the petition demonstrates both that the application of the rule would create a substantial hardship or violate principles of fairness, as each of those terms is defined in Section 120.542(2), F.S., and that the purpose of the underlying statute will be or has been achieved by other means by the petitioner.

Persons subject to regulation pursuant to any federally delegated or approved air program should be aware that Florida is specifically not authorized to issue variances or waivers from any requirements of any such federally delegated or approved program. The requirements of the program remain fully enforceable by the Administrator of EPA and by the person under the Clean Air Act unless and until Administrator separately approves any variance or waiver in accordance with the procedures of the federal program.

This "Authorization" is final and effective on the date filed with the Clerk of the Department unless a timely petition for an administrative hearing is filed pursuant to Sections 120.569 and 120.57, F.S. or unless a request for an extension of time in which to file a petition is filed within the time specified for filing a petition. Upon timely filing of

a petition or a request for an extension of time to file the petition, this authorization will not be effective until further Order of the Department.

Any party to the Order (Authorization) has the right to seek judicial review of the Order pursuant to Section 120.68, F.S., by the filing of 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, Douglas Building, 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 of Appeal must be filed within 30 days after this Order is filed with the Clerk of the Department.

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL PROTECTION

Gerald J. Kissel, P.E.  
District Air Program Administrator

CERTIFICATE OF SERVICE

This is to certify that this NOTICE OF AUTHORIZATION was sent to the addressee by certified mail and all copies were sent by regular mail before the close of business on \_\_\_\_\_ to the listed persons, unless otherwise noted.

US EPA Region 4  
Air and EPCRA Enforcement Branch  
Air Enforcement Section  
61 Forsyth Street  
Atlanta, GA 30303

Mr. John B. Koogler, Ph.D., P.E.  
Koogler and Associates

Mr. Jim Pennington, P.E.  
FDEP-Tallahassee

Clerk Stamp

FILING AND ACKNOWLEDGEMENT FILED,  
on this date, pursuant to Section 120.52(7), Florida  
Statutes, with the designated Department Clerk  
receipt of which is hereby acknowledge.

\_\_\_\_\_  
(Clerk)

\_\_\_\_\_  
(Date)



CERTIFIED MAIL

Mr. John Doran, Manager  
C.F. Industries, Inc.  
P.O. Box 1480  
Bartow, FL 33831

Re: Letter dated September 17, 2004  
Notice of Operating Change-Truck Transfer  
Facility ID No. 1050052

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Based upon the above, the Department does not concur that the Notice of Operating Change is an appropriate method to make this change. Failure to obtain the proper permits and/or revisions prior to implementing this change may result in enforcement action by the Department.

If you have any questions, please call Mr. Jason Waters of my staff at (813) 744-6100 extension 107.

A person whose substantial interests are affected by this letter may petition for an administrative proceeding (hearing) under Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station 35, Tallahassee, Florida, 32399-3000. Petitions filed by the permit applicant or any of the parties listed below must be filed within **21** days of receipt of this notice. A petitioner shall mail a copy of the petition to the applicant at the address indicated

**Paved Road Emissions Estimation - CF Bartow (9/21/04)**

E = PM10 (lb/VMT)	0.0767	Note(1)
k = base emission factor for particle size	0.016	
E = PM (lb/VMT)	0.3931	Note (1)
k = base emission factor for particle size	0.082	
sL = surface silt loading (g/m <sup>2</sup> )	0.14	Note (2)
W = average weight of vehicles (tons), in-out	27	Note (3)
Customer road miles, round-trip	0.4	Note (4)
Material transfer rate, (tph)	130	
Capacity (tons) per truck	23	
Number of vehicles per hour, avg.	5.0	
Hours per year for loadout	8760.0	
Vehicle miles traveled per hour	2.00	
Vehicle miles traveled per year	17520	
PM10 Emission rate (lb/hr)	0.15	Note (5)
PM10 Emission rate (tpy)	0.7	Note (6)
PM Emission rate (lb/hr)	0.79	Note (5)
PM Emission rate (tpy)	3.4	Note (6)

Notes:

- (1)  $E = C5 * \text{POWER}((C6/2), 0.65) * \text{POWER}((C7/3), 1.5)$
- (2) Measured value at cement handling facility with similar truck traffic and roads.
- (3) Average weight when full/empty
- (4) Two-way paved road in plant 0.2 mile.
- (5) Calculation of PM/PM10 = E x VMT, hr
- (6) Calculation of PM/PM10 = E x VMT, yr

## STATEMENT OF BASIS

CF Industries, Inc.  
Bartow Phosphate Complex  
Facility ID No.: 1050052  
Polk County

**PROPOSED Permit No. 1050052-008-AV**  
(Initial Title V Permit No.: 1050052-004-AV)

The initial Title V Air Operation Permit No. 1050052-004-AV, was issued/effective on September 9, 1998 for the CF Industries, Bartow Phosphate Complex. This Title V Air Operation Permit Renewal is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210 and 62-213. The above named permittee is hereby authorized to operate the facility shown on the application and approved drawing(s), plans, and other documents, attached hereto or on file with the permitting authority, in accordance with the terms and conditions of this permit.

This facility consists of one active Sulfuric Acid Plant, two Monoammonium/Diamonium Phosphate (MAP)/DAP Shipping Plants including DAP/MAP Railcar/Truck Unloading and Transfer Operation, one Auxiliary Boiler, and a Molten Sulfur Storage and Handling System. The CAM Rule does not apply to these units. Additionally the facility consists of several process units which were excluded from the renewal by the permittee in accordance with Rule 62-210-300(2)(a)(3)(c), F.A.C., and are not permitted to operate. The units are one Sulfuric Acid Plant (unit 005), one Phosphoric Acid Plant No. 1 (unit 007), one Rock Surge Bin for Phosphoric Acid Plant No. 2 (unit 017), one Phosphoric Acid Clarification Plant (unit 022), one Phosphoric Acid Aging Tank (023), one Phosphoric Acid Storage Tank (unit 024) and one Rock Unloading facility (unit 026).

This renewal application will include changes to the Initial Title V Permit 1050052-004-AV. The renewal incorporates Air Construction Projects 1050052-006-AC and 1050052-009-AC. Project 1050052-006-AC increases the unloading and transfer rate for the DAP/MAP/GTSP Railcar Unloading and Transfer Operation from 80.0 tons per hour to 130.0 tons per hour. Project 1050052-009-AC incorporates truck operations at the DAP/MAP/GTSP Railcar Unloading and Transfer Operation. With the incorporation of Air Construction Permits 1050052-006-AC and 1050052-009-AC, the following changes have been made as follow:

### **a. Table of Contents**

**FROM:** 031 DAP/MAP/GTSP Railcar Unloading and Transfer Operation

**TO:** 031 DAP/MAP/GTSP Railcar/Truck Unloading and Transfer Operation

### **b. Section I, Subsection A, Facility Description**

**FROM:** This facility consists of one sulfuric acid plant, two monoammonium phosphate (MAP)/diammonium phosphate (DAP) shipping plants including DAP/MAP railcar unloading and transfer operation, one auxiliary boiler, and a molten sulfur storage and handling system.

**TO:** This facility consists of one sulfuric acid plant, two monoammonium phosphate (MAP)/diammonium phosphate (DAP) shipping plants including DAP/MAP railcar/truck unloading and transfer operation, one auxiliary boiler, and a molten sulfur storage and handling system.

**c. Section I, Subsection B**

**FROM:** DAP/MAP/GTSP Railcar Unloading and Transfer Operation

**TO:** DAP/MAP/GTSP Railcar/Truck Unloading and Transfer Operation

**d. Section II, Facility Wide Conditions**

**FROM: 6.** Reasonable precautions to prevent emissions of unconfined particulate matter at this facility include: only DAP/MAP/GTSP which has been treated with a dust suppressant shall be unloaded and transferred at the DAP/MAP/GTSP Railcar Unloading and Transfer Operation, and watering of plant areas on an as needed basis.

[Rule 62-296.320(4)(c)2., F.A.C.; Air Construction Permit AC53-246837]

**TO: 6.** Reasonable precautions to prevent emissions of unconfined particulate matter at this facility include: only DAP/MAP/GTSP which has been treated with a dust suppressant shall be unloaded and transferred at the DAP/MAP/GTSP Railcar/Truck Unloading and Transfer Operation, and watering of plant areas on an as needed basis.

[Rule 62-296.320(4)(c)2., F.A.C.; Air Construction Permit AC53-246837, Air Construction Permit 1050052-009-AC]

**e. Section III, Subsection D**

**FROM:**

**Subsection D. This section addresses the following emissions unit(s).**

**E.U. ID**

**No.      Brief Description**

-031      DAP/MAP/GTSP Railcar Unloading and Transfer Operation

The Diammonium Phosphate/Monoammonium Phosphate/Granulated Triple Super Phosphate (DAP/MAP/GTSP) Railcar Unloading and Transfer Operation has an unloading and transfer rate of 80.0 tons per hour of DAP/MAP/GTSP. The operation 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 to a conveyor system which conveys the material to a warehouse for storage.

{**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 Unloading and Transfer Operation shall not exceed 80.0 tons per hour.

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

**Emission Limitations and Standards**

**D.2.** All material transferred from the DAP/MAP/GTSP Railcar 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%.

[Rule 62-296.320(4)(a), F.A.C.]

**Test Methods and Procedures**

**D.3.** Each material transfer point associated with the DAP/MAP/GTSP railcar 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)4 and 62-4.070(4), F.A.C.]

**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.]

**Monitoring of Operations**

**D.5.** In order to provide reasonable assurance that the visible emission limitation of Condition D.2 is being met, the permittee shall record the amount and type (identification) of dust suppressant material used daily (daily record log). These records may be based on vendor supplied information.

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

**Recordkeeping and Reporting Requirements**

**D.6.** In order to document compliance with Condition D.1, the permittee shall maintain a daily record of the material unloading and transfer rate during operation and the hours of process operations. 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.]

**D.7.** The following information shall be reported along with each test report:

- a. The DAP/MAP/GTSP material unloading and transfer rate in tons/hour.
- b. The type of material transferred (DAP or MAP).
- c. Documentation that the material transferred was treated with a dust suppressant along with an explanation of the type/kind of dust suppressant applied. These records may be based on vendor supplied information.

Failure to submit the following with each test report may invalidate the test and fail to provide reasonable assurance of compliance.

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

**TO:** -

**Subsection D. This section addresses the following emissions unit(s).**

**E.U. ID**

**No.**

**Brief Description**

-031

DAP/MAP/GTSP Railcar/Truck Unloading and Transfer Operation

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 130.0 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 and from the railcar 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% for the railcar operation. 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 62-296.320(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 unloading and transfer operation shall be tested for visible emissions annually.

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

**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.]

**Monitoring of Operations**

**D.5.** In order to provide reasonable assurance that the visible emission limitation of Condition D.2 is being met, the permittee shall record the amount and type (identification) of dust suppressant material used daily (daily record log). These records may be based on vendor supplied information.

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

**Recordkeeping and Reporting Requirements**

**D.6.** In order to document compliance with Condition D.1, the permittee shall maintain a daily record of the material unloading and transfer rate during operation and the hours of process operations. 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.]

**D.7.** The following information shall be reported along with each test report:

- a. The DAP/MAP/GTSP material unloading and transfer rate in tons/hour.
- b. The type of material transferred (DAP or MAP).
- c. Documentation that the material transferred was treated with a dust suppressant along with an explanation of the type/kind of dust suppressant applied. These records may be based on vendor supplied information.

Failure to submit the following with each test report may invalidate the test and fail to provide reasonable assurance of compliance.

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

Also included in this permit are miscellaneous unregulated/insignificant emissions units and/or activities.

Based on the Title V Air Operation Permit Renewal application received February 28, 2003 and additional information provided by the applicant, this facility is not a major source of hazardous air pollutants (HAPs).



# Department of Environmental Protection Southwest District

Job Bush  
Governor

Division of Air Resource Management  
3804 Coconut Palm Drive  
Tampa, Florida 33619-1352

David B. Struhs  
Secretary

### FACSIMILE TRANSMISSION SHEET

**EU#31**

DATE 2/27/04

TO: Bobby Bell

Department FOEP - Tallahassee

Phone 850-921-9585 Fax 850-922-6979

FROM: Jose' Zornitta

DEP Southwest District Office - Air Program

Phone: (813) 744-6100 (SunCom 512-1042) Ext. \_\_\_\_\_

OPERATOR: \_\_\_\_\_

SUBJECT: C.F. Bartow - Permit No. 1050052-006-AC

Total Number of Pages, Including Cover Page 10

DEP SWD AIR PROGRAM FAX NUMBERS: (813) 744-6458  
SUNCOM 512-1073





# Department of Environmental Protection

Jeb Bush  
Governor

Southwest District  
3804 Coconut Palm Drive  
Tampa, Florida 33619

David B. Struhs  
Secretary

## NOTICE OF PERMIT ISSUANCE

In the Matter of an Application  
for Permit by:

DEP File No.: 1050052-006-AC  
County: Polk

Mr. Paul R. Roberts  
Operations Manager  
CF Industries, Inc.  
P.O. Box 1480  
Bartow, FL 33831

Enclosed is Permit Number 1050052-006-AC to increase the DAP/MAP/GTSP railcar unloading/transfer rate from 80 to 130 TPH at the Bartow Phosphate Complex located at Bonnie Mine Road, West of Bartow, Polk County, issued pursuant to Section 403.087, 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, 3900 Commonwealth Boulevard, Mail Station 35, 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 Tampa, Florida.

Sincerely,

Ann Quillian, P.E.  
Air Permit Engineer

cc: John B. Koogler, Ph.D., P.E., Koogler & Associates

RECEIVED

FEB 27 2004

BUREAU OF AIR REGULATION

[electronic file 1050052006nop.doc]

Page 1 of 2

"More Protection, Less Process"

Printed on recycled paper.

CF Industries, Inc.  
1050052-006-AC

Page 2 of 2

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this NOTICE OF PERMIT ISSUANCE and all copies were sent by regular mail before the close of business on FEB 19 2002 to the listed persons, unless otherwise noted.

Clerk Stamp

FILING AND ACKNOWLEDGEMENT FILED,  
on this date, pursuant to Section 120.52(7), Florida  
Statutes, with the designated Department Clerk,  
receipt of which is hereby acknowledged.

 FEB 19 2002  
(Clerk) (Date)



Jeb Bush  
Governor

# Department of Environmental Protection

Southwest District  
3804 Coconut Palm Drive  
Tampa, Florida 33619

David B. Struhs  
Secretary

**PERMITTEE:**

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

**Permit No.:** 1050052-006-AC

**County:** Polk

**Effective Date:** February 19, 2002

**Expiration Date:** February 1, 2004

**Project:** Increase Hourly Railcar  
Unloading and Transfer Rate

This 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 to increase the unloading and transfer rate from 80.0 tons per hour to 130.0 tons per hour.** This operation 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.

Location: 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.: 1050052-004-AV

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

PERMITTEE:  
CF Industries, Inc.  
Page 2 of 4

Permit No.: 1050052-006-AC  
Project: Increase Hourly Railcar  
Unloading and Transfer Rate

**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.  
[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 unloading and transfer rate shall not exceed 130.0 tons per hour (daily average) and 700,800 tons 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 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 watering of plant and unpaved areas as needed.  
[Rule 62-296.320(4)(c), F.A.C.]
8. As an indicator that the dust suppressant is adequately controlling the unconfined particulate emissions, visible emissions from each material transfer point shall not exceed an opacity of 5%. If the said value is exceeded it shall not be considered a violation in of itself, but an indicator that additional controls may be required.  
[Rule 62-4.070, F.A.C.; Air Construction Permit Application dated October 22, 2001]

PERMITTEE:  
CF Industries, Inc.  
Page 3 of 4

Permit No.: 1050052-006-AC  
Project: Increase Hourly Railcar  
Unloading and Transfer Rate

9. Monitoring of Operations. In order to provide reasonable assurance that the visible emissions limitation of Specific Condition 8 is being met, the permittee shall record the amount and type (identification) of dust suppressant material used daily (daily record log). These records may be based on vendor supplied information.

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

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 unloading and transfer operation shall be tested for visible emissions within 30 days of achieving the maximum railcar 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. Compliance with the visible emission limitation of Specific Condition 8 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. Each visible emissions test shall be conducted by a certified observer and be a minimum of 30 minutes in duration. 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.]

PERMITTEE:  
CF Industries, Inc.  
Page 4 of 4

Permit No.: 1050052-006-AC  
Project: Increase Hourly Railcar  
Unloading and Transfer Rate

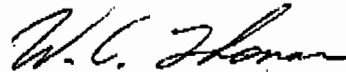
15. The permittee shall notify the Air Compliance Section of the Southwest District Office of the Department at least 15 days prior to the date on which each compliance test is to begin of the date, time, and place of each such test, and the test contact person who will be responsible for coordinating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

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

16. Operation Permit Application. An application for an operating permit (DEP Form 62-210.900(1)) shall be submitted to the Southwest District Office of the Department within 45 days of completed construction or at least 180 days prior to the expiration date of this construction permit, whichever occurs first. Included in the operating permit application should be copies of at least one month of records as required in Specific Conditions 9 and 10.

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

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL PROTECTION



---

W.C. Thomas, P.E.  
District Air Program Administrator  
Southwest District

## ATTACHMENT - GENERAL CONDITIONS

1. The terms, conditions, requirements, limitations and restrictions set forth in this permit, are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.141, 403.727, or 403.859 through 403.861, Florida Statutes (F.S.). The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.
2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.
3. As provided in subsections 403.087(6) and 403.722(5), F.S., the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state, or local laws or regulations. This permit is not a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in this permit.
4. Not applicable to Air Permits.
5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.
6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed and used by the permittee to achieve compliance with the conditions of this permit, are required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.
7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at reasonable times, access to the premises where the permitted activity is located or conducted to:
  - a. Have access to and copy any records that must be kept under conditions of the permit;

## GENERAL CONDITIONS:

b. Inspect the facility, equipment, practices, or operations regulated or required under this permit; and

c. Sample or monitor any substances or parameters at any location reasonable necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:

a. A description of and cause of noncompliance; and

b. The period of noncompliance, including dates and times; or, if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance. The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by Section 403.111 and 403.73, F.S. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance; provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.

11. This permit is transferable only upon Department approval in accordance with Rule 62-4.120 and 62-730.300 F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.

12. This permit or a copy thereof shall be kept at the work site of the permitted activity.



## GENERAL CONDITIONS:

13. This permit also constitutes:

- ( ) Determination of Best Available Control Technology (BACT)
- ( ) Determination of Prevention of Significant Deterioration (PSD)
- ( ) Compliance with New Source Performance Standards (NSPS)

14. The permittee shall comply with the following:

a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.

b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.

c. Records of monitoring information shall include:

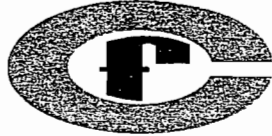
1. the date, exact place, and time of sampling or measurements;
2. the person responsible for performing the sampling or measurements;
3. the dates analyses were performed;
4. the person responsible for performing the analyses;
5. the analytical techniques or methods used;
6. the results of such analyses.

15. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware the relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

16. Not applicable to Air Permits.

17. Not applicable to Air Permits.

P.O. Drawer L.  
Plant City, Florida 33564-9007  
Telephone: 813/782-1591  
Fax: 813/715-0851



# CF Industries, Inc.

Phosphate Operations

January 29, 2004

Mr. Errin Pichard, P.E., Administrator  
Emissions Monitoring Section  
Bureau of Air Monitoring and Mobile Sources  
Florida Department of Environmental Protection  
2600 Blair Stone Road, MS-5505  
Tallahassee, FL 32399-2400

Re: Proposed Alternative Monitoring Plan; Pichard E-mail Letter of January 13, 2004.

Dear Mr. Pichard:

CF Industries, Inc., looks forward to achieving a mutually acceptable conclusion with the Department on the alternative monitoring plan and related issues.

Regarding the issue of monitoring costs relative to expected environmental benefits, such considerations are an essential feature of the NESHAP program. In fact, a court recently held that an aspect of a NESHAP rule other than the actual emissions limits – in that case a compliance schedule – cannot “impose costly obligations on regulated entities without regard to the Clean Air Act’s purpose.” In the case of Chemical Manufacturers Assoc. v. EPA, 217 F.3d 861 (D.C. Cir. 2000), EPA promulgated MACT standards that included a bifurcated compliance schedule. Sources intending to install the necessary pollution controls had three years to do so, whereas sources planning to cease the regulated activity were afforded two years (this was referred to as the “early cessation” provision). The court determined that the early cessation provision would not reduce the amount of hazardous air pollutant emissions, and therefore held that EPA’s action in imposing costly obligations on regulated entities without producing an environmental benefit was unreasonable. Chemical Manufacturers expressly required that burdens imposed by EPA be related to environmental benefits, and indicated that the application of this concept applies not only to emission standards but also to associated compliance schedules. Similarly, EPA’s expensive Subparts AA and BB monitoring requirements should also have ascertainable environmental benefits.

CF’s point is that, if the rule applies, alternative monitoring is justified in part because subparts AA and BB will otherwise impose additional costly monitoring, record-

Errin Pichard, P.E., Administrator

January 29, 2004

Page 2

keeping, and reporting requirements on the phosphoric acid and fertilizer manufacturing lines, which release only small amounts of HF emissions (less than 10 pounds per day from all point sources combined). By any reasonable metric, the environmental benefits associated with the more intensive monitoring and other requirements will be negligible. Moreover, pervasive monitoring of operational parameters associated with these process lines already is required under other existing regulations and the Title V permit. In sum, the lack of a correlation between the costs of monitoring and discernible environmental benefits supports the approval of alternative requirements as proposed by CF Industries.

Regarding the suggestion in your e-mail that CF declare itself a major source of HAPs as a pre-requisite to moving ahead on the alternative monitoring issue, CF presently is engaged in good faith negotiations with the Department to develop a Settlement Stipulation that will entail additional testing and analysis to resolve the major source issue. A feature of the current draft of that Settlement Stipulation, as proposed by CF, is that it will include as an attachment an alternative monitoring plan that will be applicable in the event that additional testing finds CF's phosphate complex to be a major source of HAPs. This is an important aspect of the settlement process to CF, and therefore we would appreciate the opportunity to proactively resolve the remaining alternative monitoring plan issues. In the interest of furthering that process, CF will shortly provide, under separate cover, the information items requested in your e-mail letter.

On a related matter, CF has communicated with the Department with regard to its intention, in the near future, to seek permit approval to increase the sulfuric acid production rate at the Plant City Phosphate Complex. In that respect CF has been advised that it is the Department's intention to include the HF MACT regulations as applicable requirements in the construction permit approval associated with that production rate increase. CF offers two comments with respect to that possibility.

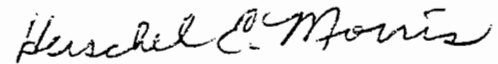
First and foremost, we believe that it is not necessary or appropriate to address the HF MACT issue in a construction permit modification addressing an unrelated production rate increase. The HF MACT applicability issue is being addressed in good faith in the development of a Settlement Stipulation relating to the Title V permit, based on what we have understood to be mutual concurrence amongst CF and the Department that it is preferable to resolve the issue on the basis of additional and more reliable data. This logical and even-handed approach would be short-circuited by including the HF MACT rule as an applicable requirement in another permit. We hope that the Department will not withdraw from its ongoing effort with CF to develop a basis for resolving the HF MACT issue based on good science.

Second, in the event that DEP perceives that the production rate permit must contain at least an acknowledgment of the HF MACT regulations, CF requests that it simply identify the regulation and state, in a footnote or otherwise, that applicability is being determined via additional testing.

Errin Pichard, P.E., Administrator  
January 29, 2004  
Page 3

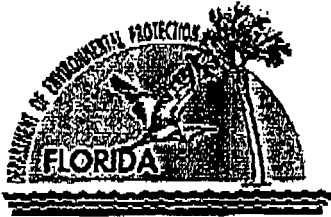
Again, we appreciate the Department's courtesy and cooperation on these matters.

Very truly yours,



Herschel E. Morris  
Vice President  
Phosphate Operations and  
General Manager

cc: Michael Cooke, DARM  
Trina Vielhauer, DARM  
Al Linero, DARM  
Jim Pennington, DARM  
Cindy Phillips, DARM  
Jerry Kissel, Southwest District  
Jerry Campbell, EPCHC  
J. S. Alves, HGS  
Jim Sampson, CF



Jeb Bush  
Governor

# Department of Environmental Protection

Southwest District  
3804 Coconut Palm Drive  
Tampa, Florida 33619-1352

Colleen M. Castille  
Secretary

## FACSIMILE TRANSMISSION SHEET

DATE 6/17/04

TO: Bobby Bull  
Department \_\_\_\_\_  
Phone \_\_\_\_\_ Fax \_\_\_\_\_

FROM: Jason Waters  
DEP Southwest District Office – Air Program  
Phone: (813) 744-6100 (SunCom 512-1042) Ext. 107

OPERATOR: JW

SUBJECT: See attached  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Total Number of Pages, Including Cover Page: 14

DEP SWD AIR PROGRAM FAX NUMBERS: (813) 744-6458  
(SunCom) 512-1073



4014 NW THIRTEENTH STREET  
GAINESVILLE, FLORIDA 32609  
352/377-5822 ■ FAX/377-7158

KA 344-94-02

April 9, 1998

Mr. P. Roger Cawkwell  
Florida Department of  
Environmental Protection  
Southwest District Office  
3804 Coconut Palm Drive  
Tampa, FL 33619-8318

**RECEIVED**  
APR 13 1998

Department of Environmental Protection  
SOUTHWEST DISTRICT  
BY \_\_\_\_\_

Subject: Polk County-AP  
CF Industries, Inc.  
Bartow Facility  
Additional Information  
File No. 1050052-004-AV

Dear Mr. Cawkwell:

This is a follow up to your telephone conversation with Pradeep Raval last month requesting additional information on the existing molten sulfur system at CF's Bartow facility.

The requested information, in a format compatible with the Title V permit format, is provided in Attachment 1.

If you have any questions, please call Pradeep Raval or me.

Very truly yours,

KOGLER & ASSOCIATES

John B. Koogler, Ph.D., P.E.

JBK:par  
Encl.

c: C. Kovach, CF Bartow

ATTACHMENT 1

CF BARTOW - MOLTEN SULFUR SYSTEM

This section addresses the following components of the molten sulfur system emissions unit:

ID      BRIEF DESCRIPTION

1. Rail/Truck Unloading Pit
2. North Storage Tank
3. South Storage Tank

The existing molten sulfur storage and handling system consists of a rail/truck unloading pit with a 150 ton capacity; a north storage tank with a 500 ton capacity; a south storage tank with a 1500 ton capacity; and, all of the associated transfer pumps and piping. Although the molten sulfur system could accommodate the sulfur requirements of Sulfuric Acid Plants Nos. 4, 5 and 6, the No. 4 Plant has been demolished. Thus the current combined sulfur throughput (feed rate), for Nos. 5 and 6 Plants would be about 340 tons per day and about 306,000 tons per year. The portion of the molten sulfur system located next to Sulfuric Acid Plant No. 7 has been shut down since 1982.

Molten sulfur is currently unloaded from trucks into the below-grade Rail/Truck Unloading Pit. Up to three trucks can unload at a time. Although not presently in use, the rail car unloading station can unload five rail cars at a time. The sulfur is pumped from the pit to the storage tanks. The molten sulfur is then pumped from the storage tanks to the sulfuric acid plants. Steam is used to keep the sulfur in liquid state. A plot plan and process flow diagram are enclosed.

This emissions unit is regulated under Rule 62-296.320, FAC, General Pollutant Emissions Limiting Standards; and, Rule 62-296.411, FAC, Sulfur Storage and Handling Facilities.

The estimated emissions from the emissions unit for PSD inventory purposes, based on the PSD inventory information of a sulfur system of similar capacity, are as follows:

I.D.	Estimated Pollutant Emissions (tons per year)			
	PM/PM10	SO2	TRS/H2S	VOC
Rail/Truck Unloading Pit	0.5	0.5	0.3	0.4
North Storage Tank	0.5	0.5	0.3	0.4
South Storage Tank	0.6	0.6	0.4	0.4



**KOOGLER & ASSOCIATES****ENVIRONMENTAL SERVICES**4014 NW THIRTEENTH STREET  
GAINESVILLE, FLORIDA 32609  
352/377-5822 • FAX/377-7158

KA 344-94-02

February 24, 1998

RECEIVED  
FEB 27 1998  
D E PMr. P. Roger Cawkwell  
Florida Department of  
Environmental Protection  
Southwest District Office  
3804 Coconut Palm Drive  
Tampa, FL 33619-8318Subject: Polk County-AP  
CF Industries, Inc. (Bartow)  
Additional Information for  
Title V Permit Application  
File No. 1050052-004-AV

Dear Mr. Cawkwell:

This is in response to your letter dated December 5, 1997 requesting additional information on the above referenced application. The numerical sequence of the responses follows that of the items in your letter. The associated certifications for this submittal are provided in Attachment A.

**FACILITY INFORMATION****RESPONSE 1:**

Attachments 3, and 14 through 17 are addressed in Attachment B, in a manner consistent with recent discussions with FDEP staff.

**RESPONSE 2:**

The information requested is identical to the information contained in the FDEP permit files, except for the Fugitive Emissions Identification Document (addressed in RESPONSE 11).

**EMISSIONS UNIT INFORMATION****RESPONSE 3:**

The information requested is identical to the information contained in the FDEP permit files.

**RESPONSE 4:**

CF recognizes that unless the units are restarted, the permits for the shutdown emissions units will be valid only up to a period of 10 years from the date of shutdown. CF also recognizes that air construction



Mr. P. Roger Cawkwell  
 Florida Department of  
 Environmental Protection

February 24, 1998  
 Page 2

permits will be required prior to re-start of emissions units which have expired air permits.

While most of the information contained in Table 2 of FDEP's letter is accurate, please note the following updates:

<u>Emissions Unit</u>	<u>Comment</u>
002, Fertilizer Shipping Unit No. 1	Reactivated 12-16-91
008, Phosphoric Acid Plant No. 2	Shutdown 11-22-82
018, Rock Surge Bin For PAP No. 3	Shutdown 12-06-82

RESPONSE 5:

For the permitted units Nos. 007, 022, 023 and 024, the facility fluorides allocations in the Title V permit application (corresponding to the information in Table 3 dated 05-09-94 of FDEP's letter), are valid. The remaining units referred to in Table 3 are inactive.

DAP PLANTS

RESPONSE 6:

Emissions estimates for the four DAP plants are not provided as the units have no current valid permits. Should CF choose to reactivate the units, the requested information will be provided in a construction permit application.

SURGE BIN FOR PAP #3

RESPONSE 7:

The most recent air operation permit for the rock surge bin is presented in Attachment C.

BOILER No.1

RESPONSE 8:

All the requested calculations are presented in Attachment D.

CLAY SILO WITH BAGHOUSE

RESPONSE 9:

This unit is inactive. Should CF choose to reactivate the unit a

Mr. P. Roger Cawkwell  
Florida Department of  
Environmental Protection

February 24, 1998  
Page 3

construction permit application will be submitted.

#### MOLTEN SULFUR SYSTEM

##### RESPONSE 10:

This unit had traditionally been considered part of the sulfuric acid plant. At CF Bartow, it had not been permitted individually in the late 1980s when most other sulfur systems at phosphate operations were permitted by FDEP, only because the unit was not in operation at that time. CF has included the information on the unit in the Title V application in order to establish appropriate federally enforceable conditions. A construction permit application for the unit, under these circumstances, should not be necessary.

#### UNREGULATED EMISSIONS UNITS & FUGITIVE EMISSIONS INFORMATION

##### RESPONSE 11:

Additional information regarding unregulated units and facility wide fugitive emissions is presented in Attachment E.

#### PHOSPHOGYPSUM SYSTEM INFORMATION

##### RESPONSE 12:

The requested information is provided in Attachment E.

#### RESPONSIBLE OFFICIAL AND PROFESSIONAL ENGINEER CERTIFICATION STATEMENT

The requested certifications are included in Attachment A.

If you have any further questions, please call Pradeep Raval or me.

Very truly yours,

KOGLER & ASSOCIATES

  
John B. Koogler, Ph.D., P.E.

JBK.par  
encl.

c: C. Kovach, CF Bartow

**ENVIRONMENTAL SERVICES**

4014 NW THIRTEENTH STREET  
GAINESVILLE, FLORIDA 32609  
352/377-5822 • FAX/377-7158

KA 344-94-02

January 5, 1998

RECEIVED  
JAN 07 1998  
D E P

Mr. P. Roger Cawkwell  
Florida Department of  
Environmental Protection  
Southwest District Office  
3804 Coconut Palm Drive  
Tampa, FL 33619-8318

Subject: Polk County-AP  
CF Industries, Inc.  
Bartow Facility  
Additional Time to Respond  
File No. 1050052-004-AV

Dear Mr. Cawkwell:

This is a follow up to your telephone conversation with Pradeep Raval around December 5, 1997, regarding the Title V permit application for CF's Bartow facility.

As indicated during your conversation, we expect to provide the information requested in your letter dated 12-05-97 by March 5, 1998. The additional time to respond is needed to gather the pertinent information.

If you have any questions, please call Pradeep Raval or me.

Very truly yours,

KOGLER & ASSOCIATES

John B. Koogler, Ph.D., P.E.

JBK.par

c: C. Kovach, CF Bartow



# Department of Environmental Protection

Lawton Chiles  
Governor

Southwest District  
3804 Coconut Palm Drive  
Tampa, Florida 33619

Virginia B. Wetherell  
Secretary

December 5, 1997

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

David M. Miller  
Manager  
C.F. Industries, Inc.  
P.O. Box 1480  
Bartow, FL 33831

Re: Request for Additional Information Regarding Initial Title V Permit Application  
File No. 1050052-004-AV  
Bonnie Mine Rd, West of Bartow

Dear Mr. Miller:

Your initial Title V permit application for Bonnie Mine Rd, West of Bartow facility was "timely and complete" for purposes of the initial Title V application submission (see Rule 62-213.420(1)(a)1. and (b)2., F.A.C.).

However, in order to continue processing your application, the Department will need the below additional information pursuant to Rule 62-213.420(1)(b)3., F.A.C., and Rule 62-4.070(1), F.A.C. The additional information requested is organized by topic.

Should your response to any of the below items require new calculations, please submit the new calculations, assumptions, reference material and appropriate revised pages of the application form.

### Facility Supplemental Information

1. Please submit Attachments 3, and 14 through 17 that were referenced but not submitted with the Title V application received on June 13, 1996. Since we do not know the nature of these Attachments, we can not judge whether they are required.
2. Please submit the Process Flow Diagram, the Facility Plot Plan, the Area Map, the Precautions to Prevent Emissions of Unconfined Particulate Matter Plan, and the Fugitive Emissions Identification Document for the facility. The process flow diagram should show any

*"Protect, Conserve and Manage Florida's Environment and Natural Resources"*

Mr. Miller  
December 5, 1997  
Page 2 of 7

proposed new or modified emissions units and all existing emissions units at your facility. Indicate the operating rate of each emissions unit, and identify the pathways by which raw materials and products flow from unit to unit. Alternatively, you may make a statement that the information requested above is identical to the information contained in the prior applications that we have on file.

### Emissions Unit Supplemental Information

3. Waivers have been requested for supplemental information for all emission sources at the Bonnie Mine Rd, West of Bartow facility. Table 1 is a summary of those requests by Emissions Unit ID Number. In addition, the attachments not included for each emission unit and other information needed by emission unit is included in this table. Please submit the process flow diagram; fuel analysis or specification; detailed description of control equipment; and description of stack sampling facilities. Alternatively, you may make a statement that the information requested above regarding the emission units, is identical to the information contained in the air operating permits and the permit applications we have on file.

E.U. ID Nos. 1, 2, 5, 6, 9, 11, 12, 13, 14, 15, 17, 19, and 20 of 23 (001 -- East Phosphate Rock Unloading, 002 -- No. 1 MAP/DAP Shipping Unit Scrubber, 007 -- Phosphoric Acid Plant No. 1, 008 -- Phosphoric Acid, 012 -- DAP Plant No. 2, 014 -- Sulfuric Acid Plant No. 7, 016 -- Rock Surge Bin for PAP #1, 017 -- Rock Surge Bin for PAP #2, 018 -- Rock Surge Bin for PAP #3, 020 -- DAP Plant No. 4, 022 + 023 + 024 -- Phosphoric Acid Clarification & Storage Area, 026 -- West Rock Unloading, and 029 Acid Cleanup Scrubber)

4. Have the emissions units listed in Table 2 been placed in operation since the shut down date? A significant number of these emission units have expired permits. Does CF Industries intend to submit construction permit applications for those sources that have not operated in the last 10 years (prior to December 1987)? Please explain. For those sources that have not operated within the last five years, the permits for those sources will expire 10 years from the date of shutdown.

Points 4, 5, and 9 of 11 (Emission Units 009, 010, and 019)

5. The fluoride emissions allocation for these sources is listed in Table 3. There appears to be some discrepancy between the fluoride emissions allocation of 5/9/94 and the values listed in the Title V application. The fluoride emissions for DAP Plant #1 are stated in the Title V application as 5.2 lbs/hr and the fluoride emissions allocation of 5/9/94 for DAP Plant #1 is 6.20 lbs/hr. Similarly, fluoride emissions for the DAP Plant #3 are stated in the Title V application as 11.4 lbs/hr and the fluoride emissions allocation of 5/9/94 for DAP Plant #3 is 4.39 lbs/hr. Please provide the current fluoride emissions allocation for the facility.

Mr. Miller  
December 5, 1997  
Page 3 of 7

E.U. ID Nos. 8, 9, 10, and 15 of 23 ( 011 -- DAP Plant No. 1, DAP Plant No. 2, DAP Plant No. 3 and DAP Plant No. 4)

6. Please provide calculations for the estimation of CO and NO<sub>x</sub> emissions from the Phosphate Rock Dryers.

E.U. ID No. 14 of 23 (018 -- Rock Surge Bin for PAP #3)

7. Please provide a copy of the most recent air operating permit for the Rock Surge Bin for Phosphoric Acid Plant #3.

E.U. ID No. 16 of 23 (021 -- Boiler No. 1)

8. Please provide calculations for the estimation of PM/PM<sub>10</sub>, CO and NO<sub>x</sub> emissions from the No. 1 Boiler.

(030 -- Clay Storage Silo w/Baghouse)

9. The Title V application did not address the Clay Storage Silo. The most recent air operating permit for this emission unit expired 11/19/90. Is this source inactive? Please explain.

E.U. ID No. 22 of 23 ( No Corresponding I.D. -- Molten Sulfur Storage & Handling)

10. The Molten Sulfur Storage & Handling does not have a valid operating permit? Has a construction permit been issued for this source? Please explain.

E.U. ID No. 23 of 23 (xxx -- Unregulated Emissions Unit)

11. The portion of the application referring to fugitive emissions and unregulated units were essentially left blank. Please verify that this is correct or provide further data.

Phosphogypsum Stack

12. The phosphogypsum stack at your facility is subject to 40 CFR 61 Subpart A and R (National Emission Standards for Hazardous Air Pollutants -- General Provisions and National Emission Standards for Radon Emissions from Phosphogypsum Stacks.). The phosphogypsum stack, emitting Radon 222 is considered an unregulated emissions unit for Title V permitting purposes. Please provide the following information from the Air Permit Application form with regard to the phosphogypsum stack:

- a. Subsection B. General Emissions Unit Information
- b. Subsection F. Segment Information
- c. Subsection G. Emissions Unit Pollutants

Mr. Miller  
December 5, 1997  
Page 4 of 7

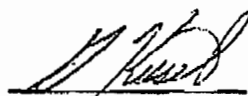
**Best Available Copy**

Responsible Official (R.O.) Certification Statement: Rule 62-213.420, F.A.C. requires that all Title V permit applications must be certified by a responsible official. Due to the nature of the information requested above, your response should be certified by the responsible official. Please complete and submit a new R.O. certification statement page from the new long application form, DEP Form No. 62-210.900, effective March 21, 1996 (enclosed).

Professional Engineer (P.E.) Certification Statement: 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. As a result, at a minimum your response to Item number(s) 8, 9, and 10 above should be certified by a professional engineer registered in the State of Florida. Please complete and submit a new P.E. certification statement page from the new long application form, DEP Form No. 62-210.900, effective March 21, 1996 (enclosed).

Please respond within 30 days (thirty) days of receipt of this letter. If you have any questions or anticipate any problems in completing a response within 30 days, please call Roger Cawkwell, P.E., at 813-744-6100, ext.117.

Sincerely,



G. J. Kissel, P.E.  
Air Permitting Supervisor  
Southwest District

P 124 378 329

copy to:  
John B. Koogler, Ph.D., P.E.  
Koogler & Associates  
4014 NW 13th Street  
Gainesville, FL 32609

US Postal Service  
**Receipt for Certified Mail**  
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Mr. David M. Miller, Manager  
CF Industries, Inc.  
P.O. Box 1480  
Bartow, FL 33831

PS Form 3800, April 1995	Return Receipt Showing to Whom & Date Delivered	
	Return Receipt Showing to Whom, Date, & Addressee's Address	
	TOTAL Postage & Fees	\$
	Postmark or Date	

Mr. Miller  
 December 5, 1997  
 Page 5 of 7

**Table 1. Summary of Waivers Requested, Attachments Not Included, and Other Information by Emissions Unit**

Emissions Unit ID	Description of E.U.	Waiver Requested <sup>1</sup>	Attachments Not Included	Other Information
	Facility Wide	A1, A2, A3, A4, A5	3, 14, 15, 16	Major source for NOx and CO; no NOx and CO emissions were estimated
001	East Phosphate Rock Unloading	1, 3, 4	15, 16	Source has been shut down since 6/28/85. (Does not have a valid operating permit)
002	No. 1 MAP/DAP Shipping Unit Scrubber	1, 3, 4	14, 15, 16	Facility is shut down. (Shut down since 08/30/89?)
005	Sulfuric Acid Plant No. 5	1, 3, 4	14, 15, 16, 17	
006	Sulfuric Acid Plant No. 6	1, 3, 4	14, 15, 16, 17	
007	Phosphoric Acid Plant No. 1	1, 3, 4	15, 16	Plant not currently operating. (Shut down since 05/30/89?)
008	Phosphoric Acid Plant No. 2	1, 3, 4	15, 16	Plant not currently operating. (Shutdown since 1989)
009	Phosphoric Acid Plant No. 3	1, 3, 4	15, 16	
011	DAP Plant No. 1	1, 2, 3, 4	14, 15, 16	Fluoride emissions based on 5/9/94 allocation are 6.20 lbs/hr vs. 5.2 lb/hr as stated in the Title V application.
012	DAP Plant No. 2	1, 2, 3, 4	14, 15, 16	The No. 2 DAP Plant last operated on December 10, 1982 and the permit expired on December 12, 1992.
013	DAP Plant No. 3	1, 2, 3, 4	14, 15, 16	Fluoride emissions based on 5/9/94 allocation are 4.39 lbs/hr vs. 11.4 lbs/hr as stated in the Title V application.
014	Sulfuric Acid Plant No. 7	1, 3, 4	14, 15, 16, 17	The No. 7 Sulfuric Acid Plant has been inactive since 11/12/82 and the permit expired on 11/12/92.
016	Rock Surge Bin for PAP #1	1, 3, 4	15, 16	The Rock Surge Bin for PAP #1 has been shut down since 7/5/85.
017	Rock Surge Bin for PAP #2	1, 3, 4	15, 16	The Rock Surge Bin for PAP #2 has been shut down since 5/29/89.
018	Rock Surge Bin for PAP #3	1, 3, 4	15, 16	Permit not in file. The Rock Surge Bin for PAP #3 has been shut down since 1989.
020	DAP Plant No. 4	1, 2, 3, 4	14, 15, 16	The No. 4 DAP Plant has been shut down since 10/12/82.



Mr. Miller  
 December 5, 1997  
 Page 6 of 7

**Table 1. Summary of Waivers Requested, Attachments Not Included, and Other Information by Emissions Unit (Continued)**

Emissions Unit ID	Description of E.U.	Waiver Requested <sup>1</sup>	Attachments Not Included	Other Information
020	DAP Plant No. 4	1, 2, 3, 4	14, 15, 16	The No. 4 DAP Plant has been shut down since 10/12/82.
021	Boiler No. 1	1, 2, 4	14, 15, 16	NO <sub>x</sub> and CO emissions were not calculated
022 + 023 + 024	Phosphoric Acid Clarification & Storage Area	1, 3, 4	15, 16	Sources 022 and 024 have been shut down since 6/9/89. Source 023 has been shut down since 6/2/89.
025	No. 2 MAP/DAP Shipping Unit	1, 3, 4	14, 15, 16	
026	West Rock Unloading	1, 3, 4	15, 16	The West Phosphate Rock Unloading System has been shut down since 5/26/89.
029	Acid Cleanup Scrubber	1, 3, 4	15, 16	The Uranium Recovery Acid Cleanup has been shut down since July 8, 1985.
030	Clay Storage Silo w/Baghouse			No active permit. The most recent operating permit expired 11/19/90.
031	DAP/MAP Railcar Unloading and Transfer Operation	1	15, 16	
xxx	Molten Sulfur Storage & Handling	1	15, 16	No permit for this source.
xxx	Unregulated Emission Units & Facility-Wide Fugitive Emissions			No description or other information such as activity data or emission estimates

<sup>1</sup>A1--Area Map Showing Facility Location  
 A2--Facility Plot Plan  
 A3--Process Flow Diagram  
 A4--Precautions to Prevent Emissions of Unconfined PM  
 A5--Fugitive Emissions Identification  
 1--Process Flow Diagram  
 2--Fuel Analysis or Specification  
 3--Detailed Description of Control Equipment  
 4--Description of Stack Sampling Facilities

Mr. Miller  
December 5, 1997  
Page 7 of 7

**Table 2. Shutdown Date of Emission Units**

Emission Unit ID	Description of E.U.	Date of Shutdown
001	East Phosphate Rock Unloading	06/28/95
002	No. 1 MAP/DAP Shipping Unit Scrubber	08/30/89
007	Phosphoric Acid Plant No. 1	05/30/89
008	Phosphoric Acid Plant No. 2	1989
012	DAP Plant No. 2	12/10/82
014	Sulfuric Acid Plant No. 7	11/12/82
016	Rock Surge Bin for PAP #1	07/05/85
017	Rock Surge Bin for PAP #2	05/29/89
018	Rock Surge Bin for PAP #3	1989
020	DAP Plant No. 4	10/12/82
022	Phos. Acid Clarification Tank	06/09/89
023	Phos. Acid Aging Tank	06/02/89
024	Phos. Acid Storage Tank	06/09/89
026	West Rock Unloading	05/26/89
029	Acid Cleanup Scrubber	07/08/85

**Table 3. Fluoride Emissions Allocation**

Emission Unit ID	Description of E.U.	08/26/87 Fluoride Emissions Allocation (lbs/hour)	05/09/94 Fluoride Emissions Allocation (lbs/hour)
007	PAP-1	1.5	0.40
008	PAP-2	1.5	
009	PAP-3	1.5	
023	Phos. Acid Aging Tank	1.5	1.22
022	Phos. Acid Clarification Tank	0.8	0.72
024	Phos. Acid Storage Tank	0.8	0.37
011	DAP-1	5.2	6.20
012	DAP-2	11.9	
013	DAP-3	11.4	4.39
020	DAP-4	1.9	
	Total	38.0	13.3

**Bull, Robert**

**From:** Waters, Jason  
**Sent:** Thursday, June 10, 2004 2:57 PM  
**To:** Bull, Robert  
**Subject:** RE:

Bobby,

I think the info I sent contained the RACT for one of the shipping units. I'll try and find it for the Molten Sulfur and Boiler.

Jason

-----Original Message-----

**From:** Bull, Robert  
**Sent:** Thursday, June 10, 2004 2:30 PM  
**To:** Waters, Jason  
**Subject:**

Jason,

**Here is the information from the Facility wide conditions that contains the PM limit for the Boiler. There is no BACT number or PSD number that would indicate how these numbers were determined.**

thanks

26. This facility shall not emit more than 9 tons per year of Hydrogen Fluoride or any other Hazardous Air Pollutant. (Per applicant request to avoid MACT Standards.)

27. This facility shall not emit more than 24 tons per year of any combinations of Hazardous Air Pollutants. (Per applicant request to avoid MACT Standards.)

**NOTES to PERMITTEE:**

Based on a modeling study approved by the Department, it was determined that emissions from this facility will not have a significant impact on the Hillsborough County Air Quality Maintenance Area and it is therefore exempt from the PM RACT requirements in accordance with Rule 62-296.700(2)(b), F.A.C. The following emission units have permitted particulate emission limits and are subject to modeling in order to demonstrate to the department that this facility will not have a significant impact on the Air Quality Maintenance Area.

Subsection	E.U. I.D. No.	Description	Particulate Matter (PM) Limit	
			lbs/hr	Tons per year
A	002	No. 1 MAP/DAP/GTSP Shipping Unit	**3	
A	025	No. 2 MAP/DAP/GTSP Shipping Unit	**3	
C	021	Boiler No. 1	0.5 <sup>1</sup>	2.1 <sup>1</sup>
E	032 - 034	Molten Sulfur System		1.6 <sup>2</sup>
Total			0.5**3	

<sup>1</sup>Emission limit based on BACT determination.

<sup>2</sup>Emission estimate for emission inventory and PSD purposes.

<sup>3</sup>The Title V Permit Revision No. 1050052-007-AV replaced the PM allowables of 40.4 lbs per hour for each Nos. 1 and 2

MAP/DAP/GTSP Shipping Units with a 5% opacity limit for the handling of only product which has been treated with a dust suppressant (see Section III, Subsection A of this permit).

Please reference the Permit No., Facility ID No., and appropriate Emissions Unit(s) ID No(s). on all correspondence, test report submittals, applications, etc.

Table 1-1, Summary of Air Pollutant Standards and Terms, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.

Table 2-1, Summary of Compliance Requirements, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.

Permit Renewal - Reference Appendix TV-4, item 5

ARMINV50

POINT: AIRS ID: 1050052 STATUS: A OFFICE: SWD SW: TAMPA  
 SITE NAME: BARTOW PHOSPHATE COMPLEX COUNTY: POLK  
 OWNER/COMP: CF INDUSTRIES, INC.

EU ID *	Stat	Description
002	A	NO. 1 MAP/DAP/GTSP SHIPPING UNIT
006	A	SULFURIC ACID PLANT NO.6
021	A	BOILER NO. 1
025	A	NO. 2 MAP/DAP SHIPPING UNIT
031	A	DAP/MAP/GTSTP RAIL CAR UNLOADING AND TRANSFER OPERATION
032	A	Rail/Truck Unloading Pit -- Molten Sulfur System
033	A	North Storage Tank -- Molten Sulfur System
034	A	South Storage Tank -- Molten Sulfur System
035	A	Phosphogypsum Stack
036	A	Fugitive Emissions
001	I	EAST PHOSPHATE ROCK UNLOADING

ARMINV76

AIRS ID \* 1050052 STATUS: A OFFICE SWD SW: TAMPA  
 OWNER/COMP CF INDUSTRIES, INC. SITE BARTOW PHOSPHATE COMPLEX  
 LOCI/ADR 2501 BONNIE MINE RD  
 EU ID \* 002 NO. 1 MAP/DAP/GTSP SHIPPING UNIT ST A

Year	Oper	Recv Date	Review Date	County	Act	Date Done	Date Due	CS
2002	Y	01/23/2003	02/14/2003	POLK		03/03/2003	09/30/2003	IN
2001	Y	02/11/2002	05/10/2002	POLK		05/10/2002	09/30/2002	IN
2000	Y	02/20/2001	03/06/2001	POLK		03/06/2001	09/30/2001	IN
1999	Y	01/27/2000	02/01/2000	POLK		02/01/2000	09/30/2000	IN
1998	Y	02/26/1999	04/27/1999	POLK		04/27/1999	09/30/1999	IN
1997	Y	01/21/1998	01/27/1998	POLK		01/27/1998	09/30/1998	IN
1996	Y	01/22/1997	05/07/1997	POLK				
1995	Y	03/29/1996	08/07/1996	POLK				
1994	Y	01/19/1995	10/09/1995	POLK				
1993	Y	01/14/1994		POLK				
1992	Y	02/03/1993		POLK				

ARMINV76

AIRS ID \* 1050052 STATUS A OFFICE SWD SW: TAMPA  
 OWNER/COMP CF INDUSTRIES, INC. SITE BARTOW PHOSPHATE COMPLEX  
 LOC/ADR 2501 BONNIE MINE RD  
 EU ID \* 006 SULFURIC ACID PLANT NO.6 ST A

Year	Oper	Recv Date	Review Date	County	Act	Date Done	Date Due	CS
2002	N	01/23/2003	02/14/2003	POLK	->	03/03/2003	09/30/2003	IN
2001	N	02/11/2002	05/10/2002	POLK		05/10/2002	09/30/2002	IN
2000	N	02/20/2001	03/06/2001	POLK		03/06/2001	09/30/2001	IN
1999	Y	01/27/2000	02/01/2000	POLK		02/01/2000	09/30/2000	IN
1998	Y	02/26/1999	04/27/1999	POLK		04/27/1999	09/30/1999	IN
1997	Y	01/21/1998	01/27/1998	POLK		01/27/1998	09/30/1998	IN
1996	Y	01/22/1997	05/07/1997	POLK				
1995	N	03/29/1996	08/07/1996	POLK				
1994	N	01/19/1995	10/09/1995	POLK				
1993	Y	01/14/1994		POLK				
1992	Y	02/03/1993		POLK				

ARMINV76

AIRS ID \* 1050052 STATUS A OFFICE SWD SW: TAMPA  
 OWNER/COMP CF INDUSTRIES, INC. SITE BARTOW PHOSPHATE COMPLEX  
 LOCIADR 2501 BONNIE MINE RD  
 EU ID \* 021 BOILER NO. 1 ST A

Year	Oper	Recv Date	Review Date	County	Act	Date Done	Date Due	CS
2002	N	01/23/2003	02/14/2003	POLK	->	03/03/2003	09/30/2003	IN
2001	N	02/11/2002	05/10/2002	POLK		05/10/2002	09/30/2002	IN
2000	N	02/20/2001	03/06/2001	POLK		03/06/2001	09/30/2001	IN
1999	Y	01/27/2000	02/01/2000	POLK		02/01/2000	09/30/2000	IN
1998	Y	02/26/1999	04/27/1999	POLK		04/27/1999	09/30/1999	IN
1997	Y	01/21/1998	01/27/1998	POLK		01/27/1998	09/30/1998	IN
1996	Y	01/22/1997	05/07/1997	POLK				
1995	Y	03/29/1996	06/07/1996	POLK				
1994	N	01/19/1995	10/09/1995	POLK				
1993	Y	01/14/1994		POLK				
1992	Y	02/03/1993		POLK				



ARMINV76

AIRS ID \* 1050052 STATUS A OFFICE SWD SW: TAMPA  
 OWNER/COMP CF INDUSTRIES, INC. SITE BARTOW PHOSPHATE COMPLEX  
 LOC/ADR 2501 BONNIE MINE RD  
 EU ID \* 025 NO. 2 MAP/DAP SHIPPING UNIT ST A

Year	Oper	Recv Date	Review Date	County	Act	Date Done	Date Due	CS
2002	Y	01/23/2003	02/14/2003	POLK	->	03/03/2003	09/30/2003	IN
2001	Y	02/11/2002	05/10/2002	POLK		05/10/2002	09/30/2002	IN
2000	Y	02/20/2001	03/06/2001	POLK		03/06/2001	09/30/2001	IN
1999	Y	01/27/2000	02/01/2000	POLK		02/01/2000	09/30/2000	IN
1998	Y	02/26/1999	04/27/1999	POLK		04/27/1999	09/30/1999	IN
1997	Y	01/21/1998	01/27/1998	POLK		01/27/1998	09/30/1998	IN
1996	Y	01/22/1997	05/07/1997	POLK				
1995	Y	03/29/1996	08/07/1996	POLK				
1994	Y	01/19/1995	10/09/1995	POLK				
1993	Y	01/14/1994		POLK				
1992	Y	02/03/1993		POLK				

ARMINV76

AIRS ID \* 1050052 STATUS A OFFICE SWD SW: TAMPA  
 OWNER/COMP CF INDUSTRIES, INC. SITE BARTOW PHOSPHATE COMPLEX  
 LOC/ADR 2501 BONNIE MINE RD  
 EU ID \* 031 DAP/MAP/GTSTP RAIL CAR UNLOADING AND TRANSFER OPERATION ST A

Year	Oper	Recv Date	Review Date	County	Act	Date Done	Date Due	CS
2002	Y	01/23/2003	02/14/2003	POLK	-	03/03/2003	09/30/2003	IN
2001	Y	02/11/2002	05/10/2002	POLK		05/10/2002	09/30/2002	IN
2000	Y	02/20/2001	03/06/2001	POLK		03/06/2001	09/30/2001	IN
1999	Y	01/27/2000	02/01/2000	POLK		02/01/2000	09/30/2000	IN
1998	Y	02/26/1999	04/27/1999	POLK		04/27/1999	09/30/1999	IN
1997	Y	01/21/1998	01/27/1998	POLK		01/27/1998	09/30/1998	IN
1996	Y	01/22/1997	05/07/1997	POLK				
1995	Y	03/29/1996	08/07/1996	POLK				
1994	Y	01/19/1995	10/09/1995	POLK				
1993	Y	01/14/1994		POLK				
1992	Y			POLK				











## Emission Unit Report for 1050052 CFI-Bartow

EU ID	EU DESCRIPTION	AIRS DESCRIPTION	EU STATUS	LONG TERM RESERVE SHUTDOWN DATE	PERMANENT SHUTDOWN DATE
1	EAST PHOSPHATE ROCK UNLOADING	EAST PHOSPHATE ROCK UNLOA	I		6/28/1985
2	NO. 1 MAP/DAP/GTSP SHIPPING UNIT	NO. 1 MAP/DAP SHIPPING UN	A		
3	SULFURIC ACID PLT NO.3 - PERMANENTLY SHUTDOWN -	SULFURIC ACID PLT NO.3 -	I		2/15/1990
4	SULFURIC ACID PLT NO.4 - PERMANENTLY SHUTDOWN -	SULFURIC ACID PLT NO.4 -	I		2/15/1990
5	SULFURIC ACID PLANT NO.5	SULFURIC ACID PLT NO.5 DO	I	6/30/1989	6/30/1989
6	SULFURIC ACID PLANT NO.6	SULFURIC ACID PLT NO.6 DO	A	11/24/1999	
7	PHOSPHORIC ACID PLANT NO.1	PHOSPHORIC ACID PLT NO.1	I	5/30/1989	5/30/1989
8	PHOSPHORIC ACID MFG UNIT NO 2	PHOSPHORIC ACID MFG UNIT	I		5/29/1989
9	PHOSPHORIC ACID PLT NO 3.	PHOSPHORIC ACID PLT NO 3.	I		6/28/1985
11	DAP PLT #1-DRYER,SCREENING,COOLER	DAP PLT #1-DRYER,SCREENIN	I	7/8/1985	
12	DAP PLANT NO.2	DAP PLANT NO.2	I		12/10/1982
13	DAP PLANT NO.3	DAP PLANT NO.3	I	7/9/1985	
14	SULFURIC ACID PLT NO 7 DOUBLE CONTACT DOUBLE ABSORPTION	SULFURIC ACID PLT NO 7 DO	I		11/12/1982
15	PHOS ROCK UNLOADER TO SILOS BAGHOUSES	PHOS ROCK UNLOADER TO SIL	I		6/28/1985
16	ROCK SURGE BIN BAGHOUSE FOR PAP #1	ROCK SURGE BIN BAGHOUSE F	I	7/5/1985	
17	PHOSPHORIC ACID PLANT #2 ROCK SURGE BIN	PHOSPHORIC ACID PLANT #2	I		5/29/1989
18	ROCK SURGE BIN BAGHOUSE FOR PAP #3	ROCK SURGE BIN BAGHOUSE F	I		6/12/1982
20	DIAMMONIUM PHOSPHATE PLANT #4	DIAMMONIUM PHOSPHATE PLAN	I		10/12/1982
21	BOILER NO. 1	32 MMBTU/HR AUXILIARY BOI	A		
22	PHOSPHORIC ACID CLARIFICATION TANK	T-3047-40% PHOS ACID CLAR	I	6/9/1989	6/9/1989
23	PHOSPHORIC ACID AGING TANK	40% PHOS ACID AGING TANK	I	6/2/1989	6/2/1989
24	PHOSPHORIC ACID STORAGE TANK	43% PHOS ACID STOR. TANK	I	6/9/1989	6/9/1989
25	NO. 2 MAP/DAP SHIPPING UNIT	NO. 2 MAP/DAP SHIPPING UN	A		
26	WEST PHOSPHATE ROCK UNLOADING SYSTEM	WEST PHOSPHATE ROCK UNLOA	I	5/26/1989	5/26/1989
27	EAST ROCK UNL BAGHOUSE,POINT B	EAST ROCK UNL BAGHOUSE,PO	I		6/28/1985
28	EAST ROCK UNL BAGHOUSE,POINT C	EAST ROCK UNL BAGHOUSE,PO	I		6/28/1985
29	URANIUM RECOVERY ACID CLEANUP SCRUBBER	URANIUM RECOVERY ACID CLE	I	7/6/1985	
30	CLAY STORAGE SILO W/ BAGHOUSE	CLAY STORAGE SILO W/BAGHO	I	7/6/1985	
31	DAP/MAP/GTSP RAILCAR UNLOADING AND TRANSFER OPERATION	DAP/MAP RAILCAR UNLOADING	A		
32	Rail/Truck Unloading Pit -- Molten Sulfur System	RAIL/TRUCK UNLOADING PIT	A		
33	North Storage Tank -- Molten Sulfur System	NORTH STORAGE TANK -- MOL	A		
34	South Storage Tank -- Molten Sulfur System	SOUTH STORAGE TANK -- MOL	A		
35	Phosphogypsum Stack	PHOSPHOGYPSUM STACK	A		
36	Fugitive Emissions	FUGITIVE EMISSIONS	A		

AOR

yes

✓

✓

✓

EU ID	EU COMMENT	MAXIMUM THROUGHPUT RATE	MAXIMUM THROUGHPUT RATE UNIT	MAXIMUM PRODUCTION RATE	MAXIMUM PRODUCTION RATE UNIT	OPERATING CAPACITY COMMENT
1	SOURCE HAS BEEN SHUT DOWN SINCE 6/28/85 10 YEAR PERMIT FROM DATE OF SHUT DOWN. CARRY AS ACTIVE UNTIL PERMIT EXPIRES.	102	TPH UNLOADING			
2		325	TPH SHIPPED			
3	DID NOT OPERATE IN 1986	11	TONP	33	TONM	
4	THIS PLANT DID NOT OPERATE IN 1985 OR 1986					
5		46	TPH	46	TPH	
6		60	TPH 100% H2SO4	60	TPH	
7				33	TON OF P2O5	
8	THIS EQUIPMENT DID NOT OPERATE IN '85 OR '86	33	TPH 100% P2O5			
9	THIS PLANT DID NOT OPERATE IN 1985 OR 1986	33	TPH 100% P2O5			
11	AOR.	198	TPH	38	TPH	
12	THE LAST DATE OF OPERATION WAS DECEMBER 10, 1982. THE OPERATION PERMIT CANNOT BE RENEWED UNLESS DAP #2 IS STARTED.	304	TPH	57	TPH	
13	THE LAST DATE OF OPERATION WAS JULY 9, 1985. CARRY AS ACTIVE UNTIL THE PERMIT EXPIRES. PERMIT CARRIED OVER UNTIL TITLE V PERMITTING ACTION.	292	TPH	54	TPH	
14	THIS PLANT HAS BEEN SHUT DOWN SINCE 1982	83	TPH 100% H2SO4			
15	DID NOT OPERATE IN 1986 PERMIT EXPIRED.	102	TONP	103	TONM	
16	LAST OPERATING DAY WAS 7-5-85, PERMIT ISSUED FOR 10 YEARS FROM DATE OF SHUT DOWN. CARRY AS ACTIVE UNTIL PERMIT DIES. PERMIT EXTENDED UNTIL AFTER TITLE V PERMITTING ACTION.	119	TPH	119	TPH	
17		119	TPH	119	TPH	
18	LAST OPERATING DAY WAS 12-6-82, PERMIT ISSUED FOR 10 YEARS FROM DATE OF SHUT DOWN	60	TPH	60	TPH	
20		401	TPH	75	TPH	
21						
22		57	TPH P2O5	57	TPA P2O5	
23		57	TPH P2O5	57	TPA P2O5	
24		57	TPH P2O5	57	TPA P2O5	
25		325	TPH SHIPPED			
26		204	TPH			
27	FACILITY IS SHUT DOWN					
28	FACILITY IS SHUT DOWN					
29	WAS IMC UNDER NEDS 0160 POINT 04 CARRY AS ACTIVE UNTIL THE CURRENT PERMIT EXPIRES.	136	TPH			
30	WAS IMC UNDER NEDS 0160 POINT 07	15	TPH	15	TPH	
31		130	TPH LOADING			
32		840	TPD MOLTEN S			840 TPD & 306,000 TPY
33		840	TPD MOLTEN S			
34		840	TPD MOLTEN S			
35						
36	UNREGULATED FACILITY-WIDE FUGITIVE EMISSIONS					



**Bull, Robert**

---

**From:** Vielhauer, Trina  
**Sent:** Tuesday, March 02, 2004 2:23 PM  
**To:** Bull, Robert; Phillips, Cindy  
**Subject:** CF Bartow

Bobby & Cindy,

I spoke briefly with Craig Kovach from CF Bartow regarding possible resolution of the phosphate MACT issue for their facility. He indicated they'd sent their response to the RAI today. He indicated that the phosphoric acid plants at their facility have been shut down and non-operational since 1989. They still want the plants listed in their Title V permit but understand that they'd have to get a new construction permit to actually operate them. Would we still need to make the statement they are a major source? [I am not clear on their pond situation] In the event we would just be looking at MACT because of the phos acid, could we modify the IMC language to say something like: prior to resuming operation of the phos acid plants they must obtain a construction permit and the Department will identify the facility as a major source at that time. However, if additional testing.....[rest of IMC language].

We can talk more when you return.

Thx,  
Trina

**Bull, Robert**

**From:** Phillips, Cindy  
**Sent:** Thursday, February 26, 2004 4:00 PM  
**To:** Bull, Robert  
**Subject:** Renewal of Shutdown Emissions Units - See 62-210.300(2)(a)3.c.

**62-210.300 Permits Required.**

(2) Air Operation Permits. Upon expiration of the air operation permit for any existing facility or emissions unit, subsequent to construction or modification, or subsequent to the creation of or change to a bubble, and demonstration of compliance with the conditions of the construction permit for any new or modified facility or emissions unit, any air emissions bubble, or as otherwise provided in this chapter or Chapter 62-213, F.A.C., the owner or operator of such facility or emissions unit shall obtain a renewal air operation permit, an initial air operation permit or air general permit, or an administrative correction or revision of an existing air operation permit, whichever is appropriate, in accordance with all applicable provisions of this chapter, Chapter 62-213 (if the facility is a Title V source), and Chapter 62-4, F.A.C.

(a) Minimum Requirements for All Air Operation Permits. At a minimum, a permit issued pursuant to this subsection shall:

1. Specify the manner, nature, volume and frequency of the emissions permitted, and the applicable emission limiting standards or performance standards, if any;

2. Require proper operation and maintenance of any pollution control equipment by qualified personnel, where applicable in accordance with the provisions of any operation and maintenance plan required by the air pollution rules of the Department.

3. Contain an effective date stated in the permit which shall not be earlier than the date final action is taken on the application and be issued for a period, beginning on the effective date, as provided below.

a. The operation permit for an emissions unit which is in compliance with all applicable rules and in operational condition,

and

which the owner or operator intends to continue operating, shall be issued or renewed for a five-year period, except that, for Title V sources subject to subparagraph 62-213.420(1)(a)1., F.A.C., operation permits shall be extended until 60 days after the due date for submittal of the facility's Title V permit application as specified in subparagraph 62-213.420(1)(a)1., F.A.C.

b. Except as provided in sub-subparagraph 62-210.300(2)(a)3.d., F.A.C., the operation permit for an emissions unit which has been shut down for six months or more prior to the expiration date of the current operation permit, shall be renewed for a period not to exceed five years from the date of shutdown, even if the emissions unit is not maintained in operational condition, provided: the owner or operator of the emissions unit demonstrates to the Department that the emissions unit may need to be reactivated and used, or that it is the owner's or operator's intent to apply to the Department for a permit to construct a new emissions unit at the facility before the end of the extension period; and

the owner or operator of the emissions unit agrees to and is legally prohibited from providing the allowable emission permitted by the renewed permit as an emissions offset to any other person under Rule 62-212.500, F.A.C.; and the emissions unit was operating in compliance with all applicable rules as of the time the source was shut down.

c. Except as provided in sub-subparagraph 62-210.300(2)(a)3.d., F.A.C., the operation permit for an emissions unit

which

has been shut down for five years or more prior to the expiration date of the current operation permit shall be renewed for a maximum period not to exceed ten years from the date of shutdown, even if the emissions unit is not maintained in operational condition, provided the conditions given in sub-subparagraph 62-210.300(2)(a)3.b., F.A.C., are met and the owner or operator demonstrates to the Department that failure to renew the permit would constitute a hardship, which may include economic hardship.

d. The operation permit for an electric utility generating unit on cold standby or long-term reserve shutdown shall be renewed for a five-year period, and additional five-year periods, even if the unit is not maintained in operational condition, provided the conditions given in sub-sub-subparagraphs 62-210.300(2)(a)3.b.i. through iii., F.A.C., are met.

4. In the case of an emissions unit permitted pursuant to sub-subparagraphs 62-210.300(2)(a)3.b., c., and d., F.A.C., include reasonable notification and compliance testing requirements for reactivation of such emissions unit and provide that the owner or operator demonstrate to the Department prior to reactivation that such reactivation would not constitute reconstruction pursuant to subsection 62-204.800(7), F.A.C.

**Bull, Robert**

**From:** Pennington, Jim  
**Sent:** Thursday, February 26, 2004 8:35 AM  
**To:** Reynolds, John; Bull, Robert; Halpin, Mike; Holladay, Cleve; Holtom, Jonathan; Mitchell, Bruce  
**Subject:** FW: CF update

FYI

-----Original Message-----

**From:** Linero, Alvaro  
**Sent:** Wednesday, February 25, 2004 2:50 PM  
**To:** Phillips, Cindy; Arif, Syed; Cascio, Tom; Heron, Teresa; Koerner, Jeff; Nelson, Deborah  
**Cc:** Adams, Patty; Friday, Barbara; Pennington, Jim; Sheplak, Scott; DeAngelo, Gregory  
**Subject:** FW: CF update

I thought all of you might want to know Pat's opinion on these kinds of situations.

Al.

-----Original Message-----

**From:** Comer, Patricia  
**Subject:** RE: CF update

They can withdraw the renewal application provided they haven't operated since September 8 2003. If they operated since then, they need to have the extended or renewed permit expired. The statute extended the permit indefinitely while the application pends and if they operated after September 8 2003 and then withdraw the application without completing it, the way our rules are written they might negate the extension and wind up having operated w/o permit. And we need to have a date certain for expiration anyway.

The process for this isn't entirely clear since our rules and the federal and state statutes don't line up well. I think they can ask to have the state permit expire at a date certain (in the past---not in the future. If they want to continue to operate into the future they should continue the renewal process and take a less than five-year permit term)

They'd still need to certify compliance until the date they closed and they need to continue to hold the records of operation, compliance, etc. available for five years.

When we get this done, we should notify EPA.

[Pat Comer]

**Subject:** CF update

On CF's Bartow facility: they no longer plan to operate that facility. Tom is checking with another individual for a definite on this- but it sounds like they will want to "surrender" their Title V permit. Do they need to withdraw the renewal application? Will that be enough since the "current" Title V for Bartow expired on September 8, 2003?

<u>Expired</u>	<u>Valid</u>
005	002 ✓ Shipping
007	006 = Sulfur
017	021 ✓ operational
022	025 ✓ shipping
023	031 ✓ Unloading
024	032 ✓ Molten Sulfur
026	034 ✓ Molten
	035 = phosphogypsum
	033 ✓ Molten Sulfur



- Most are already shutdown  
 → 3 currently operational  
 → Contact Craig Kovach waiting information

VIA Certified Mail Return Receipt Requested

April 17, 2003

Mr. Paul R. Roberts  
Operations Manager  
CF Industries, Inc.  
P.O. Box 1480  
Bartow, FL 33831

Re: Request for Additional Information  
Regarding Title V Operation Permit Renewal Request, Dated February 26, 2003  
Title V Operation Permit Renewal Project No. 1050052-008-AV  
(Initial Title V Operation Permit No. 1050052-004-AV)  
Bartow Phosphate Complex, Polk County

Dear Mr. Roberts:

In order to continue processing the CF Industries, Inc. February 26, 2003 application to renew the Bartow Phosphate Complex's Title V operation permit (DEP Permit Project No. 1050052-008-AV), the Department will need the below additional information pursuant to Rule 62-213.420(1)(b)3., F.A.C., and Rule 62-4.070(1), F.A.C.

1. Per Rules 62-213.420(1)(b) and 62-213.430(3), F.A.C., applications for permits that are being renewed shall be submitted on the DEP Form 62-210.900(1) and contain all the information identified in Rule 62-213.420(3), F.A.C. Re-submit your Title V operation permit renewal application with all the required information as well as any supporting calculations, assumptions, and reference material with the completed application form (DEP Form 62-210.900(1) Effective 2/11/99). Include with this application all required attachments and supplemental information, such as but not limited to diagrams and compliance assurance monitoring (CAM) plans. Please note that up to date versions of the application form can be down loaded from the Department's webpage:

<http://www.dep.state.fl.us/air/forms/application.htm#airpermit>.

Request for Additional Information

Regarding Title V Operation Permit Renewal Request, Dated February 26, 2003

Title V Operation Permit Renewal Project No. 1050052-008-AV

(Initial Title V Operation Permit No. 1050052-004-AV)

Bartow Phosphate Complex, Polk County

April 17, 2003

Page 2 of 2

2. According to the Department's database, Mr. Paul Roberts is listed as both an authorized representative and responsible official. Please confirm which designation applies and indicate as such by checking the correct box on the Owner/Authorized Representative or Responsible Official Certification Statement.
3. The incorrect box was checked under the Professional Engineer Statement of your renewal application dated February 26, 2003. When submitting your application as a response to this request, the professional engineer should check the first box, as this project is to obtain a Title V source air operation permit.
4. In Field 15, Compliance Certification (Page 11 of the application received), the box was selected that the compliance certification was attached. However, that attachment was not included. When submitting your application as a response to this request, include a compliance certification.

Responsible Official (R.O.) Certification Statement: Rule 62-213.420, F.A.C. requires that all Title V permit applications must be certified by a responsible official. Due to the nature of the information requested above, your response should be certified by the responsible official. Please complete and submit a new R.O. certification statement page from the DEP Form 62-210.900(1), effective February 11, 1999.

Professional Engineer (P.E.) Certification Statement: 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 response to Department requests for additional information of an engineering nature. Please complete and submit a new P.E. certification statement page from DEP Form 62-210.900(1), effective February 11, 1999.

The Department must receive a response from you within 90 (ninety) days of receipt of this letter, unless you (the applicant) request additional time under Rule 62-213.420(1)(b)6, F.A.C.

If you have any questions, please let me know at (813)744-6100 x117.

Sincerely,

Ann Quillian, P.E.  
Air Permitting Engineer

cc: Craig Kovach, CF Industries, Inc., Bartow Phosphate Complex  
Pradeep Raval, Koogler & Associates

Permitting Application - Permit Detail and Log Permit

**ARMS Facility**

POINT AIRS ID 1050052 STATUS A OFFICE SWD SW: TAMPA  
SITE NAME BARTOW PHOSPHATE COMPLEX COUNTY POLK  
OWNER/COMPANY CF INDUSTRIES, INC.

**Project**

AIR Permit# 1050052 - 006 - AC Project # 006 CRA Reference #  
Permit Office SWD (DISTRICT) Agency Action Issued  
Project Name INCREASE RAIL TRANSFER RATE Desc  
Type/Sub/Des AC / 1F Source less than 5 tpy \$250 Logged 10/30/2001  
Received 10/25/2001 Issued 02/19/2002 Expires 02/01/2004 OGC  
Fee 0.00 Fee Recd Dele Override TITLE V

**Related Party**

Role APPLICANT Begin 10/30/2001 End  
Name ROBERTS, PAUL R. Company CF INDUSTRIES, INC.  
Address POST OFFICE BOX 1480  
City BARTOW State FL Zip 33831 - 1480 Country U.S.A.  
Phone 863-533-3181 Fax 863-534-1841

**Processors**

Processor QUILLIAN\_A Y Active 11/06/2001 Inactive Events

Events Scheduled

2 of 98

AIRS ID: 1050052 Site Name: BARTOW PHOSPHATE COMPLEX  
 Permit #: 1050052-006-AC Type/Subtype: AC / 1F Received: 10/25/2001  
 Project #: 006 Project Name: (INCREASE RAIL TRANSFER RATE)

> Receive Request: Done

Event	Begin Date	Period	Due Date	Rmn	Status	End Date
Receive Request	10/25/2001	1	10/26/2001		Done	10/25/2001
Fee Verification	10/25/2001	2	10/27/2001		Sufficient Fee	10/27/2001
Completeness Review	10/25/2001	30	11/24/2001		Default	11/25/2001
Determine Agency Action	10/25/2001	90	01/23/2002		Issue	01/22/2002
Mail Public Notice of Intent to Applicant and	01/22/2002	10	02/01/2002		Done	01/22/2002
Date of Publication	01/22/2002	999	10/17/2004		Published	01/31/2002
Awaiting Petition for Administrative Proce-	01/31/2002	14	02/14/2002		Not Received	02/14/2002
Issue Final Permit	02/14/2002	14	02/28/2002		Issued	02/19/2002
ISSUE PERMIT	02/19/2002	1	02/20/2002		Issued	02/19/2002
STOP CLOCK	02/19/2002	1	02/20/2002		Done	02/19/2002
ARMS Data Entry	02/19/2002	40	03/31/2002		Done	03/21/2002

Permitting Application - Permit Detail and Log Permit											
<b>ARMS Facility</b>											
POINT	AIR ID	1050052	STATUS	A	OFFICE	SWD	SW: TAMPA				
SITE NAME		BARTOW PHOSPHATE COMPLEX			COUNTY		POLK				
OWNER/COMPANY		CF INDUSTRIES, INC.									
<b>Project</b>											
AIR Permit #	1050052	-	007	-	AV	Project #	007	CRA Reference #			
Permit Office	SWD (DISTRICT)				Agency Action	Issued					
Project Name	OIL PRODUCT VS. SCRUBBER			Desc							
Type/Sub/Des	AV	/	02	Title V - Revision	Logged	12/24/2001					
Received	12/20/2001	Issued	10/02/2002	Expires	09/08/2003	OGC	<input type="checkbox"/>				
Fee	0.00	Fee Recd		Dele		Override	NONE				
<b>Related Party</b>											
Role	APPLICANT			Begin	12/24/2001	End					
Name	ROBERTS, PAUL R.				<input type="checkbox"/>	Company	CF INDUSTRIES, INC.				
Address	POST OFFICE BOX 1480										
City	BARTOW			State	FL	Zip	33831	-	1480	Country	U.S.A.
Phone	863-533-3181		Fax	863-534-1841							
<b>Processors</b>											
Processor	QUILLIAN_A			Y	Active	01/08/2002	Inactive			Events	



Events Scheduled

24 of 98

AIRS ID: 1050052 Site Name: BARTOW PHOSPHATE COMPLEX  
 Permit #: 1050052-007-AV Type/Subtype: AV / 02 Received: 12/20/2001  
 Project #: 007 Project Name: (OIL PRODUCT VS. SCRUBBER)

> Completeness Review: Default

Event	Begin Date	Period	Due Date	Rmn	Status	End Date
Receive Request	12/20/2001	1	12/21/2001		Done	12/20/2001
Initial Completeness Review	12/20/2001	60	02/18/2002		Incomplete	02/14/2002
RESET CLOCK	02/14/2002	1	02/15/2002		Done	02/14/2002
Awaiting Additional Information	02/14/2002	90	05/15/2002		Received	04/18/2002
<b>Completeness Review</b>	04/18/2002	30	05/18/2002		Default	05/19/2002
Determine Agency Action	04/18/2002	90	07/17/2002		Issue	06/24/2002
Draft Permit	06/24/2002	1	06/25/2002		Issue	06/24/2002
STOP CLOCK	06/24/2002	1	06/25/2002		Done	06/24/2002
Date of Publication	06/24/2002	999	03/19/2005		Published	07/03/2002
Public Comment Period	07/03/2002	30	08/02/2002		Done	08/02/2002
Proposed Permit	08/02/2002	1	08/03/2002		Issue	08/08/2002

Events Scheduled

24 of 90

AIRS ID: 1050052 Site Name: BARTOW PHOSPHATE COMPLEX  
 Permit #: 1050052-007-AV Type/Subtype: AV / 02 Received: 12/20/2001  
 Project #: 007 Project Name: (OIL PRODUCT VS. SCRUBBER)

> Completeness Review: Default

Event	Begin Date	Period	Due Date	Rmn	Status	End Date
<b>Completeness Review</b>	04/18/2002	30	05/18/2002		Default	05/19/2002
Determine Agency Action	04/18/2002	90	07/17/2002		Issue	06/24/2002
Draft Permit	06/24/2002	1	06/25/2002		Issue	06/24/2002
STOP CLOCK	06/24/2002	1	06/25/2002		Done	06/24/2002
Date of Publication	06/24/2002	999	03/19/2005		Published	07/03/2002
Public Comment Period	07/03/2002	30	08/02/2002		Done	08/02/2002
Proposed Permit	08/02/2002	1	08/03/2002		Issue	08/08/2002
EPA Review	08/08/2002	55	10/02/2002		No Comment	10/02/2002
Final Permit	10/02/2002	1	10/03/2002		Issued	10/02/2002
ISSUE PERMIT	10/02/2002	1	10/03/2002		Issued	10/02/2002
ARMS Data Entry	10/02/2002	40	11/11/2002		Done	11/13/2002

POINT		AIRMS ID	1050052	STATUS	A	OFFICE	SWD	SW: TAMPA
SITE NAME		BARTOW PHOSPHATE COMPLEX			COUNTY	POLK		
OWNER/COMPANY		CF INDUSTRIES, INC.						
<b>Project</b>								
AIR Permit #				Project #	008		CRA Reference #	
Permit Office	TAL (HEADQUARTERS)			Agency Action	Pending			
Project Name	TITLE V RENEWAL			Desc	Renewal of 004-AV. 1 or more CAM plans are required *** Transfere			
Type/Sub/Des	AV	/ 05	Title V - Renewal	Logged	03/07/2003			
Received	02/28/2003	Issued		Expires		OGC	<input type="checkbox"/>	
Fee	0.00	Fee Recd		Dele		Override	NONE	
<b>Related Party</b>								
Role	APPLICANT		Begin	03/07/2003	End			
Name	ROBERTS, PAUL R.			Company	CF INDUSTRIES, INC.			
Address	POST OFFICE BOX 1480							
City	BARTOW		State	FL	Zip	33831 - 1480	Country	U.S.A.
Phone	863-533-3181		Fax	863-534-1841				
<b>Processors</b>								
Processor	BULL_R		Y	Active	12/15/2003	Inactive		Events

Permitting Application - Events

### Events Scheduled

90 of 90

AIRS ID: 1050052      Site Name: BARTOW PHOSPHATE COMPLEX

Permit #:      Type/Subtype: AV / 05      Received: 02/28/2003

Project #: 008      Project Name: (TITLE V RENEWAL)

> Receive Request: Done

Event	Begin Date	Period	Due Date	Rmn	Status	End Date
Receive Request	02/28/2003	1	03/01/2003		Done	02/28/2003
Initial Completeness Review	02/28/2003	60	04/29/2003		Incomplete	04/17/2003
RESET CLOCK	04/17/2003	1	04/18/2003		Done	04/17/2003
Awaiting Additional Information	04/17/2003	150	09/14/2003		Received	09/25/2003
Completeness Review	09/25/2003	30	10/25/2003		Incomplete	10/13/2003
RESET CLOCK	10/13/2003	1	10/14/2003		Done	10/13/2003
Awaiting Additional Information	10/13/2003	90	01/11/2004	-47	Pending	
Office Transfer	12/15/2003	3	12/18/2003		Done	12/15/2003
Office Verification	12/15/2003	1	12/16/2003		Correct	12/15/2003

**APPLICANT DATA SUMMARY REPORT**

2/24/2004 12:41:27 PM

CF-BARTOW (APP #: 207)  
CF INDUSTRIES, INC. (FACILITY ID: 1050052)

**\*\*\*\*\* APPLICATION SECTION \*\*\*\*\*****\*\* APPLICATION IDENTIFICATION INFORMATION \*\***

Application Number: 207  
Applicant's Version: 1  
Application Name: CF-BARTOW  
Application Type: LONG FORM  
Purpose of Application: TITLE V AIR OPERATION PERMIT RENEWAL.  
Application Comment:

Are you requesting a multi-unit or facility-wide emissions cap for one or more pollutants? NO

**\*\* SCOPE OF APPLICATION \*\***

EU ID	Description	Permit Type	Processing Fee
002	NO. 1 MAP/DAP/GTSP SHIPPING UNIT	AV05	\$0.00
006	SULFURIC ACID PLANT NO.6	AV05	\$0.00
021	BOILER NO. 1	AV05	\$0.00
025	NO. 2 MAP/DAP SHIPPING UNIT	AV05	\$0.00
031	DAP/MAP/GTSTP RAILCAR UNLOADING AND TRANSFER OPERATION	AV05	\$0.00
032	RAIL/TRUCK UNLOADING PIT -- MOLTEN SULFUR SYSTEM	AV05	\$0.00
033	NORTH STORAGE TANK -- MOLTEN SULFUR SYSTEM	AV05	\$0.00
034	SOUTH STORAGE TANK -- MOLTEN SULFUR SYSTEM	AV05	\$0.00
035	PHOSPHOGYPSUM STACK	AV05	\$0.00
036	FUGITIVE EMISSIONS	AV05	\$0.00
<b>Total Processing Fee:</b>			<b>\$0.00</b>

**\*\* APPLICATION CONTACT INFORMATION \*\***

First Name: PRADEEP  
Last Name: RAVAL  
Job Title: CONSULTANT  
Name of Organization/Firm: KOOGLER & ASSOCIATES  
Street Address: 4014 NW 13TH STREET  
City: GAINESVILLE  
State: FL  
Zip: 32609  
Telephone: 352 - 377 - 5822  
Fax: 352 - 377 - 7158  
E-mail: PRAVAL@YAHOO.COM

**\*\* PROFESSIONAL ENGINEER INFORMATION \*\***

First Name: JOHN  
Last Name: KOOGLER  
Job Title:  
Name of Organization/Firm: KOOGLER AND ASSOCIATES  
Registration Number: 12925  
Street Address: 4014 NW 13TH STREET  
City: GAINESVILLE  
State: FL  
Zip: 32609

**Telephone:** 352 - 377 - 5822  
**Fax:** 352 - 377 - 7158  
**E-mail:** JKOGLER@KOOGLERASSOCIATES.COM

**\*\* OWNER/AUTHORIZED REPRESENTATIVE INFORMATION \*\***

**First Name:**  
**Last Name:**  
**Job Title:**  
**Name of Organization/Firm:**  
**Street Address:**  
**City:**  
**State:**  
**Zip:**  
**Telephone:**  
**Fax:**  
**E-mail:**

**\*\* RESPONSIBLE OFFICIAL INFORMATION \*\***

**First Name:** JOHN  
**Last Name:** DORAN  
**Primary RO?** YES  
**Job Title:**  
**Name of Organization/Firm:** CF INDUSTRIES, INC  
**Street Address:** P.O.BOX 1480  
**City:** BARTOW  
**State:** FL  
**Zip:** 33831  
**Telephone:** 863 - 533 - 0528  
**Fax:** 863 - 533 - 7097  
**E-mail:** JDORAN@CFIFL.COM

**RO Qualification:** For a corporation, the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit under Chapter 62-213, F.A.C.

**CF-BARTOW (APP #: 207)  
CF INDUSTRIES, INC. (FACILITY ID: 1050052)**

**\*\*\*\*\* FACILITY SECTION \*\*\*\*\***

**\*\* FACILITY IDENTIFICATION INFORMATION \*\***

**Owner/Company Name:** CF INDUSTRIES, INC.  
**Site Name:** BARTOW PHOSPHATE COMPLEX  
**Facility Office:** SWD - SW: TAMPA  
**Description of Location:** BONNIE MINE RD, WEST OF BARTOW  
**Street Address:** 2501 BONNIE MINE RD  
**City:** BARTOW  
**County:** POLK  
**ZIP:** 33830  
**Relocatable:** NO  
**Facility Status:** A - ACTIVE  
**Comment:** FORMERLY CF CHEMICALS, INC.

**\*\* FACILITY LOCATION AND TYPE \*\***

**Facility UTM Coordinates:** Zone: 17 East(km): 408.3 North(km): 3082.5  
**Facility Latitude:** Degrees: 27 Minutes: 51 Seconds: 56  
**Facility Longitude:** Degrees: 81 Minutes: 55 Seconds: 53  
**Facility Type:** 6 - PHOSPHATE FERTILIZER PLANT  
**Facility SIC Codes:** Primary: 2874 - CHEMICALS AND ALLIED PRODUCTS  
 AGRICULTURAL CHEMICALS  
 PHOSPHATIC FERTILIZERS  
**Governmental Facility Code:** 0 - NOT OWNED OR OPERATED BY A FEDERAL, STATE, OR LOCAL GOVERNMENT  
**Facility Major Group SIC:** 28 - CHEMICALS AND ALLIED PRODUCTS

**\*\* FACILITY CONTACT INFORMATION \*\***

**First Name:** CRAIG  
**Last Name:** KOVACH  
**Job Title:**  
**Name of Organization/Firm:** CF INDUSTRIES, INC.  
**Street Address:** PO BOX 1480  
**City:** BARTOW  
**State:** FL  
**Zip:** 33831 - 1480  
**Telephone:** 863 - 533 - 3181  
**Fax:** 863 - 534 - 1841  
**E-mail:**

**\*\* FACILITY REGULATORY CLASSIFICATIONS \*\***

**Small Business Stationary Source?** No  
**Title V?** Yes  
**Major Source of Pollutants Other than HAPs?** Yes  
**Major Source of HAPs?**  
**TITLE V Source by EPA Designation?**  
**Synthetic Non-Title V Source?**  
**Synthetic Minor Source of Pollutants Other than Hazardous Air Pollutants (HAPs)?**  
**Synthetic Minor Source of HAPs?**  
**One or More EUs Subject to NSPS?** Yes  
**AOR Required?** Yes  
**Ozone SIP Facility?** No  
**One or More EUs Subject to NESHAP?**  
**Regulatory Classifications Comment:**

**\*\* FACILITY POLLUTANT INFORMATION \*\***

Code	Description	Class.	Comment
CO	Carbon Monoxide	B	
FL	Fluorides - Total (elemental fluorine and fluoride compounds)	B	
H161	Radionuclides (including radon)	C	
NOX	Nitrogen Oxides	B	
PB	Lead - Total (elemental lead and lead compounds)	B	
PM	Particulate Matter - Total	B	
PM10	Particulate Matter - PM10	B	
SAM	Sulfuric Acid Mist	B	
SO2	Sulfur Dioxide	A	
TRS	Total Reduced Sulfur	B	
VOC	Volatile Organic Compounds	B	

**\*\* FACILITY POLLUTANT CAP INFORMATION \*\***

<b>*** NO FACILITY POLLUTANTS WITH CAPS FOUND ***</b>
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**\*\* FACILITY SUPPLEMENTARY ITEMS \*\***

Supplementary Item	Applicable?	Attachment?
ADDITIONAL IMPACT ANALYSES (RULES 62-212.400(5)(e)1. and 62-212.500(4)(e),F.A.C.)	No	No
AIR QUALITY IMPACT SINCE 1977 (RULE 62-212.400(5)(h)5.,F.A.C.)	No	No
ALTERNATIVE ANALYSIS REQUIREMENTS (RULE 62-212.500(4)(g),F.A.C.)	No	No
AMBIENT IMPACT ANALYSIS (RULE 62-212.400(5)(D),F.A.C.)	No	No
AREA MAP SHOWING FACILITY LOCATION	No	No
COMPLIANCE REPORT AND PLAN	Yes	Yes
DESCRIPTION OF PROPOSED CONSTRUCTION OR MODIFICATION	No	No
FACILITY PLOT PLAN Previously submitted? YES Submittal Date:	No	No
FUGITIVE EMISSIONS IDENTIFICATION (RULE 62-212.400(2),F.A.C.)	No	No
IDENTIFICATION OF APPLICABLE REQUIREMENTS	Yes	Yes
LIST OF EQUIPMENT/ACTIVITIES REGULATED UNDER TITLE VI Equipment/Activities On Site but Not Required to be Individually Listed? NO	No	No
LIST OF EXEMPT EMISSIONS UNITS (RULE 62-210.300(3)(a) or (b)1.,F.A.C.)	No	No
LIST OF EXEMPT EMISSIONS UNITS (RULE 62-210.300(3)(a) or (b)1.,F.A.C.)	No	No
LIST OF INSIGNIFICANT ACTIVITIES	Yes	Yes
OTHER FACILITY INFORMATION	No	No
PRECAUTIONS TO PREVENT EMISSIONS OF UNCONFINED PARTICULATE MATTER Previously submitted? YES Submittal Date:	No	No
PRECONSTRUCTION AIR QUALITY MONITORING AND ANALYSIS (RULE 62-212.400(5)(f),F.A.C.)	No	No
PROCESS FLOW DIAGRAM(s) Previously submitted? YES Submittal Date:	No	No
REQUESTED CHANGES TO CURRENT TITLE V AIR OPERATION PERMIT	No	No
RULE APPLICABILITY ANALYSIS	No	No
VERIFICATION OF RISK MANAGEMENT PLAN SUBMISSION TO EPA	No	No

**\*\* FACILITY SUPPLEMENTARY ATTACHMENTS \*\***

Supplementary Item	Electronic?	Attachment Description	Electronic File Name	Uploaded?
COMPLIANCE REPORT AND PLAN	No	COMPLIANCE REPORT	N/A	N/A
IDENTIFICATION OF APPLICABLE REQUIREMENTS	No	APPLICABLE REQUIREMENTS	N/A	N/A



LIST OF INSIGNIFICANT ACTIVITIES	No	INSIGNIFICANT ACTIVITIES	N/A	N/A
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**CF-BARTOW (APP #: 207)  
CF INDUSTRIES, INC. (FACILITY ID: 1050052)**

**\*\*\*\*\* EMISSIONS UNIT SECTION \*\*\*\*\***

**\*\* EU 002: DESCRIPTION AND DETAIL INFORMATION \*\***

**Type of EU:** THIS EU INFORMATION SECTION ADDRESSES, AS A SINGLE EMISSIONS UNIT, A SINGLE PROCESS OR PRODUCTION UNIT, OR ACTIVITY, WHICH PRODUCES ONE OR MORE AIR POLLUTANTS AND WHICH HAS AT LEAST ONE DEFINABLE EMISSION POINT (STACK OR VENT).

**EU Description:** NO. 1 MAP/DAP/GTSP SHIPPING UNIT

**EU Status:** A - ACTIVE

**EU Classification:** R - REGULATED EMISSIONS UNIT

**Acid Rain Unit?** No

**CEMS Required?** No

**Ozone SIP Base Year Unit?** Yes

**Initial Startup Date:**

**Long-term Reserve Shutdown Date:**

**Commence Construction Date:**

**EU Major Group SIC:** 28 - CHEMICALS AND ALLIED PRODUCTS

**EU Type:** 2.04 - AGRICULTURAL CHEMICAL MANUFACTURE

**Package Unit Manufacturer:**

**Generator Nameplate Rating:**

**Incinerator Dwell Temp:**

**Incinerator Dwell Time:**

**Incinerator Afterburner Temp:**

**EU Comment:**

**\*\*EU 002: CONTROL EQUIPMENT/METHOD INFORMATION \*\***

**Control Equipment/Method Name:** WET SCRUBBER MED EFFICIENCY (80.0-94.9%)

**Description:**

**Manufacturer:**

**Model Number:**

**Serial Number:**

**Control Equipment/Method Name:** GAS SCRUBBER, GENERAL

**Description:** WET SCRUBBER

**Manufacturer:**

**Model Number:**

**Serial Number:**

**Control Equipment/Method Name:** DUST SUPPRESSION BY CHEMICAL STABILIZERS/WETTING AGENTS

**Description:**

**Manufacturer:**

**Model Number:**

**Serial Number:**

**\*\*EU 002: OPERATING CAPACITY AND SCHEDULE \*\***

**Maximum Heat Input Rate:**

**Maximum Incineration Rate:**

**Maximum Process or Throughput Rate:** 325

**Maximum Process or Throughput Rate Units:** TPH SHIPPED

**Maximum Production Rate:**

**Maximum Process or Throughput Rate Units:**

**Requested Maximum Operating Schedule:** 24 hours/day 7 days/week 52 weeks/year 8760 weeks/year

**Operating Capacity and Schedule Comment:**

**\*\*EU 002: POINT (STACK/VENT) INFORMATION \*\***

**Stack Number:** 2  
**Identification of Point on Plot Plan or Flow Diagram?**  
**Emission Point Type Code:** 1 - A SINGLE EMISSION POINT SERVING A SINGLE EMISSIONS UNIT  
**Discharge Type Code:**  
**Stack Height:** 140 feet  
**Exit Diameter:** 2.5 feet  
**Exit Temperature:** 77 Fahrenheit  
**Actual Volumetric Flow Rate:** 21000 acfm  
**Water Vapor:**  
**Maximum Dry Standard Flow Rate:**  
**Nonstack Emission Point Height:**  
**Emission Point UTM Coordinates:**  
**Emission Point Latitude:**  
**Emission Point Longitude:**  
**Emission Point Comment:**

**\*\*EU 002: SEGMENT (PROCESS/FUEL) INFORMATION \*\***

**SCC Code:** 30510597  
**Units:** Tons Material Processed  
**Description 1:** Industrial Processes  
**Description 2:** Mineral Products  
**Description 3:** Bulk Materials Loading Operation  
**Description 4:** Fertilizer: Specify in Comments  
**Is this a Valid Segment?** YES  
**Status:** INACTIVE  
**Segment Description (Process/Fuel Type):**  
**Maximum Hourly Rate:** 325  
**Hourly Rate Limit:** 325  
**Maximum Annual Rate:**  
**Annual Rate Limit:** 2847000  
**Estimated Annual Activity Factor:**  
**Maximum % Sulfur:**  
**% Sulfur Rate Limit:**  
**Maximum % Ash:**  
**Million Btu per SCC Unit:** 0  
**Segment Comment:** DAP/MAP/GTSP LOADOUT

**\*\*EU 002: POLLUTANT INFORMATION \*\***

**Pollutant Code:** PM  
**Pollutant Description:** PARTICULATE MATTER - TOTAL  
**Is this a Valid Pollutant?** YES  
**Status:** ACTIVE  
**Include in the Facility Emissions Cap?** NO  
**Pollutant Regulatory Code:** WP - POLLUTANT REGULATED UNDER WORK PRACTICE STANDARD ONLY  
**Primary Control Device:** DUST SUPPRESSION BY CHEMICAL STABILIZERS/WETTING AGENTS  
**Secondary Control Device:**  
**Total % Efficiency of Control:** 95  
**Potential Emissions:** 0.11 lb/hour 0.5 tons/year  
**Synthetically Limited?:** NO  
**Emissions Method:** CALCULATED BASED ON SIMILAR PROCESS IN AP-42/FIRE SYSTEM.  
**Emission Factor:**  
**Emission Factor Units:** PPMVD @ 8% O2  
**Emission Factor Reference:**  
**Calculation of Emissions:**  
**Range of Estimated Fugitive Emissions (Lower Limit):**  
**Range of Estimated Fugitive Emissions (Upper Limit):**

**Pollutant Comment:** ONLY MATERIALS TREATED WITH DUST SUPPRESSANTS ALLOWED; 5%VE INDICATOR THAT SUPPRESSANT IS WORKING

**Pollutant Code:** PM10  
**Pollutant Description:** PARTICULATE MATTER - PM10  
**Is this a Valid Pollutant?** YES  
**Status:** ACTIVE  
**Include in the Facility Emissions Cap?** NO  
**Pollutant Regulatory Code:** NS - POLLUTANT NOT EMISSIONS-LIMITED NOT SUBJECT TO WORK PRACTICE  
**Primary Control Device:** DUST SUPPRESSION BY CHEMICAL STABILIZERS/WETTING AGENTS  
**Secondary Control Device:**  
**Total % Efficiency of Control:**  
**Potential Emissions:**  
**Synthetically Limited?:** NO  
**Emissions Method:**  
**Emission Factor:**  
**Emission Factor Units:** PPMVD @ 8% O2  
**Emission Factor Reference:**  
**Calculation of Emissions:**  
**Range of Estimated Fugitive Emissions (Lower Limit):**  
**Range of Estimated Fugitive Emissions (Upper Limit):**  
**Pollutant Comment:**

**\*\*EU 002: POLLUTANT ALLOWABLE EMISSIONS INFORMATION \*\***

\*\*\* NO POLLUTANT ALLOWABLE EMISSIONS INFORMATION FOUND FOR THIS EU \*\*\*

**\*\*EU 002: VISIBLE EMISSIONS INFORMATION \*\***

**Visible Emissions Subtype:** VE05  
**Basis for Allowable Opacity:** OTHER  
**Regulation:**  
**Requested Allowable Opacity in Normal Conditions:**  
**Requested Allowable Opacity in Exceptional Conditions:**  
**Maximum Period of Excess Opacity Allowed:**  
**Compliance Test Method(s):**  
**Compliance Test Frequency:** 0 - NONE REQUIRED  
**Frequency Base Date:**  
**COM Required?** No  
**Visible Emissions Comment:** 5%VE (CONDITION A.2) INDICATOR THAT DUST SUPPRESSANTS ARE WORKING.

**Visible Emissions Subtype:** VE20  
**Basis for Allowable Opacity:** RULE  
**Regulation:** 62-296.320(4)(b)  
**Requested Allowable Opacity in Normal Conditions:** 020  
**Requested Allowable Opacity in Exceptional Conditions:**  
**Maximum Period of Excess Opacity Allowed:** 0  
**Compliance Test Method(s):**  
**Compliance Test Frequency:** 1 - ANNUALLY  
**Frequency Base Date:** 12/7/1989  
**COM Required?** No  
**Visible Emissions Comment:** VE TEST TO BE AT LEAST 30 MINUTES LONG; 5%VE indicator that dust suppressants are working

**\*\*EU 002: CONTINUOUS MONITOR INFORMATION \*\***

\*\*\* NO CONTINUOUS MONITOR INFORMATION FOUND FOR THIS EU \*\*\*

**\*\* EU 002: SUPPLEMENTARY ITEMS \*\***

Supplementary Item	Applicable?	Attachment?
ACID RAIN PART (FORM NO. 62-210.900(1)(a)) Previously submitted? NO Submittal Date:	No	No
ALTERNATIVE METHODS OF OPERATION	No	No
ALTERNATIVE MODES OF OPERATION (EMISSIONS TRADING)	No	No
CERTIFICATE OF REPRESENTATION (EPA FORM NO. 7610-1)	No	No
COMPLIANCE ASSURANCE MONITORING PLAN	No	No
COMPLIANCE DEMONSTRATION REPORTS/RECORDS Previously submitted? YES Submittal Date: Previously Submitted Test Date(s)/Pollutants Tested: To Be submitted? NO Submittal Date: To Be Submitted Test Date(s)/Pollutants Tested:	Yes	Yes
CONTROL TECHNOLOGY REVIEW AND ANALYSIS (RULES 62-212.400(6) and 62-212.500(7), F.A.C.; 40 CFR 63.43(d) and (e))	No	No
DESCRIPTION OF STACK SAMPLING FACILITIES	No	No
DETAILED DESCRIPTION OF CONTROL EQUIPMENT Previously submitted? YES Submittal Date:	Yes	Yes
FUEL ANALYSIS OR SPECIFICATION Previously submitted? NO Submittal Date:	No	No
GOOD ENGINEERING PRACTICE STACK HEIGHT ANALYSIS (RULE 62-212.400(5)(h)6., F.A.C., and RULE 62-212.500(4)(f), F.A.C.)	No	No
IDENTIFICATION OF APPLICABLE REQUIREMENTS	Yes	Yes
NEW UNIT EXEMPTION (FORM NO. 62-210.900(1)(a)2.) Previously submitted? NO Submittal Date:	No	No
OPERATION AND MAINTENANCE PLAN Previously submitted? NO Submittal Date:	No	No
OTHER EMISSIONS UNIT INFORMATION	No	No
OTHER INFORMATION REQUIRED BY RULE OR STATUTE	No	No
PHASE II NOx AVERAGING PLAN (FORM NO. 62-210.900(1)(a)5.) Previously submitted? NO Submittal Date:	No	No
PHASE II NOx COMPLIANCE PLAN (FORM NO. 62-210.900(1)(a)4.) Previously submitted? NO Submittal Date:	No	No
PROCEDURES FOR STARTUP AND SHUTDOWN Previously submitted? NO Submittal Date:	No	No
PROCESS FLOW DIAGRAM Previously submitted? YES Submittal Date:	Yes	Yes
REPOWERING EXTENSION PLAN (FORM NO. 62-210.900(1)(a)1.) Previously submitted? NO Submittal Date:	No	No
RETIRED UNIT EXEMPTION (FORM NO. 62-210.900(1)(a)3.) Previously submitted? NO Submittal Date:	No	No

**\*\* EU 002: SUPPLEMENTARY ATTACHMENTS \*\***

Supplementary Item	Electronic?	Attachment Description	Electronic File Name	Uploaded?
COMPLIANCE DEMONSTRATION REPORTS/RECORDS	No	COMPLIANCE REPORT	N/A	N/A
DETAILED DESCRIPTION OF CONTROL EQUIPMENT	No	CONTROL EQUIPMENT	N/A	N/A
IDENTIFICATION OF APPLICABLE REQUIREMENTS	No	APPLICABLE REQUIREMENTS	N/A	N/A
PROCESS FLOW DIAGRAM	No	PROCESS FLOW	N/A	N/A

**\*\* EU 006: DESCRIPTION AND DETAIL INFORMATION \*\***

**Type of EU:** THIS EMISSIONS UNIT INFORMATION SECTION ADDRESSES, AS A SINGLE EMISSIONS UNIT, A GROUP OF PROCESS OR PRODUCTION UNITS AND ACTIVITIES WHICH HAS AT LEAST ONE DEFINABLE EMISSION POINT (STACK OR VENT) BUT MAY ALSO PRODUCE FUGITIVE EMISSIONS.

**EU Description:** SULFURIC ACID PLANT NO.6

**EU Status:** A - ACTIVE

**EU Classification:** R - REGULATED EMISSIONS UNIT

**Acid Rain Unit?** No

**CEMS Required?** No

**Ozone SIP Base Year Unit?** Yes

**Initial Startup Date:**

**Long-term Reserve Shutdown Date:** 11/24/1999

**Commence Construction Date:**

**EU Major Group SIC:** 28 - CHEMICALS AND ALLIED PRODUCTS

**EU Type:** 2.04 - AGRICULTURAL CHEMICAL MANUFACTURE

**Package Unit Manufacturer:**

**Generator Nameplate Rating:**

**Incinerator Dwell Temp:**

**Incinerator Dwell Time:**

**Incinerator Afterburner Temp:**

**EU Comment:**

**\*\*EU 006: CONTROL EQUIPMENT/METHOD INFORMATION \*\***

**Control Equipment/Method Name:** MIST ELIMINATOR HIGH VELOCITY (V>250FT/MIN)

**Description:** DEMISTERS

**Manufacturer:**

**Model Number:**

**Serial Number:**

**Control Equipment/Method Name:** SULFURIC ACID PLANT-DOUBLE CONTACT PROCESS

**Description:** DOUBLE ABSORTION

**Manufacturer:**

**Model Number:**

**Serial Number:**

**\*\*EU 006: OPERATING CAPACITY AND SCHEDULE \*\***

**Maximum Heat Input Rate:**

**Maximum Incineration Rate:**

**Maximum Process or Throughput Rate:** 60

**Maximum Process or Throughput Rate Units:** TPH 100% H2SO4

**Maximum Production Rate:** 60

**Maximum Process or Throughput Rate Units:** TPH

**Requested Maximum Operating Schedule:** 24 hours/day 7 days/week 52 weeks/year 8760 weeks/year

**Operating Capacity and Schedule Comment:**

**\*\*EU 006: POINT (STACK/VENT) INFORMATION \*\***

**Stack Number:** 6

**Identification of Point on Plot Plan or Flow Diagram?**

**Emission Point Type Code:** 1 - A SINGLE EMISSION POINT SERVING A SINGLE EMISSIONS UNIT

**Discharge Type Code:**

**Stack Height:** 206 feet

**Exit Diameter:** 7 feet

**Exit Temperature:** 140 Fahrenheit

**Actual Volumetric Flow Rate:** 50700 acfm

**Water Vapor:**

**Maximum Dry Standard Flow Rate:**

**Nonstack Emission Point Height:**  
**Emission Point UTM Coordinates:**  
**Emission Point Latitude:**  
**Emission Point Longitude:**  
**Emission Point Comment:**

**\*\*EU 006: SEGMENT (PROCESS/FUEL) INFORMATION \*\***

**SCC Code: 30102304**  
**Units:** Tons 100% Sulfuric Acid Produced  
**Description 1:** Industrial Processes  
**Description 2:** Chemical Manufacturing  
**Description 3:** Sulfuric Acid (Contact Process)  
**Description 4:** Absorber/@ 99.5% Conversion  
**Is this a Valid Segment?** YES  
**Status:** ACTIVE  
**Segment Description (Process/Fuel Type):** SULFURIC ACID PRODUCTION  
**Maximum Hourly Rate:**  
**Hourly Rate Limit:** 60  
**Maximum Annual Rate:**  
**Annual Rate Limit:** 525600  
**Estimated Annual Activity Factor:**  
**Maximum % Sulfur:**  
**% Sulfur Rate Limit:**  
**Maximum % Ash:**  
**Million Btu per SCC Unit:** 0  
**Segment Comment:** SULFURIC ACID CONTACT PROCESS - ABSORBER/@ 99.5%  
 CONVERSION

**SCC Code: 30102306**  
**Units:** Tons 100% Sulfuric Acid Produced  
**Description 1:** Industrial Processes  
**Description 2:** Chemical Manufacturing  
**Description 3:** Sulfuric Acid (Contact Process)  
**Description 4:** Absorber/@ 99.0% Conversion  
**Is this a Valid Segment?** YES  
**Status:** INACTIVE  
**Segment Description (Process/Fuel Type):**  
**Maximum Hourly Rate:**  
**Hourly Rate Limit:**  
**Maximum Annual Rate:**  
**Annual Rate Limit:**  
**Estimated Annual Activity Factor:**  
**Maximum % Sulfur:**  
**% Sulfur Rate Limit:**  
**Maximum % Ash:**  
**Million Btu per SCC Unit:**  
**Segment Comment:** SULFURIC ACID CONTACT PROCESS - ABSORBER/@ 99%  
 CONVERSION

**\*\*EU 006: POLLUTANT INFORMATION \*\***

**Pollutant Code:** NOX  
**Pollutant Description:** NITROGEN OXIDES  
**Is this a Valid Pollutant?** YES  
**Status:** ACTIVE  
**Include in the Facility Emissions Cap?** NO  
**Pollutant Regulatory Code:** NS - POLLUTANT NOT EMISSIONS-LIMITED NOT SUBJECT TO  
 WORK PRACTICE  
**Primary Control Device:**  
**Secondary Control Device:**  
**Total % Efficiency of Control:**

**Potential Emissions:**  
**Synthetically Limited?:**  
**Emissions Method:**  
**Emission Factor:**  
**Emission Factor Units:**  
**Emission Factor Reference:**  
**Calculation of Emissions:**  
**Range of Estimated Fugitive Emissions (Lower Limit):**  
**Range of Estimated Fugitive Emissions (Upper Limit):**  
**Pollutant Comment:**

**Pollutant Code:** PM  
**Pollutant Description:** PARTICULATE MATTER - TOTAL  
**Is this a Valid Pollutant?** YES  
**Status:** ACTIVE  
**Include in the Facility Emissions Cap?** NO  
**Pollutant Regulatory Code:** NS - POLLUTANT NOT EMISSIONS-LIMITED NOT SUBJECT TO WORK PRACTICE

**Primary Control Device:**  
**Secondary Control Device:**  
**Total % Efficiency of Control:**  
**Potential Emissions:**  
**Synthetically Limited?:** NO  
**Emissions Method:** CALCULATED USING EMISSION FACTOR FROM AP-42/FIRE SYSTEM.

**Emission Factor:**  
**Emission Factor Units:** PPMVD @ 8% O2  
**Emission Factor Reference:**  
**Calculation of Emissions:**

**Range of Estimated Fugitive Emissions (Lower Limit):**  
**Range of Estimated Fugitive Emissions (Upper Limit):**  
**Pollutant Comment:**

**Pollutant Code:** PM10  
**Pollutant Description:** PARTICULATE MATTER - PM10  
**Is this a Valid Pollutant?** YES  
**Status:** ACTIVE  
**Include in the Facility Emissions Cap?** NO  
**Pollutant Regulatory Code:** NS - POLLUTANT NOT EMISSIONS-LIMITED NOT SUBJECT TO WORK PRACTICE

**Primary Control Device:**  
**Secondary Control Device:**  
**Total % Efficiency of Control:**  
**Potential Emissions:**  
**Synthetically Limited?:**  
**Emissions Method:**  
**Emission Factor:**  
**Emission Factor Units:**  
**Emission Factor Reference:**  
**Calculation of Emissions:**

**Range of Estimated Fugitive Emissions (Lower Limit):**  
**Range of Estimated Fugitive Emissions (Upper Limit):**  
**Pollutant Comment:**

**Pollutant Code:** SAM  
**Pollutant Description:** SULFURIC ACID MIST  
**Is this a Valid Pollutant?** YES  
**Status:** ACTIVE  
**Include in the Facility Emissions Cap?** NO  
**Pollutant Regulatory Code:** EL - EMISSION-LIMITED POLLUTANT  
**Primary Control Device:** SULFURIC ACID PLANT-DOUBLE CONTACT PROCESS  
**Secondary Control Device:** MIST ELIMINATOR HIGH VELOCITY (V>250FT/MIN)  
**Total % Efficiency of Control:** 99  
**Potential Emissions:** 12 lb/hour 52.56 tons/year  
**Synthetically Limited?:** NO



**Emissions Method:** EQUAL TO EQUIVALENT ALLOWABLE EMISSION/WORST-CASE ALLOWABLE EMISSION.

**Emission Factor:** 12

**Emission Factor Units:** LB/HR

**Emission Factor Reference:**

**Calculation of Emissions:** SO2 = 12 LB/HR X 8760 HR/YR X TON/2000 LB = 52.56 TPY

**Range of Estimated Fugitive Emissions (Lower Limit):**

**Range of Estimated Fugitive Emissions (Upper Limit):**

**Pollutant Comment:**

**Pollutant Code:** SO2

**Pollutant Description:** SULFUR DIOXIDE

**Is this a Valid Pollutant?** YES

**Status:** ACTIVE

**Include in the Facility Emissions Cap?** NO

**Pollutant Regulatory Code:** EL - EMISSION-LIMITED POLLUTANT

**Primary Control Device:** SULFURIC ACID PLANT-DOUBLE CONTACT PROCESS

**Secondary Control Device:**

**Total % Efficiency of Control:** 99.5

**Potential Emissions:** 400 lb/hour 1752 tons/year

**Synthetically Limited?:** NO

**Emissions Method:** EQUAL TO EQUIVALENT ALLOWABLE EMISSION/WORST-CASE ALLOWABLE EMISSION.

**Emission Factor:** 400

**Emission Factor Units:** LB/HR

**Emission Factor Reference:** PERMIT

**Calculation of Emissions:** SO2 = 400 LBS/HR X 8760 HR/YR X TON/2000 LB = 1752 TPY

**Range of Estimated Fugitive Emissions (Lower Limit):**

**Range of Estimated Fugitive Emissions (Upper Limit):**

**Pollutant Comment:**

**\*\*EU 006: POLLUTANT ALLOWABLE EMISSIONS INFORMATION \*\***

**Pollutant Code:** SAM

**Pollutant Description:** SULFURIC ACID MIST

**Basis for Allowable Emissions Code:** RULE - EMISSIONS CAP REQUIRED BY RULE

**Regulation:** 62-296.402(1)(b)

**Future Effective Date of Allowable Emissions:**

**Allowable Emissions:** 0.2

**Allowable Emissions Unit:** POUNDS PER TON OF PRODUCT

**Equivalent Allowable Emissions:** 12 lb/hour 52.56 tons/year

**Method of Compliance:** EPA METHOD 8

**Compliance Method Code:** 1 - STACK TEST

**Compliance Test Frequency:** 1 - ANNUALLY

**Frequency Base Date:** 1/4/1999

**Comment/Description of Operating Method:**

**Pollutant Code:** SO2

**Pollutant Description:** SULFUR DIOXIDE

**Basis for Allowable Emissions Code:** RULE - EMISSIONS CAP REQUIRED BY RULE

**Regulation:** 62-296.402(1)(b)

**Future Effective Date of Allowable Emissions:**

**Allowable Emissions:** 6.7

**Allowable Emissions Unit:** POUNDS PER TON OF PRODUCT

**Equivalent Allowable Emissions:** 400 lb/hour 1752 tons/year

**Method of Compliance:** EPA METHOD 8

**Compliance Method Code:** 3 - STACK TEST & CMS

**Compliance Test Frequency:** 1 - ANNUALLY

**Frequency Base Date:** 1/4/1999

**Comment/Description of Operating Method:**

**\*\*EU 006: VISIBLE EMISSIONS INFORMATION \*\***

Visible Emissions Subtype: VE10  
 Basis for Allowable Opacity: RULE  
 Regulation: 62-296.402  
 Requested Allowable Opacity in Normal Conditions: 10  
 Requested Allowable Opacity in Exceptional Conditions: 666  
 Maximum Period of Excess Opacity Allowed: 0  
 Compliance Test Method(s):  
 Compliance Test Frequency: 1 - ANNUALLY  
 Frequency Base Date: 1/4/1999  
 COM Required? No  
 Visible Emissions Comment:

**\*\*EU 006: CONTINUOUS MONITOR INFORMATION \*\***

CM Identifier: 1  
 Parameter Code: EM - EMISSION  
 Pollutant(s) Monitored: SO2 - Sulfur Dioxide  
 CMS Requirement:  
 CEM Requirement: 4 - OTHER (SPECIFY IN COMMENT)  
 Monitor Manufacturer: DUPONT  
 Model Number: 460  
 Serial Number: 3894  
 Installation Date: 6/1/1975  
 Certification Date: 7/30/1981  
 Performance Specification Test Date: 7/1/1981  
 Performance Specification Test Status: P  
 Status: ACTIVE  
 Continuous Monitor Comment: 62-296.402, F.A.C.

**\*\* EU 006: SUPPLEMENTARY ITEMS \*\***

Supplementary Item	Applicable?	Attachment?
ACID RAIN PART (FORM NO. 62-210.900(1)(a)) Previously submitted? NO Submittal Date:	No	No
ALTERNATIVE METHODS OF OPERATION	No	No
ALTERNATIVE MODES OF OPERATION (EMISSIONS TRADING)	No	No
CERTIFICATE OF REPRESENTATION (EPA FORM NO. 7610-1)	No	No
COMPLIANCE ASSURANCE MONITORING PLAN	Yes	Yes
COMPLIANCE DEMONSTRATION REPORTS/RECORDS Previously submitted? YES Submittal Date: Previously Submitted Test Date(s)/Pollutants Tested: To Be submitted? NO Submittal Date: To Be Submitted Test Date(s)/Pollutants Tested:	Yes	Yes
CONTROL TECHNOLOGY REVIEW AND ANALYSIS (RULES 62-212.400(6) and 62-212.500(7), F.A.C.; 40 CFR 63.43(d) and (e))	No	No
DESCRIPTION OF STACK SAMPLING FACILITIES	No	No
DETAILED DESCRIPTION OF CONTROL EQUIPMENT Previously submitted? YES Submittal Date:	Yes	Yes
FUEL ANALYSIS OR SPECIFICATION Previously submitted? NO Submittal Date:	No	No
GOOD ENGINEERING PRACTICE STACK HEIGHT ANALYSIS (RULE 62-212.400(5)(h)6., F.A.C., and RULE 62-212.500(4)(f), F.A.C.)	No	No
IDENTIFICATION OF APPLICABLE REQUIREMENTS	Yes	Yes
NEW UNIT EXEMPTION (FORM NO. 62-210.900(1)(a)2.) Previously submitted? NO Submittal Date:	No	No
OPERATION AND MAINTENANCE PLAN Previously submitted? NO Submittal Date:	No	No
OTHER EMISSIONS UNIT INFORMATION	No	No
OTHER INFORMATION REQUIRED BY RULE OR STATUTE	No	No
PHASE II NOx AVERAGING PLAN (FORM NO. 62-210.900(1)(a)5.)		

Previously submitted? NO Submittal Date:	No	No
<b>PHASE II NOx COMPLIANCE PLAN (FORM NO. 62-210.900(1)(a)4.</b> Previously submitted? NO Submittal Date:	No	No
<b>PROCEDURES FOR STARTUP AND SHUTDOWN</b> Previously submitted? YES Submittal Date:	Yes	Yes
<b>PROCESS FLOW DIAGRAM</b> Previously submitted? YES Submittal Date:	Yes	Yes
<b>REPOWERING EXTENSION PLAN (FORM NO. 62-210.900(1)(a)1.)</b> Previously submitted? NO Submittal Date:	No	No
<b>RETIRED UNIT EXEMPTION (FORM NO. 62-210.900(1)(a)3.)</b> Previously submitted? NO Submittal Date:	No	No

**\*\* EU 006: SUPPLEMENTARY ATTACHMENTS \*\***

Supplementary Item	Electronic?	Attachment Description	Electronic File Name	Uploaded?
COMPLIANCE ASSURANCE MONITORING PLAN	No	CAM PLAN	N/A	N/A
COMPLIANCE DEMONSTRATION REPORTS/RECORDS	No	COMPLIANCE REPORT	N/A	N/A
DETAILED DESCRIPTION OF CONTROL EQUIPMENT	No	CONTROL EQUIPMENT	N/A	N/A
IDENTIFICATION OF APPLICABLE REQUIREMENTS	No	APPLICABLE REQUIREMENTS	N/A	N/A
PROCEDURES FOR STARTUP AND SHUTDOWN	No	START-UP SHUTDOWN	N/A	N/A
PROCESS FLOW DIAGRAM	No	PROCESS FLOW	N/A	N/A

**\*\* EU 021: DESCRIPTION AND DETAIL INFORMATION \*\***

**Type of EU:** THIS EU INFORMATION SECTION ADDRESSES, AS A SINGLE EMISSIONS UNIT, A SINGLE PROCESS OR PRODUCTION UNIT, OR ACTIVITY, WHICH PRODUCES ONE OR MORE AIR POLLUTANTS AND WHICH HAS AT LEAST ONE DEFINABLE EMISSION POINT (STACK OR VENT).

**EU Description:** BOILER NO. 1

**EU Status:** A - ACTIVE

**EU Classification:** R - REGULATED EMISSIONS UNIT

**Acid Rain Unit?** No

**CEMS Required?** No

**Ozone SIP Base Year Unit?** Yes

**Initial Startup Date:**

**Long-term Reserve Shutdown Date:**

**Commence Construction Date:**

**EU Major Group SIC:** 28 - CHEMICALS AND ALLIED PRODUCTS

**EU Type:** 10.02 - INDUSTRIAL

**Package Unit Manufacturer:**

**Generator Nameplate Rating:**

**Incinerator Dwell Temp:**

**Incinerator Dwell Time:**

**Incinerator Afterburner Temp:**

**EU Comment:**

**\*\*EU 021: CONTROL EQUIPMENT/METHOD INFORMATION \*\***

\*\*\* NO CONTROL EQUIPMENT/METHOD(S) FOUND FOR THIS EU \*\*\*

**\*\*EU 021: OPERATING CAPACITY AND SCHEDULE \*\***

**Maximum Heat Input Rate:** 33 mmBtu/hr

**Maximum Incineration Rate:**

**Maximum Process or Throughput Rate:**

**Maximum Process or Throughput Rate Units:**

**Maximum Production Rate:**

**Maximum Process or Throughput Rate Units:**

**Requested Maximum Operating Schedule:** 24 hours/day 7 days/week 52 weeks/year 8760 weeks/year

**Operating Capacity and Schedule Comment:**

**\*\*EU 021: POINT (STACK/VENT) INFORMATION \*\***

**Stack Number:** 21

**Identification of Point on Plot Plan or Flow Diagram?**

**Emission Point Type Code:** 1 - A SINGLE EMISSION POINT SERVING A SINGLE EMISSIONS UNIT

**Discharge Type Code:**

**Stack Height:** 36 feet

**Exit Diameter:** 2.5 feet

**Exit Temperature:** 600 Fahrenheit

**Actual Volumetric Flow Rate:** 13000 acfm

**Water Vapor:**

**Maximum Dry Standard Flow Rate:**

**Nonstack Emission Point Height:**

**Emission Point UTM Coordinates:**

**Emission Point Latitude:**

**Emission Point Longitude:**

**Emission Point Comment:**

**\*\*EU 021: SEGMENT (PROCESS/FUEL) INFORMATION \*\***

**SCC Code:** 10200501

**Units:** 1000 Gallons Distillate Oil (No. 1 & 2) Burned  
**Description 1:** External Combustion Boilers  
**Description 2:** Industrial  
**Description 3:** Distillate Oil  
**Description 4:** Grades 1 and 2 Oil  
**Is this a Valid Segment?** YES  
**Status:** ACTIVE  
**Segment Description (Process/Fuel Type):**  
**Maximum Hourly Rate:** 5.26  
**Hourly Rate Limit:** 5.26  
**Maximum Annual Rate:**  
**Annual Rate Limit:**  
**Estimated Annual Activity Factor:**  
**Maximum % Sulfur:** 0.5  
**% Sulfur Rate Limit:** 0.5  
**Maximum % Ash:**  
**Million Btu per SCC Unit:** 150  
**Segment Comment:**

**SCC Code:** 10200502  
**Units:** 1000 Gallons Distillate Oil Burned  
**Description 1:** External Combustion Boilers  
**Description 2:** Industrial  
**Description 3:** Distillate Oil  
**Description 4:** 10-100 Million Btu/hr \*\*  
**Is this a Valid Segment?** YES  
**Status:** INACTIVE  
**Segment Description (Process/Fuel Type):** DISTILLATE OIL BURNING  
**Maximum Hourly Rate:** 0.236  
**Hourly Rate Limit:** 0.235  
**Maximum Annual Rate:**  
**Annual Rate Limit:** 2056.72  
**Estimated Annual Activity Factor:**  
**Maximum % Sulfur:**  
**% Sulfur Rate Limit:** 0.5  
**Maximum % Ash:**  
**Million Btu per SCC Unit:** 140  
**Segment Comment:**

**SCC Code:** 10200602  
**Units:** Million Cubic Feet Natural Gas Burned  
**Description 1:** External Combustion Boilers  
**Description 2:** Industrial  
**Description 3:** Natural Gas  
**Description 4:** 10-100 Million Btu/hr  
**Is this a Valid Segment?** YES  
**Status:** INACTIVE  
**Segment Description (Process/Fuel Type):** NATURAL GAS BURNING  
**Maximum Hourly Rate:** 0.033  
**Hourly Rate Limit:** 0.033  
**Maximum Annual Rate:**  
**Annual Rate Limit:** 287.94  
**Estimated Annual Activity Factor:**  
**Maximum % Sulfur:**  
**% Sulfur Rate Limit:**  
**Maximum % Ash:**  
**Million Btu per SCC Unit:** 1000  
**Segment Comment:**

**\*\*EU 021: POLLUTANT INFORMATION \*\***

**Pollutant Code:** CO  
**Pollutant Description:** CARBON MONOXIDE

**Is this a Valid Pollutant?** YES**Status:** ACTIVE**Include in the Facility Emissions Cap?** NO**Pollutant Regulatory Code:** NS - POLLUTANT NOT EMISSIONS-LIMITED NOT SUBJECT TO WORK PRACTICE**Primary Control Device:****Secondary Control Device:****Total % Efficiency of Control:****Potential Emissions:****Synthetically Limited?:****Emissions Method:** CALCULATED USING EMISSION FACTOR FROM AP-42/FIRE SYSTEM.**Emission Factor:****Emission Factor Units:****Emission Factor Reference:****Calculation of Emissions:****Range of Estimated Fugitive Emissions (Lower Limit):****Range of Estimated Fugitive Emissions (Upper Limit):****Pollutant Comment:****Pollutant Code:** NOX**Pollutant Description:** NITROGEN OXIDES**Is this a Valid Pollutant?** YES**Status:** ACTIVE**Include in the Facility Emissions Cap?** NO**Pollutant Regulatory Code:** NS - POLLUTANT NOT EMISSIONS-LIMITED NOT SUBJECT TO WORK PRACTICE**Primary Control Device:****Secondary Control Device:****Total % Efficiency of Control:****Potential Emissions:****Synthetically Limited?:****Emissions Method:** CALCULATED USING EMISSION FACTOR FROM AP-42/FIRE SYSTEM.**Emission Factor:****Emission Factor Units:****Emission Factor Reference:****Calculation of Emissions:****Range of Estimated Fugitive Emissions (Lower Limit):****Range of Estimated Fugitive Emissions (Upper Limit):****Pollutant Comment:****Pollutant Code:** PB**Pollutant Description:** LEAD - TOTAL (ELEMENTAL LEAD AND LEAD COMPOUNDS)**Is this a Valid Pollutant?** YES**Status:** ACTIVE**Include in the Facility Emissions Cap?** NO**Pollutant Regulatory Code:** NS - POLLUTANT NOT EMISSIONS-LIMITED NOT SUBJECT TO WORK PRACTICE**Primary Control Device:****Secondary Control Device:****Total % Efficiency of Control:****Potential Emissions:****Synthetically Limited?:****Emissions Method:****Emission Factor:****Emission Factor Units:****Emission Factor Reference:****Calculation of Emissions:****Range of Estimated Fugitive Emissions (Lower Limit):****Range of Estimated Fugitive Emissions (Upper Limit):****Pollutant Comment:****Pollutant Code:** PM**Pollutant Description:** PARTICULATE MATTER - TOTAL

**Is this a Valid Pollutant?** YES**Status:** ACTIVE**Include in the Facility Emissions Cap?** NO**Pollutant Regulatory Code:** NS - POLLUTANT NOT EMISSIONS-LIMITED NOT SUBJECT TO WORK PRACTICE**Primary Control Device:****Secondary Control Device:****Total % Efficiency of Control:****Potential Emissions:****Synthetically Limited?:** NO**Emissions Method:** EQUAL TO EQUIVALENT ALLOWABLE EMISSION/WORST-CASE ALLOWABLE EMISSION.**Emission Factor:****Emission Factor Units:** PPMVD @ 8% O2**Emission Factor Reference:** PERMIT**Calculation of Emissions:****Range of Estimated Fugitive Emissions (Lower Limit):****Range of Estimated Fugitive Emissions (Upper Limit):****Pollutant Comment:****Pollutant Code:** PM10**Pollutant Description:** PARTICULATE MATTER - PM10**Is this a Valid Pollutant?** YES**Status:** ACTIVE**Include in the Facility Emissions Cap?** NO**Pollutant Regulatory Code:** NS - POLLUTANT NOT EMISSIONS-LIMITED NOT SUBJECT TO WORK PRACTICE**Primary Control Device:****Secondary Control Device:****Total % Efficiency of Control:****Potential Emissions:****Synthetically Limited?:****Emissions Method:****Emission Factor:****Emission Factor Units:****Emission Factor Reference:****Calculation of Emissions:****Range of Estimated Fugitive Emissions (Lower Limit):****Range of Estimated Fugitive Emissions (Upper Limit):****Pollutant Comment:****Pollutant Code:** SO2**Pollutant Description:** SULFUR DIOXIDE**Is this a Valid Pollutant?** YES**Status:** ACTIVE**Include in the Facility Emissions Cap?** NO**Pollutant Regulatory Code:** EL - EMISSION-LIMITED POLLUTANT**Primary Control Device:****Secondary Control Device:****Total % Efficiency of Control:****Potential Emissions:** 16.8 lb/hour 73.4 tons/year**Synthetically Limited?:** NO**Emissions Method:** CALCULATED USING EMISSION FACTOR FROM AP-42/FIRE SYSTEM.**Emission Factor:** 142**Emission Factor Units:** OTHER (SPECIFY IN COMMENT)**Emission Factor Reference:** AP-42**Calculation of Emissions:** SO2 = 142 (0.5) LB/1000 GAL X 0.236 = 16.8 LB/HR X 8760 HRS/YR X TON/2000 LBS = 73.4 TPY**Range of Estimated Fugitive Emissions (Lower Limit):****Range of Estimated Fugitive Emissions (Upper Limit):****Pollutant Comment:****Pollutant Code:** VOC**Pollutant Description:** VOLATILE ORGANIC COMPOUNDS

**Is this a Valid Pollutant?** YES  
**Status:** ACTIVE  
**Include in the Facility Emissions Cap?** NO  
**Pollutant Regulatory Code:** NS - POLLUTANT NOT EMISSIONS-LIMITED NOT SUBJECT TO WORK PRACTICE  
**Primary Control Device:**  
**Secondary Control Device:**  
**Total % Efficiency of Control:**  
**Potential Emissions:**  
**Synthetically Limited?:**  
**Emissions Method:** CALCULATED USING EMISSION FACTOR FROM AP-42/FIRE SYSTEM.  
**Emission Factor:**  
**Emission Factor Units:**  
**Emission Factor Reference:**  
**Calculation of Emissions:**  
**Range of Estimated Fugitive Emissions (Lower Limit):**  
**Range of Estimated Fugitive Emissions (Upper Limit):**  
**Pollutant Comment:**

**\*\*EU 021: POLLUTANT ALLOWABLE EMISSIONS INFORMATION \*\***

**Pollutant Code:** PM  
**Pollutant Description:** PARTICULATE MATTER - TOTAL  
**Basis for Allowable Emissions Code:**  
**Regulation:**  
**Future Effective Date of Allowable Emissions:**  
**Allowable Emissions:** 48.1  
**Allowable Emissions Unit:** TONS/YEAR  
**Equivalent Allowable Emissions:** 48.1 tons/year  
**Method of Compliance:**  
**Compliance Method Code:** 99 - OTHER  
**Compliance Test Frequency:** 0 - NONE REQUIRED  
**Frequency Base Date:**  
**Comment/Description of Operating Method:** TN/YR

**Pollutant Code:** SO2  
**Pollutant Description:** SULFUR DIOXIDE  
**Basis for Allowable Emissions Code:** OTHER - REQUESTED BY APPLICANT FOR OTHER REASONS  
**Regulation:**  
**Future Effective Date of Allowable Emissions:**  
**Allowable Emissions:** 0.5  
**Allowable Emissions Unit:** PERCENT SULFUR IN FUEL  
**Equivalent Allowable Emissions:** 16.8 lb/hour 73.4 tons/year  
**Method of Compliance:** FUEL SULFUR ANALYSIS  
**Compliance Method Code:** 4 - FUEL SAMPLING  
**Compliance Test Frequency:** 0 - NONE REQUIRED  
**Frequency Base Date:**  
**Comment/Description of Operating Method:**

**\*\*EU 021: VISIBLE EMISSIONS INFORMATION \*\***

**Visible Emissions Subtype:** VE20  
**Basis for Allowable Opacity:** RULE  
**Regulation:** 62-296.406(1)  
**Requested Allowable Opacity in Normal Conditions:** 20  
**Requested Allowable Opacity in Exceptional Conditions:** 27  
**Maximum Period of Excess Opacity Allowed:** 6  
**Compliance Test Method(s):**  
**Compliance Test Frequency:** 11 - EACH FFY (1 OCT - 30 SEP)  
**Frequency Base Date:** 2/24/2000



**COM Required?** No  
**Visible Emissions Comment:** TEST CAN BE WAIVED IF REQUESTED IN WRITING ON A YEAR BY YEAR BASIS, IF FUEL OIL HAS NOT BEEN USED MORE THAN 400 HOURS IN THE PRIOR 12 MONTHS. FUEL RECORDS REQUIRED FOR NO. 2 FUEL OIL.

**\*\*EU 021: CONTINUOUS MONITOR INFORMATION \*\***

\*\*\* NO CONTINUOUS MONITOR INFORMATION FOUND FOR THIS EU \*\*\*

**\*\* EU 021: SUPPLEMENTARY ITEMS \*\***

Supplementary Item	Applicable?	Attachment?
ACID RAIN PART (FORM NO. 62-210.900(1)(a)) Previously submitted? NO Submittal Date:	No	No
ALTERNATIVE METHODS OF OPERATION	No	No
ALTERNATIVE MODES OF OPERATION (EMISSIONS TRADING)	No	No
CERTIFICATE OF REPRESENTATION (EPA FORM NO. 7610-1)	No	No
COMPLIANCE ASSURANCE MONITORING PLAN	No	No
COMPLIANCE DEMONSTRATION REPORTS/RECORDS Previously submitted? YES Submittal Date: Previously Submitted Test Date(s)/Pollutants Tested: To Be submitted? NO Submittal Date: To Be Submitted Test Date(s)/Pollutants Tested:	Yes	Yes
CONTROL TECHNOLOGY REVIEW AND ANALYSIS (RULES 62-212.400(6) and 62-212.500(7), F.A.C., 40 CFR 63.43(d) and (e))	No	No
DESCRIPTION OF STACK SAMPLING FACILITIES	No	No
DETAILED DESCRIPTION OF CONTROL EQUIPMENT Previously submitted? NO Submittal Date:	No	No
FUEL ANALYSIS OR SPECIFICATION Previously submitted? YES Submittal Date:	Yes	Yes
GOOD ENGINEERING PRACTICE STACK HEIGHT ANALYSIS (RULE 62-212.400(5)(h)6., F.A.C., and RULE 62-212.500(4)(f), F.A.C.)	No	No
IDENTIFICATION OF APPLICABLE REQUIREMENTS	Yes	Yes
NEW UNIT EXEMPTION (FORM NO. 62-210.900(1)(a)2.) Previously submitted? NO Submittal Date:	No	No
OPERATION AND MAINTENANCE PLAN Previously submitted? NO Submittal Date:	No	No
OTHER EMISSIONS UNIT INFORMATION	No	No
OTHER INFORMATION REQUIRED BY RULE OR STATUTE	No	No
PHASE II NOx AVERAGING PLAN (FORM NO. 62-210.900(1)(a)5.) Previously submitted? NO Submittal Date:	No	No
PHASE II NOx COMPLIANCE PLAN (FORM NO. 62-210.900(1)(a)4.) Previously submitted? NO Submittal Date:	No	No
PROCEDURES FOR STARTUP AND SHUTDOWN Previously submitted? NO Submittal Date:	No	No
PROCESS FLOW DIAGRAM Previously submitted? YES Submittal Date:	Yes	Yes
REPOWERING EXTENSION PLAN (FORM NO. 62-210.900(1)(a)1.) Previously submitted? NO Submittal Date:	No	No
RETIRED UNIT EXEMPTION (FORM NO. 62-210.900(1)(a)3.) Previously submitted? NO Submittal Date:	No	No

**\*\* EU 021: SUPPLEMENTARY ATTACHMENTS \*\***

Supplementary Item	Electronic?	Attachment Description	Electronic File Name	Uploaded?
COMPLIANCE DEMONSTRATION REPORTS/RECORDS	No	COMPLIANCE REPORT	N/A	N/A
FUEL ANALYSIS OR SPECIFICATION	No	FUEL SPECIFICATION	N/A	N/A
IDENTIFICATION OF APPLICABLE REQUIREMENTS	No	APPLICABLE REQUIREMENTS	N/A	N/A

PROCESS FLOW DIAGRAM	No	PROCESS FLOW	N/A	N/A
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**\*\* EU 025: DESCRIPTION AND DETAIL INFORMATION \*\***

Type of EU: THIS EMISSIONS UNIT INFORMATION SECTION ADDRESSES, AS A SINGLE EMISSIONS UNIT, A GROUP OF PROCESS OR PRODUCTION UNITS AND ACTIVITIES WHICH HAS AT LEAST ONE DEFINABLE EMISSION POINT (STACK OR VENT) BUT MAY ALSO PRODUCE FUGITIVE EMISSIONS.

EU Description: NO. 2 MAP/DAP SHIPPING UNIT  
 EU Status: A - ACTIVE  
 EU Classification: R - REGULATED EMISSIONS UNIT  
 Acid Rain Unit? No  
 CEMS Required? No  
 Ozone SIP Base Year Unit? Yes  
 Initial Startup Date:  
 Long-term Reserve Shutdown Date:  
 Commence Construction Date:  
 EU Major Group SIC: 28 - CHEMICALS AND ALLIED PRODUCTS  
 EU Type: 2.04 - AGRICULTURAL CHEMICAL MANUFACTURE  
 Package Unit Manufacturer:  
 Generator Nameplate Rating:  
 Incinerator Dwell Temp:  
 Incinerator Dwell Time:  
 Incinerator Afterburner Temp:  
 EU Comment:

**\*\*EU 025: CONTROL EQUIPMENT/METHOD INFORMATION \*\***

Control Equipment/Method Name: WET SCRUBBER MED EFFICIENCY (80.0-94.9%)

Description:  
 Manufacturer:  
 Model Number:  
 Serial Number:

Control Equipment/Method Name: GAS SCRUBBER, GENERAL

Description: WET SCRUBBER  
 Manufacturer:  
 Model Number:  
 Serial Number:

Control Equipment/Method Name: DUST SUPPRESSION BY CHEMICAL STABILIZERS/WETTING AGENTS

Description:  
 Manufacturer:  
 Model Number:  
 Serial Number:

**\*\*EU 025: OPERATING CAPACITY AND SCHEDULE \*\***

Maximum Heat Input Rate:  
 Maximum Incineration Rate:  
 Maximum Process or Throughput Rate: 325  
 Maximum Process or Throughput Rate Units: TPH SHIPPED  
 Maximum Production Rate:  
 Maximum Process or Throughput Rate Units:  
 Requested Maximum Operating Schedule: 24 hours/day 7 days/week 52 weeks/year 8760 weeks/year  
 Operating Capacity and Schedule Comment:

**\*\*EU 025: POINT (STACK/VENT) INFORMATION \*\***

Stack Number: 25  
 Identification of Point on Plot Plan or Flow Diagram?  
 Emission Point Type Code: 1 - A SINGLE EMISSION POINT SERVING A SINGLE EMISSIONS UNIT  
 Discharge Type Code:

**Stack Height:** 135 feet  
**Exit Diameter:** 5 feet  
**Exit Temperature:** 77 Fahrenheit  
**Actual Volumetric Flow Rate:** 30600 acfm  
**Water Vapor:**  
**Maximum Dry Standard Flow Rate:**  
**Nonstack Emission Point Height:**  
**Emission Point UTM Coordinates:**  
**Emission Point Latitude:**  
**Emission Point Longitude:**  
**Emission Point Comment:**

**\*\*EU 025: SEGMENT (PROCESS/FUEL) INFORMATION \*\***

**SCC Code:** 30510597  
**Units:** Tons Material Processed  
**Description 1:** Industrial Processes  
**Description 2:** Mineral Products  
**Description 3:** Bulk Materials Loading Operation  
**Description 4:** Fertilizer: Specify in Comments  
**Is this a Valid Segment?** YES  
**Status:** INACTIVE  
**Segment Description (Process/Fuel Type):** BULK FERTILIZER LOADOUT OPERATION  
**Maximum Hourly Rate:** 325  
**Hourly Rate Limit:** 325  
**Maximum Annual Rate:**  
**Annual Rate Limit:** 2847000  
**Estimated Annual Activity Factor:**  
**Maximum % Sulfur:**  
**% Sulfur Rate Limit:**  
**Maximum % Ash:**  
**Million Btu per SCC Unit:** 0  
**Segment Comment:** DAP AND MAP LOADOUT

**\*\*EU 025: POLLUTANT INFORMATION \*\***

**Pollutant Code:** PM  
**Pollutant Description:** PARTICULATE MATTER - TOTAL  
**Is this a Valid Pollutant?** YES  
**Status:** ACTIVE  
**Include in the Facility Emissions Cap?** NO  
**Pollutant Regulatory Code:** WP - POLLUTANT REGULATED UNDER WORK PRACTICE STANDARD ONLY  
**Primary Control Device:** DUST SUPPRESSION BY CHEMICAL STABILIZERS/WETTING AGENTS  
**Secondary Control Device:**  
**Total % Efficiency of Control:** 95  
**Potential Emissions:** 0.11 lb/hour 0.5 tons/year  
**Synthetically Limited?:** NO  
**Emissions Method:** CALCULATED BASED ON SIMILAR PROCESS IN AP-42/FIRE SYSTEM.  
**Emission Factor:** 0  
**Emission Factor Units:**  
**Emission Factor Reference:**  
**Calculation of Emissions:**  
**Range of Estimated Fugitive Emissions (Lower Limit):**  
**Range of Estimated Fugitive Emissions (Upper Limit):**  
**Pollutant Comment:** Only materials treated with dust suppressants allowed; 5%VE indicator that suppressant is working

**Pollutant Code:** PM10  
**Pollutant Description:** PARTICULATE MATTER - PM10

**Is this a Valid Pollutant?** YES  
**Status:** ACTIVE  
**Include in the Facility Emissions Cap?** NO  
**Pollutant Regulatory Code:** NS - POLLUTANT NOT EMISSIONS-LIMITED NOT SUBJECT TO WORK PRACTICE  
**Primary Control Device:** DUST SUPPRESSION BY CHEMICAL STABILIZERS/WETTING AGENTS  
**Secondary Control Device:**  
**Total % Efficiency of Control:**  
**Potential Emissions:**  
**Synthetically Limited?:** NO  
**Emissions Method:**  
**Emission Factor:**  
**Emission Factor Units:**  
**Emission Factor Reference:**  
**Calculation of Emissions:**  
**Range of Estimated Fugitive Emissions (Lower Limit):**  
**Range of Estimated Fugitive Emissions (Upper Limit):**  
**Pollutant Comment:**

**\*\*EU 025: POLLUTANT ALLOWABLE EMISSIONS INFORMATION \*\***

\*\*\* NO POLLUTANT ALLOWABLE EMISSIONS INFORMATION FOUND FOR THIS EU \*\*\*

**\*\*EU 025: VISIBLE EMISSIONS INFORMATION \*\***

**Visible Emissions Subtype:** VE05  
**Basis for Allowable Opacity:** OTHER  
**Regulation:**  
**Requested Allowable Opacity in Normal Conditions:**  
**Requested Allowable Opacity in Exceptional Conditions:**  
**Maximum Period of Excess Opacity Allowed:**  
**Compliance Test Method(s):**  
**Compliance Test Frequency:** 0 - NONE REQUIRED  
**Frequency Base Date:**  
**COM Required?**  
**Visible Emissions Comment:** 5%VE (Condition A.2) indicator that dust suppressants are working.

**Visible Emissions Subtype:** VE20  
**Basis for Allowable Opacity:** RULE  
**Regulation:** 62-296.320(4)(b)  
**Requested Allowable Opacity in Normal Conditions:** 020  
**Requested Allowable Opacity in Exceptional Conditions:**  
**Maximum Period of Excess Opacity Allowed:** 0  
**Compliance Test Method(s):**  
**Compliance Test Frequency:** 1 - ANNUALLY  
**Frequency Base Date:** 1/25/1990  
**COM Required?** No  
**Visible Emissions Comment:** VE TEST TO BE AT LEAST 30 MINUTES LONG; 5%VE indicator that dust suppressant is working

**\*\*EU 025: CONTINUOUS MONITOR INFORMATION \*\***

\*\*\* NO CONTINUOUS MONITOR INFORMATION FOUND FOR THIS EU \*\*\*

<b>** EU 025: SUPPLEMENTARY ITEMS **</b>
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Supplementary Item	Applicable?	Attachment?
ACID RAIN PART (FORM NO. 62-210.900(1)(a)) Previously submitted? NO Submittal Date:	No	No
ALTERNATIVE METHODS OF OPERATION	No	No
ALTERNATIVE MODES OF OPERATION (EMISSIONS TRADING)	No	No
CERTIFICATE OF REPRESENTATION (EPA FORM NO. 7610-1)	No	No
COMPLIANCE ASSURANCE MONITORING PLAN	No	No
COMPLIANCE DEMONSTRATION REPORTS/RECORDS Previously submitted? YES Submittal Date: Previously Submitted Test Date(s)/Pollutants Tested: To Be submitted? NO Submittal Date: To Be Submitted Test Date(s)/Pollutants Tested:	Yes	Yes
CONTROL TECHNOLOGY REVIEW AND ANALYSIS (RULES 62-212.400(6) and 62-212.500(7), F.A.C.;40 CFR 63.43(d) and (e))	No	No
DESCRIPTION OF STACK SAMPLING FACILITIES	No	No
DETAILED DESCRIPTION OF CONTROL EQUIPMENT Previously submitted? YES Submittal Date:	Yes	Yes
FUEL ANALYSIS OR SPECIFICATION Previously submitted? NO Submittal Date:	No	No
GOOD ENGINEERING PRACTICE STACK HEIGHT ANALYSIS (RULE 62-212.400(5)(h)6.,F.A.C., and RULE 62-212.500(4)(f),F.A.C.)	No	No
IDENTIFICATION OF APPLICABLE REQUIREMENTS	Yes	Yes
NEW UNIT EXEMPTION (FORM NO. 62-210.900(1)(a)2.) Previously submitted? NO Submittal Date:	No	No
OPERATION AND MAINTENANCE PLAN Previously submitted? NO Submittal Date:	No	No
OTHER EMISSIONS UNIT INFORMATION	No	No
OTHER INFORMATION REQUIRED BY RULE OR STATUTE	No	No
PHASE II NOx AVERAGING PLAN (FORM NO. 62-210.900(1)(a)5.) Previously submitted? NO Submittal Date:	No	No
PHASE II NOx COMPLIANCE PLAN (FORM NO. 62-210.900(1)(a)4.) Previously submitted? NO Submittal Date:	No	No
PROCEDURES FOR STARTUP AND SHUTDOWN Previously submitted? NO Submittal Date:	No	No
PROCESS FLOW DIAGRAM Previously submitted? YES Submittal Date:	Yes	Yes
REPOWERING EXTENSION PLAN (FORM NO. 62-210.900(1)(a)1.) Previously submitted? NO Submittal Date:	No	No
RETIRED UNIT EXEMPTION (FORM NO. 62-210.900(1)(a)3.) Previously submitted? NO Submittal Date:	No	No

**\*\* EU 025: SUPPLEMENTARY ATTACHMENTS \*\***

Supplementary Item	Electronic?	Attachment Description	Electronic File Name	Uploaded?
COMPLIANCE DEMONSTRATION REPORTS/RECORDS	No	COMPLIANCE REPORT	N/A	N/A
DETAILED DESCRIPTION OF CONTROL EQUIPMENT	No	CONTROL EQUIPMENT	N/A	N/A
IDENTIFICATION OF APPLICABLE REQUIREMENTS	No	APPLICABLE REQUIREMENTS	N/A	N/A
PROCESS FLOW DIAGRAM	No	PROCESS FLOW	N/A	N/A

**\*\* EU 031: DESCRIPTION AND DETAIL INFORMATION \*\***

**Type of EU:** THIS EMISSIONS UNIT INFORMATION SECTION ADDRESSES, AS A SINGLE EMISSIONS UNIT, A GROUP OF PROCESS OR PRODUCTION UNITS AND ACTIVITIES WHICH HAS AT LEAST ONE DEFINABLE EMISSION POINT (STACK OR VENT) BUT MAY ALSO PRODUCE FUGITIVE EMISSIONS.

**EU Description:** DAP/MAP/GTSTP RAILCAR UNLOADING AND TRANSFER OPERATION

**EU Status:** A - ACTIVE

**EU Classification:** R - REGULATED EMISSIONS UNIT

**Acid Rain Unit?** No

**CEMS Required?** No

**Ozone SIP Base Year Unit?** No

**Initial Startup Date:**

**Long-term Reserve Shutdown Date:**

**Commence Construction Date:**

**EU Major Group SIC:** 28 - CHEMICALS AND ALLIED PRODUCTS

**EU Type:** 2.04 - AGRICULTURAL CHEMICAL MANUFACTURE

**Package Unit Manufacturer:**

**Generator Nameplate Rating:**

**Incinerator Dwell Temp:**

**Incinerator Dwell Time:**

**Incinerator Afterburner Temp:**

**EU Comment:**

**\*\*EU 031: CONTROL EQUIPMENT/METHOD INFORMATION \*\***

**Control Equipment/Method Name:** MISCELLANEOUS CONTROL DEVICES

**Description:** PRODUCT HANDLED IS RECEIVED PRECOATED WITH DUST SUPPRESSANT

**Manufacturer:**

**Model Number:**

**Serial Number:**

**\*\*EU 031: OPERATING CAPACITY AND SCHEDULE \*\***

**Maximum Heat Input Rate:**

**Maximum Incineration Rate:**

**Maximum Process or Throughput Rate:** 130

**Maximum Process or Throughput Rate Units:** TPH LOADING

**Maximum Production Rate:**

**Maximum Process or Throughput Rate Units:**

**Requested Maximum Operating Schedule:** 24 hours/day 7 days/week 52 weeks/year 8760 weeks/year

**Operating Capacity and Schedule Comment:**

**\*\*EU 031: POINT (STACK/VENT) INFORMATION \*\***

**Stack Number:** 31

**Identification of Point on Plot Plan or Flow Diagram?**

**Emission Point Type Code:** 1 - A SINGLE EMISSION POINT SERVING A SINGLE EMISSIONS UNIT

**Discharge Type Code:**

**Stack Height:**

**Exit Diameter:**

**Exit Temperature:** 77 Fahrenheit

**Actual Volumetric Flow Rate:**

**Water Vapor:**

**Maximum Dry Standard Flow Rate:**

**Nonstack Emission Point Height:** 2 feet

**Emission Point UTM Coordinates:** Zone: 17 East(km): 408.3 North(km): 3082.05

**Emission Point Latitude:**

**Emission Point Longitude:**

**Emission Point Comment:**

**\*\*EU 031: SEGMENT (PROCESS/FUEL) INFORMATION \*\***

**SCC Code:** 30510597  
**Units:** Tons Material Processed  
**Description 1:** Industrial Processes  
**Description 2:** Mineral Products  
**Description 3:** Bulk Materials Loading Operation  
**Description 4:** Fertilizer: Specify in Comments  
**Is this a Valid Segment?** YES  
**Status:** ACTIVE  
**Segment Description (Process/Fuel Type):** FERTILIZER UNLOADING OPERATION  
**Maximum Hourly Rate:** 130  
**Hourly Rate Limit:** 130  
**Maximum Annual Rate:**  
**Annual Rate Limit:** 700800  
**Estimated Annual Activity Factor:**  
**Maximum % Sulfur:**  
**% Sulfur Rate Limit:**  
**Maximum % Ash:**  
**Million Btu per SCC Unit:** 0  
**Segment Comment:**

**\*\*EU 031: POLLUTANT INFORMATION \*\***

**Pollutant Code:** PM  
**Pollutant Description:** PARTICULATE MATTER - TOTAL  
**Is this a Valid Pollutant?** YES  
**Status:** ACTIVE  
**Include in the Facility Emissions Cap?** NO  
**Pollutant Regulatory Code:** WP - POLLUTANT REGULATED UNDER WORK PRACTICE STANDARD ONLY  
**Primary Control Device:** MISCELLANEOUS CONTROL DEVICES  
**Secondary Control Device:**  
**Total % Efficiency of Control:**  
**Potential Emissions:**  
**Synthetically Limited?:**  
**Emissions Method:**  
**Emission Factor:**  
**Emission Factor Units:**  
**Emission Factor Reference:**  
**Calculation of Emissions:**  
**Range of Estimated Fugitive Emissions (Lower Limit):**  
**Range of Estimated Fugitive Emissions (Upper Limit):**  
**Pollutant Comment:** ONLY MAP/DAP TREATED WITH DUST SUPPRESSANT CAN BE UNLOADED.

**Pollutant Code:** PM10  
**Pollutant Description:** PARTICULATE MATTER - PM10  
**Is this a Valid Pollutant?** YES  
**Status:** ACTIVE  
**Include in the Facility Emissions Cap?** NO  
**Pollutant Regulatory Code:** WP - POLLUTANT REGULATED UNDER WORK PRACTICE STANDARD ONLY  
**Primary Control Device:** MISCELLANEOUS CONTROL DEVICES  
**Secondary Control Device:**  
**Total % Efficiency of Control:**  
**Potential Emissions:**  
**Synthetically Limited?:**  
**Emissions Method:**  
**Emission Factor:**  
**Emission Factor Units:**  
**Emission Factor Reference:**



**Calculation of Emissions:**

**Range of Estimated Fugitive Emissions (Lower Limit):**

**Range of Estimated Fugitive Emissions (Upper Limit):**

**Pollutant Comment:** ONLY MAP/DAP TREATED WITH DUST SUPPRESSANT CAN BE UNLOADED.

**\*\*EU 031: POLLUTANT ALLOWABLE EMISSIONS INFORMATION \*\***

\*\*\* NO POLLUTANT ALLOWABLE EMISSIONS INFORMATION FOUND FOR THIS EU \*\*\*

**\*\*EU 031: VISIBLE EMISSIONS INFORMATION \*\***

**Visible Emissions Subtype:** VE05

**Basis for Allowable Opacity:** OTHER

**Regulation:**

**Requested Allowable Opacity in Normal Conditions:** 005

**Requested Allowable Opacity in Exceptional Conditions:**

**Maximum Period of Excess Opacity Allowed:** 0

**Compliance Test Method(s):**

**Compliance Test Frequency:** 1 - ANNUALLY

**Frequency Base Date:** 7/7/1994

**COM Required?** No

**Visible Emissions Comment:** MAP/DAP WITH DUST SUPPRESSANT ONLY. TEST AT 130 TPH FOR 30 MIN.

**\*\*EU 031: CONTINUOUS MONITOR INFORMATION \*\***

\*\*\* NO CONTINUOUS MONITOR INFORMATION FOUND FOR THIS EU \*\*\*

**\*\* EU 031: SUPPLEMENTARY ITEMS \*\***

Supplementary Item	Applicable?	Attachment?
ACID RAIN PART (FORM NO. 62-210.900(1)(a)) Previously submitted? NO Submittal Date:	No	No
ALTERNATIVE METHODS OF OPERATION	No	No
ALTERNATIVE MODES OF OPERATION (EMISSIONS TRADING)	No	No
CERTIFICATE OF REPRESENTATION (EPA FORM NO. 7610-1)	No	No
COMPLIANCE ASSURANCE MONITORING PLAN	No	No
COMPLIANCE DEMONSTRATION REPORTS/RECORDS Previously submitted? YES Submittal Date: Previously Submitted Test Date(s)/Pollutants Tested: To Be submitted? NO Submittal Date: To Be Submitted Test Date(s)/Pollutants Tested:	Yes	Yes
CONTROL TECHNOLOGY REVIEW AND ANALYSIS (RULES 62-212.400(6) and 62-212.500(7), F.A.C.; 40 CFR 63.43(d) and (e))	No	No
DESCRIPTION OF STACK SAMPLING FACILITIES	No	No
DETAILED DESCRIPTION OF CONTROL EQUIPMENT Previously submitted? NO Submittal Date:	No	No
FUEL ANALYSIS OR SPECIFICATION Previously submitted? NO Submittal Date:	No	No
GOOD ENGINEERING PRACTICE STACK HEIGHT ANALYSIS (RULE 62-212.400(5)(h)6., F.A.C., and RULE 62-212.500(4)(f), F.A.C.)	No	No
IDENTIFICATION OF APPLICABLE REQUIREMENTS	Yes	Yes
NEW UNIT EXEMPTION (FORM NO. 62-210.900(1)(a)2.) Previously submitted? NO Submittal Date:	No	No
OPERATION AND MAINTENANCE PLAN Previously submitted? NO Submittal Date:	No	No
OTHER EMISSIONS UNIT INFORMATION	No	No

OTHER INFORMATION REQUIRED BY RULE OR STATUTE	No	No
PHASE II NO <sub>x</sub> AVERAGING PLAN (FORM NO. 62-210.900(1)(a)5.) Previously submitted? NO Submittal Date:	No	No
PHASE II NO <sub>x</sub> COMPLIANCE PLAN (FORM NO. 62-210.900(1)(a)4.) Previously submitted? NO Submittal Date:	No	No
PROCEDURES FOR STARTUP AND SHUTDOWN Previously submitted? NO Submittal Date:	No	No
PROCESS FLOW DIAGRAM Previously submitted? YES Submittal Date:	Yes	Yes
REPOWERING EXTENSION PLAN (FORM NO. 62-210.900(1)(a)1.) Previously submitted? NO Submittal Date:	No	No
RETIRED UNIT EXEMPTION (FORM NO. 62-210.900(1)(a)3.) Previously submitted? NO Submittal Date:	No	No

**\*\* EU 031: SUPPLEMENTARY ATTACHMENTS \*\***

Supplementary Item	Electronic?	Attachment Description	Electronic File Name	Uploaded?
COMPLIANCE DEMONSTRATION REPORTS/RECORDS	No	COMPLIANCE REPORT	N/A	N/A
IDENTIFICATION OF APPLICABLE REQUIREMENTS	No	APPLICABLE REQUIREMENTS	N/A	N/A
PROCESS FLOW DIAGRAM	No	PROCESS FLOW	N/A	N/A

**\*\* EU 032: DESCRIPTION AND DETAIL INFORMATION \*\***

**Type of EU:** THIS EMISSIONS UNIT INFORMATION SECTION ADDRESSES, AS A SINGLE EMISSIONS UNIT, A GROUP OF PROCESS OR PRODUCTION UNITS AND ACTIVITIES WHICH HAS AT LEAST ONE DEFINABLE EMISSION POINT (STACK OR VENT) BUT MAY ALSO PRODUCE FUGITIVE EMISSIONS.

**EU Description:** RAIL/TRUCK UNLOADING PIT -- MOLTEN SULFUR SYSTEM

**EU Status:** A - ACTIVE

**EU Classification:** R - REGULATED EMISSIONS UNIT

**Acid Rain Unit?** No

**CEMS Required?** No

**Ozone SIP Base Year Unit?** No

**Initial Startup Date:**

**Long-term Reserve Shutdown Date:**

**Commence Construction Date:**

**EU Major Group SIC:** 28 - CHEMICALS AND ALLIED PRODUCTS

**EU Type:** 2.04 - AGRICULTURAL CHEMICAL MANUFACTURE

**Package Unit Manufacturer:**

**Generator Nameplate Rating:**

**Incinerator Dwell Temp:**

**Incinerator Dwell Time:**

**Incinerator Afterburner Temp:**

**EU Comment:**

**\*\*EU 032: CONTROL EQUIPMENT/METHOD INFORMATION \*\***

\*\*\* NO CONTROL EQUIPMENT/MEHTOD(S) FOUND FOR THIS EU \*\*\*

**\*\*EU 032: OPERATING CAPACITY AND SCHEDULE \*\***

**Maximum Heat Input Rate:**

**Maximum Incineration Rate:**

**Maximum Process or Throughput Rate:** 840

**Maximum Process or Throughput Rate Units:** TPD MOLTEN S

**Maximum Production Rate:**

**Maximum Process or Throughput Rate Units:**

**Requested Maximum Operating Schedule:** 24 hours/day 7 days/week 52 weeks/year 8760 weeks/year

**Operating Capacity and Schedule Comment:** 840 TPD & 306,000 TPY

**\*\*EU 032: POINT (STACK/VENT) INFORMATION \*\***

**Stack Number:** 48

**Identification of Point on Plot Plan or Flow Diagram?**

**Emission Point Type Code:** 1 - A SINGLE EMISSION POINT SERVING A SINGLE EMISSIONS UNIT

**Discharge Type Code:** W - A VERTICAL STACK WITH A WEATHER CAP OR SIMILAR OBSTRUCTION IN THE EXHAUST STREAM

**Stack Height:** 25 feet

**Exit Diameter:** 1 feet

**Exit Temperature:**

**Actual Volumetric Flow Rate:**

**Water Vapor:**

**Maximum Dry Standard Flow Rate:**

**Nonstack Emission Point Height:**

**Emission Point UTM Coordinates:**

**Emission Point Latitude:**

**Emission Point Longitude:**

**Emission Point Comment:**

**\*\*EU 032: SEGMENT (PROCESS/FUEL) INFORMATION \*\***

**SCC Code:** 30510408  
**Units:** Tons Material Processed  
**Description 1:** Industrial Processes  
**Description 2:** Mineral Products  
**Description 3:** Bulk Materials Unloading Operation  
**Description 4:** Sulfur  
**Is this a Valid Segment?** YES  
**Status:** ACTIVE  
**Segment Description (Process/Fuel Type):** RAIL/TRUCK UNLOADING PIT  
**Maximum Hourly Rate:**  
**Hourly Rate Limit:** 35  
**Maximum Annual Rate:**  
**Annual Rate Limit:** 306000  
**Estimated Annual Activity Factor:**  
**Maximum % Sulfur:**  
**% Sulfur Rate Limit:**  
**Maximum % Ash:**  
**Million Btu per SCC Unit:** 0  
**Segment Comment:**

**\*\*EU 032: POLLUTANT INFORMATION \*\***

**Pollutant Code:** PM  
**Pollutant Description:** PARTICULATE MATTER - TOTAL  
**Is this a Valid Pollutant?** YES  
**Status:** ACTIVE  
**Include in the Facility Emissions Cap?** NO  
**Pollutant Regulatory Code:** WP - POLLUTANT REGULATED UNDER WORK PRACTICE STANDARD ONLY  
**Primary Control Device:**  
**Secondary Control Device:**  
**Total % Efficiency of Control:**  
**Potential Emissions:** 0.114155 lb/hour 0.5 tons/year  
**Synthetically Limited?:** NO  
**Emissions Method:** CALCULATED USING EMISSION FACTOR OTHER THAN AP-42/FIRE SYSTEM.  
**Emission Factor:**  
**Emission Factor Units:**  
**Emission Factor Reference:**  
**Calculation of Emissions:**  
**Range of Estimated Fugitive Emissions (Lower Limit):**  
**Range of Estimated Fugitive Emissions (Upper Limit):**  
**Pollutant Comment:**

**Pollutant Code:** PM10  
**Pollutant Description:** PARTICULATE MATTER - PM10  
**Is this a Valid Pollutant?** YES  
**Status:** ACTIVE  
**Include in the Facility Emissions Cap?** NO  
**Pollutant Regulatory Code:** WP - POLLUTANT REGULATED UNDER WORK PRACTICE STANDARD ONLY  
**Primary Control Device:**  
**Secondary Control Device:**  
**Total % Efficiency of Control:**  
**Potential Emissions:** 0.114155 lb/hour 0.5 tons/year  
**Synthetically Limited?:** NO  
**Emissions Method:** CALCULATED USING EMISSION FACTOR OTHER THAN AP-42/FIRE SYSTEM.  
**Emission Factor:**  
**Emission Factor Units:**  
**Emission Factor Reference:**  
**Calculation of Emissions:**  
**Range of Estimated Fugitive Emissions (Lower Limit):**

**Range of Estimated Fugitive Emissions (Upper Limit):**  
**Pollutant Comment:**

**Pollutant Code:** SO2  
**Pollutant Description:** SULFUR DIOXIDE  
**Is this a Valid Pollutant?** YES  
**Status:** ACTIVE  
**Include in the Facility Emissions Cap?** NO  
**Pollutant Regulatory Code:** WP - POLLUTANT REGULATED UNDER WORK PRACTICE STANDARD ONLY  
**Primary Control Device:**  
**Secondary Control Device:**  
**Total % Efficiency of Control:**  
**Potential Emissions:** 0.114155 lb/hour 0.5 tons/year  
**Synthetically Limited?:** NO  
**Emissions Method:** CALCULATED USING EMISSION FACTOR OTHER THAN AP-42/FIRE SYSTEM.  
**Emission Factor:**  
**Emission Factor Units:**  
**Emission Factor Reference:**  
**Calculation of Emissions:**  
**Range of Estimated Fugitive Emissions (Lower Limit):**  
**Range of Estimated Fugitive Emissions (Upper Limit):**  
**Pollutant Comment:**

**Pollutant Code:** TRS  
**Pollutant Description:** TOTAL REDUCED SULFUR  
**Is this a Valid Pollutant?** YES  
**Status:** ACTIVE  
**Include in the Facility Emissions Cap?** NO  
**Pollutant Regulatory Code:** WP - POLLUTANT REGULATED UNDER WORK PRACTICE STANDARD ONLY  
**Primary Control Device:**  
**Secondary Control Device:**  
**Total % Efficiency of Control:**  
**Potential Emissions:** 0.068493 lb/hour 0.3 tons/year  
**Synthetically Limited?:** NO  
**Emissions Method:** CALCULATED USING EMISSION FACTOR OTHER THAN AP-42/FIRE SYSTEM.  
**Emission Factor:**  
**Emission Factor Units:**  
**Emission Factor Reference:**  
**Calculation of Emissions:**  
**Range of Estimated Fugitive Emissions (Lower Limit):**  
**Range of Estimated Fugitive Emissions (Upper Limit):**  
**Pollutant Comment:**

**Pollutant Code:** VOC  
**Pollutant Description:** VOLATILE ORGANIC COMPOUNDS  
**Is this a Valid Pollutant?** YES  
**Status:** ACTIVE  
**Include in the Facility Emissions Cap?** NO  
**Pollutant Regulatory Code:** WP - POLLUTANT REGULATED UNDER WORK PRACTICE STANDARD ONLY  
**Primary Control Device:**  
**Secondary Control Device:**  
**Total % Efficiency of Control:**  
**Potential Emissions:** 0.091324 lb/hour 0.4 tons/year  
**Synthetically Limited?:** NO  
**Emissions Method:** CALCULATED USING EMISSION FACTOR OTHER THAN AP-42/FIRE SYSTEM.  
**Emission Factor:**  
**Emission Factor Units:**  
**Emission Factor Reference:**  
**Calculation of Emissions:**

Range of Estimated Fugitive Emissions (Lower Limit):  
 Range of Estimated Fugitive Emissions (Upper Limit):  
 Pollutant Comment:

**\*\*EU 032: POLLUTANT ALLOWABLE EMISSIONS INFORMATION \*\***

\*\*\* NO POLLUTANT ALLOWABLE EMISSIONS INFORMATION FOUND FOR THIS EU \*\*\*

**\*\*EU 032: VISIBLE EMISSIONS INFORMATION \*\***

Visible Emissions Subtype: VE20  
 Basis for Allowable Opacity: RULE  
 Regulation: 62-296.411(1)(g)  
 Requested Allowable Opacity in Normal Conditions: 20  
 Requested Allowable Opacity in Exceptional Conditions:  
 Maximum Period of Excess Opacity Allowed:  
 Compliance Test Method(s):  
 Compliance Test Frequency: 5 - EVERY 5 YEARS  
 Frequency Base Date: 9/9/2003  
 COM Required? No  
 Visible Emissions Comment:

**\*\*EU 032: CONTINUOUS MONITOR INFORMATION \*\***

\*\*\* NO CONTINUOUS MONITOR INFORMATION FOUND FOR THIS EU \*\*\*

**\*\* EU 032: SUPPLEMENTARY ITEMS \*\***

Supplementary Item	Applicable?	Attachment?
ACID RAIN PART (FORM NO. 62-210.900(1)(a)) Previously submitted? NO Submittal Date:	No	No
ALTERNATIVE METHODS OF OPERATION	No	No
ALTERNATIVE MODES OF OPERATION (EMISSIONS TRADING)	No	No
CERTIFICATE OF REPRESENTATION (EPA FORM NO. 7610-1)	No	No
COMPLIANCE ASSURANCE MONITORING PLAN	No	No
COMPLIANCE DEMONSTRATION REPORTS/RECORDS Previously submitted? YES Submittal Date: Previously Submitted Test Date(s)/Pollutants Tested: To Be submitted? NO Submittal Date: To Be Submitted Test Date(s)/Pollutants Tested:	Yes	Yes
CONTROL TECHNOLOGY REVIEW AND ANALYSIS (RULES 62-212.400(6) and 62-212.500(7), F.A.C.; 40 CFR 63.43(d) and (e))	No	No
DESCRIPTION OF STACK SAMPLING FACILITIES	No	No
DETAILED DESCRIPTION OF CONTROL EQUIPMENT Previously submitted? NO Submittal Date:	No	No
FUEL ANALYSIS OR SPECIFICATION Previously submitted? NO Submittal Date:	No	No
GOOD ENGINEERING PRACTICE STACK HEIGHT ANALYSIS (RULE 62-212.400(5)(h)6., F.A.C., and RULE 62-212.500(4)(f), F.A.C.)	No	No
IDENTIFICATION OF APPLICABLE REQUIREMENTS	Yes	Yes
NEW UNIT EXEMPTION (FORM NO. 62-210.900(1)(a)2.) Previously submitted? NO Submittal Date:	No	No
OPERATION AND MAINTENANCE PLAN Previously submitted? NO Submittal Date:	No	No
OTHER EMISSIONS UNIT INFORMATION	No	No
OTHER INFORMATION REQUIRED BY RULE OR STATUTE	No	No
PHASE II NOx AVERAGING PLAN (FORM NO. 62-210.900(1)(a)5.) Previously submitted? NO Submittal Date:	No	No

PHASE II NO <sub>x</sub> COMPLIANCE PLAN (FORM NO. 62-210.900(1)(a)4. Previously submitted? NO Submittal Date:	No	No
PROCEDURES FOR STARTUP AND SHUTDOWN Previously submitted? NO Submittal Date:	No	No
PROCESS FLOW DIAGRAM Previously submitted? YES Submittal Date:	Yes	Yes
REPOWERING EXTENSION PLAN (FORM NO. 62-210.900(1)(a)1.) Previously submitted? NO Submittal Date:	No	No
RETIRED UNIT EXEMPTION (FORM NO. 62-210.900(1)(a)3.) Previously submitted? NO Submittal Date:	No	No

**\*\* EU 032: SUPPLEMENTARY ATTACHMENTS \*\***

Supplementary Item	Electronic?	Attachment Description	Electronic File Name	Uploaded?
COMPLIANCE DEMONSTRATION REPORTS/RECORDS	No	COMPLIANCE REPORT	N/A	N/A
IDENTIFICATION OF APPLICABLE REQUIREMENTS	No	APPLICABLE REQUIREMENTS	N/A	N/A
PROCESS FLOW DIAGRAM	No	PROCESS FLOW	N/A	N/A

**\*\* EU 033: DESCRIPTION AND DETAIL INFORMATION \*\***

**Type of EU:** THIS EMISSIONS UNIT INFORMATION SECTION ADDRESSES, AS A SINGLE EMISSIONS UNIT, A GROUP OF PROCESS OR PRODUCTION UNITS AND ACTIVITIES WHICH HAS AT LEAST ONE DEFINABLE EMISSION POINT (STACK OR VENT) BUT MAY ALSO PRODUCE FUGITIVE EMISSIONS.

**EU Description:** NORTH STORAGE TANK -- MOLTEN SULFUR SYSTEM

**EU Status:** A - ACTIVE

**EU Classification:** R - REGULATED EMISSIONS UNIT

**Acid Rain Unit?** No

**CEMS Required?** No

**Ozone SIP Base Year Unit?** No

**Initial Startup Date:**

**Long-term Reserve Shutdown Date:**

**Commence Construction Date:**

**EU Major Group SIC:** 28 - CHEMICALS AND ALLIED PRODUCTS

**EU Type:** 2.04 - AGRICULTURAL CHEMICAL MANUFACTURE

**Package Unit Manufacturer:**

**Generator Nameplate Rating:**

**Incinerator Dwell Temp:**

**Incinerator Dwell Time:**

**Incinerator Afterburner Temp:**

**EU Comment:**

**\*\*EU 033: CONTROL EQUIPMENT/METHOD INFORMATION \*\***

\*\*\* NO CONTROL EQUIPMENT/METHOD(S) FOUND FOR THIS EU \*\*\*

**\*\*EU 033: OPERATING CAPACITY AND SCHEDULE \*\***

**Maximum Heat Input Rate:**

**Maximum Incineration Rate:**

**Maximum Process or Throughput Rate:** 840

**Maximum Process or Throughput Rate Units:** TPD MOLTEN S

**Maximum Production Rate:**

**Maximum Process or Throughput Rate Units:**

**Requested Maximum Operating Schedule:** 24 hours/day 7 days/week 52 weeks/year 8760 weeks/year

**Operating Capacity and Schedule Comment:**

**\*\*EU 033: POINT (STACK/VENT) INFORMATION \*\***

**Stack Number:** 47

**Identification of Point on Plot Plan or Flow Diagram?**

**Emission Point Type Code:** 1 - A SINGLE EMISSION POINT SERVING A SINGLE EMISSIONS UNIT

**Discharge Type Code:** W - A VERTICAL STACK WITH A WEATHER CAP OR SIMILAR OBSTRUCTION IN THE EXHAUST STREAM

**Stack Height:** 25 feet

**Exit Diameter:** 1 feet

**Exit Temperature:**

**Actual Volumetric Flow Rate:**

**Water Vapor:**

**Maximum Dry Standard Flow Rate:**

**Nonstack Emission Point Height:**

**Emission Point UTM Coordinates:**

**Emission Point Latitude:**

**Emission Point Longitude:**

**Emission Point Comment:**

**\*\*EU 033: SEGMENT (PROCESS/FUEL) INFORMATION \*\***



**SCC Code:** 30510208  
**Units:** Tons Material Processed  
**Description 1:** Industrial Processes  
**Description 2:** Mineral Products  
**Description 3:** Bulk Materials Storage Bins  
**Description 4:** Sulfur  
**Is this a Valid Segment?** YES  
**Status:** ACTIVE  
**Segment Description (Process/Fuel Type):** NORTH STORAGE TANK  
**Maximum Hourly Rate:**  
**Hourly Rate Limit:** 35  
**Maximum Annual Rate:**  
**Annual Rate Limit:** 306000  
**Estimated Annual Activity Factor:**  
**Maximum % Sulfur:**  
**% Sulfur Rate Limit:**  
**Maximum % Ash:**  
**Million Btu per SCC Unit:** 0  
**Segment Comment:**

**\*\*EU 033: POLLUTANT INFORMATION \*\***

**Pollutant Code:** PM  
**Pollutant Description:** PARTICULATE MATTER - TOTAL  
**Is this a Valid Pollutant?** YES  
**Status:** ACTIVE  
**Include in the Facility Emissions Cap?** NO  
**Pollutant Regulatory Code:** WP - POLLUTANT REGULATED UNDER WORK PRACTICE STANDARD ONLY  
**Primary Control Device:**  
**Secondary Control Device:**  
**Total % Efficiency of Control:**  
**Potential Emissions:** 0.114155 lb/hour 0.5 tons/year  
**Synthetically Limited?:** NO  
**Emissions Method:** CALCULATED USING EMISSION FACTOR OTHER THAN AP-42/FIRE SYSTEM.  
**Emission Factor:**  
**Emission Factor Units:**  
**Emission Factor Reference:**  
**Calculation of Emissions:**  
**Range of Estimated Fugitive Emissions (Lower Limit):**  
**Range of Estimated Fugitive Emissions (Upper Limit):**  
**Pollutant Comment:**

**Pollutant Code:** PM10  
**Pollutant Description:** PARTICULATE MATTER - PM10  
**Is this a Valid Pollutant?** YES  
**Status:** ACTIVE  
**Include in the Facility Emissions Cap?** NO  
**Pollutant Regulatory Code:** WP - POLLUTANT REGULATED UNDER WORK PRACTICE STANDARD ONLY  
**Primary Control Device:**  
**Secondary Control Device:**  
**Total % Efficiency of Control:**  
**Potential Emissions:** 0.114155 lb/hour 0.5 tons/year  
**Synthetically Limited?:** NO  
**Emissions Method:** CALCULATED USING EMISSION FACTOR OTHER THAN AP-42/FIRE SYSTEM.  
**Emission Factor:**  
**Emission Factor Units:**  
**Emission Factor Reference:**  
**Calculation of Emissions:**  
**Range of Estimated Fugitive Emissions (Lower Limit):**

**Range of Estimated Fugitive Emissions (Upper Limit):**  
**Pollutant Comment:**

**Pollutant Code:** SO2  
**Pollutant Description:** SULFUR DIOXIDE  
**Is this a Valid Pollutant?** YES  
**Status:** ACTIVE  
**Include in the Facility Emissions Cap?** NO  
**Pollutant Regulatory Code:** WP - POLLUTANT REGULATED UNDER WORK PRACTICE STANDARD ONLY  
**Primary Control Device:**  
**Secondary Control Device:**  
**Total % Efficiency of Control:**  
**Potential Emissions:** 0.114155 lb/hour 0.5 tons/year  
**Synthetically Limited?:** NO  
**Emissions Method:** CALCULATED USING EMISSION FACTOR OTHER THAN AP-42/FIRE SYSTEM.  
**Emission Factor:**  
**Emission Factor Units:**  
**Emission Factor Reference:**  
**Calculation of Emissions:**  
**Range of Estimated Fugitive Emissions (Lower Limit):**  
**Range of Estimated Fugitive Emissions (Upper Limit):**  
**Pollutant Comment:**

**Pollutant Code:** TRS  
**Pollutant Description:** TOTAL REDUCED SULFUR  
**Is this a Valid Pollutant?** YES  
**Status:** ACTIVE  
**Include in the Facility Emissions Cap?** NO  
**Pollutant Regulatory Code:** WP - POLLUTANT REGULATED UNDER WORK PRACTICE STANDARD ONLY  
**Primary Control Device:**  
**Secondary Control Device:**  
**Total % Efficiency of Control:**  
**Potential Emissions:** 0.068493 lb/hour 0.3 tons/year  
**Synthetically Limited?:** NO  
**Emissions Method:** CALCULATED USING EMISSION FACTOR OTHER THAN AP-42/FIRE SYSTEM.  
**Emission Factor:**  
**Emission Factor Units:**  
**Emission Factor Reference:**  
**Calculation of Emissions:**  
**Range of Estimated Fugitive Emissions (Lower Limit):**  
**Range of Estimated Fugitive Emissions (Upper Limit):**  
**Pollutant Comment:**

**Pollutant Code:** VOC  
**Pollutant Description:** VOLATILE ORGANIC COMPOUNDS  
**Is this a Valid Pollutant?** YES  
**Status:** ACTIVE  
**Include in the Facility Emissions Cap?** NO  
**Pollutant Regulatory Code:** WP - POLLUTANT REGULATED UNDER WORK PRACTICE STANDARD ONLY  
**Primary Control Device:**  
**Secondary Control Device:**  
**Total % Efficiency of Control:**  
**Potential Emissions:** 0.091324 lb/hour 0.4 tons/year  
**Synthetically Limited?:** NO  
**Emissions Method:** CALCULATED USING EMISSION FACTOR OTHER THAN AP-42/FIRE SYSTEM.  
**Emission Factor:**  
**Emission Factor Units:**  
**Emission Factor Reference:**  
**Calculation of Emissions:**

Range of Estimated Fugitive Emissions (Lower Limit):  
 Range of Estimated Fugitive Emissions (Upper Limit):  
 Pollutant Comment:

**\*\*EU 033: POLLUTANT ALLOWABLE EMISSIONS INFORMATION \*\***

\*\*\* NO POLLUTANT ALLOWABLE EMISSIONS INFORMATION FOUND FOR THIS EU \*\*\*

**\*\*EU 033: VISIBLE EMISSIONS INFORMATION \*\***

Visible Emissions Subtype: VE20  
 Basis for Allowable Opacity: RULE  
 Regulation: 62-296.411(1)(g)  
 Requested Allowable Opacity in Normal Conditions: 20  
 Requested Allowable Opacity in Exceptional Conditions:  
 Maximum Period of Excess Opacity Allowed:  
 Compliance Test Method(s):  
 Compliance Test Frequency: 5 - EVERY 5 YEARS  
 Frequency Base Date: 9/9/2003  
 COM Required? No  
 Visible Emissions Comment:

**\*\*EU 033: CONTINUOUS MONITOR INFORMATION \*\***

\*\*\* NO CONTINUOUS MONITOR INFORMATION FOUND FOR THIS EU \*\*\*

**\*\* EU 033: SUPPLEMENTARY ITEMS \*\***

Supplementary Item	Applicable?	Attachment?
ACID RAIN PART (FORM NO. 62-210.900(1)(a)) Previously submitted? NO Submittal Date:	No	No
ALTERNATIVE METHODS OF OPERATION	No	No
ALTERNATIVE MODES OF OPERATION (EMISSIONS TRADING)	No	No
CERTIFICATE OF REPRESENTATION (EPA FORM NO. 7610-1)	No	No
COMPLIANCE ASSURANCE MONITORING PLAN	No	No
COMPLIANCE DEMONSTRATION REPORTS/RECORDS Previously submitted? YES Submittal Date: Previously Submitted Test Date(s)/Pollutants Tested: To Be submitted? NO Submittal Date: To Be Submitted Test Date(s)/Pollutants Tested:	Yes	Yes
CONTROL TECHNOLOGY REVIEW AND ANALYSIS (RULES 62-212.400(6) and 62-212.500(7), F.A.C.; 40 CFR 63.43(d) and (e))	No	No
DESCRIPTION OF STACK SAMPLING FACILITIES	No	No
DETAILED DESCRIPTION OF CONTROL EQUIPMENT Previously submitted? NO Submittal Date:	No	No
FUEL ANALYSIS OR SPECIFICATION Previously submitted? NO Submittal Date:	No	No
GOOD ENGINEERING PRACTICE STACK HEIGHT ANALYSIS (RULE 62-212.400(5)(h)6., F.A.C., and RULE 62-212.500(4)(f), F.A.C.)	No	No
IDENTIFICATION OF APPLICABLE REQUIREMENTS	Yes	Yes
NEW UNIT EXEMPTION (FORM NO. 62-210.900(1)(a)2.) Previously submitted? NO Submittal Date:	No	No
OPERATION AND MAINTENANCE PLAN Previously submitted? NO Submittal Date:	No	No
OTHER EMISSIONS UNIT INFORMATION	No	No
OTHER INFORMATION REQUIRED BY RULE OR STATUTE	No	No
PHASE II NOx AVERAGING PLAN (FORM NO. 62-210.900(1)(a)5.) Previously submitted? NO Submittal Date:	No	No

PHASE II NOx COMPLIANCE PLAN (FORM NO. 62-210.900(1)(a)4. Previously submitted? NO Submittal Date:	No	No
PROCEDURES FOR STARTUP AND SHUTDOWN Previously submitted? NO Submittal Date:	No	No
PROCESS FLOW DIAGRAM Previously submitted? YES Submittal Date:	Yes	Yes
REPOWERING EXTENSION PLAN (FORM NO. 62-210.900(1)(a)1.) Previously submitted? NO Submittal Date:	No	No
RETIRED UNIT EXEMPTION (FORM NO. 62-210.900(1)(a)3.) Previously submitted? NO Submittal Date:	No	No

**\*\* EU 033: SUPPLEMENTARY ATTACHMENTS \*\***

Supplementary Item	Electronic?	Attachment Description	Electronic File Name	Uploaded?
COMPLIANCE DEMONSTRATION REPORTS/RECORDS	No	COMPLIANCE REPORT	N/A	N/A
IDENTIFICATION OF APPLICABLE REQUIREMENTS	No	APPLICABLE REQUIREMENTS	N/A	N/A
PROCESS FLOW DIAGRAM	No	PROCESS FLOW	N/A	N/A

**\*\* EU 034: DESCRIPTION AND DETAIL INFORMATION \*\***

**Type of EU:** THIS EMISSIONS UNIT INFORMATION SECTION ADDRESSES, AS A SINGLE EMISSIONS UNIT, A GROUP OF PROCESS OR PRODUCTION UNITS AND ACTIVITIES WHICH HAS AT LEAST ONE DEFINABLE EMISSION POINT (STACK OR VENT) BUT MAY ALSO PRODUCE FUGITIVE EMISSIONS.

**EU Description:** SOUTH STORAGE TANK -- MOLTEN SULFUR SYSTEM

**EU Status:** A - ACTIVE

**EU Classification:** R - REGULATED EMISSIONS UNIT

**Acid Rain Unit?** No

**CEMS Required?** No

**Ozone SIP Base Year Unit?** No

**Initial Startup Date:**

**Long-term Reserve Shutdown Date:**

**Commence Construction Date:**

**EU Major Group SIC:** 28 - CHEMICALS AND ALLIED PRODUCTS

**EU Type:** 2.04 - AGRICULTURAL CHEMICAL MANUFACTURE

**Package Unit Manufacturer:**

**Generator Nameplate Rating:**

**Incinerator Dwell Temp:**

**Incinerator Dwell Time:**

**Incinerator Afterburner Temp:**

**EU Comment:**

**\*\*EU 034: CONTROL EQUIPMENT/METHOD INFORMATION \*\***

\*\*\* NO CONTROL EQUIPMENT/METHOD(S) FOUND FOR THIS EU \*\*\*

**\*\*EU 034: OPERATING CAPACITY AND SCHEDULE \*\***

**Maximum Heat Input Rate:**

**Maximum Incineration Rate:**

**Maximum Process or Throughput Rate:** 840

**Maximum Process or Throughput Rate Units:** TPD MOLTEN S

**Maximum Production Rate:**

**Maximum Process or Throughput Rate Units:**

**Requested Maximum Operating Schedule:** 24 hours/day 7 days/week 52 weeks/year 8760 weeks/year

**Operating Capacity and Schedule Comment:**

**\*\*EU 034: POINT (STACK/VENT) INFORMATION \*\***

**Stack Number:** 49

**Identification of Point on Plot Plan or Flow Diagram?**

**Emission Point Type Code:** 3 - A CONFIGURATION OF MULTIPLE EMISSION POINTS SERVING A SINGLE EMISSIONS UNIT

**Discharge Type Code:** W - A VERTICAL STACK WITH A WEATHER CAP OR SIMILAR OBSTRUCTION IN THE EXHAUST STREAM

**Stack Height:** 25 feet

**Exit Diameter:** 1 feet

**Exit Temperature:**

**Actual Volumetric Flow Rate:**

**Water Vapor:**

**Maximum Dry Standard Flow Rate:**

**Nonstack Emission Point Height:**

**Emission Point UTM Coordinates:**

**Emission Point Latitude:**

**Emission Point Longitude:**

**Emission Point Comment:**

**\*\*EU 034: SEGMENT (PROCESS/FUEL) INFORMATION \*\***

**SCC Code:** 30510208  
**Units:** Tons Material Processed  
**Description 1:** Industrial Processes  
**Description 2:** Mineral Products  
**Description 3:** Bulk Materials Storage Bins  
**Description 4:** Sulfur  
**Is this a Valid Segment?** YES  
**Status:** ACTIVE  
**Segment Description (Process/Fuel Type):**  
**Maximum Hourly Rate:**  
**Hourly Rate Limit:** 35  
**Maximum Annual Rate:**  
**Annual Rate Limit:** 306000  
**Estimated Annual Activity Factor:**  
**Maximum % Sulfur:**  
**% Sulfur Rate Limit:**  
**Maximum % Ash:**  
**Million Btu per SCC Unit:** 0  
**Segment Comment:**

**\*\*EU 034: POLLUTANT INFORMATION \*\***

**Pollutant Code:** PM  
**Pollutant Description:** PARTICULATE MATTER - TOTAL  
**Is this a Valid Pollutant?** YES  
**Status:** ACTIVE  
**Include in the Facility Emissions Cap?** NO  
**Pollutant Regulatory Code:** WP - POLLUTANT REGULATED UNDER WORK PRACTICE STANDARD ONLY  
**Primary Control Device:**  
**Secondary Control Device:**  
**Total % Efficiency of Control:**  
**Potential Emissions:** 0.136986 lb/hour 0.6 tons/year  
**Synthetically Limited?:** NO  
**Emissions Method:** CALCULATED USING EMISSION FACTOR OTHER THAN AP-42/FIRE SYSTEM.  
**Emission Factor:**  
**Emission Factor Units:**  
**Emission Factor Reference:**  
**Calculation of Emissions:**  
**Range of Estimated Fugitive Emissions (Lower Limit):**  
**Range of Estimated Fugitive Emissions (Upper Limit):**  
**Pollutant Comment:**

**Pollutant Code:** PM10  
**Pollutant Description:** PARTICULATE MATTER - PM10  
**Is this a Valid Pollutant?** YES  
**Status:** ACTIVE  
**Include in the Facility Emissions Cap?** NO  
**Pollutant Regulatory Code:** WP - POLLUTANT REGULATED UNDER WORK PRACTICE STANDARD ONLY  
**Primary Control Device:**  
**Secondary Control Device:**  
**Total % Efficiency of Control:**  
**Potential Emissions:** 0.136986 lb/hour 0.6 tons/year  
**Synthetically Limited?:** NO  
**Emissions Method:** CALCULATED USING EMISSION FACTOR OTHER THAN AP-42/FIRE SYSTEM.  
**Emission Factor:**  
**Emission Factor Units:**  
**Emission Factor Reference:**  
**Calculation of Emissions:**  
**Range of Estimated Fugitive Emissions (Lower Limit):**

Range of Estimated Fugitive Emissions (Upper Limit):  
Pollutant Comment:

Pollutant Code: SO2  
Pollutant Description: SULFUR DIOXIDE  
Is this a Valid Pollutant? YES  
Status: ACTIVE  
Include in the Facility Emissions Cap? NO  
Pollutant Regulatory Code: WP - POLLUTANT REGULATED UNDER WORK PRACTICE STANDARD ONLY  
Primary Control Device:  
Secondary Control Device:  
Total % Efficiency of Control:  
Potential Emissions: 0.136986 lb/hour 0.6 tons/year  
Synthetically Limited?: NO  
Emissions Method: CALCULATED USING EMISSION FACTOR OTHER THAN AP-42/FIRE SYSTEM.  
Emission Factor:  
Emission Factor Units:  
Emission Factor Reference:  
Calculation of Emissions:  
Range of Estimated Fugitive Emissions (Lower Limit):  
Range of Estimated Fugitive Emissions (Upper Limit):  
Pollutant Comment:

Pollutant Code: TRS  
Pollutant Description: TOTAL REDUCED SULFUR  
Is this a Valid Pollutant? YES  
Status: ACTIVE  
Include in the Facility Emissions Cap? NO  
Pollutant Regulatory Code: WP - POLLUTANT REGULATED UNDER WORK PRACTICE STANDARD ONLY  
Primary Control Device:  
Secondary Control Device:  
Total % Efficiency of Control:  
Potential Emissions: 0.091324 lb/hour 0.4 tons/year  
Synthetically Limited?: NO  
Emissions Method: CALCULATED USING EMISSION FACTOR OTHER THAN AP-42/FIRE SYSTEM.  
Emission Factor:  
Emission Factor Units:  
Emission Factor Reference:  
Calculation of Emissions:  
Range of Estimated Fugitive Emissions (Lower Limit):  
Range of Estimated Fugitive Emissions (Upper Limit):  
Pollutant Comment:

Pollutant Code: VOC  
Pollutant Description: VOLATILE ORGANIC COMPOUNDS  
Is this a Valid Pollutant? YES  
Status: ACTIVE  
Include in the Facility Emissions Cap? NO  
Pollutant Regulatory Code: WP - POLLUTANT REGULATED UNDER WORK PRACTICE STANDARD ONLY  
Primary Control Device:  
Secondary Control Device:  
Total % Efficiency of Control:  
Potential Emissions: 0.091324 lb/hour 0.4 tons/year  
Synthetically Limited?: NO  
Emissions Method: CALCULATED USING EMISSION FACTOR OTHER THAN AP-42/FIRE SYSTEM.  
Emission Factor:  
Emission Factor Units:  
Emission Factor Reference:  
Calculation of Emissions:

Range of Estimated Fugitive Emissions (Lower Limit):  
 Range of Estimated Fugitive Emissions (Upper Limit):  
 Pollutant Comment:

**\*\*EU 034: POLLUTANT ALLOWABLE EMISSIONS INFORMATION \*\***

\*\*\* NO POLLUTANT ALLOWABLE EMISSIONS INFORMATION FOUND FOR THIS EU \*\*\*

**\*\*EU 034: VISIBLE EMISSIONS INFORMATION \*\***

Visible Emissions Subtype: VE20  
 Basis for Allowable Opacity: RULE  
 Regulation: 62-296.411(1)(g)  
 Requested Allowable Opacity in Normal Conditions: 20  
 Requested Allowable Opacity in Exceptional Conditions:  
 Maximum Period of Excess Opacity Allowed:  
 Compliance Test Method(s):  
 Compliance Test Frequency: 5 - EVERY 5 YEARS  
 Frequency Base Date: 9/9/2003  
 COM Required? No  
 Visible Emissions Comment:

**\*\*EU 034: CONTINUOUS MONITOR INFORMATION \*\***

\*\*\* NO CONTINUOUS MONITOR INFORMATION FOUND FOR THIS EU \*\*\*

**\*\* EU 034: SUPPLEMENTARY ITEMS \*\***

Supplementary Item	Applicable?	Attachment?
ACID RAIN PART (FORM NO. 62-210.900(1)(a)) Previously submitted? NO Submittal Date:	No	No
ALTERNATIVE METHODS OF OPERATION	No	No
ALTERNATIVE MODES OF OPERATION (EMISSIONS TRADING)	No	No
CERTIFICATE OF REPRESENTATION (EPA FORM NO. 7610-1)	No	No
COMPLIANCE ASSURANCE MONITORING PLAN	No	No
COMPLIANCE DEMONSTRATION REPORTS/RECORDS Previously submitted? YES Submittal Date: Previously Submitted Test Date(s)/Pollutants Tested: To Be submitted? NO Submittal Date: To Be Submitted Test Date(s)/Pollutants Tested:	Yes	Yes
CONTROL TECHNOLOGY REVIEW AND ANALYSIS (RULES 62-212.400(6) and 62-212.500(7), F.A.C.; 40 CFR 63.43(d) and (e))	No	No
DESCRIPTION OF STACK SAMPLING FACILITIES	No	No
DETAILED DESCRIPTION OF CONTROL EQUIPMENT Previously submitted? NO Submittal Date:	No	No
FUEL ANALYSIS OR SPECIFICATION Previously submitted? NO Submittal Date:	No	No
GOOD ENGINEERING PRACTICE STACK HEIGHT ANALYSIS (RULE 62-212.400(5)(h)6., F.A.C., and RULE 62-212.500(4)(f), F.A.C.)	No	No
IDENTIFICATION OF APPLICABLE REQUIREMENTS	Yes	Yes
NEW UNIT EXEMPTION (FORM NO. 62-210.900(1)(a)2.) Previously submitted? NO Submittal Date:	No	No
OPERATION AND MAINTENANCE PLAN Previously submitted? NO Submittal Date:	No	No
OTHER EMISSIONS UNIT INFORMATION	No	No
OTHER INFORMATION REQUIRED BY RULE OR STATUTE	No	No
PHASE II NOx AVERAGING PLAN (FORM NO. 62-210.900(1)(a)5.) Previously submitted? NO Submittal Date:	No	No



PHASE II NO <sub>x</sub> COMPLIANCE PLAN (FORM NO. 62-210.900(1)(a)4. Previously submitted? NO Submittal Date:	No	No
PROCEDURES FOR STARTUP AND SHUTDOWN Previously submitted? NO Submittal Date:	No	No
PROCESS FLOW DIAGRAM Previously submitted? YES Submittal Date:	Yes	Yes
REPOWERING EXTENSION PLAN (FORM NO. 62-210.900(1)(a)1.) Previously submitted? NO Submittal Date:	No	No
RETIRED UNIT EXEMPTION (FORM NO. 62-210.900(1)(a)3.) Previously submitted? NO Submittal Date:	No	No

**\*\* EU 034: SUPPLEMENTARY ATTACHMENTS \*\***

Supplementary Item	Electronic?	Attachment Description	Electronic File Name	Uploaded?
COMPLIANCE DEMONSTRATION REPORTS/RECORDS	No	COMPLIANCE REPORT	N/A	N/A
IDENTIFICATION OF APPLICABLE REQUIREMENTS	No	APPLICABLE REQUIREMENTS	N/A	N/A
PROCESS FLOW DIAGRAM	No	PROCESS FLOW	N/A	N/A

**\*\* EU 035: DESCRIPTION AND DETAIL INFORMATION \*\***

**Type of EU:** THIS EMISSIONS UNIT INFORMATION SECTION ADDRESSES, AS A SINGLE EMISSIONS UNIT, ONE OR MORE PROCESS OR PRODUCTION UNITS AND ACTIVITIES WHICH PRODUCE FUGITIVE EMISSIONS ONLY.

**EU Description:** PHOSPHOGYPSUM STACK

**EU Status:** A - ACTIVE

**EU Classification:** R - REGULATED EMISSIONS UNIT

**Acid Rain Unit?** No

**CEMS Required?** No

**Ozone SIP Base Year Unit?** No

**Initial Startup Date:**

**Long-term Reserve Shutdown Date:**

**Commence Construction Date:**

**EU Major Group SIC:** 28 - CHEMICALS AND ALLIED PRODUCTS

**EU Type:** 12.01 - GYPSUM STACK (NO AOR)

**Package Unit Manufacturer:**

**Generator Nameplate Rating:**

**Incinerator Dwell Temp:**

**Incinerator Dwell Time:**

**Incinerator Afterburner Temp:**

**EU Comment:**

**\*\*EU 035: CONTROL EQUIPMENT/METHOD INFORMATION \*\***

\*\*\* NO CONTROL EQUIPMENT/METHOD(S) FOUND FOR THIS EU \*\*\*

**\*\*EU 035: OPERATING CAPACITY AND SCHEDULE \*\***

**Maximum Heat Input Rate:**

**Maximum Incineration Rate:**

**Maximum Process or Throughput Rate:**

**Maximum Process or Throughput Rate Units:**

**Maximum Production Rate:**

**Maximum Process or Throughput Rate Units:**

**Requested Maximum Operating Schedule:**

**Operating Capacity and Schedule Comment:**

**\*\*EU 035: POINT (STACK/VENT) INFORMATION \*\***

**Stack Number:** 50

**Identification of Point on Plot Plan or Flow Diagram?**

**Emission Point Type Code:** 4 - NO TRUE EMISSION POINT

**Discharge Type Code:** F - FUGITIVE EMISSIONS; NO STACK EXISTS

**Stack Height:**

**Exit Diameter:**

**Exit Temperature:**

**Actual Volumetric Flow Rate:**

**Water Vapor:**

**Maximum Dry Standard Flow Rate:**

**Nonstack Emission Point Height:** 200 feet

**Emission Point UTM Coordinates:**

**Emission Point Latitude:**

**Emission Point Longitude:**

**Emission Point Comment:**

**\*\*EU 035: SEGMENT (PROCESS/FUEL) INFORMATION \*\***

**SCC Code:** 30101602

**Units:** Tons Phosphate Rock Handled

**Description 1:** Industrial Processes

**Description 2:** Chemical Manufacturing  
**Description 3:** Phosphoric Acid: Wet Process  
**Description 4:** Gypsum Pond  
**Is this a Valid Segment?** YES  
**Status:** ACTIVE  
**Segment Description (Process/Fuel Type):** PHOSPHOGYPSUM STACK  
**Maximum Hourly Rate:**  
**Hourly Rate Limit:**  
**Maximum Annual Rate:**  
**Annual Rate Limit:**  
**Estimated Annual Activity Factor:**  
**Maximum % Sulfur:**  
**% Sulfur Rate Limit:**  
**Maximum % Ash:**  
**Million Btu per SCC Unit:** 0  
**Segment Comment:**

**\*\*EU 035: POLLUTANT INFORMATION \*\***

**Pollutant Code:** H161  
**Pollutant Description:** RADIONUCLIDES (INCLUDING RADON)  
**Is this a Valid Pollutant?** YES  
**Status:** ACTIVE  
**Include in the Facility Emissions Cap?** NO  
**Pollutant Regulatory Code:** NS - POLLUTANT NOT EMISSIONS-LIMITED NOT SUBJECT TO WORK PRACTICE  
  
**Primary Control Device:**  
**Secondary Control Device:**  
**Total % Efficiency of Control:**  
**Potential Emissions:**  
**Synthetically Limited?:**  
**Emissions Method:**  
**Emission Factor:**  
**Emission Factor Units:**  
**Emission Factor Reference:**  
**Calculation of Emissions:**  
**Range of Estimated Fugitive Emissions (Lower Limit):**  
**Range of Estimated Fugitive Emissions (Upper Limit):**  
**Pollutant Comment:**

**\*\*EU 035: POLLUTANT ALLOWABLE EMISSIONS INFORMATION \*\***

\*\*\* NO POLLUTANT ALLOWABLE EMISSIONS INFORMATION FOUND FOR THIS EU \*\*\*

**\*\*EU 035: VISIBLE EMISSIONS INFORMATION \*\***

\*\*\* NO VISIBLE EMISSIONS INFORMATION FOUND FOR THIS EU \*\*\*

**\*\*EU 035: CONTINUOUS MONITOR INFORMATION \*\***

\*\*\* NO CONTINUOUS MONITOR INFORMATION FOUND FOR THIS EU \*\*\*

<b>** EU 035: SUPPLEMENTARY ITEMS **</b>	

Supplementary Item	Applicable?	Attachment?
ACID RAIN PART (FORM NO. 62-210.900(1)(a)) Previously submitted? NO Submittal Date:	No	No
ALTERNATIVE METHODS OF OPERATION	No	No
ALTERNATIVE MODES OF OPERATION (EMISSIONS TRADING)	No	No
CERTIFICATE OF REPRESENTATION (EPA FORM NO. 7610-1)	No	No
COMPLIANCE ASSURANCE MONITORING PLAN	No	No
COMPLIANCE DEMONSTRATION REPORTS/RECORDS Previously submitted? NO Submittal Date: Previously Submitted Test Date(s)/Pollutants Tested: To Be submitted? NO Submittal Date: To Be Submitted Test Date(s)/Pollutants Tested:	No	No
CONTROL TECHNOLOGY REVIEW AND ANALYSIS (RULES 62-212.400(6) and 62-212.500(7), F.A.C.; 40 CFR 63.43(d) and (e))	No	No
DESCRIPTION OF STACK SAMPLING FACILITIES	No	No
DETAILED DESCRIPTION OF CONTROL EQUIPMENT Previously submitted? NO Submittal Date:	No	No
FUEL ANALYSIS OR SPECIFICATION Previously submitted? NO Submittal Date:	No	No
GOOD ENGINEERING PRACTICE STACK HEIGHT ANALYSIS (RULE 62-212.400(5)(h)6., F.A.C., and RULE 62-212.500(4)(f), F.A.C.)	No	No
IDENTIFICATION OF APPLICABLE REQUIREMENTS	No	No
NEW UNIT EXEMPTION (FORM NO. 62-210.900(1)(a)2.) Previously submitted? NO Submittal Date:	No	No
OPERATION AND MAINTENANCE PLAN Previously submitted? NO Submittal Date:	No	No
OTHER EMISSIONS UNIT INFORMATION	No	No
OTHER INFORMATION REQUIRED BY RULE OR STATUTE	No	No
PHASE II NO <sub>x</sub> AVERAGING PLAN (FORM NO. 62-210.900(1)(a)5.) Previously submitted? NO Submittal Date:	No	No
PHASE II NO <sub>x</sub> COMPLIANCE PLAN (FORM NO. 62-210.900(1)(a)4.) Previously submitted? NO Submittal Date:	No	No
PROCEDURES FOR STARTUP AND SHUTDOWN Previously submitted? NO Submittal Date:	No	No
PROCESS FLOW DIAGRAM Previously submitted? NO Submittal Date:	No	No
REPOWERING EXTENSION PLAN (FORM NO. 62-210.900(1)(a)1.) Previously submitted? NO Submittal Date:	No	No
RETIRED UNIT EXEMPTION (FORM NO. 62-210.900(1)(a)3.) Previously submitted? NO Submittal Date:	No	No

\*\*\* No Emissions Unit Supplemental Attachments Found \*\*\*

**\*\* EU 036: DESCRIPTION AND DETAIL INFORMATION \*\***

**Type of EU:** THIS EMISSIONS UNIT INFORMATION SECTION ADDRESSES, AS A SINGLE EMISSIONS UNIT, ONE OR MORE PROCESS OR PRODUCTION UNITS AND ACTIVITIES WHICH PRODUCE FUGITIVE EMISSIONS ONLY.

**EU Description:** FUGITIVE EMISSIONS

**EU Status:** A - ACTIVE

**EU Classification:** U - UNREGULATED EMISSIONS UNIT

**Acid Rain Unit?** No

**CEMS Required?** No

**Ozone SIP Base Year Unit?** No

**Initial Startup Date:**

**Long-term Reserve Shutdown Date:**

**Commence Construction Date:**

**EU Major Group SIC:** 28 - CHEMICALS AND ALLIED PRODUCTS

**EU Type:** 12.02 - FACILITY-WIDE FUGITIVE (NO AOR)

**Package Unit Manufacturer:**

**Generator Nameplate Rating:**

**Incinerator Dwell Temp:**

**Incinerator Dwell Time:**

**Incinerator Afterburner Temp:**

**EU Comment:** UNREGULATED FACILITY-WIDE FUGITIVE EMISSIONS

**\*\*EU 036: CONTROL EQUIPMENT/METHOD INFORMATION \*\***

\*\*\* NO CONTROL EQUIPMENT/METHOD(S) FOUND FOR THIS EU \*\*\*

**\*\*EU 036: OPERATING CAPACITY AND SCHEDULE \*\***

**Maximum Heat Input Rate:**

**Maximum Incineration Rate:**

**Maximum Process or Throughput Rate:**

**Maximum Process or Throughput Rate Units:**

**Maximum Production Rate:**

**Maximum Process or Throughput Rate Units:**

**Requested Maximum Operating Schedule:**

**Operating Capacity and Schedule Comment:**

**\*\*EU 036: POINT (STACK/VENT) INFORMATION \*\***

**Stack Number:** 51

**Identification of Point on Plot Plan or Flow Diagram?**

**Emission Point Type Code:** 4 - NO TRUE EMISSION POINT

**Discharge Type Code:** F - FUGITIVE EMISSIONS; NO STACK EXISTS

**Stack Height:**

**Exit Diameter:**

**Exit Temperature:**

**Actual Volumetric Flow Rate:**

**Water Vapor:**

**Maximum Dry Standard Flow Rate:**

**Nonstack Emission Point Height:** 0 feet

**Emission Point UTM Coordinates:**

**Emission Point Latitude:**

**Emission Point Longitude:**

**Emission Point Comment:**

**\*\*EU 036: SEGMENT (PROCESS/FUEL) INFORMATION \*\***

**SCC Code:** 30199999

**Units:** Tons Product Produced

**Description 1:** Industrial Processes

**Description 2:** Chemical Manufacturing  
**Description 3:** Other Not Classified  
**Description 4:** Specify in Comments Field  
**Is this a Valid Segment?** YES  
**Status:** ACTIVE  
**Segment Description (Process/Fuel Type):** MISC. PROCESSES  
**Maximum Hourly Rate:**  
**Hourly Rate Limit:**  
**Maximum Annual Rate:**  
**Annual Rate Limit:**  
**Estimated Annual Activity Factor:**  
**Maximum % Sulfur:**  
**% Sulfur Rate Limit:**  
**Maximum % Ash:**  
**Million Btu per SCC Unit:**  
**Segment Comment:** FUGITIVE EMISSIONS FROM FACILITY-WIDE OPERATIONS

**\*\*EU 036: POLLUTANT INFORMATION \*\***

**Pollutant Code:** CO  
**Pollutant Description:** CARBON MONOXIDE  
**Is this a Valid Pollutant?** YES  
**Status:** ACTIVE  
**Include in the Facility Emissions Cap?** NO  
**Pollutant Regulatory Code:** NS - POLLUTANT NOT EMISSIONS-LIMITED NOT SUBJECT TO WORK PRACTICE  
**Primary Control Device:**  
**Secondary Control Device:**  
**Total % Efficiency of Control:**  
**Potential Emissions:**  
**Synthetically Limited?:**  
**Emissions Method:**  
**Emission Factor:**  
**Emission Factor Units:**  
**Emission Factor Reference:**  
**Calculation of Emissions:**  
**Range of Estimated Fugitive Emissions (Lower Limit):**  
**Range of Estimated Fugitive Emissions (Upper Limit):**  
**Pollutant Comment:**

**Pollutant Code:** FL  
**Pollutant Description:** FLUORIDES - TOTAL (ELEMENTAL FLUORINE AND FLORIDE COMPOUNDS)  
**Is this a Valid Pollutant?** YES  
**Status:** ACTIVE  
**Include in the Facility Emissions Cap?** NO  
**Pollutant Regulatory Code:** NS - POLLUTANT NOT EMISSIONS-LIMITED NOT SUBJECT TO WORK PRACTICE  
**Primary Control Device:**  
**Secondary Control Device:**  
**Total % Efficiency of Control:**  
**Potential Emissions:**  
**Synthetically Limited?:**  
**Emissions Method:**  
**Emission Factor:**  
**Emission Factor Units:**  
**Emission Factor Reference:**  
**Calculation of Emissions:**  
**Range of Estimated Fugitive Emissions (Lower Limit):**  
**Range of Estimated Fugitive Emissions (Upper Limit):**  
**Pollutant Comment:**

**Pollutant Code:** NOX

**Pollutant Description:** NITROGEN OXIDES  
**Is this a Valid Pollutant?** YES  
**Status:** ACTIVE  
**Include in the Facility Emissions Cap?** NO  
**Pollutant Regulatory Code:** NS - POLLUTANT NOT EMISSIONS-LIMITED, NOT SUBJECT TO WORK PRACTICE  
**Primary Control Device:**  
**Secondary Control Device:**  
**Total % Efficiency of Control:**  
**Potential Emissions:**  
**Synthetically Limited?:**  
**Emissions Method:**  
**Emission Factor:**  
**Emission Factor Units:**  
**Emission Factor Reference:**  
**Calculation of Emissions:**  
**Range of Estimated Fugitive Emissions (Lower Limit):**  
**Range of Estimated Fugitive Emissions (Upper Limit):**  
**Pollutant Comment:**

**Pollutant Code:** PM  
**Pollutant Description:** PARTICULATE MATTER - TOTAL  
**Is this a Valid Pollutant?** YES  
**Status:** ACTIVE  
**Include in the Facility Emissions Cap?** NO  
**Pollutant Regulatory Code:** NS - POLLUTANT NOT EMISSIONS-LIMITED NOT SUBJECT TO WORK PRACTICE  
**Primary Control Device:**  
**Secondary Control Device:**  
**Total % Efficiency of Control:**  
**Potential Emissions:**  
**Synthetically Limited?:**  
**Emissions Method:**  
**Emission Factor:**  
**Emission Factor Units:**  
**Emission Factor Reference:**  
**Calculation of Emissions:**  
**Range of Estimated Fugitive Emissions (Lower Limit):**  
**Range of Estimated Fugitive Emissions (Upper Limit):**  
**Pollutant Comment:**

**Pollutant Code:** PM10  
**Pollutant Description:** PARTICULATE MATTER - PM10  
**Is this a Valid Pollutant?** YES  
**Status:** ACTIVE  
**Include in the Facility Emissions Cap?** NO  
**Pollutant Regulatory Code:** NS - POLLUTANT NOT EMISSIONS-LIMITED NOT SUBJECT TO WORK PRACTICE  
**Primary Control Device:**  
**Secondary Control Device:**  
**Total % Efficiency of Control:**  
**Potential Emissions:**  
**Synthetically Limited?:**  
**Emissions Method:**  
**Emission Factor:**  
**Emission Factor Units:**  
**Emission Factor Reference:**  
**Calculation of Emissions:**  
**Range of Estimated Fugitive Emissions (Lower Limit):**  
**Range of Estimated Fugitive Emissions (Upper Limit):**  
**Pollutant Comment:**

**Pollutant Code:** SO2  
**Pollutant Description:** SULFUR DIOXIDE  
**Is this a Valid Pollutant?** YES

**Status:** ACTIVE  
**Include in the Facility Emissions Cap?** NO  
**Pollutant Regulatory Code:** NS - POLLUTANT NOT EMISSIONS-LIMITED NOT SUBJECT TO WORK PRACTICE  
**Primary Control Device:**  
**Secondary Control Device:**  
**Total % Efficiency of Control:**  
**Potential Emissions:**  
**Synthetically Limited?:**  
**Emissions Method:**  
**Emission Factor:**  
**Emission Factor Units:**  
**Emission Factor Reference:**  
**Calculation of Emissions:**  
**Range of Estimated Fugitive Emissions (Lower Limit):**  
**Range of Estimated Fugitive Emissions (Upper Limit):**  
**Pollutant Comment:**

**Pollutant Code:** VOC  
**Pollutant Description:** VOLATILE ORGANIC COMPOUNDS  
**Is this a Valid Pollutant?** YES  
**Status:** ACTIVE  
**Include in the Facility Emissions Cap?** NO  
**Pollutant Regulatory Code:** NS - POLLUTANT NOT EMISSIONS-LIMITED NOT SUBJECT TO WORK PRACTICE  
**Primary Control Device:**  
**Secondary Control Device:**  
**Total % Efficiency of Control:**  
**Potential Emissions:**  
**Synthetically Limited?:**  
**Emissions Method:**  
**Emission Factor:**  
**Emission Factor Units:**  
**Emission Factor Reference:**  
**Calculation of Emissions:**  
**Range of Estimated Fugitive Emissions (Lower Limit):**  
**Range of Estimated Fugitive Emissions (Upper Limit):**  
**Pollutant Comment:**

**\*\*EU 036: POLLUTANT ALLOWABLE EMISSIONS INFORMATION \*\***

\*\*\* NO POLLUTANT ALLOWABLE EMISSIONS INFORMATION FOUND FOR THIS EU \*\*\*

**\*\*EU 036: VISIBLE EMISSIONS INFORMATION \*\***

\*\*\* NO VISIBLE EMISSIONS INFORMATION FOUND FOR THIS EU \*\*\*

**\*\*EU 036: CONTINUOUS MONITOR INFORMATION \*\***

\*\*\* NO CONTINUOUS MONITOR INFORMATION FOUND FOR THIS EU \*\*\*

**\*\* EU 036: SUPPLEMENTARY ITEMS \*\***

Supplementary Item	Applicable?	Attachment?
ACID RAIN PART (FORM NO. 62-210.900(1)(a)) Previously submitted? NO Submittal Date:	No	No



ALTERNATIVE METHODS OF OPERATION	No	No
ALTERNATIVE MODES OF OPERATION (EMISSIONS TRADING)	No	No
CERTIFICATE OF REPRESENTATION (EPA FORM NO. 7610-1)	No	No
COMPLIANCE ASSURANCE MONITORING PLAN	No	No
COMPLIANCE DEMONSTRATION REPORTS/RECORDS Previously submitted? NO Submittal Date: Previously Submitted Test Date(s)/Pollutants Tested: To Be submitted? NO Submittal Date: To Be Submitted Test Date(s)/Pollutants Tested:	No	No
CONTROL TECHNOLOGY REVIEW AND ANALYSIS (RULES 62-212.400(6) and 62-212.500(7), F.A.C.; 40 CFR 63.43(d) and (e))	No	No
DESCRIPTION OF STACK SAMPLING FACILITIES	No	No
DETAILED DESCRIPTION OF CONTROL EQUIPMENT Previously submitted? NO Submittal Date:	No	No
FUEL ANALYSIS OR SPECIFICATION Previously submitted? NO Submittal Date:	No	No
GOOD ENGINEERING PRACTICE STACK HEIGHT ANALYSIS (RULE 62-212.400(5)(h)6., F.A.C., and RULE 62-212.500(4)(f), F.A.C.)	No	No
IDENTIFICATION OF APPLICABLE REQUIREMENTS	No	No
NEW UNIT EXEMPTION (FORM NO. 62-210.900(1)(a)2.) Previously submitted? NO Submittal Date:	No	No
OPERATION AND MAINTENANCE PLAN Previously submitted? NO Submittal Date:	No	No
OTHER EMISSIONS UNIT INFORMATION	No	No
OTHER INFORMATION REQUIRED BY RULE OR STATUTE	No	No
PHASE II NOx AVERAGING PLAN (FORM NO. 62-210.900(1)(a)5.) Previously submitted? NO Submittal Date:	No	No
PHASE II NOx COMPLIANCE PLAN (FORM NO. 62-210.900(1)(a)4.) Previously submitted? NO Submittal Date:	No	No
PROCEDURES FOR STARTUP AND SHUTDOWN Previously submitted? NO Submittal Date:	No	No
PROCESS FLOW DIAGRAM Previously submitted? NO Submittal Date:	No	No
REPOWERING EXTENSION PLAN (FORM NO. 62-210.900(1)(a)1.) Previously submitted? NO Submittal Date:	No	No
RETIRED UNIT EXEMPTION (FORM NO. 62-210.900(1)(a)3.) Previously submitted? NO Submittal Date:	No	No

\*\*\* No Emissions Unit Supplemental Attachments Found \*\*\*

\*\*\*\*\*

**PROFESSIONAL ENGINEER CERTIFICATION:**

I hereby certify, except as particularly noted herein\*, that:

- (1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this application for air permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; and
- (2) To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application.
- (3) If the purpose of this application is to obtain a Title V air operation permit (check here , if so), I further certify that each emissions unit described in this application for air permit, when properly operated and maintained, will comply with the applicable requirements identified in this application to which the unit is subject, except those emissions units for which a compliance plan and schedule is submitted with this application.
- (4) If the purpose of this application is to obtain an air construction permit (check here , if so) or concurrently process and obtain an air construction permit and a Title V air operation permit revision or renewal for one or more proposed new

or modified emissions units (check here , if so), I further certify that the engineering features of each such emissions unit described in this application have been designed or examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application.

(5) If the purpose of this application is to obtain an initial air operation permit or operation permit revision or renewal for one or more newly constructed or modified emissions units (check here , if so), I further certify that, with the exception of any changes detailed as part of this application, each such emissions unit has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with all provisions contained in such permit.

Professional Engineer Name: JOHN KOGLER  
Professional Engineer Registration Number:  
Date Professional Engineer Submitted: 11/10/2003

#### RESPONSIBLE OFFICIAL CERTIFICATION:

By entering my PIN to submit this application, I certify that I am a responsible official of the Title V source addressed in this air permit application. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof and all other applicable requirements identified in this application to which the Title V source is subject. I understand that a permit, if granted by the department, cannot be transferred without authorization from the department, and I will promptly notify the department upon sale or legal transfer of the facility or any permitted emissions unit. Finally, I certify that the facility and each emissions unit are in compliance with all applicable requirements to which they are subject, except as identified in compliance plan(s) submitted with this application.

Responsible Official Name: JOHN DORAN  
Date Responsible Official Submitted: 11/25/2003

\*\*\* End of Applicant's Summary Report \*\*\*

(f) Electrical Power.

1. A minimum of two 120-volt AC, 20-amp outlets shall be provided at the sampling platform within 20 feet of each sampling port.

2. If extension cords are used to provide the electrical power, they shall be kept on the plant's property and be available immediately upon request by sampling personnel.

(g) Sampling Equipment Support.

1. A three-quarter inch eyebolt and an angle bracket shall be attached directly above each port on vertical stacks and above each row of sampling ports on the sides of horizontal ducts.

a. The bracket shall be a standard 3 inch × 3 inch × one-quarter inch equal-legs bracket which is 1 and one-half inches wide. A hole that is one-half inch in diameter shall be drilled through the exact center of the horizontal portion of the bracket. The horizontal portion of the bracket shall be located 14 inches above the centerline of the sampling port.

b. A three-eighth inch bolt which protrudes 2 inches from the stack may be substituted for the required bracket. The bolt shall be located 15 and one-half inches above the centerline of the sampling port.

c. The three-quarter inch eyebolt shall be capable of supporting a 500 pound working load. For stacks that are less than 12 feet in diameter, the eyebolt shall be located 48 inches above the horizontal portion of the angle bracket. For stacks that are greater than or equal to 12 feet in diameter, the eyebolt shall be located 60 inches above the horizontal portion of the angle bracket. If the eyebolt is more than 120 inches above the platform, a length of chain shall be attached to it to bring the free end of the chain to within safe reach from the platform.

2. A complete monorail or dualrail arrangement may be substituted for the eyebolt and bracket.

3. When the sample ports are located in the top of a horizontal duct, a frame shall be provided above the port to allow the sample probe to be secured during the test.

(7) Frequency of Compliance Tests. The following provisions apply only to those emissions units that are subject to an emissions limiting standard for which compliance testing is required.

(a) General Compliance Testing.

1. The owner or operator of a new or modified emissions unit that is subject to an emission limiting standard shall conduct a compliance test that demonstrates compliance with the applicable emission limiting standard prior to obtaining an operation permit for such emissions unit.

2. For excess emission limitations for particulate matter specified in Rule 62-210.700, F.A.C., a compliance test shall be conducted annually while the emissions unit is operating under soot blowing conditions in each federal fiscal year during which soot blowing is part of normal emissions unit operation, except that such test shall not be required in any federal fiscal year in which a fossil fuel steam generator does not burn liquid and/or solid fuel for more than 400 hours other than during startup.

3. The owner or operator of an emissions unit that is subject to any emission limiting standard shall conduct a compliance test that demonstrates compliance with the applicable emission limiting standard prior to obtaining a renewed operation permit. Emissions units that are required to conduct an annual compliance test may submit the most recent annual compliance test to satisfy the requirements of this provision. In renewing an air operation permit pursuant to sub-subparagraph 62-210.300(2)(a)3.b., c., or d., F.A.C., the Department shall not require submission of emission compliance test results for any emissions unit that, during the year prior to renewal:

a. Did not operate; or

b. In the case of a fuel burning emissions unit, burned liquid and/or solid fuel for a total of no more than 400 hours,

4. During each federal fiscal year (October 1 – September 30), unless otherwise specified by rule, order, or permit, the owner or operator of each emissions unit shall have a formal compliance test conducted for:

a. Visible emissions, if there is an applicable standard;

b. Each of the following pollutants, if there is an applicable standard, and if the emissions unit emits or has the potential to emit: 5 tons per year or more of lead or lead compounds measured as elemental lead; 30 tons per year or more of acrylonitrile; or 100 tons per year or more of any other regulated air pollutant; and

c. Each NESHAP pollutant, if there is an applicable emission standard.

5. An annual compliance test for particulate matter emissions shall not be required for any fuel burning emissions unit that, in a federal fiscal year, does not burn liquid and/or solid fuel, other than during startup, for a total of more than 400 hours.

6. For fossil fuel steam generators on a semi-annual particulate matter emission compliance testing schedule, a compliance test shall not be required for any six-month period in which liquid and/or solid fuel is not burned for more than 200 hours other than during startup.

7. For emissions units electing to conduct particulate matter emission compliance testing quarterly pursuant to paragraph 62-296.405(2)(a), F.A.C., a compliance test shall not be required for any quarter in which liquid and/or solid fuel is not burned for more than 100 hours other than during startup.

8. Any combustion turbine that does not operate for more than 400 hours per year shall conduct a visible emissions compliance test once per each five-year period, coinciding with the term of its air operation permit.

9. The owner or operator shall notify the Department, at least 15 days prior to the date on which each formal 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 for the owner or operator.

10. An annual compliance test conducted for visible emissions shall not be required for units exempted from air permitting pursuant to subsection 62-210.300(3), F.A.C.; units determined to be insignificant pursuant to subparagraph 62-213.300(2)(a)1., F.A.C., or paragraph 62-213.430(6)(b), F.A.C.; or units permitted under the General Permit provisions in paragraph 62-210.300(4)(a) or Rule 62-213.300, F.A.C., unless the general permit specifically requires such testing.

(b) Special Compliance Tests. When the Department, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in a Department rule or in a permit issued pursuant to those rules is being violated, it shall require the owner or operator of the emissions unit to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to the Department.

(c) Waiver of Compliance Test Requirements. If the owner or operator of an emissions unit that is subject to a compliance test requirement demonstrates to the Department, pursuant to the procedure established in Rule 62-297.620, F.A.C., that the compliance of the emissions unit with an applicable weight emission limiting standard can be adequately determined by means other than the designated test procedure, such as specifying a surrogate standard of no visible emissions for particulate matter sources equipped with a bag house or specifying a fuel analysis for sulfur dioxide emissions, the Department shall waive the compliance test requirements for such emissions units and order that the alternate means of determining compliance be used, provided, however, the provisions of paragraph 62-297.310(7)(b), F.A.C., shall apply.

(8) Test Reports.

(a) The owner or operator of an emissions unit for which a compliance test is required shall file a report with the Department on the results of each such test.

(b) The required test report shall be filed with the Department as soon as practical but no later than 45 days after the last sampling run of each test is completed.

(c) The test report shall provide sufficient detail on the emissions unit tested and the test procedures used to allow the Department to determine if the test was properly conducted and the test results properly computed. As a minimum, the test report, other than for an EPA or DEP Method 9 test, shall provide the following information:

1. The type, location, and designation of the emissions unit tested.
2. The facility at which the emissions unit is located.
3. The owner or operator of the emissions unit.
4. The normal type and amount of fuels used and materials processed, and the types and amounts of fuels used and material processed during each test run.
5. The means, raw data and computations used to determine the amount of fuels used and materials processed, if necessary to determine compliance with an applicable emission limiting standard.
6. The type of air pollution control devices installed on the emissions unit, their general condition, their normal operating parameters (pressure drops, total operating current and GPM scrubber water), and their operating parameters during each test run.
7. A sketch of the duct within 8 stack diameters upstream and 2 stack diameters downstream of the sampling ports, including the distance to any upstream and downstream bends or other flow disturbances.
8. The date, starting time and duration of each sampling run.
9. The test procedures used, including any alternative procedures authorized pursuant to Rule 62-297.620, F.A.C. Where optional procedures are authorized in this chapter, indicate which option was used.
10. The number of points sampled and configuration and location of the sampling plane.
11. For each sampling point for each run, the dry gas meter reading, velocity head, pressure drop across the stack, temperatures, average meter temperatures and sample time per point.
12. The type, manufacturer and configuration of the sampling equipment used.
13. Data related to the required calibration of the test equipment.
14. Data on the identification, processing and weights of all filters used.
15. Data on the types and amounts of any chemical solutions used.
16. Data on the amount of pollutant collected from each sampling probe, the filters, and the impingers, are reported separately for the compliance test.
17. The names of individuals who furnished the process variable data, conducted the test, analyzed the samples and prepared the report.
18. All measured and calculated data required to be determined by each applicable test procedure for each run.
19. The detailed calculations for one run that relate the collected data to the calculated emission rate.
20. The applicable emission standard, and the resulting maximum allowable emission rate for the emissions unit, plus the test result in the same form and unit of measure.
21. A certification that, to the knowledge of the owner or his authorized agent, all data submitted are true and correct. When a compliance test is conducted for the Department or its agent, the person who conducts the test shall provide the certification with respect to the test procedures used. The owner or his authorized agent shall certify that all data required and provided to the person conducting the test are true and correct to his knowledge.

(9) The terms stack and duct are used interchangeably in this rule.

**Phillips, Cindy**

---

**From:** Vielhauer, Trina  
**Sent:** Tuesday, March 02, 2004 2:23 PM  
**To:** Bull, Robert; Phillips, Cindy  
**Subject:** CF Bartow

Bobby & Cindy,

I spoke briefly with Craig Kovach from CF Bartow regarding possible resolution of the phosphate MACT issue for their facility. He indicated they'd sent their response to the RAI today. He indicated that the phosphoric acid plants at their facility have been shut down and non-operational since 1989. They still want the plants listed in their Title V permit but understand that they'd have to get a new construction permit to actually operate them. Would we still need to make the statement they are a major source? [I am not clear on their pond situation] In the event we would just be looking at MACT because of the phos acid, could we modify the IMC language to say something like: prior to resuming operation of the phos acid plants they must obtain a construction permit and the Department will identify the facility as a major source at that time. However, if additional testing.....[rest of IMC language].

We can talk more when you return.

Thx,  
Trina

105005-025

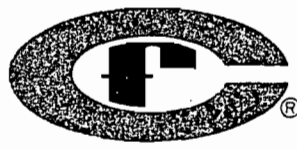
VIA

P.O. Box 1480  
Bartow, Florida 33831  
Telephone: 863/533-3181  
Fax: 863/534-1841



CF IND.

1050052



**CF Industries, Inc.**

**Bartow Phosphate Complex**

February 6, 2001

**RECEIVED**

FEB 09 2001

Department of Environmental Protection  
SOUTHWEST DISTRICT

Mr. William A. Proses  
Air Compliance Supervisor  
Department of Environmental Protection  
Southwest District  
3804 Coconut Palm Drive  
Tampa, Florida 33619

Dear Mr. Proses:

SUBJECT: CF Industries, Inc. (CFI)  
Bartow Phosphate Complex  
No.1 MAP/DAP Shipping Unit  
Annual Visible Emissions Test  
Permit No.: 1050052-002-AV

EU 002  
MAP/DAP  
SHIPPING

As required by Section II,A.,4., of our Title V permit, an annual testing for visible emissions was performed at our No.2 DAP/MAP Shipping Unit on January 23, 2001. During the test, MAP fertilizer was loaded into railcars at the rate of 300 tons per hour, which is 92.3% of the permitted rate. No visible emissions were observed during the test. A copy of the Visual Emission Observation form is attached.

Please contact us if you have any questions about this submittal.

Sincerely,

James E. Parsons  
General Manager

JEP/SYM/sym

Enclosure

Distribution: PR Roberts, C.A. Kovach, M.L. Vadelund

VISIBLE EMISSION OBSERVATION FORM

No.

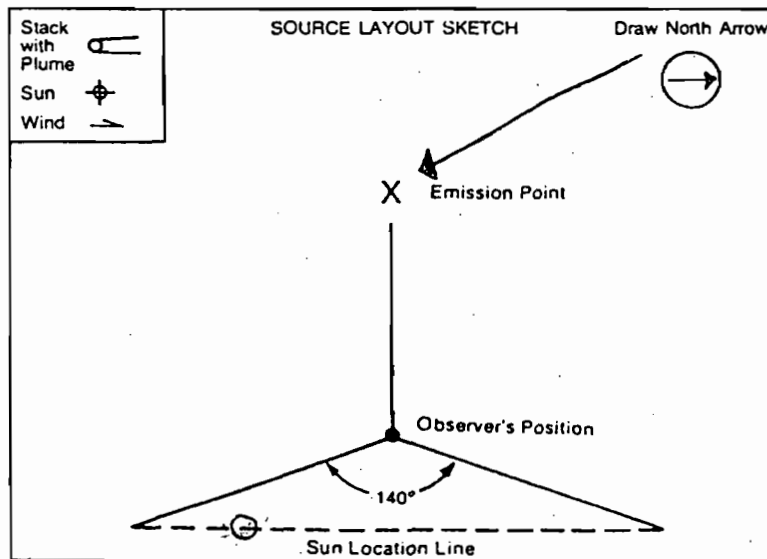
COMPANY NAME **CF INDUSTRIES, INC. Bartow**  
 STREET ADDRESS **2501 BONNIE MINE RD**  
**P.O. BOX 1480**  
 CITY **BARTOW** STATE **FL** ZIP **33831**  
 PHONE (KEY CONTACT) **863-533-3181** SOURCE ID NUMBER **1050052-004-002**

PROCESS EQUIPMENT **#2 DAP/MAP SHIPPING UNIT** OPERATING MODE **NORMAL**  
 CONTROL EQUIPMENT **BUEN CYCLONE AIRETRON CYCLONE SPRAY SCRUBBER** OPERATING MODE **NORMAL**

DESCRIBE EMISSION POINT  
**CIRCULAR STACK OPENING**  
**APPROXIMATELY 5' IN DIAMETER**  
 HEIGHT ABOVE GROUND LEVEL **~135'** HEIGHT RELATIVE TO OBSERVER  
 Start **~125'** End **~125'**  
 DISTANCE FROM OBSERVER Start **~210'** End **~220'** DIRECTION FROM OBSERVER  
 Start **SW** End **SW**

DESCRIBE EMISSIONS  
 Start **NONE** End **NONE**  
 EMISSION COLOR Start **N/A** End **N/A** IF WATER DROPLET PLUME  
 Attached  Detached   
 POINT IN THE PLUME AT WHICH OPACITY WAS DETERMINED  
 Start **~2' ABOVE STACK** End **~2' ABOVE STACK**

DESCRIBE PLUME BACKGROUND  
 Start **BLUE SKY** End **BLUE SKY w/CLOUDS**  
 BACKGROUND COLOR Start **BLUE** End **BLUE/WHITE** SKY CONDITIONS  
 Start **CLEAR** End **BROKEN**  
 WIND SPEED Start **8-14 MPH** End **8-14 MPH** WIND DIRECTION  
 Start **NW** End **NW**  
 AMBIENT TEMP Start **45°** End **50°** WET BULB TEMP \_\_\_\_\_ RH. percent  
**56%**



ADDITIONAL INFORMATION

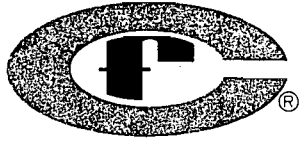
OBSERVATION DATE		START TIME		END TIME	COMMENTS
01-23-2001		10:		11:02	
SEC	0	15	30	45	
MIN					
1	0	0	0	0	HOPPER CAR
2	0	0	0	0	#CSXT 260166
3	0	0	0	0	
4	0	0	0	0	
5	0	0	0	0	
6	0	0	0	0	
7	0	0	0	0	
8	0	0	0	0	
9	0	0	0	0	
10	0	0	0	0	
11	0	0	0	0	
12	0	0	0	0	
13	0	0	0	0	
14	0	0	0	0	
15	0	0	0	0	
16	0	0	0	0	
17	0	0	0	0	
18	0	0	0	0	
19	0	0	0	0	
20	0	0	0	0*	*end of hopper @ 10:36 AM
21	**0	0	0	0	**start car 10:41 A.M.
22	0	0	0	0	CSXT 260253
23	0	0	0	0	
24	0	0	0	0	
25	0	0	0	0	
26	0	0	0	0	
27	0	0	0	0	
28	0	0	0	0	
29	0	0	0	0	
30	0	0	0	0	

OBSERVER'S NAME (PRINT) **Sandra Y. Martin**  
 OBSERVER'S SIGNATURE **Sandra Y. Martin** DATE **1-23-01**  
 ORGANIZATION **CF Industries, Inc., Bartow Complex**  
 CERTIFIED BY **Eastern Technical Associates** DATE **8-22-00**

CONTINUED ON VEO FORM NUMBER







**CF Industries, Inc.**

Bartow Phosphate Complex

December 8, 1999

AA  
D.E.P.  
DEC 27 1999  
Southwest District Tampa

Mr. William A. Proses  
Air Compliance Supervisor  
Department of Environmental Protection  
Southwest District  
3804 Coconut Palm Drive  
Tampa, Florida 33619

Dear Mr. Proses:

SUBJECT: CF Industries, Inc. (CFI),  
Bartow Phosphate Complex  
Facility ID No.: 1050052  
No. 2 MAP/DAP Shipping Unit  
Point ID No.: 025  
Annual Visible Emissions Test  
Permit No.: 1050052-004-AV

As required by Section III, A., 4. of our Title V permit, an annual visible emissions test was performed at our No. 2 DAP/MAP Shipping Unit on December 2, 1999. During the test, DAP fertilizer was loaded into railcars at the rate of 303 tons per hour, which is 93% of the permitted rate. No visible emissions were observed during the test. Copies of the Visible Emissions Observation form and the operating log are attached.

Please contact Frank Dlugos if you have any questions about this submittal.

Sincerely,

James E. Parsons,  
General Manager

JEP/SYM/sym

Enclosure

Dist: P.R. Roberts, C.A. Kovach, G.W. Curry

VISIBLE EMISSION OBSERVATION FORM

No.

COMPANY NAME  
*CF INDUSTRIES, INC. BARTOW*

STREET ADDRESS  
*BONNIE MINE ROAD*

*P. O. BOX 1480*

CITY *BARTOW* STATE *FL* ZIP *33831*

PHONE (KEY CONTACT) *(941) 533-3181* SOURCE ID NUMBER *1050052-025*

OBSERVATION DATE *12-2-99* START TIME *10:03 AM* END TIME *10:35 AM*

PROCESS EQUIPMENT *No. 2 DAP SHIPPING UNIT* OPERATING MODE *NORMAL*

CONTROL EQUIPMENT *BUEN CYCLONE AIRETRON CYCLONE SPRAY SCRUBBER* OPERATING MODE *NORMAL*

DESCRIBE EMISSION POINT  
*CIRCULAR STACK OPENING*

*APPROXIMATELY 5' IN DIAMETER*

HEIGHT ABOVE GROUND LEVEL *~135'* HEIGHT RELATIVE TO OBSERVER  
Start *~125'* End *~125'*

DISTANCE FROM OBSERVER Start *~250'* End *~250'* DIRECTION FROM OBSERVER  
Start *W* End *W*

DESCRIBE EMISSIONS  
Start *NONE* End *NONE*

EMISSION COLOR Start *N/A* End *N/A* IF WATER DROPLET PLUME  
Attached  Detached

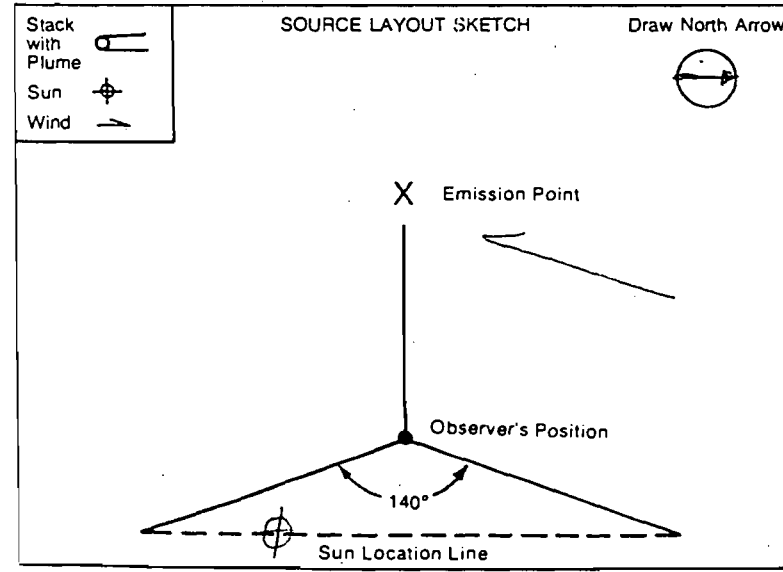
POINT IN THE PLUME AT WHICH OPACITY WAS DETERMINED  
Start *~2' ABOVE STACK* End *~2' ABOVE STACK*

DESCRIBE PLUME BACKGROUND  
Start *CLEAR BLUE SKY* End *CLEAR BLUE SKY*

BACKGROUND COLOR Start *BLUE* End *BLUE* SKY CONDITIONS Start *CLEAR* End *CLEAR*

WIND SPEED Start *10-12 MPH* End *10-12 MPH* WIND DIRECTION Start *NE* End *ENE*

AMBIENT TEMP Start *52°F* End *55°F* WET BULB TEMP *—* RH, percent *57%*



SEC	0	15	30	45	COMMENTS
1	0	0	0	0	NAHX 15694
2	0	0	0	0	
3	0	0	0	0	
4	0	0	0	0	
5	0	0	0	0	
6	0	0	0	0	
7	0	0	0	0	
8	0	0	0	0	
9	0	0	0	0	
10	0	0	0	0	
11	0	0	0	0	
12	0	0	0	0	
13	0	0	0	0	
14	0	0	0	0	
15	0	0	0	0	
16	0	0	0	0	
17	0	0	0	0	
18	0	0	0	0	
19	0	0	0	0	
20	0	0	0	0	
21	*0	0	0	0	STARTED @ 10:25
22	0	0	0	0	CSXT 250107
23	0	0	0	0	
24	0	0	0	0	
25	0	0	0	0	
26	0	0	0	0	
27	0	0	0	0	
28	0	0	0	0	
29	0	0	0	0	
30	0	0	0	0	

OBSERVER'S NAME (PRINT) *Sandra Y Martin*

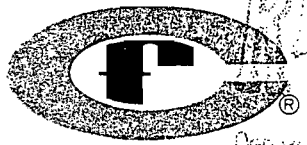
OBSERVER'S SIGNATURE *Sandra Y Martin* DATE *12-2-99*

ORGANIZATION *CF INDUSTRIES, INC. BARTOW*

CERTIFIED BY *EASTERN Technical Associates* DATE *8-25-99*

CONTINUED ON VEO FORM NUMBER

ADDITIONAL INFORMATION



**CF Industries, Inc.**

**Bartow Phosphate Complex**

Department of Environmental Protection  
Southwest District  
December 17, 1998

Mr. William A. Proses  
Air Compliance Supervisor  
Department of Environmental Protection  
Southwest District  
3804 Coconut Palm Drive  
Tampa, Florida 33619

Dear Mr. Proses:

SUBJECT: CF Industries, Inc. (CFI),  
Bartow Phosphate Complex  
Facility ID No.: 1050052  
No. 1 MAP/DAP Shipping Unit  
Point ID No.: 025  
Annual Visible Emissions Test  
Permit No.: 1050052-004-AV

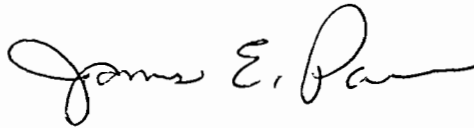
As required by Section III, A., 4. of our Title V permit, an annual visible emissions test was performed at our No. 2 DAP/MAP Shipping Unit on December 16, 1998. During the test, DAP fertilizer was loaded into railcars at the rate of 305 tons per hour, which is 94% of the permitted rate. Operating parameters during the test were as follows:

	Operating Minimum	Test Value
Pressure Drop (in.)	2.2	2.4
Scrubber Flow Rate (gpm)	143	180
Recycle Flow Rate (gpm)	95	168

No visible emissions were observed during the test. Copies of the Visible Emissions Observation form and the operating log are attached.

Please contact Frank Dlugos if you have any questions about this submittal.

Sincerely,

A handwritten signature in cursive script that reads "James E. Parsons". The signature is written in black ink and is positioned above the typed name.

James E. Parsons,  
General Manager

FJD/FJD/fjd

Enclosure

Dist: P.R. Roberts, C.A. Kovach, G.W. Curry

VISIBLE EMISSION OBSERVATION FORM

No. *175*

COMPANY NAME  
*CF Industries, Inc. Bartow Complex*

STREET ADDRESS  
*2501 Bonnie Mine Road*

*P.O. Box 1480*

CITY *Bartow* STATE *FL* ZIP *33831*

PHONE (KEY CONTACT) *941-533-3181* SOURCE ID NUMBER *105-00525 025*

PROCESS EQUIPMENT *No. 2 MAP/DAP Shipping Unit* OPERATING MODE *Normal*

CONTROL EQUIPMENT *Buen cyclones & Airetron cyclone spray scrubber* OPERATING MODE *Normal*

DESCRIBE EMISSION POINT  
*Circular stack opening approx. 5 Feet in diameter*

HEIGHT ABOVE GROUND LEVEL *~135'* HEIGHT RELATIVE TO OBSERVER  
Start *~125'* End *~125'*

DISTANCE FROM OBSERVER Start *~300'* End *~300'* DIRECTION FROM OBSERVER  
Start *W* End *W*

DESCRIBE EMISSIONS  
Start *None* End *None*

EMISSION COLOR Start *NA* End *NA* IF WATER DROPLET PLUME  
Attached  Detached

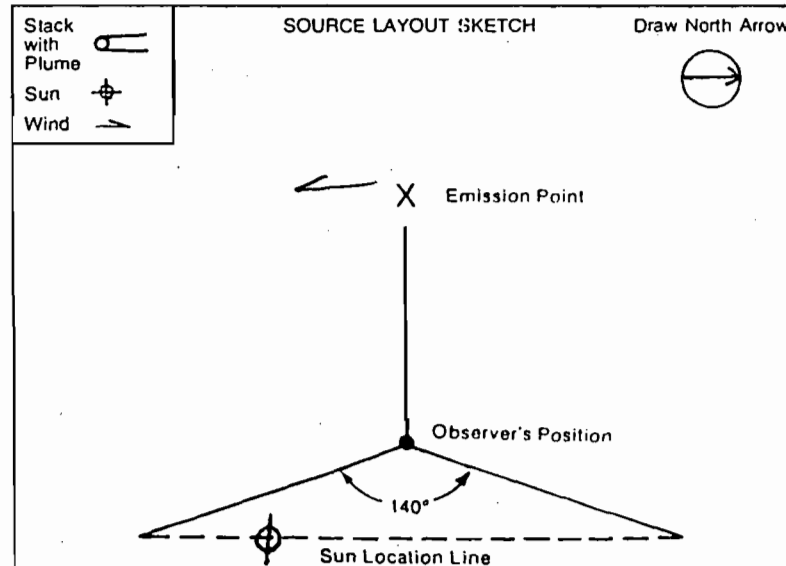
POINT IN THE PLUME AT WHICH OPACITY WAS DETERMINED  
Start *~2' from stack top* End *~2' from stack top*

DESCRIBE PLUME BACKGROUND  
Start *Clear sky* End *Clear sky*

BACKGROUND COLOR Start *Blue* End *Blue* SKY CONDITIONS  
Start *Clear* End *Clear*

WIND SPEED Start *10-14mph* End *10-14mph* WIND DIRECTION  
Start *N* End *N*

AMBIENT TEMP Start *52°F* End *53°F* WET BULB TEMP. RH, percent  
*60*



ADDITIONAL INFORMATION

OBSERVATION DATE		START TIME		END TIME	COMMENTS
12/16/98		1018		1056	
SEC	0	15	30	45	COMMENTS
MIN	0	15	30	45	
1	0	0	0	0	<i>NAHX 488614</i>
2	0	0	0	0	
3	0	0	0	0	
4	0	0	0	0	
5	0	0	0	0	
6	0	0	0	0	
7	0	0	0	0	
8	0	0	0	0	
9	0	0	0	0	
10	0	0	0	0	
11	0	0	0	0	
12	0	0	0	0	
13	0	0	0	0	
14	0	0	0	0	
15	0	0	0	0	
16	0	0	0	0	
17	0	0	0	0	
18	0	0	0	0	
19	0	0	0	0	
20	<i>*0</i>	0	0	0	<i>*started @ 10:46am</i>
21	0	0	0	0	<i>AEX 4140</i>
22	0	0	0	0	
23	0	0	0	0	
24	0	0	0	0	
25	0	0	0	0	
26	0	0	0	0	
27	0	0	0	0	
28	0	0	0	0	
29	0	0	0	0	
30	0	0	0	0	

OBSERVER'S NAME (PRINT)  
*Lloyd G. Camp*

OBSERVER'S SIGNATURE *Lloyd G. Camp* DATE *12/16/98*

ORGANIZATION  
*CF Industries, Inc. Plant City Complex*

CERTIFIED BY *Eastern Technical Associates* DATE *8/26/98*

CONTINUED ON VEO FORM NUMBER

# SHIFTING UNIT SCRUBBER REPORT

(DO NOT OPERATE AT LESS THAN PERMIT MINIMUMS)

Date: <u>12-16-98</u>	Shipping Unit No.: <u>2</u>
Shift: <u>1/5</u>	Chief Operator: <u>J. PARKER</u>

## SHIPPING SCRUBBER REPORT

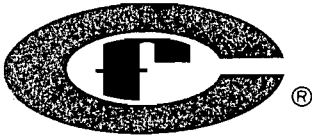
Notes \_\_\_\_\_

Scrubber Fan Amps	<u>120</u>		
Pond Water Pump Discharge Pressure (psi)	<u>40</u>		
		Permit Minimums	
		No. 1 Shipping	No. 2 Shipping
Pond Water Flow to Scrubber (gpm)	<u>180</u>	54	159
Scrub Water Recycle (gpm)	<u>168</u>	119	105
Pressure Drop Across Scrubber (Inches of Water)	<u>2.4</u>	10.8	2.2
Visible Stack	<u>NO</u>		
	Yes/No		
Dust Visible In Building	<u>NO</u>		
	Yes/No		
Dust Visible at top of Railroad Car	<u>NO</u>		
	Yes/No		
Overall Condition of Scrubber	<u>Very Good</u>		
	Very Good, Good or Poor	<u>10:15</u>	Time Checked

## SHIPPING SCRUBBER SERVICE REPORT

Scrubber Last Inspected and Cleaned	Date
Scrubber Nozzles Last Inspected and Cleaned	Date
Scrubber Fan Last Inspected and Cleaned	Date
Pond Water Screen Cleaned	Date
Service Performed by	
Report Reviewed and Filed by	<u>R. Rose</u>

Signature of Supervisor



**CF Industries**  
Bartow Phosphate Complex

1050052-031  
 (A)  
 D.E.P.  
 JUL 14 2003  
 Southwest District Tampa

P.O. Box 1480  
 Bartow, Florida 33831  
 Telephone: 863/578-1000  
 Fax: 863/534-1841

BSCM

July 9, 2003

Mr. Joel Smolen  
 Air Compliance Supervisor  
 Department of Environmental Protection  
 Southwest District  
 3804 Coconut Palm Drive  
 Tampa, Florida 33619

EU 031  
 UNLOADING &  
 TRANSFER

Dear Mr. Proses:

SUBJECT: CF Industries, Inc. (CFI),  
 Bartow Phosphate Complex  
 Facility ID No.: 1050052  
 DAP/MAP Railcar Unloading and Transfer Unit  
 Point ID No.: 031  
 Annual Visible Emissions Test  
 Permit No.: 1050052-004-AV

As required by Subsection H.3. of our Title V permit, an annual visible emissions test was performed at our DAP/MAP Railcar Unloading and Transfer Unit on July 8, 2003.

At the time of the test, monoammonium phosphate fertilizer (MAP) fertilizer was being unloaded into railcars at the rate of 119 tons per hour. This material had been coated with the petroleum based coating agent, Arr-Maz Dustrol 3015W, for dust control, prior to the time it was loaded into railcars at our Plant City facility. No visible emissions were observed during the test. A copy of the Visible Emissions Observation Form is attached.

Please contact Frank Dlugos if you have any questions about this submittal.

Sincerely,

*Paul R. Roberts*  
 Paul R. Roberts  
 Operations Manager

PRR/FJD/fjd

Enclosure

Dist: C.A. Kovach, M.L. Vadelund, W.H. Martin

VISIBLE EMISSION OBSERVATION FORM

No.

(A)

COMPANY NAME  
**CF INDUSTRIES INC. BARTOW COMPLEX**  
STREET ADDRESS  
**2501 BONNIE MIKE ROAD**

CITY  
**BARTOW** STATE  
**FL** ZIP  
**33831**  
PHONE (KEY CONTACT)  
**863-533-321X** SOURCE ID NUMBER  
**1050052-031**

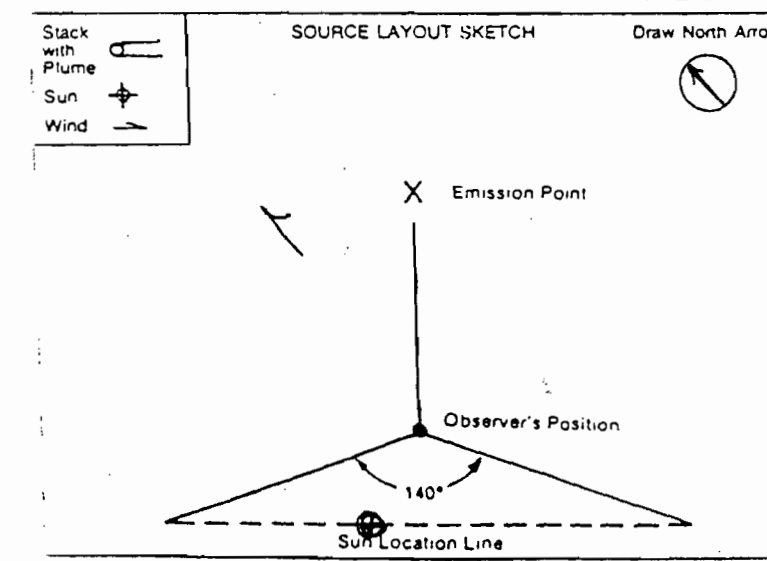
PROCESS EQUIPMENT  
**MAP RAILCAR UNLOADING** OPERATING MODE  
**NORMAL**  
CONTROL EQUIPMENT  
**NONE** OPERATING MODE  
**NORMAL**

DESCRIBE EMISSION POINT  
**END AND MIDDLE RAIL CAR HOPPERS**

HEIGHT ABOVE GROUND LEVEL  
**~3'** HEIGHT RELATIVE TO OBSERVER  
Start **~3'** End **~3'**  
DISTANCE FROM OBSERVER  
Start **~15'** End **~15'** DIRECTION FROM OBSERVER  
Start **N/E** End **N/E**

DESCRIBE EMISSIONS  
Start **NONE** End **NONE**  
EMISSION COLOR  
Start **N/A** End **N/A** Attached  Detached   
POINT IN THE PLUME AT WHICH OPACITY WAS DETERMINED  
Start **~1' FROM HOPPER** End **~1' FROM HOPPER**

DESCRIBE PLUME BACKGROUND  
Start **TRACKS & CONCRETE** End **TRACKS & CONCRETE**  
BACKGROUND COLOR  
Start **BROWN/GRAY** End **BROWN/GRAY** SKY CONDITIONS  
Start **(PARTLY) CLOUDY** End **(PARTLY) CLOUDY**  
WIND SPEED  
Start **0-5MPH** End **0-5MPH** WIND DIRECTION  
Start **SW** End **SW**  
AMBIENT TEMP  
Start **97°** End **97°** WET BULB TEMP  
RH. percent  
**49**



ADDITIONAL INFORMATION

OBSERVATION DATE		START TIME		END TIME	COMMENTS
7/8/03		1:07 PM		1:41 PM	
SEC	0	15	30	45	COMMENTS
MIN					
1	0	0	0	0	AEX 1040
2	0	0	0	0	(END HOPPER)
3	0	0	0	0	
4	0	0	0	0	
5	0	0	0	0	
6	0	0	0	0	
7	0	0	0	0	
8	0	0	0	0	
9	0	0	0	0	
10	0	0	0	0	
11	0	0	0	0	
12	0	0	0	0	
13	0	0	0	0	
14	0	0	0	0	
15	0	0	0	0	
16	0	0	0	0	
17	0	0	0	0	* POWER OUTAGE, 3 MIN.
18	*0	0	0	0	* 1:27 PM
19	0	0	0*	0	* MIDDLE HOPPER
20	0	0	0	0	
21	0	0	0	0	
22	0	0	0	0	
23	0	0	0	0	
24	0	0	0	0	
25	0	0	0	0	
26	0	0	0	0	
27	0	0	0	0	
28	0	0	0	0	
29	0*	*0	0	0	* POWER OUT * 1:40 PM
30	0	0	0	0	

OBSERVER'S NAME (PRINT)  
**ERNEST L. KRZETSCHMAN**  
OBSERVER'S SIGNATURE  
*[Signature]* DATE  
**7/8/03**  
ORGANIZATION  
**CF INDUSTRIES INC, PLANT CITY COMPLEX**  
CERTIFIED BY  
**EASTERN TECHNICAL ASSOCIATES** DATE  
**2/19/03**

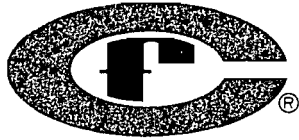
CONTINUED ON VEO FORM NUMBER



1050052-031

P.O. Box 1480  
Bartow, Florida 33831  
Telephone: 863/533-3181  
Fax: 863/534-1841

(A)



**CF Industries, Inc.**  
Bartow Phosphate Complex

June 20, 2001

VA  
D.E.P.  
JUN 25 2001  
Southwest District Tampa

Mr. William A. Proses  
Air Compliance Supervisor  
Department of Environmental Protection  
Southwest District  
3804 Coconut Palm Drive  
Tampa, Florida 33619

Dear Mr. Proses:

SUBJECT: CF Industries, Inc. (CFI)  
Bartow Phosphate Complex  
Facility ID No.: 1050052-031  
DAP/MAP Railcar Unloading and Transfer  
Annual Visible Emissions Test  
Permit No.: 1050052-004-AV

As required by Section H.3. of our Title V permit, an annual visible emissions test was performed at our DAP/MAP Railcar Unloading and Transfer Unit on May 24, 2001.

At the time of the test, monoammonium phosphate (MAP), fertilizer was being unloaded and transferred from railcars at the rate of 75.0 tons per hour. This material had been coated with the petroleum based coating agent, Arr-Maz Dustrol 3015W, for dust control, at the time it was loaded into railcars at our Plant City facility. No visible emissions were observed during the test. A copy of the Visual Emission Observation form is attached.

Based on the information and belief formed after reasonable inquiry, the statements and information in this document are true, accurate, and complete. Please contact us if you have any questions about this submittal.

Sincerely,

Paul R. Roberts,  
Operations Manager

PRR/SYM/sym  
Enclosure

Distribution: PR Roberts, C.A. Kovach, M.L. Vadelund

COMPANY NAME  
*CF Industries, Inc. Bartow Complex*

STREET ADDRESS  
*2501 Bonnie Mine Road*

CITY *Bartow* STATE *FL* ZIP *33831*

PHONE (KEY CONTACT) *863 533 3181 x 333* SOURCE ID NUMBER *1050052-031*

PROCESS EQUIPMENT *Map railcar unloading* OPERATING MODE *Normal*

CONTROL EQUIPMENT *NONE* OPERATING MODE *Normal*

DESCRIBE EMISSION POINT  
*End + MIDDLE Railcar  
hoppers*

HEIGHT ABOVE GROUND LEVEL *~3'* HEIGHT RELATIVE TO OBSERVER  
Start *~3'* End *~3'*

DISTANCE FROM OBSERVER *~25'* DIRECTION FROM OBSERVER  
Start *E* End *E*

DESCRIBE EMISSIONS  
Start *NONE* End *NONE*

EMISSION COLOR Start *N/A* End *N/A* IF WATER DROPLET PLUME  
Attached  Detached

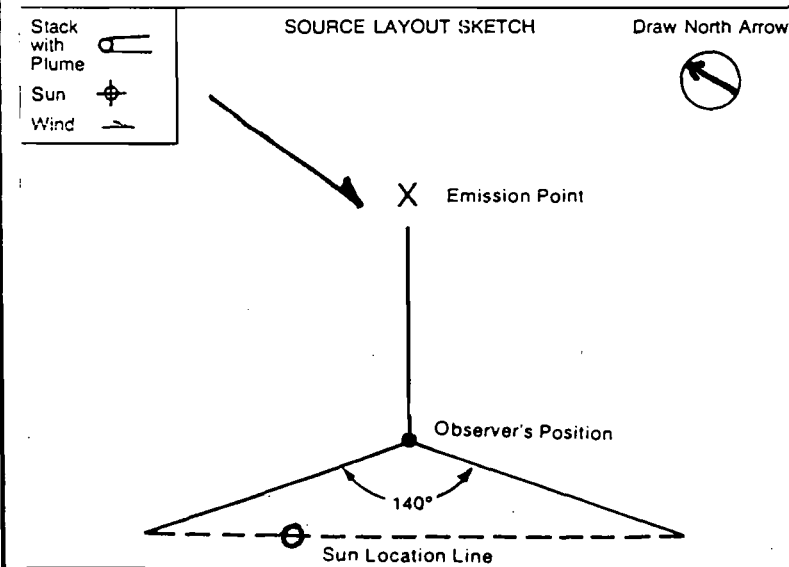
POINT IN THE PLUME AT WHICH OPACITY WAS DETERMINED  
Start *~1' from hopper* End *~1' from hopper*

DESCRIBE PLUME BACKGROUND  
Start *tracks + concrete* End *tracks + concrete*

BACKGROUND COLOR Start *brown/gay* End *brown gray* SKY CONDITIONS  
Start *clear* End *clear*

WIND SPEED Start *10-12 MPH* End *10-12 MPH* WIND DIRECTION  
Start *N* End *N*

AMBIENT TEMP Start *89* End *89* WET BULB TEMP *—* RH, percent *42*



ADDITIONAL INFORMATION

OBSERVATION DATE		START TIME		END TIME	COMMENTS
5-24-01		13:07		13:39	
SEC	0	15	30	45	COMMENTS
MIN					
1	0	0	0	0	AEX178
2	0	0	0	0	MIDDLE HOPPER
3	0	0	0	0	
4	0	0	0	0	
5	0	0	0	0	
6	0	0	0	0	
7	0	0	0	0	
8	0	0	0	0	
9	0	0	0	0	
10	0	0	0	0	
11	0	0	0	0	
12	0	0	0	0	
13	0	0	0	0	
14	0	0	0	0	
15	0	0	0	0	
16	0	0	0	0	
17	0	0	0	0	
18	*0	0	0	0	AEX178
19	0	0	0	0	END HOPPER
20	0	0	0	0	
21	0	0	0	0	
22	0	0	0	0	
23	0	0	0	0	
24	0	0	0	0	
25	0	0	0	0	
26	0	0	0	0	
27	0	0	0	0	
28	0	0	0	0	
29	0	0	0	0	
30	0	0	0	0	

OBSERVER'S NAME (PRINT) *Sandra Y. Martin*

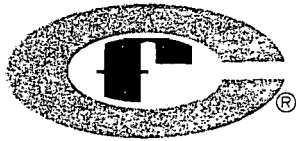
OBSERVER'S SIGNATURE *Sandra Y. Martin* DATE *5-24-01*

ORGANIZATION *CF Industries, Inc. Bartow Complex*

CERTIFIED BY *Eastern Technical Associates* DATE *2-20-2001*

CONTINUED ON VEO FORM NUMBER

AA



# CF Industries, Inc.

Bartow Phosphate Complex

June 16, 2000

Mr. William A. Proses  
Air Compliance Supervisor  
Department of Environmental Protection  
Southwest District  
3804 Coconut Palm Drive  
Tampa, Florida 33619

D.E.P.  
JUN 20 2000  
Southwest District Tampa

Dear Mr. Proses:

SUBJECT: CF Industries, Inc. (CFI),  
Bartow Phosphate Complex  
Facility ID No.: 1050052  
DAP/MAP Railcar Unloading and Transfer Unit  
Point ID No.: 031  
Annual Visible Emissions Test  
Permit No.: 1050052-004-AV

As required by Subsection H.3. of our Title V permit, an annual visible emissions test was performed at our DAP/MAP Railcar Unloading and Transfer Unit on June 15, 2000.

At the time of the test, monoammonium phosphate fertilizer (MAP) fertilizer was being unloaded into railcars at the rate of 80 tons per hour. This material had been coated with the petroleum based coating agent, Arr-Maz Dustrol 3015W, for dust control, prior to the time it was loaded into railcars at our Plant City facility. No visible emissions were observed during the test. A copy of the Visible Emissions Observation Form is attached.

Please contact Frank Dlugos if you have any questions about this submittal.

Sincerely,

*James E. Parsons*  
James E. Parsons  
General Manager

FJD/FJD/fjd

Enclosure

Dist: P.R. Roberts, C.A. Kovach, G.W. Curry

VISIBLE EMISSION OBSERVATION FORM

No.

COMPANY NAME  
*CF Industries, Inc. Bartow Complex*

STREET ADDRESS  
*2501 Bonnie Mine Road*

CITY *Bartow* STATE *FL* ZIP *33831*

PHONE (KEY CONTACT) *(941)533-3181 (x314)* SOURCE ID NUMBER *1050052-031*

PROCESS EQUIPMENT *MAP Railcar unloading* OPERATING MODE *Normal*

CONTROL EQUIPMENT *None* OPERATING MODE *Normal*

DESCRIBE EMISSION POINT  
*End and middle railcar hoppers*

HEIGHT ABOVE GROUND LEVEL *~3'* HEIGHT RELATIVE TO OBSERVER  
Start *~3'* End *~3'*

DISTANCE FROM OBSERVER Start *~25'* End *~25'* DIRECTION FROM OBSERVER  
Start *NE* End *NE*

DESCRIBE EMISSIONS  
Start *None* End *None*

EMISSION COLOR Start *NA* End *NA* IF WATER DROPLET PLUME  
Attached  Detached

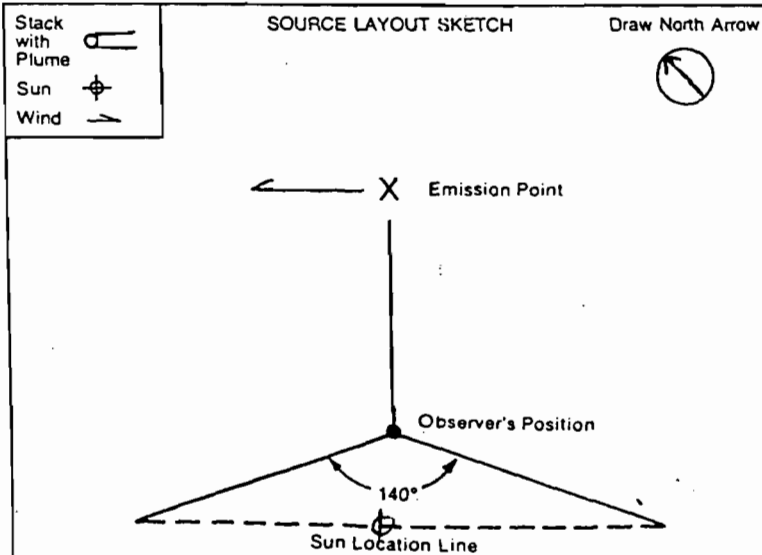
POINT IN THE PLUME AT WHICH OPACITY WAS DETERMINED  
Start *~1' from hopper* End *~1' from hopper*

DESCRIBE PLUME BACKGROUND  
Start *tracks & concrete* End *tracks & concrete*

BACKGROUND COLOR Start *brown, gray* End *gray* SKY CONDITIONS  
Start *Broken* End *Broken*

WIND SPEED Start *10-14 mph* End *10-14 mph* WIND DIRECTION  
Start *SE* End *SE*

AMBIENT TEMP Start *90°F* End *91°F* WET BULB TEMP *46* RH, percent



OBSERVATION DATE		START TIME				END TIME
6/15/00		1318				1350
SEC	0	15	30	45	COMMENTS	
MIN						
1	0	0	0	0	XTRX 815 end	
2	0	0	0	0	hopper	
3	0	0	0	0		
4	0	0	0	0		
5	0	0	0	0		
6	0	0	0	0	D.E.P.	
7	0	0	0	0	JUN 20 2000	
8	0	0	0	0		
9	0	0	0	0	Southwest District Tampa	
10	0	0	0	0		
11	0	0	0	0		
12	0	0	0	0		
13	0	0	0	0		
14	0	0	0	0		
15	0	0	0	0		
16	0	0	0	0		
17	*0	0	0	0	* Middle hopper	
18	0	0	0	0	of XTRX 815	
19	0	0	0	0	started @ 1336	
20	0	0	0	0		
21	0	0	0	0		
22	0	0	0	0		
23	0	0	0	0		
24	0	0	0	0		
25	0	0	0	0		
26	0	0	0	0		
27	0	0	0	0		
28	0	0	0	0		
29	0	0	0	0		
30	0	0	0	0		

OBSERVER'S NAME (PRINT)  
*Lloyd B. Camp*

OBSERVER'S SIGNATURE *Lloyd B. Camp* DATE *6/15/00*

ORGANIZATION  
*CF Industries, Inc. Plant City Complex*

CERTIFIED BY *Eastern Technical Associates* DATE *2/24/00*

ADDITIONAL INFORMATION

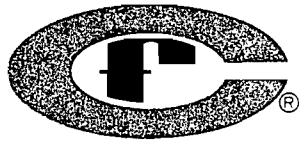
CONTINUED ON VEO FORM NUMBER

1050052-004

AA

Post Office Box 1480  
Bartow, Florida 33831  
Telephone: 941/533-3181

*(Handwritten signature)*



**CF Industries, Inc.**  
Bartow Phosphate Complex

June 24, 1999

D.E.P.

JUN 29 1999

Southwest District Tampa

Mr. William A. Proses  
Air Compliance Supervisor  
Department of Environmental Protection  
Southwest District  
3804 Coconut Palm Drive  
Tampa, Florida 33619

Dear Mr. Proses:

SUBJECT: CF Industries, Inc. (CFI)  
Bartow Phosphate Complex  
DAP/MAP RAILCAR Unloading and Transfer  
Annual Visible Emissions Test  
Permit No.: 1050052-004-AV  
Source ID No.: 1050052-031

As required by Section II, A., 4., of our Title V permit, annual testing for visible emissions was performed at our DAP/MAP Railcar Unloading and Transfer Operations on June 17, 1999.

At the time of the test diammonium phosphate (DAP), was being unloaded at the rate of 79.0 tons per hour. This material had been coated with the petroleum based coating agent, Arr-Maz Dustrol 3015W, for dust control, at the time it was loaded into railcars at our Plant City facility. No visible emissions were observed during the test. A copy of the Visual Emission Observation form is attached.

Please contact us if you have any questions about this submittal.

Sincerely,

*(Handwritten signature: James E. Parsons)*

James E. Parsons,  
General Manager

JEP/SYM/sym

Enclosure

Distribution: PR Roberts, C.A. Kovach, G.W. Curry

VISIBLE EMISSION OBSERVATION FORM<sup>A</sup>

No.

COMPANY NAME  
*CF Industries, Inc. (Bartow)*

STREET ADDRESS  
*2501 Bonnie Mine Road*

*Bartow Phosphate Complex*

CITY *Bartow* STATE *FL* ZIP *33831*

PHONE (KEY CONTACT) *(941) 533-3181 x 314* SOURCE ID NUMBER *1050052-031*

OBSERVATION DATE *6-17-99* START TIME *13:57* END TIME *15:56*

PROCESS EQUIPMENT *DAP RAILCAR UNLOADING* OPERATING MODE *Normal*

CONTROL EQUIPMENT *NONE* OPERATING MODE *Normal*

DESCRIBE EMISSION POINT  
*END and Middle rail car*

HEIGHT ABOVE GROUND LEVEL *~3'* HEIGHT RELATIVE TO OBSERVER  
Start *~3'* End *~3'*

DISTANCE FROM OBSERVER *Start ~20' End ~20'* DIRECTION FROM OBSERVER  
Start *NE* End *NE*

DESCRIBE EMISSIONS  
Start *None* End *None*

EMISSION COLOR Start *N/A* End *Na* IF WATER DROPLET PLUME  
Attached  Detached

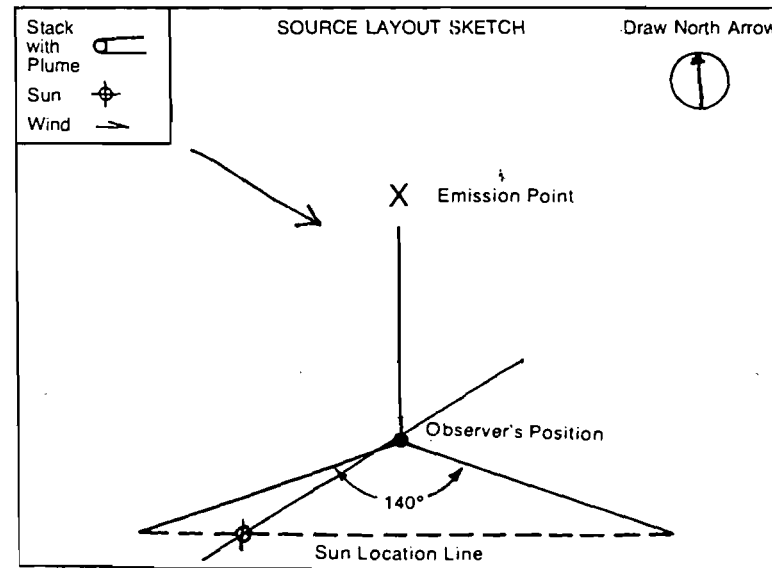
POINT IN THE PLUME AT WHICH OPACITY WAS DETERMINED  
Start *~1' from Hopper* End *~1' from Hopper*

DESCRIBE PLUME BACKGROUND  
Start *Brown Track & Gray concrete* End *Brown Track & Gray concrete*

BACKGROUND COLOR Start *Brown/Gray* End *Brown/Gray* SKY CONDITIONS  
Start *Broken* End *Broken*

WIND SPEED Start *4-7mph* End *4-7mph* WIND DIRECTION  
Start *NW* End *NW*

AMBIENT TEMP Start *81° F* End *78° F* WET BULB TEMP \_\_\_\_\_ RH, percent *85%*



SEC	0	15	30	45	COMMENTS
1	0	0	0	0	Rail car
2	0	0	0	0	GACX 5190
3	0	0	0	0	
4	0	0	0	0	
5	0	0	0	0	
6	0	0	0	0	
7	0	0	0	0	
8	0	0	0	0	
9	0	0	0	0	
10	0	0	0	0	
11	0	0	0	0	
12	0	0	0	0	
13	0	0	0	0	
14	0	0	0	0	
15	0	0	0	0	
16	0	0	0	0	
17	0	0	0	0	
18	0	0	0	0	
19	0	0	0	0*	end of car
20	**0	0	0	0	** started @
21	0	0	0	0	3:45 pm
22	0	0	0	0	Rail car
23	0	0	0	0	NAHX 485335
24	0	0	0	0	
25	0	0	0	0	
26	0	0	0	0	
27	0	0	0	0	
28	0	0	0	0	
29	0	0	0	0	
30	0	0	0	0	

OBSERVER'S NAME (PRINT) *Sandra Martin*

OBSERVER'S SIGNATURE *Sandra G Martin* DATE *6-17-99*

ORGANIZATION *CF Industries, Inc., Bartow*

CERTIFIED BY *Eastern Technical Association* DATE *2-26-99*

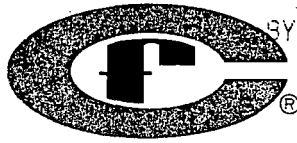
ADDITIONAL INFORMATION

CONTINUED ON VEO FORM NUMBER

RECEIVED

JUN 22 1998

Department of Environmental Protection  
SOUTHWEST DISTRICT



BY  
**CF Industries, Inc.**

**Bartow Phosphate Complex**

AA  
Post Office Box 1480  
Bartow, Florida 33831  
Telephone: 941/533-3181

June 16, 1998

Mr. William A. Proses  
Air Compliance Supervisor  
Department of Environmental Protection  
Southwest District  
3804 Coconut Palm Drive  
Tampa, Florida 33619

Dear Mr. Proses:

SUBJECT: CF Industries, Inc. (CFI),  
Bartow Phosphate Complex  
DAP/MAP Railcar Unloading and Transfer  
Annual Visible Emissions Test  
Permit No.:            AIRS No.:  
A053-254733            1050052031

As required by Specific Condition No. 6 of Permit No. A053-254733, an annual visible emissions test was performed at our DAP/MAP Railcar Unloading and Transfer Operation on June 12, 1998.

At the time of the test monoammonium phosphate (MAP), was being unloaded at a rate of 79.7 tons per hour. This material had been coated with the petroleum based coating agent, Arr-Maz Dustrol 3015W, for dust control, at the time it was loaded into railcars at our Plant City facility. No visible emissions were observed during the test. A copy of the Visible Emissions Observation form is attached.

Please contact us if you have any questions about this submittal.

Sincerely,

David M. Miller,  
Manager

DMM/SDM/sdm

enclosure

COMPANY NAME  
**CF Industries, Bartow Complex**

STREET ADDRESS  
**Bonnie Mine Road**  
**P.O. Box 1480**

CITY **Bartow** STATE **Florida** ZIP **33830**

PHONE (KEY CONTACT) **941-533-3181** SOURCE ID NUMBER **A053254733**

PROCESS EQUIPMENT **MAP RAILCAR UNLOADING** OPERATING MODE **NORMAL**

CONTROL EQUIPMENT **NONE** OPERATING MODE **NORMAL**

DESCRIBE EMISSION POINT  
**END AND MIDDLE RAILCAR**  
**MAP UNLOADING**

HEIGHT ABOVE GROUND LEVEL **~2'** HEIGHT RELATIVE TO OBSERVER  
Start **~2'** End **~2'**

DISTANCE FROM OBSERVER **Start ~30' End ~30'** DIRECTION FROM OBSERVER  
Start **E** End **E**

DESCRIBE EMISSIONS  
Start **NONE** End **NONE**

EMISSION COLOR **N/A** End **N/A** IF WATER DROPLET PLUME  
Attached  Detached

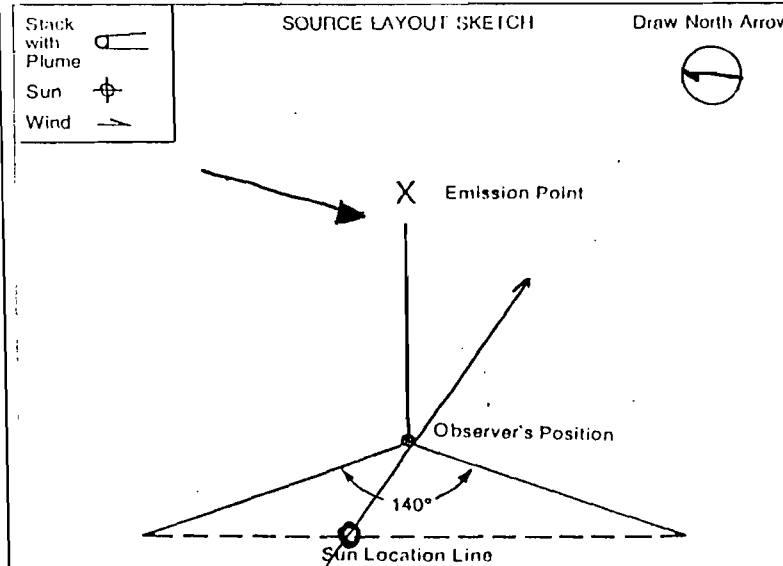
POINT IN THE PLUME AT WHICH OPACITY WAS DETERMINED  
Start **~1' From Hopper** End **~1' From Hopper**

DESCRIBE PLUME BACKGROUND  
Start **Brown track Gray Concrete** End **Brown Tracks Gray Noncrete**

BACKGROUND COLOR **Brown/Gray** End **Brown Gray** SKY CONDITIONS **Broken** End **Broken**

WIND SPEED **3.5 MPH** End **3.5 MPH** WIND DIRECTION **N** End **N**

AMBIENT TEMP **93°F** End **93°F** WET BULB TEMP **---** RH, percent **52%**



ADDITIONAL INFORMATION

OBSERVATION DATE		START TIME		END TIME	COMMENTS
6-12-98		2:06 PM		2:38 PM	
SEC	0	15	30	45	MIN
1	0	0	0	0	
2	0	0	0	0	END HOPPER
3	0	0	0	0	
4	0	0	0	0	
5	0	0	0	0	
6	0	0	0	0	
7	0	0	0	0	
8	0	0	0	0	
9	0	0	0	0	
10	0	0	0	0	
11	0	0	0	0	
12	0	0	0	0	
13	0	0	0	0	
14	0	0	0	0	
15	0	0	0	0	
16	0	0	0	0	
17	0	0	0	0	
18	0	0	0	0	
19	*0	0	0	0	*AEX 4137
20	0	0	0	0	MIDDLE HOPPER
21	0	0	0	0	@ 2:26
22	0	0	0	0	
23	0	0	0	0	
24	0	0	0	0	
25	0	0	0	0	
26	0	0	0	0	
27	0	0	0	0	
28	0	0	0	0	
29	0	0	0	0	
30	0	0	0	0	

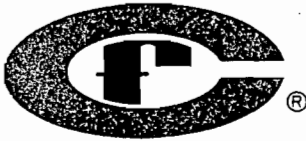
OBSERVER'S NAME (PRINT) **Sandra Yvette Martin**

OBSERVER'S SIGNATURE **Sandra Y Martin** DATE **6/12/98**

ORGANIZATION **CF Industries Plant City Complex**

CERTIFIED BY **Eastern Technical Associates** DATE **2/26/98**





**CF Industries, Inc.**  
Bartow Phosphate Complex

105-052-021

P.O. Box 1480  
Bartow, Florida 33831  
Telephone: 863/533-3181  
Fax: 863/534-1841

RECEIVED  
JAN 16 2003  
January 16 2003  
SOUTHWEST DISTRICT

Mr. William A. Proses  
Air Compliance Supervisor  
Department of Environmental Protection  
Southwest District  
3804 Coconut Palm Drive  
Tampa, Florida 33619

EU 021  
Boiler

Dear Mr. Proses:

SUBJECT: CF Industries, Inc. (CFI),  
Bartow Phosphate Complex  
Facility ID No.: 1050052  
Boiler No. 1  
E.U. ID No.: 021  
Permit No.: 1050052-004-AV

The purpose of this letter is to request that the requirement to perform an annual visible emissions compliance test at the subject source be waived this year as allowed by Specific Condition E.6. of the permit.

Specific Condition E.4. requires annual testing on February 24. Specific Condition E.6. states that compliance testing can be waived on a year by year basis if fuel oil has not been used as fuel for the previous 12 months and is not expected to be used during the following 12 months. We do not expect to burn fuel oil during the next 12 months.

It is CF's intent to forego the annual test unless the Department advises otherwise. Please contact us if you have any questions or need further information.

Sincerely,

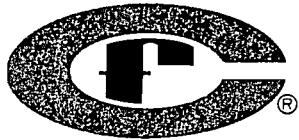
*Paul R. Roberts*  
Paul R. Roberts  
Operations Manager

PRR/FJD/fjd  
Dist: C.A. Kovach, M.L.Vadelund

1050052-721

P.O. Box 1480  
Bartow, Florida 33831  
Telephone: 863/533-3181  
Fax: 863/534-1841

VA  
NE



**CF Industries, Inc.**  
Bartow Phosphate Complex

January 10, 2001

Mr. William A. Proses  
Air Compliance Supervisor  
Department of Environmental Protection  
Southwest District  
3804 Coconut Palm Drive  
Tampa, Florida 33619

Dear Mr. Proses:

SUBJECT: CF Industries, Inc. (CFI),  
Bartow Phosphate Complex  
Facility ID No.: 1050052  
Boiler No. 1  
E.U. ID No.: 021  
Permit No.: 1050052-004-AV

**RECEIVED**  
JAN 16 2001

Department of Environmental Protection  
SOUTHWEST DISTRICT

The purpose of this letter is to request that the requirement to perform an annual visible emissions compliance test at the subject source be waived this year as allowed by Specific Condition E.6. of the permit.

Specific Condition E.4. requires annual testing on February 24. Specific Condition E.6. states that compliance testing can be waived on a year by year basis if fuel oil has not been used as fuel for the previous 12 months and is not expected to be used during the following 12 months. During the past year, this boiler has been burning only natural gas. We do not expect to burn fuel oil during the next 12 months.

It is CF's intent to forego the annual test unless the Department advises otherwise. Please contact us if you have any questions or need further information.

Sincerely,

James E. Parsons,  
General Manager

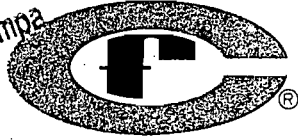
JEP/SYM/sym

Dist: P.R. Roberts, C.A. Kovach, M.L.Vadelund

AA

Post Office Box 1480  
Bartow, Florida 33831  
Telephone: 941/533-3181

D.E.P.  
JAN 21 2000  
Southwest District Tampa



**CF Industries, Inc.**

**Bartow Phosphate Complex**

January 14, 2000

Mr. William A. Proses  
Air Compliance Supervisor  
Department of Environmental Protection  
Southwest District  
3804 Coconut Palm Drive  
Tampa, Florida 33619

Dear Mr. Proses:

SUBJECT: CF Industries, Inc. (CFI),  
Bartow Phosphate Complex  
Facility ID No.: 1050052  
Boiler No. 1  
E.U. ID No.: 021  
Permit No.: 1050052-004-AV

The purpose of this letter is to request that the requirement to perform an annual visible emissions compliance test at the subject source be waived this year as allowed by Specific Condition E.6. of the permit.

Specific Condition E.4. requires annual testing on February 24. Specific Condition E.6. states that compliance testing can be waived on a year by year basis if fuel oil has not been used as fuel for the previous 12 months and is not expected to be used during the following 12 months. During the past year, this boiler has been burning only natural gas. We do not expect to burn fuel oil during the next 12 months.

It is CF's intent to forego the annual test unless the Department advises otherwise. Please contact us if you have any questions or need further information.

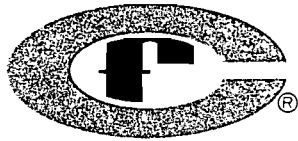
Sincerely,

James E. Parsons,  
General Manager

JEP/FJD/fjd

Dist: P.R. Roberts, C.A. Kovach, G.W. Curry

AA



**CF Industries, Inc.**  
Bartow Phosphate Complex

January 21, 1999

Mr. William A. Proses  
Air Compliance Supervisor  
Department of Environmental Protection  
Southwest District  
3804 Coconut Palm Drive  
Tampa, Florida 33619

Dear Mr. Proses:

SUBJECT: CF Industries, Inc. (CFI),  
Bartow Phosphate Complex  
Facility ID No.: 1050052  
Boiler No. 1  
E.U. ID No.: 021  
Permit No.: 1050052-004-AV

The purpose of this letter is to request that the requirement to perform an annual visible emissions compliance test at the subject source be waived this year as allowed by Specific Condition E.6. of the permit.

Specific Condition E.4. requires annual testing on February 24. Specific Condition E.6. states that compliance testing can be waived on a year by year basis if fuel oil has not been used as fuel for the previous 12 months and is not expected to be used during the following 12 months. During the past year, this boiler has been burning only natural gas. We do not expect to burn fuel oil during the next 12 months.

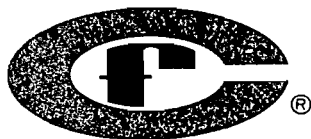
It is CF's intent to forego the annual test unless the Department advises otherwise. Please contact us if you have any questions or need further information.

Sincerely,

James E. Parsons,  
General Manager

JEP/FJD/fjd

Dist: P.R. Roberts, C.A. Kovach, G.W. Curry



**CF Industries**

Bartow Phosphate Complex

P.O. Box 1480  
Bartow, Florida 33831  
Telephone: 863/533-3181  
Fax: 863/534-1841

RECEIVED  
MAY 01 2003  
D.E.P.  
SOUTHWEST DISTRICT

April 28, 2003

Mr. William A. Proses  
Air Compliance Supervisor  
Department of Environmental Protection  
Southwest District  
3804 Coconut Palm Drive  
Tampa, Florida 33619

RU 002

Dear Mr. Proses:

SHIPPING

SUBJECT: CF Industries, Inc. (CFI),  
Bartow Phosphate Complex  
Facility ID No.: 1050052  
No. 1 MAP/DAP Shipping Units  
Point ID No.: 002, 025  
Annual Visible Emissions Tests  
Permit No.: 1050052-004-AV

As required by Section III, A., 4. of our Title V permit, an annual visible emission test was performed at our No. 1 DAP/MAP Shipping Unit on April 24, 2003. MAP fertilizer was loaded into railcars at the rate of 269 tons per hour during the test, which is 83% of the permitted rate. Since permitted capacity was not achieved during the test, the new maximum loading rate at the No. 1 DAP/MAP Shipping Unit will be 110% of 269 tons per hour or 296 tons per hour. CFI understands that operation at higher capacities is allowed for no more than 30 consecutive days for the purposes of additional compliance testing to regain the permitted capacity specified in the permit. No visible emissions were observed. A copy of the *Visible Emissions Observation Forms* is attached.

Please contact Craig Kovach or Frank Dlugos if you have any questions concerning this submittal.

Sincerely,

*Paul R. Roberts*  
Paul R. Roberts  
Operations Manager

PRR/FJD/fjd

Enclosure

Dist: C.A. Kovach, M.L. Vadelund, W.H. Martin

COMPANY NAME  
CF Industries, Inc. Bartow Complex

STREET ADDRESS  
Bonnie Mine Road

P.O. Box 1480

CITY STATE ZIP  
Bartow FL 33831

PHONE (KEY CONTACT) SOURCE ID NUMBER  
(863) 533-3181 1050032-004-002

PROCESS EQUIPMENT No 1 DAP/MAP OPERATING MODE  
Shipping Unit Normal

CONTROL EQUIPMENT OPERATING MODE  
Doyle Scrubber Scrubber off

DESCRIBE EMISSION POINT  
Rectangular opening North side of #1 Shipping building 30' High by 30' wide.

HEIGHT ABOVE GROUND LEVEL HEIGHT RELATIVE TO OBSERVER  
~ 30' Start ~ 30' End ~ 30'

DISTANCE FROM OBSERVER DIRECTION FROM OBSERVER  
Start ~ 30' End ~ 30' Start WSW End WSW

DESCRIBE EMISSIONS  
Start Fugitive Dust End Fugitive Dust

EMISSION COLOR IF WATER DROPLET PLUME  
Start None End None Attached  Detached

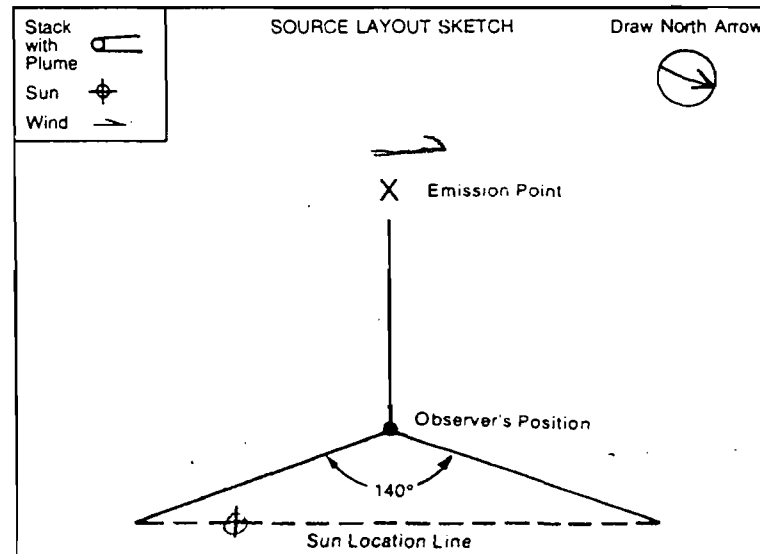
POINT IN THE PLUME AT WHICH OPACITY WAS DETERMINED  
Start ~ 1' from opening End ~ 1' from opening

DESCRIBE PLUME BACKGROUND  
Start Gray building/blue sky End Gray building/blue sky

BACKGROUND COLOR SKY CONDITIONS  
Start Gray End Gray Start Clear End Clear

WIND SPEED WIND DIRECTION  
Start ~ 12 mph End ~ 12 mph Start SE End SE

AMBIENT TEMP WET BULB TEMP RH, percent  
Start 72°F End 73°F 59



ADDITIONAL INFORMATION  
30.01 in of H<sub>2</sub>

OBSERVATION DATE		START TIME				END TIME
4/24/03		10:37 am				11:15 am
SEC	0	15	30	45	COMMENTS	
MIN						
1	0	0	0	0	CSXT 255139	
2	0	0	0	0		
3	0	0	0	0		
4	0	0	0	0		
5	0	0	0	0		
6	0	0	0	0		
7	0	0	0	0		
8	0	0	0	0		
9	0	0	0	0		
10	0	0	0	0		
11	0	0	0	0		
12	0	0	0	0		
13	0	0	0	0		
14	0	0	0	0		
15	0	0	0	0		
16	0	0	0	0		
17	0	0	0	0		
18	0	0	0	0		
19	0	0	0	0		
20	0	0	0	0		
21	0	0	0	0		
22	0	0	0	0	End CSXT 255139 Stop @ 10:58 am	
23	0	0	0	0	Start @ 11:08 am	
24	0	0	0	0		
25	0	0	0	0		
26	0	0	0	0		
27	0	0	0	0		
28	0	0	0	0		
29	0	0	0	0		
30	0	0	0	0		

OBSERVER'S NAME (PRINT)  
William F. Cherry Jr.

OBSERVER'S SIGNATURE  
William F. Cherry Jr.

DATE  
4/24/03

ORGANIZATION  
CF Industries, Inc. Plant City, Complex

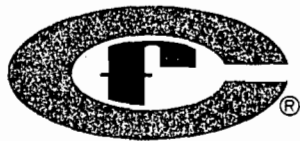
CERTIFIED BY  
Eastern Technical Associates

DATE  
2/20/03

CONTINUED ON VEO FORM NUMBER

**D.E.P.**  
**NOV 28 2001**  
**Southwest District Tampa**

P.O. Box 1480  
 Bartow, Florida 33831  
 Telephone: 863/533-3181  
 Fax: 863/534-1841



**CF Industries, Inc.**  
**Bartow Phosphate Complex**

November 27, 2001

Mr. William A. Proses  
 Air Compliance Supervisor  
 Department of Environmental Protection  
 Southwest District  
 3804 Coconut Palm Drive  
 Tampa, Florida 33619

Dear Mr. Proses:

SUBJECT: CF Industries, Inc. (CFI),  
 Bartow Phosphate Complex  
 Facility ID No.: 1050052  
 No. 1 and No. 2 MAP/DAP Shipping Units  
 Point ID No.: 002, 025  
 Annual Visible Emissions Tests  
 Permit No.: 1050052-004-AV

As required by Section III, A., 4. of our Title V permit, annual visible emissions tests were performed at our No. 1 and No. 2 DAP/MAP Shipping Units on November 27, 2001. At the No. 1 DAP/MAP Shipping Unit, MAP fertilizer was loaded into railcars at the rate of 300 tons per hour during the test, which is 92% of the permitted rate. No visible emissions were observed.

At the No. 2 DAP/MAP Shipping Unit, MAP fertilizer was loaded into railcars at the rate of 299 tons per hour during the test, which is 92% of the permitted rate. No visible emissions were observed.

Copies of the *Visible Emissions Observation Forms* are attached.

Please contact Frank Dlugos if you have any questions concerning this submittal.

Sincerely,

*Paul R. Roberts*  
 Paul R. Roberts  
 Operations Manager

PRR/FJD/fjd

Enclosure

Dist: C.A. Kovach, M.L. Vadelund, W.H. Martin

VISIBLE EMISSION OBSERVATION FORM

No. 1050052 - 002

COMPANY NAME  
**CF INDUSTRIES, INC. BARTOW COMPLEX**

STREET ADDRESS  
**RONNIE MINE ROAD**

P.O. BOX 1480

CITY **BARTOW** STATE **FL** ZIP **33831**

PHONE (KEY CONTACT) **863-533-3131** SOURCE ID NUMBER **1050052-004-002**

OBSERVATION DATE **11/27/01** START TIME **10:24 AM** END TIME **11:06 AM**

MIN	SEC				COMMENTS
	0	15	30	45	
1	0	0	0	0	FURX
2	0	0	0	0	828809
3	0	0	0	0	
4	0	0	0	0	
5	0	0	0	0	
6	0	0	0	0	
7	0	0	0	0	
8	0	0	0	0	
9	0	0	0	0	
10	0	0	0	0	
11	0	0	0	0	
12	0	0	0	0	
13	0	0	0	0	
14	0	0	0	0	
15	0	0	0	0	
16	0	0	0	0	
17	0	0	0	0	
18	0	0	0	0	
19	0	0	0	0*	* END OF REPORT at 10:43 AM
20	**	0	0	0	** STAGE CAR 10:55 AM
21	0	0	0	0	NAHX 439345
22	0	0	0	0	
23	0	0	0	0	
24	0	0	0	0	
25	0	0	0	0	
26	0	0	0	0	
27	0	0	0	0	
28	0	0	0	0	
29	0	0	0	0	
30	0	0	0	0	

PROCESS EQUIPMENT **#2 DAP/MAP SHIPPING UNIT** OPERATING MODE **NORMAL**

CONTROL EQUIPMENT **BUEV CYCLONE AIRBTRON CYCLONE SPRAY SCRUBBER** OPERATING MODE **NORMAL**

DESCRIBE EMISSION POINT  
**CIRCULAR STACK OPENING**

**APPROXIMATELY 5' IN DIAMETER**

HEIGHT ABOVE GROUND LEVEL **~135'** HEIGHT RELATIVE TO OBSERVER  
Start **~125'** End **~125'**

DISTANCE FROM OBSERVER Start **210'** End  DIRECTION FROM OBSERVER Start **SW** End **SW**

DESCRIBE EMISSIONS  
Start **NONE** End **NONE**

EMISSION COLOR Start **NONE** End  IF WATER DROPLET PLUME Attached  Detached

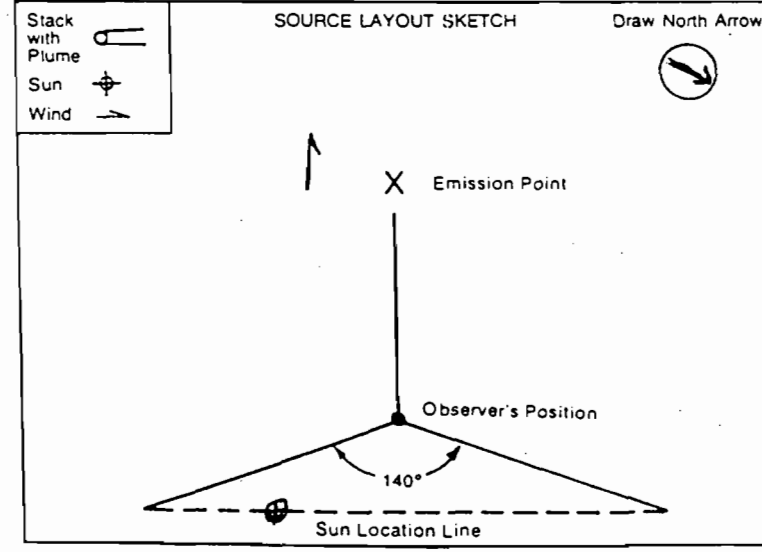
POINT IN THE PLUME AT WHICH OPACITY WAS DETERMINED  
Start **22' ABOVE STACK** End **22' ABOVE STACK**

DESCRIBE PLUME BACKGROUND  
Start **BLUE SKY** End **BLUE SKY WITH CLOUDS**

BACKGROUND COLOR Start **BLUE** End **BLUE/WHITE** SKY CONDITIONS Start **CLEAR** End **BROKEN**

WIND SPEED Start **8-10 MPH** End **5-8 MPH** WIND DIRECTION Start **NE** End **NE**

AMBIENT TEMP Start **79°** End **80°** WET BULB TEMP **-** RH, percent **58%**



ADDITIONAL INFORMATION

OBSERVER'S NAME (PRINT) **ERNEST L. KRIBSCHMAN**

OBSERVER'S SIGNATURE *Ernest L. Kribschman* DATE **11/27/01**

ORGANIZATION **CF INDUSTRIES INC.**

CERTIFIED BY **AIRSTRON TECHNICAL ASSOCIATES** DATE **8/21/01**

CONTINUED ON VEO FORM NUMBER

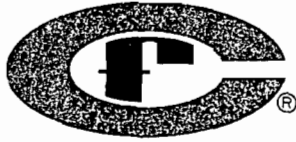


1050052-002

(A)

P.O. Box 1480  
Bartow, Florida 33831  
Telephone: 863/533-3181  
Fax: 863/534-1841

VA



# CF Industries, Inc.

Bartow Phosphate Complex

December 14, 2000

Mr. William A. Proses  
Air Compliance Supervisor  
Department of Environmental Protection  
Southwest District  
3804 Coconut Palm Drive  
Tampa, Florida 33619

**D.E.P.**  
**DEC 20 2000**  
Southwest District Tampa

Dear Mr. Proses:

SUBJECT: CF Industries, Inc. (CFI)  
Bartow Phosphate Complex  
No.1 MAP/DAP Shipping Unit  
Annual Visible Emissions Test  
Permit No.: 1050052-002-AV

TC  
C  
J  
g

As required by Section II, A., 4., of our Title V permit, an annual testing for visible emissions was performed at our No.1 DAP/MAP Shipping Unit on December 6, 2000. During the test, MAP fertilizer was loaded into railcars at the rate of 297 tons per hour, which is 91% of the permitted rate. No visible emissions were observed during the test. A copy of the Visual Emission Observation form is attached.

Please contact us if you have any questions about this submittal.

Sincerely,

James E. Parsons  
General Manager

JEP/SYM/sym

Enclosure

Distribution: PR Roberts, C.A. Kovach, G.W. Curry

COMPANY NAME  
**CF INDUSTRIES, Inc. BARTOW Complex**

STREET ADDRESS  
**BONNIE MINE ROAD**

**P. O. BOX 1480**

CITY **BARTOW** STATE **FL** ZIP **33831**

PHONE (KEY CONTACT) **863 533 3181** SOURCE ID NUMBER **1050052-004-002**

PROCESS EQUIPMENT **No. 1 DAP/MAP SHIPPING UNIT** OPERATING MODE **NORMAL**

CONTROL EQUIPMENT **DOYLE SCRUBBER** OPERATING MODE **NORMAL**

DESCRIBE EMISSION POINT  
**CIRCULAR STACK OPENING**  
**APPROXIMATELY 3' IN DIAMETER**

HEIGHT ABOVE GROUND LEVEL **~110'** HEIGHT RELATIVE TO OBSERVER  
Start **~100'** End **~100'**

DISTANCE FROM OBSERVER **Start ~150' End ~150'** DIRECTION FROM OBSERVER  
Start **NW** End **NW**

DESCRIBE EMISSIONS  
Start **NONE** End **NONE**

EMISSION COLOR **Start N/A End N/A** IF WATER DROPLET PLUME  
Attached  Detached

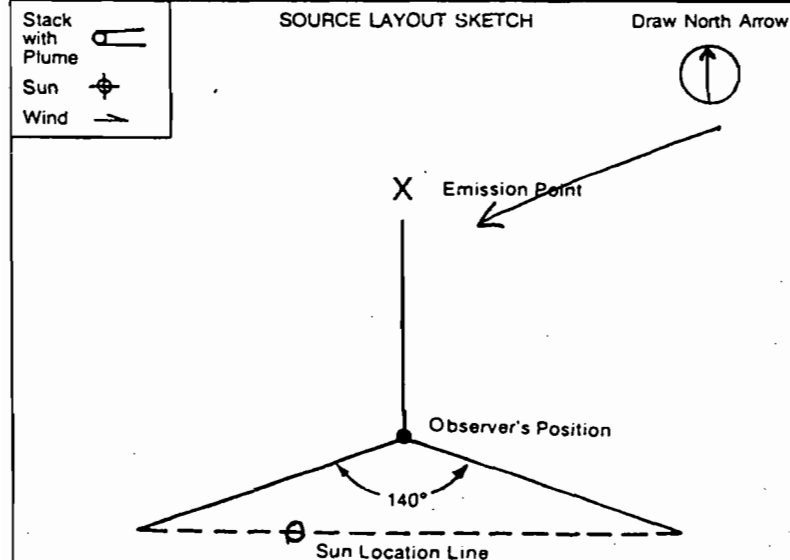
POINT IN THE PLUME AT WHICH OPACITY WAS DETERMINED  
Start **~2' ABOVE STACK** End **~2' ABOVE STACK**

DESCRIBE PLUME BACKGROUND  
Start **Scattered sky** End **blue sky**

BACKGROUND COLOR **Start white End blue** SKY CONDITIONS  
Start **Cloudy** End **Clear**

WIND SPEED **Start 8-10mph End 8-10mph** WIND DIRECTION  
Start **NNE** End **NNE**

AMBIENT TEMP **Start 63° End 63°** WET BULB TEMP **—** RH. percent **42**



ADDITIONAL INFORMATION

OBSERVATION DAT.		START TIME				END TIME
12-06-2000		10:02 AM				10:37 AM
SEC	0	15	30	45	COMMENTS	
MIN						
1	0	0	0	0	car NAHX 48748	
2	0	0	0	0		
3	0	0	0	0		
4	0	0	0	0		
5	0	0	0	0		
6	0	0	0	0		
7	0	0	0	0		
8	0	0	0	0		
9	0	0	0	0		
10	0	0	0	0		
11	0	0	0	0		
12	0	0	0	0		
13	0	0	0	0		
14	0	0	0	0		
15	0	0	0	0		
16	0	0	0	0		
17	0	0	0	0		
18	0	0	0	0		
19	0	0	0	0		
20	*0	0	0	0	* started @ 10:27am	
21	0	0	0	0	car XTRX 814	
22	0	0	0	0		
23	0	0	0	0		
24	0	0	0	0		
25	0	0	0	0		
26	0	0	0	0		
27	0	0	0	0		
28	0	0	0	0		
29	0	0	0	0		
30	0	0	0	0		

OBSERVER'S NAME (PRINT) **Sandra Y Martin**

OBSERVER'S SIGNATURE **Sandra Y Martin** DATE **12-6-00**

ORGANIZATION **CF Industries, Inc**

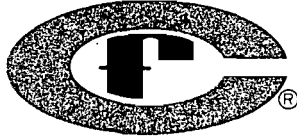
CERTIFIED BY **Eastern Technical Association** DATE **8/22/00**



1050052-00

AA

Post Office Box 1480  
Bartow, Florida 33831  
Telephone: 941/533-3181



**CF Industries, Inc.**

Bartow Phosphate Complex

November 18, 1999

D.E.P.

NOV 29 1999

Southwest District Tampa

Mr. William A. Proses  
Air Compliance Supervisor  
Department of Environmental Protection  
Southwest District  
3804 Coconut Palm Drive  
Tampa, Florida 33619

Dear Mr. Proses:

SUBJECT: CF Industries, Inc. (CFI),  
Bartow Phosphate Complex  
Facility ID No.: 1050052  
No. 1 MAP/DAP Shipping Unit  
Point ID No.: 002  
Annual Visible Emissions Test  
Permit No.: 1050052-004-AV

As required by Section III, A., 4. of our Title V permit, an annual visible emissions test was performed at our No. 1 DAP/MAP Shipping Unit on November 15, 1999. During the test, MAP fertilizer was loaded into railcars at the rate of 293 tons per hour, which is 90% of the permitted rate. No visible emissions were observed during the test. Copies of the Visible Emissions Observation form and the operating log are attached.

Please contact Frank Dlugos if you have any questions about this submittal.

Sincerely,

James E. Parsons,  
General Manager

JEP/SYM/sym

Enclosure

Dist: P.R. Roberts, C.A. Kovach, G.W. Curry

VISIBLE EMISSION OBSERVATION FORM

No.

COMPANY NAME  
*CF INDUSTRIES INC., Bartow Complex*

STREET ADDRESS  
*BONNIE MINE ROAD*

*P. O. BOX 1480*

CITY *BARTOW* STATE *FL* ZIP *33831*

PHONE (KEY CONTACT) *(941) 533-3181* SOURCE ID NUMBER *1050052-004-002*

PROCESS EQUIPMENT *No. 1 DAP/MAP SHIPPING UNIT* OPERATING MODE *NORMAL*

CONTROL EQUIPMENT *DOYLE SCRUBBER* OPERATING MODE *NORMAL*

DESCRIBE EMISSION POINT  
*CIRCULAR STACK OPENING*

*APPROX. 3 FEET IN DIAMETER*

HEIGHT ABOVE GROUND LEVEL *~110'* HEIGHT RELATIVE TO OBSERVER  
Start *~100'* End *~100'*

DISTANCE FROM OBSERVER Start *~150'* End *~160'* DIRECTION FROM OBSERVER  
Start *N* End *N*

DESCRIBE EMISSIONS  
Start *NONE* End *NONE*

EMISSION COLOR Start *N/A* End *N/A* IF WATER DROPLET PLUME  
Attached  Detached

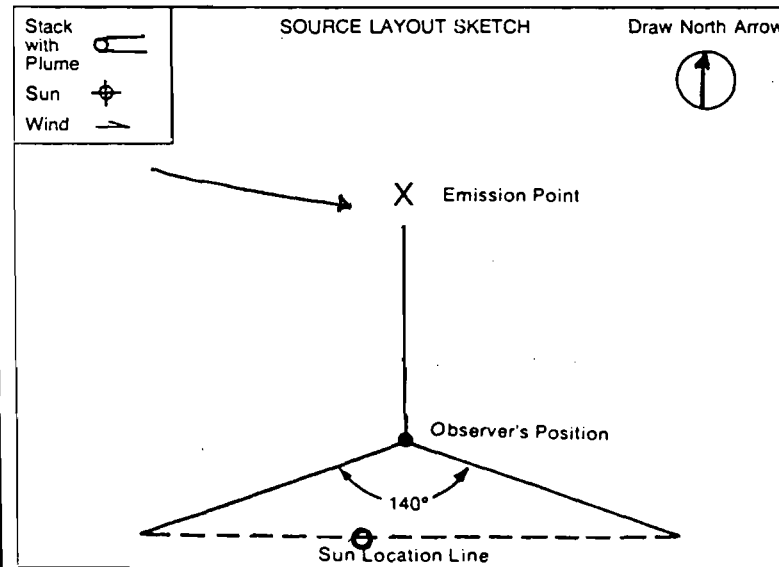
POINT IN THE PLUME AT WHICH OPACITY WAS DETERMINED  
Start *~2' ABOVE STACK* End *~2' ABOVE STACK*

DESCRIBE PLUME BACKGROUND  
Start *BLUE SKY* End *BLUE SKY*

BACKGROUND COLOR Start *BLUE* End *BLUE* SKY CONDITIONS  
Start *CLEAR* End *CLEAR*

WIND SPEED Start *4-6MPH* End *4-6MPH* WIND DIRECTION  
Start *WNW* End *W*

AMBIENT TEMP Start *68° 70°* End *74° 73°* WET BULB TEMP *---* RH, percent *80% 62%*



ADDITIONAL INFORMATION

OBSERVATION DATE		START TIME		END TIME	COMMENTS
11-15-99		10:05 AM		10:38 AM	
SEC	0	15	30	45	COMMENTS
MIN					
1	0	0	0	0	CSXT 259992
2	0	0	0	0	
3	0	0	0	0	
4	0	0	0	0	
5	0	0	0	0	
6	0	0	0	0	
7	0	0	0	0	
8	0	0	0	0	
9	0	0	0	0	
10	0	0	0	0	
11	0	0	0	0	
12	0	0	0	0	
13	0	0	0	0	
14	0	0	0	0	
15	0	0	0	0	
16	0	0	0	0	
17	0	0	0	0	
18	0	0	0	0	
19	0	0	0	0	
20	0	0	0	0	
21	*0	0	0	0	*STARTED @ 10:27 AM
22	0	0	0	0	CSXT 250279
23	0	0	0	0	
24	0	0	0	0	
25	0	0	0	0	
26	0	0	0	0	
27	0	0	0	0	
28	0	0	0	0	
29	0	0	0	0	
30	0	0	0	0	

OBSERVER'S NAME (PRINT) *Sandra Y. Martin*

OBSERVER'S SIGNATURE *Sandra Y. Martin* DATE *11-15-99*

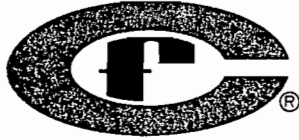
ORGANIZATION *CF Industries, Bartow Complex*

CERTIFIED BY *Eastern Technical Associates* DATE *8-25-99*

CONTINUED ON VEO FORM NUMBER



Post Office Box 1480  
Bartow, Florida 33831  
Telephone: 941/533-3181



**CF Industries, Inc.**  
Bartow Phosphate Complex

November 20, 1997

RECEIVED  
NOV 26 1997

Department of Environmental Protection  
SOUTHWEST DISTRICT  
BY \_\_\_\_\_

Mr. William A. Proses  
Air Compliance Supervisor  
Department of Environmental Protection  
Southwest District  
3804 Coconut Palm Drive  
Tampa, Florida 33619

Dear Mr. Proses:

SUBJECT: CF Industries, Inc. (CFI),  
Bartow Phosphate Complex  
No. 1 Shipping Unit  
Annual Visible Emissions Test  
Permit No.:      AIRS No.:  
AO53-173656      1050052001

Enclosed is a Visible Emission Observation Form for the annual visible emissions test which was performed at our No. 1 Shipping Unit on this date. At the time of the test we were loading the fertilizer material monoammonium phosphate (MAP) into railcars at a rate of 297 tons per hour which is 91% of the permitted rate. No visible emissions were observed during the test.

Please contact us if you have any questions about this submittal.

Sincerely,

David M. Miller,  
Manager

DMM/SDM/sdm

enclosure

cc: P.R. Roberts

-0.2

VISIBLE EMISSION OBSERVATION FORM

No. 1

COMPANY NAME  
CF INDUSTRIES, INC., BARTOW COMPLEX

STREET ADDRESS  
BONNIE MINE ROAD

P.O. BOX 1480

CITY BARTOW STATE FL ZIP 33831

PHONE (KEY CONTACT) (941) 533-381 SOURCE ID NUMBER 1050052001

PROCESS EQUIPMENT No. 1 MAP SHIPPING UNIT OPERATING MODE NORMAL

CONTROL EQUIPMENT DOYLE SCRUBBER OPERATING MODE NORMAL

DESCRIBE EMISSION POINT  
CIRCULAR STACK OPENING

APPROX. 3 FEET IN DIAMETER

HEIGHT ABOVE GROUND LEVEL ~110' HEIGHT RELATIVE TO OBSERVER Start ~95' End 110'

DISTANCE FROM OBSERVER Start ~180' End ~200' DIRECTION FROM OBSERVER Start SE End S

DESCRIBE EMISSIONS  
Start NONE End NONE

EMISSION COLOR Start N/A End N/A IF WATER DROPLET PLUME Attached  Detached

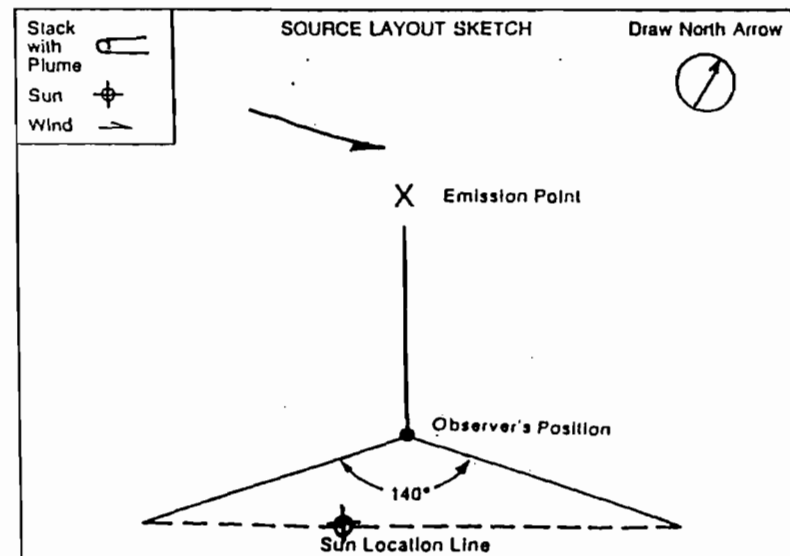
POINT IN THE PLUME AT WHICH OPACITY WAS DETERMINED  
Start ~2' ABOVE STACK End ~2' ABOVE STACK

DESCRIBE PLUME BACKGROUND  
Start SCATTERED SKY End CLEAR BLUE SKY

BACKGROUND COLOR Start BLUE/GRAY End BLUE SKY CONDITIONS Start SCATTERED End CLEAR

WIND SPEED Start 8-10 MPH End 8-10 MPH WIND DIRECTION Start SW End W

AMBIENT TEMP Start 73° End 75° WET BULB TEMP RH, percent 54



OBSERVATION DATE		START TIME				END TIME
11-20-97		10:58-10:18				11:29 AM
SEC	0	15	30	45	COMMENTS	
MIN						
1	0	0	0	0	CSXT 250820	
2	0	0	0	0	252228	
3	0	0	0	0	Adm 11/20/97	
4	0	0	0	0		
5	0	0	0	0		
6	0	0	0	0		
7	0	0	0	0		
8	0	0	0	0		
9	0	0	0	0		
10	0	0	0	0		
11	0	0	0	0		
12	0	0	0	0		
13	0	0	0	0		
14	0	0	0	0		
15	0	0	0	0		
16	0	0	0	0		
17	0	0	0	0		
18	0	0	0	0		
19	0	0	0	0	STARTED CAR	
20	0	0	0	0	CSXT 254665@1117	
21	0	0	0	0		
22	0	0	0	0		
23	0	0	0	0		
24	0	0	0	0		
25	0	0	0	0		
26	0	0	0	0		
27	0	0	0	0		
28	0	0	0	0		
29	0	0	0	0		
30	0	0	0	0		

OBSERVER'S NAME (PRINT) Sandra Y Martin

OBSERVER'S SIGNATURE *Sandra Martin* DATE 11/20/97

ORGANIZATION CF INDUSTRIES, PLANT CITY

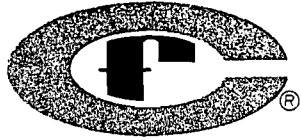
CERTIFIED BY EASTERN TECHNICAL DATE 8/26/97

ADDITIONAL INFORMATION



AA

Post Office Box 1480  
Bartow, Florida 33831  
Telephone: 941/533-3181



# CF Industries, Inc.

Bartow Phosphate Complex

October 28, 1996

Mr. Henry Gotsch  
Environmental Specialist  
Department of Environmental Protection  
Southwest District  
3804 Coconut Palm Drive  
Tampa, Florida 33619

**RECEIVED**  
NOV 01 1996

Department of Environmental Protection  
SOUTHWEST DISTRICT  
BY \_\_\_\_\_

Dear Mr. Proses:

SUBJECT: No. 1 Shipping Unit  
Annual Visible Emissions Test  
Permit No.:      AIRS No.  
AO53-173656      1050052001

The purpose of this letter is to give notice that we plan to perform a visible emissions test at our No. 1 Shipping Unit at 10 a.m. on Thursday, November 21, 1996.

Our environmental supervisor, Steve Martin, and our Chief Chemist, Frank Dlugos, will be coordinating the test. Please contact either one of them if you have any questions.

Sincerely,

David M. Miller,  
Manager

DMM/SDM/sdm

cc: P.R. Roberts

VISIBLE EMISSION OBSERVATION FOI

1050052-02  
No. *515*

COMPANY NAME  
*CF Industries, Inc. Bartow Complex*

STREET ADDRESS  
*Bonnie Mine Road*

*P.O. Box 1480*

CITY *Bartow* STATE *FL* ZIP *33831*

PHONE (KEY CONTACT) *(941) 533-3181* SOURCE ID NUMBER *105005 2001*

PROCESS EQUIPMENT *No. 1 MAP/DAP* OPERATING MODE *Normal*

*Shipping Unit*

CONTROL EQUIPMENT *Doyle Scrubber* OPERATING MODE *Normal*

DESCRIBE EMISSION POINT  
*Circular stack opening approx. 3 Feet in diameter*

HEIGHT ABOVE GROUND LEVEL *110'* HEIGHT RELATIVE TO OBSERVER  
Start *110'* End *110'*

DISTANCE FROM OBSERVER Start *~250'* End *~250'* DIRECTION FROM OBSERVER  
Start *NW* End *NW*

DESCRIBE EMISSIONS  
Start *None* End *None*

EMISSION COLOR Start *N/A* End *N/A* IF WATER DROPLET PLUME  
Attached  Detached

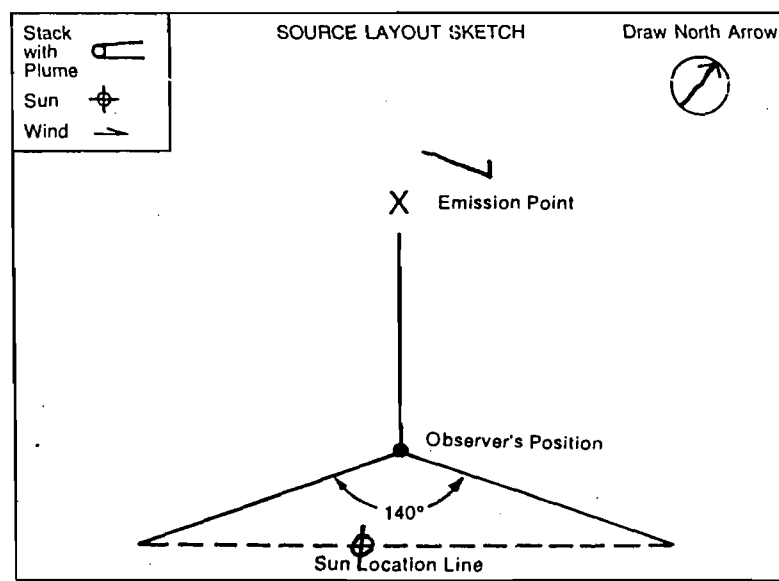
POINT IN THE PLUME AT WHICH OPACITY WAS DETERMINED  
Start *~2' above stack* End *~2' above stack*

DESCRIBE PLUME BACKGROUND  
Start *Scattered sky* End *Scattered sky*

BACKGROUND COLOR *blue, white, gray* SKY CONDITIONS  
Start *Scattered* End *Scattered*

WIND SPEED Start *4-6 mph* End *4-6 mph* WIND DIRECTION  
Start *W* End *W*

AMBIENT TEMP Start *81°F* End *82°F* WET BULB TEMP *56* RH, percent



ADDITIONAL INFORMATION

OBSERVATION DATE		START TIME				END TIME
11/21/96		1053				1129
SEC	0	15	30	45	COMMENTS	
MIN						
1	0	0	0	0	<i>Railcar</i>	
2	0	0	0	0	<i>CRDX 13347</i>	
3	0	0	0	0		
4	0	0	0	0		
5	0	0	0	0		
6	0	0	0	0		
7	0	0	0	0		
8	0	0	0	0		
9	0	0	0	0		
10	0	0	0	0		
11	0	0	0	0		
12	0	0	0	0		
13	0	0	0	0		
14	0	0	0	0		
15	0	0	0	0		
16	0	0	0	0		
17	0	0	0	0		
18	0	0	0	0		
19	0	0	0	0		
20	0	0	0	0		
21	*0	0	0	0	<i>* started railcar</i>	
22	0	0	0	0	<i>CRDX 13544</i>	
23	0	0	0	0	<i>AEX 734 @1119</i>	
24	0	0	0	0		
25	0	0	0	0		
26	0	0	0	0		
27	0	0	0	0		
28	0	0	0	0		
29	0	0	0	0		
30	0	0	0	0		

OBSERVER'S NAME (PRINT)  
*Lloyd G. Camp*

OBSERVER'S SIGNATURE  
*Lloyd G. Camp* DATE *11/21/96*

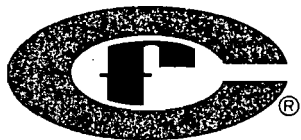
ORGANIZATION  
*CF Industries, Inc. Plant City Complex*

CERTIFIED BY  
*Eastern Technical Associates* DATE *8/27/96*

BEST AVAILABLE COPY

1050052-004  
WB (A)

P.O. Box 1480  
Bartow, Florida 33831  
Telephone: 863/533-3181  
Fax: 863/534-1841



**CF Industries, Inc.**  
Bartow Phosphate Complex

October 15, 2002

Mr. William A. Proses  
Air Compliance Supervisor  
Department of Environmental Protection  
Southwest District  
3804 Coconut Palm Drive  
Tampa, Florida 33619

EU 006  
Sulfuric 6

SUBJECT: CF Industries, Inc. (CFI), Bartow Phosphate Complex  
Excess Emissions and Monitoring Systems Performance  
Report - Third Quarter, 2002  
Title V Air Operation Permit No.: 1050052-004-AV

Dear Mr. Proses:

This letter is to notify the Department that Acid Plant No. 6 was idle during the 3rd quarter, 2002. Therefore, there were no emissions to report during this period.

Please contact us if you have any questions regarding the report.

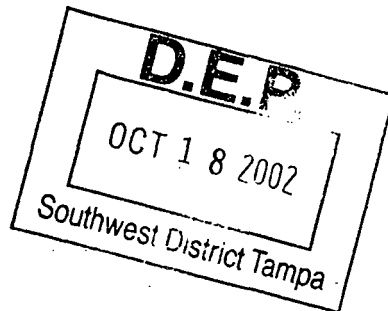
Sincerely,

*Paul R. Roberts / CAR*

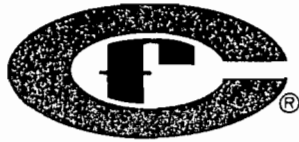
Paul R. Roberts  
Operations Manager

PRR/FJD/fjd

cc: C.A. Kovach



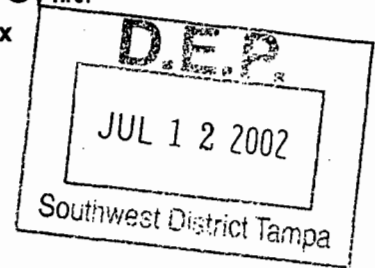
P.O. Box 1480  
Bartow, Florida 33831  
Telephone: 863/533-3181  
Fax: 863/534-1841



**CF Industries** Inc.  
Bartow Phosphate Complex

July 10, 2002

Mr. William A. Proses  
Air Compliance Supervisor  
Department of Environmental Protection  
Southwest District  
3804 Coconut Palm Drive  
Tampa, Florida 33619



SUBJECT: CF Industries, Inc. (CFI), Bartow Phosphate Complex  
Excess Emissions and Monitoring Systems  
Performance Report - Second Quarter, 2002  
Title V Air Operation Permit No.: 1050052-004-AV

Dear Mr. Proses:

This letter is to notify the Department that Acid Plant No. 6 was idle during the 2nd quarter, 2002. Therefore, there were no emissions to report during this period.

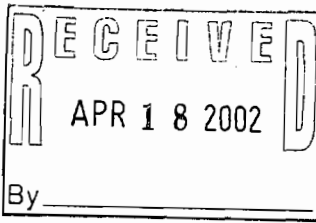
Please contact us if you have any questions regarding the report.

Sincerely,

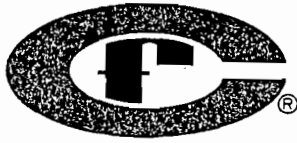
  
Paul R. Roberts  
Operations Manager

PRR/FJD/fjd

cc: C.A. Kovach



P.O. Box 1480 *NE*  
Bartow, Florida 33831  
Telephone: 863/533-3181  
Fax: 863/534-1841



**CF Industries, Inc.**  
Bartow Phosphate Complex

April 15, 2002

Mr. William A. Proses  
Air Compliance Supervisor  
Department of Environmental Protection  
Southwest District  
3804 Coconut Palm Drive  
Tampa, Florida 33619

SUBJECT: CF Industries, Inc. (CFI), Bartow Phosphate Complex  
Excess Emissions and Monitoring Systems  
Performance Report - First Quarter, 2002  
Title V Air Operation Permit No.: 1050052-004-AV

Dear Mr. Proses:

This letter is to notify the Department that Acid Plant No. 6 was idle during the 1st quarter, 2002. Therefore, there were no emissions during this period.

Please contact us if you have any questions regarding the report.

Sincerely,

*Paul R. Roberts*  
Paul R. Roberts  
Operations Manager

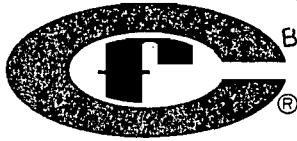
PRR/FJD/fjd

cc: P.R. Roberts  
C.A. Kovach

1050052  
Qtrly Rpt

RECEIVED  
OCT 22 2001

P.O. Box 1480  
Bartow, Florida 33831  
Telephone: 863/533-3181  
Fax: 863/534-1841



Department of Environmental Protection  
SOUTHWEST DISTRICT

BY

**CF Industries, Inc.**

**Bartow Phosphate Complex**

October 16, 2001

Mr. William Proses  
Air Compliance/Enforcement  
State of Florida  
Department of Environmental Protection  
3804 Coconut Palm Drive  
Tampa, Florida 33619


SUBJECT: Excess Emissions and Monitoring Systems  
Performance Report - First Quarter, 2001  
CF Industries, Inc. (CFI), Bartow Phosphate  
Complex  
Sulfuric Acid Plants: No. 6 Acid Plant  
Title V Air Operation Permit  
Final Permit No.: 1050052-004-AV

Dear Mr. Proses:

This letter is to notify the Department that Acid Plant No. 6 was idle during the 3rd Quarter, 2001. Therefore, there were no emissions during this period.

Please contact us if you have any questions concerning this report.

Sincerely,

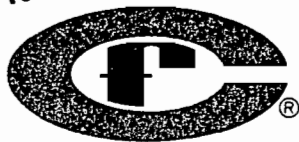
  
Paul R. Roberts  
Operations Manager

PRR/FJD/fjd

Attachments

cc: Mr. Rick Vail, FDEP, Tallahassee

**D.E.P.**  
**APR 30 2001**  
Southwest District Tampa



**CF Industries, Inc.**  
Bartow Phosphate Complex

P.O. Box 1480  
Bartow, Florida 33831  
Telephone: 863/533-3181  
Fax: 863/534-1841

VH  
NE

April 24, 2001

Mr. William Proses  
Air Compliance/Enforcement  
State of Florida  
Department of Environmental Protection  
3804 Coconut Palm Drive  
Tampa, Florida 33619

SUBJECT: Excess Emissions and Monitoring Systems  
Performance Report - First Quarter, 2001  
CF Industries, Inc. (CFI), Bartow Phosphate  
Complex  
Sulfuric Acid Plants: No. 6 Acid Plant  
Title V Air Operation Permit  
Final Permit No.: 1050052-004-AV

Dear Mr. Proses:

This letter is to notify the Department that Acid Plant No. 6 was idle during the 1<sup>st</sup> Quarter, 2001. Therefore, there were no emissions during this period.

Please contact us if you have any questions concerning this report.

Sincerely,

James E. Parsons,  
General Manager

JEP/SYM/sym

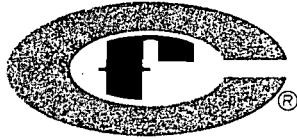
Attachments

cc: Mr. Rick Vail, FDEP, Tallahassee

YIT  
10/9

Post Office Box 1480  
Bartow, Florida 33831  
Telephone: 941/533-3181

D.E.P.  
OCT 11 2000  
Southwest District Tampa



**CF Industries, Inc.**  
Bartow Phosphate Complex

October 9, 2000

Mr. William A. Proses  
Air Compliance Supervisor  
Department of Environmental Protection  
Southwest District  
3804 Coconut Palm Drive  
Tampa, Florida 33619

SUBJECT: CF Industries, Inc. (CFI), Bartow Phosphate Complex  
Excess Emissions and Monitoring Systems  
Performance Report - Third Quarter, 2000  
Title V Air Operation Permit No.: 1050052-004-AV

Dear Mr. Proses:

This letter is to notify the Department that Acid Plant No. 6 was idle during the 3rd quarter. Therefore, there were no emissions during this period.

Based on information and belief formed after reasonable inquiry, the statements and information in this document are true, accurate, and complete.

Please contact us if you have any questions regarding the report.

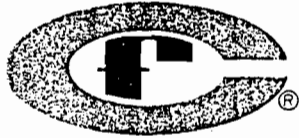
Sincerely,

*James E. Parsons / JEP*  
James E. Parsons  
General Manager

JEP/FJD/fjd

cc: P.R. Roberts  
C.A. Kovach





# CF Industries, Inc.

Bartow Phosphate Complex

January 2, 1997

**RECEIVED**  
JAN 10 1997  
Department of Environmental Protection  
SOUTHWEST DISTRICT  
BY \_\_\_\_\_

Mr. William Proses  
Air Compliance/Enforcement  
State of Florida  
Department of Environmental Protection  
3804 Coconut Palm Drive  
Tampa, Florida 33619

Dear Mr. Proses:

SUBJECT: Excess Emissions and Monitoring Systems  
Performance Report for the Fourth  
Quarter of 1996 for  
CF Industries, Inc., Sulfuric Acid Plants:  
Permit No. A053-169349 - No. 5 Acid Plant  
Permit No. A053-246083 - No. 6 Acid Plant

At CFII's Bartow Phosphate Complex, Acid Plant No. 5 remained shut down during the Fourth Quarter of 1996. Therefore, there were no excess emissions from this plant during this period.

Acid Plant No. 6 ran for the entire quarter. Please see the attached lists of *Excess SO<sub>2</sub> Emissions* and *SO<sub>2</sub> Continuous Emissions Monitor Downtime*. None of the excess emissions exceeded the two-hour limit specified in Specific Condition No. 12 of the Permit.

Please contact us if you have any questions concerning this report.

Sincerely,

*INACTIVE  
SUCARIC 5*

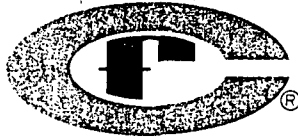
David M. Miller,  
Manager

DMM/SDM/sdm

cc: Mr. Rick Vail, FDEP, Tallahassee

AA

Post Office Box 1480  
Bartow, Florida 33831  
Telephone: 941/533-3181



# CF Industries, Inc.

Bartow Phosphate Complex

April 1, 1997

D.E.P.  
APR 07 1997  
SOUTHWEST DISTRICT  
TAMPA

Mr. William Proses  
Air Compliance/Enforcement  
State of Florida  
Department of Environmental Protection  
3804 Coconut Palm Drive  
Tampa, Florida 33619

Dear Mr. Proses:

SUBJECT: Excess Emissions and Monitoring Systems  
Performance Report for the First  
Quarter of 1997 for  
CF Industries, Inc., Sulfuric Acid Plants:  
Permit No. A053-169349 - No. 5 Acid Plant  
Permit No. A053-246083 - No. 6 Acid Plant

At CFII's Bartow Phosphate Complex, Acid Plant No. 5  
remained shut down during the First Quarter of 1997.  
Therefore, there were no excess emissions from this plant  
during this period.

Acid Plant No. 6 ran for the entire quarter. Please see the  
attached lists of *Excess SO<sub>2</sub> Emissions* and *SO<sub>2</sub> Continuous  
Emissions Monitor Downtime*. None of the excess emissions  
exceeded the two-hour limit specified in Specific Condition  
No. 12 of the Permit.

Please contact us if you have any questions concerning this  
report.

Sincerely,

David M. Miller,  
Manager

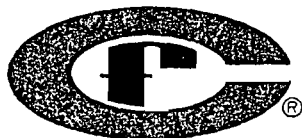
DMM/SDM/sdm

Attachments

cc: Mr. Rick Vail, FDEP, Tallahassee

AA

Post Office Box 1480  
Bartow, Florida 33831  
Telephone: 941/533-3181



**CF Industries, Inc.**  
Bartow Phosphate Complex

October 2, 1997

**RECEIVED**  
OCT 06 1997  
Department of Environmental Protection  
BY SOUTHWEST DISTRICT

Mr. William Proses  
Air Compliance/Enforcement  
State of Florida  
Department of Environmental Protection  
3804 Coconut Palm Drive  
Tampa, Florida 33619

SUBJECT: Excess Emissions and Monitoring Systems  
Performance Report for the Third  
Quarter of 1997 for  
CF Industries, Inc., Sulfuric Acid Plants:  
Permit No. AO53-169349 - No. 5 Acid Plant  
Permit No. AO53-246083 - No. 6 Acid Plant

Dear Mr. Proses:

At CFII's Bartow Phosphate Complex, Acid Plant No. 5 remained shut down during the Third Quarter of 1997. Therefore, there were no excess emissions from this plant during this period.

Acid Plant No. 6 ran continuously until it was shut down on September 5 for scheduled maintenance. The plant is expected to be re-started in early October. Please see the attached lists of *Excess SO<sub>2</sub> Emissions* and *SO<sub>2</sub> Continuous Emissions Monitor Downtime*.

Please contact us if you have any questions concerning this report.

Sincerely,

David M. Miller,  
Manager

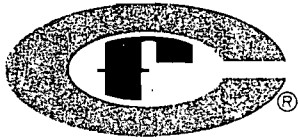
DMM/SDM/sdm

Attachments

cc: Mr. Rick Vail, FDEP, Tallahassee

AA

Post Office Box 1480  
Bartow, Florida 33831  
Telephone: 941/533-3181



D.E.P.  
JAN 13 1999  
Southwest District Tampa  
**CF Industries, Inc.**  
Bartow Phosphate Complex

January 5, 1999

Mr. William Proses  
Air Compliance/Enforcement  
State of Florida  
Department of Environmental Protection  
3804 Coconut Palm Drive  
Tampa, Florida 33619

SUBJECT: Excess Emissions and Monitoring Systems  
Performance Report - Fourth Quarter, 1998  
CF Industries, Inc. (CFI), Bartow Phosphate  
Complex  
Sulfuric Acid Plants: No. 5 Acid Plant, No. 6 Acid  
Plant  
Title V Air Operation Permit  
Final Permit No.: 1050052-004-AV

Dear Mr. Proses:

Pursuant to Section III, B.12. of the Title V permit for the CFI Bartow Phosphate Complex, the quarterly "Excess Emissions and Monitoring Systems Performance Report" is attached. Acid Plant No. 5 remained shut down during the Fourth Quarter of 1998. Therefore, there were no emissions from this plant during this period. As shown on the attached reports, no excess emissions or CEM downtime events were experienced for Acid Plant No. 6 during this quarter.

Sincerely,

James E. Parsons,  
General Manager

JEP/FJD/fjd

Attachments

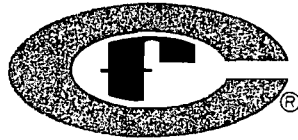
cc: Mr. Rick Vail, FDEP, Tallahassee

ACWS  
LD

1050052-005  
-006

AA

Post Office Box 1480  
Bartow, Florida 33831  
Telephone: 941/533-3181



**CF Industries**  
Bartow Phosphate Complex

**RECEIVED**  
APR 15 1999

April 6, 1999

Department of Environmental Protection  
SOUTHWEST DISTRICT  
BY \_\_\_\_\_

Mr. William Proses  
Air Compliance/Enforcement  
State of Florida  
Department of Environmental Protection  
3804 Coconut Palm Drive  
Tampa, Florida 33619

SUBJECT: Excess Emissions and Monitoring Systems  
Performance Report - First Quarter, 1999  
CF Industries, Inc. (CFI), Bartow Phosphate  
Complex  
Sulfuric Acid Plants: No. 5 Acid Plant, No. 6 Acid  
Plant  
Title V Air Operation Permit  
Final Permit No.: 1050052-004-AV

Dear Mr. Proses:

Pursuant to Section III, B.12. of the Title V permit for the CFI Bartow Phosphate Complex, the quarterly "Excess Emissions and Monitoring Systems Performance Report" is attached. Acid Plant No. 5 remained shut down during the Fourth Quarter of 1998. Therefore, there were no emissions from this plant during this period.

Please see the attached lists of *Excess SO<sub>2</sub> Emissions* and *SO<sub>2</sub> Continuous Emissions Monitor Downtime*. The occurrences of excess emissions did not exceed the three-hour limit specified under Rule 62-296.402(1)(b) (F.A.C.). Please contact us if you have any questions concerning this report.

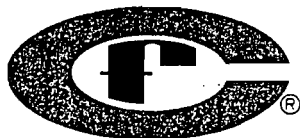
Sincerely,

James E. Parsons,  
General Manager

JEP/FJD/fjd

Attachments

cc: Mr. Rick Vail, FDEP, Tallahassee



**CF Industries, Inc.**  
Bartow Phosphate Complex

July 15, 1999

RECEIVED  
JUL 26 1999  
Department of  
BY SOUTHWEST DISTRICT

Mr. William Proses  
Air Compliance/Enforcement  
State of Florida  
Department of Environmental Protection  
3804 Coconut Palm Drive  
Tampa, Florida 33619

SUBJECT: Excess Emissions and Monitoring Systems  
Performance Report - Second Quarter, 1999  
CF Industries, Inc. (CFI), Bartow Phosphate  
Complex  
Sulfuric Acid Plants: No. 5 Acid Plant, No. 6 Acid  
Plant  
Title V Air Operation Permit  
Final Permit No.: 1050052-004-AV

Dear Mr. Proses:

Pursuant to Section III, B.12. of the Title V permit for the CFI Bartow Phosphate Complex, the quarterly "Excess Emissions and Monitoring Systems Performance Report" is attached. Acid Plant No. 5 remained shut down during the Second Quarter of 1999. Therefore, there were no emissions from this plant during this period.

Please see the attached lists of *Excess SO<sub>2</sub> Emissions* and *SO<sub>2</sub> Continuous Emissions Monitor Downtime*. The occurrences of excess emissions did not exceed the three-hour limit specified under Rule 62-296.402(1)(b) (F.A.C.). Please contact us if you have any questions concerning this report.

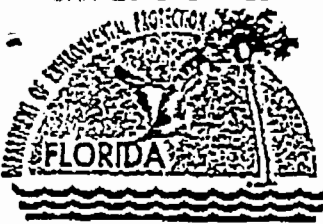
Sincerely,

James E. Parsons,  
General Manager

JEP/FJD/fjd

Attachments

cc: Mr. Rick Vail, FDEP, Tallahassee



Jeb Bush  
Governor

# Department of Environmental Protection

BEST AVAILABLE COPY

Southwest District  
3804 Coconut Palm Drive  
Tampa, Florida 33619

David B. Struhs  
Secretary

## FACSIMILE TRANSMISSION SHEET

DATE 11/20/04

TO: Cindy Phillips / Bobby Bull  
Department \_\_\_\_\_  
Phone \_\_\_\_\_ Fax \_\_\_\_\_

FROM: Jason Waters  
DEP Southwest District Office - Air Program  
Phone: (813) 744-6100 (SunCom 512-1042) Ext. 107

OPERATOR: DW

SUBJECT: FKI  
DW

Total Number of Pages, Including Cover Page: \_\_\_\_\_

DEP SWD AIR PROGRAM FAX NUMBERS: (813) 744-6458  
(Suncom) 512-1073

"Protect, Conserve and Manage Florida's Environment and Natural Resources"



BEST AVAILABLE COPY  
**CF Industries, Inc.**  
Bartow Phosphate Complex

P.O. Box 1480  
Bartow, Florida 33831  
Telephone: 863/578-1000  
Fax: 863/534-1841

January 13, 2004



Mr. Jason W. Waters  
Air Permitting Engineer  
Florida Department of Environmental Protection  
3804 Coconut Palm Drive  
Tampa, Florida 33619

**RE: CF Industries, Inc. (CFI) Bartow Phosphate Complex  
Title V Renewal Application  
Reference Permit No. 1050052-008-AV**

Dear Mr. Waters:

This correspondence is provided in response to the Department's letter dated October 13, 2003, which was received by CFI on October 17, 2003, and is attached for reference. The Department requested CFI address three additional items in order to complete the referenced renewal application. Each is enumerated below.

1. Application Responsible Official (R.O.) Certification. In accordance with the Department's comment, CFI's designated R.O., Mr. John Doran, obtained a Personal Identification Number (PIN) in November to allow completion of the appropriate online documentation for the application. On November 25, 2004, Mr. Doran completed the R.O. Certification Statement and submitted the application electronically.
2. Paper Application and EPSAP Applications. All material associated with the application has now been filed electronically.
3. April 17, 2003 Request for Additional Information. It is our understanding that DARM staff will identify any additional information that may be required after they complete their review of the updated application submitted on November 25, 2003.

Responsible Official (R.O.) Certification Statement:  
This certification has been submitted electronically and is complete.



Mr. Jason Waters  
January 13, 2004  
Page 2

**BEST AVAILABLE COPY**

Professional Engineer (P.E.) Certification

Statement: This certification has been submitted electronically and is complete.

We look forward to the Department's completion of review of this application. If you have any additional questions or if you need additional information, please contact Craig Kovach at (863)533-8048, ext. 246.

Sincerely,



John Doran  
Manager

Cc: Pradeep Raval, Koogler & Associates

Dist: C. Kovach, Quiet Earth Consultants, Inc.  
J. Bunch  
L. Vadelund  
C. Peck/File

Use

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

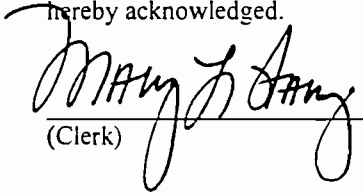
**CERTIFICATE OF SERVICE**

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.]

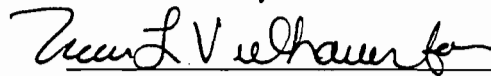
14. [Reserved]

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

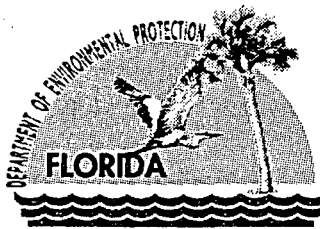
STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL PROTECTION



Michael G. Cooke, Director  
Division of Air Resource Management

MGC/jkp/rlb





Jeb Bush  
Governor

# Department of Environmental Protection

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

Colleen M. Castille  
Secretary

November 5, 2004

CERTIFIED MAIL - Return Receipt Requested

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

Re: DRAFT Title V Air Operation Permit Renewal Project No.: 1050052-008-AV  
Draft Air Construction Permit Project No.: 1050052-009-AC  
Bartow Plant

Dear Mr. Doran:

One copy of the Technical Evaluation and Preliminary Determination, the combined Public Notice, the Draft air construction permit (letter), and the DRAFT Title V air operation permit renewal for the Bartow Phosphate Complex located at 2501 Bonnie Mine Road, Bartow, Polk County, is enclosed. The permitting authority's "INTENT TO ISSUE AN AIR CONSTRUCTION PERMIT AND A TITLE V AIR OPERATION PERMIT RENEWAL" and the "PUBLIC NOTICE OF INTENT TO ISSUE AN AIR CONSTRUCTION PERMIT AND A TITLE V AIR OPERATION PERMIT RENEWAL" are also included.

An electronic version of the DRAFT Title V Air Operation Permit Renewal has been posted on the Division of Air Resource Management's world wide web site for the United States Environmental Protection Agency (USEPA) Region 4 office's review. The web site address is:

["http://www.dep.state.fl.us/air/permitting/airpermits/AirSearch\\_ltd.asp"](http://www.dep.state.fl.us/air/permitting/airpermits/AirSearch_ltd.asp)

The "PUBLIC NOTICE OF INTENT TO ISSUE AN AIR CONSTRUCTION PERMIT AND A TITLE V AIR OPERATION PERMIT RENEWAL" must be published as soon as possible. Proof of publication, i.e., newspaper affidavit, must be provided to the permitting authority's office within 7 (seven) days of publication pursuant to Rule 62-110.106(5), F.A.C. Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permit pursuant to Rule 62-110.106(11), F.A.C.

Please submit any written comments you wish to have considered concerning the permitting authority's proposed action to James K. Pennington, P.E., at the above letterhead address. If you have any other questions, please contact Bobby Bull at 850/921-9585.

Sincerely,

Trina L. Vielhauer  
Chief  
Bureau of Air Regulation

TLV/jkp/rlb

Enclosures

*"More Protection, Less Process"*

*Printed on recycled paper.*

In the Matter of an  
Application for Permits by:

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

DRAFT Title V Air Operation Permit Renewal Project No.: 1050052-008-AV  
Draft Air Construction Permit Project No.: 1050052-009-AC  
Bartow Plant  
Polk County

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**WRITTEN NOTICE OF INTENT TO ISSUE AN AIR CONSTRUCTION PERMIT AND A TITLE V AIR  
OPERATION PERMIT RENEWAL**

The Department of Environmental Protection (permitting authority) gives notice of its intent to issue an Air Construction Permit (AC) and a Title V Air Operation Permit (Permit) renewal (copies of the DRAFT AC and DRAFT Permit attached) for the Title V source detailed in the application specified above, for the reasons stated below.

The applicant, CF Industries, Inc., applied on February 28, 2003, to the permitting authority for a Permit Renewal for the Bartow Phosphate Complex 2501 Bonnie Mine Road, Bartow, Polk County. On October 4, 2004, the applicant submitted an air construction application.

The Air Construction Permit 1050052-009-AC is being issued to allow truck loading and unloading operation to take place at the DAP/MAP/GTSP railcar storage and handling facility, i.e. EU # 031.

The Permit renewal is being issued to allow continued commercial operation of the facility, as authorized by the initial Permit, No. 1050052-004-AV, and incorporate the terms of Air Construction Permits 1050052-006-AC and 1050052-009-AC.

The permitting authority has permitting jurisdiction under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, 62-212, and 62-213. This source is not exempt from construction and Title V permitting procedures. The permitting authority has determined that an AC and a Permit renewal are required to commence or continue operations at the described facility.

The permitting authority intends to issue the AC and the Permit renewal based on the belief that reasonable assurances have been provided to indicate that the AC activity and operation of the source will not adversely impact air quality, and the source will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-256, 62-257, 62-281, 62-296, and 62-297, F.A.C.

Pursuant to Sections 403.815 and 403.087, F.S., and Rules 62-110.106 and 62-210.350(3), F.A.C., you (the applicant) are required to publish at your own expense the enclosed "PUBLIC NOTICE OF INTENT TO ISSUE AN AIR CONSTRUCTION PERMIT AND A TITLE V AIR OPERATION PERMIT RENEWAL." The notice shall be published one time only as soon as possible in the legal advertisement section of a newspaper of general circulation in the area affected. For the purpose of these rules, "publication in a newspaper of general circulation in the area affected" means publication in a newspaper meeting the requirements of Sections 50.011 and 50.031, F.S., in the county where the activity is to take place. If you are uncertain that a newspaper meets these requirements, please contact the permitting authority at the address or telephone number listed below. The applicant shall provide proof of publication to the Department's Bureau of Air Regulation, 2600 Blair Stone Road, Mail Station #5505, Tallahassee, Florida 32399-2400 (Telephone: 850/488-0114; Fax: 850/921-9533), within 7 (seven) days of publication. Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permits pursuant to Rule 62-110.106, F.A.C.

The permitting authority will issue the AC and the PROPOSED Permit and subsequent FINAL Permit, in accordance with the conditions of the attached Draft AC and the DRAFT Permit, unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The permitting authority will accept written comments concerning the proposed AC issuance action for a period of 14 (fourteen) days from the date of publication of the "PUBLIC NOTICE OF INTENT TO ISSUE AN AIR CONSTRUCTION PERMIT AND A TITLE V AIR OPERATION PERMIT RENEWAL." Written comments should be provided to the permitting authority office. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in this Draft AC, the permitting authority shall issue a Revised Draft AC and require, if applicable, another Public Notice.

The Permitting Authority will accept written comments concerning the DRAFT Permit for a period of thirty (30) days from the date of publication of the "PUBLIC NOTICE OF INTENT TO ISSUE AN AIR CONSTRUCTION PERMIT AND A TITLE V AIR OPERATION PERMIT RENEWAL." Written comments must be post-marked and all facsimile comments must be received by the close of business (5:00 pm), on or before the end of this 30-day period, by the Permitting Authority at the above address or facsimile. As part of his or her comments, any person may also request that the Permitting Authority hold a public meeting on this permitting action. If the Permitting Authority determines there is sufficient interest for a public meeting, it will publish notice of the time, date, and location on the Department's official web site for notices at <http://tlhora6.dep.state.fl.us/onw> and in a newspaper of general circulation in the area affected by the permitting action. For additional information, contact the Permitting Authority at the above address or phone number. If written comments or comments received at a public meeting result in a significant change to the DRAFT Permit, the Permitting Authority shall issue a Revised DRAFT Permit and require, if applicable, another Public Notice. All comments filed will be made available for public inspection.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. Petitions filed by the permit revision applicant or any of the parties listed below must be filed within fourteen days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S., must be filed within fourteen (14) days of publication of the public notice or within fourteen (14) days of receipt of this notice of intent, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the permitting authority for notice of agency action may file a petition within fourteen days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the permitting authority's action is based must contain the following information:

- (a) The name and address of each agency affected and each agency's file or identification number, if known;
- (b) The name, address, and telephone number of the petitioner; the name, address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination;
- (c) A statement of how and when each petitioner received notice of the agency action or proposed action;
- (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate;
- (e) A concise statement of the ultimate facts alleged, as well as the rules and statutes which entitle the petitioner to relief;
- (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and,
- (g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the agency to take with respect to the agency's proposed action.

A petition that does not dispute the material facts upon which the permitting authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the permitting authority's final action may be different from the position taken by it in this notice of intent. Persons whose substantial interests will be affected by any such final decision of the permitting authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation will not be available in this proceeding.

In addition to the above, a person subject to regulation has a right to apply to the Department of Environmental Protection for a variance from or waiver of the requirements of particular rules, on certain conditions, under Section 120.542, F.S. The relief provided by this state statute applies only to state rules, not statutes, and not to any federal regulatory requirements. Applying for a variance or waiver does not substitute or extend the time for filing a petition for an administrative hearing or exercising any other right that a person may have in relation to the action proposed in this notice of intent.

The application for a variance or waiver is made by filing a petition with the Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. The petition must specify the following information:

- (a) The name, address, and telephone number of the petitioner;
- (b) The name, address, and telephone number of the attorney or qualified representative of the petitioner, if any;
- (c) Each rule or portion of a rule from which a variance or waiver is requested;
- (d) The citation to the statute underlying (implemented by) the rule identified in (c) above;
- (e) The type of action requested;
- (f) The specific facts that would justify a variance or waiver for the petitioner;
- (g) The reason why the variance or waiver would serve the purposes of the underlying statute (implemented by the rule); and,
- (h) A statement whether the variance or waiver is permanent or temporary and, if temporary, a statement of the dates showing the duration of the variance or waiver requested.

The Department will grant a variance or waiver when the petition demonstrates both that the application of the rule would create a substantial hardship or violate principles of fairness, as each of those terms is defined in Section 120.542(2), F.S., and that the purpose of the underlying statute will be or has been achieved by other means by the petitioner.

Persons subject to regulation pursuant to any federally delegated or approved air program should be aware that Florida is specifically not authorized to issue variances or waivers from any requirements of any such federally delegated or approved program. The requirements of the program remain fully enforceable by the Administrator of the United States Environmental Protection Agency and by any person under the Clean Air Act unless and until the Administrator separately approves any variance or waiver in accordance with the procedures of the federal program.

Finally, pursuant to 42 United States Code (U.S.C.) Section 7661d(b)(2), any person may petition the Administrator of the EPA within 60 (sixty) days of the expiration of the Administrator's 45 (forty-five) day review period as established at 42 U.S.C. Section 7661d(b)(1), to object to issuance of any permit. Any petition shall be based only on objections to the permit that were raised with reasonable specificity during the 30 (thirty) day public comment period provided in this notice, unless the petitioner demonstrates to the Administrator of the EPA that it was impracticable to raise such objections within the comment period or unless the grounds for such objection arose after the comment period. Filing of a petition with the Administrator of the EPA does not stay the effective date of any permit properly issued pursuant to the provisions of Chapter 62-213, F.A.C. Petitions filed with the

CF Industries, Inc.  
Bartow Plant  
DRAFT Title V Air Operation Permit Project No.: 1050052-008-AV  
Draft Air Construction Permit Project No.: 1050052-009-AC  
Page 4 of 5

Administrator of EPA must meet the requirements of 42 U.S.C. Section 7661d(b)(2) and must be filed with the Administrator of the EPA at: U.S. EPA, 401 M. Street, S.W., Washington, D.C. 20460. For more information regarding EPA review and objections, visit EPA's Region 4 web site at: <http://www.epa.gov/region4/air/permits/Florida.htm>.

Executed in Tallahassee, Florida.

**STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL PROTECTION**



---

Trina L. Vielhauer, Chief  
Bureau of Air Regulation

CF Industries, Inc.  
Bartow Plant  
DRAFT Title V Air Operation Permit Project No.: 1050052-008-AV  
Draft Air Construction Permit Project No.: 1050052-009-AC  
Page 5 of 5

### CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this INTENT TO ISSUE AN AIR CONSTRUCTION PERMIT AND A TITLE V AIR OPERATION PERMIT RENEWAL (including the Combined PUBLIC NOTICE, Draft AC and DRAFT Permit) and all copies were sent by certified mail before the close of business on 11/9/04 to the person(s) listed:

**Mr. John Doran, Manager, CF Industries, Inc., Bartow Phosphate Complex, P.O. Box 1480, Bartow, FL., 33831.**

In addition, the undersigned duly designated deputy agency clerk hereby certifies that copies of this INTENT TO ISSUE AN AIR CONSTRUCTION PERMIT AND A TITLE V AIR OPERATION PERMIT RENEWAL (including the Combined PUBLIC NOTICE, Draft AC and DRAFT Permit) were sent by U.S. mail on the same date to the person(s) listed:

John B. Koogler, PhD., P.E., Koogler and Associates  
Pradeep Raval, Consultant, Koogler and Associates

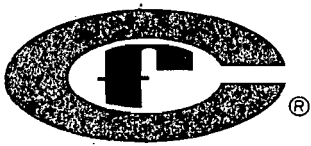
In addition, the undersigned duly designated deputy agency clerk hereby certifies that copies of this INTENT TO ISSUE AN AIR CONSTRUCTION PERMIT AND A TITLE V AIR OPERATION PERMIT RENEWAL (including the Draft AC and DRAFT Permit packages) were sent by INTERNET E-mail on the same date to the person(s) listed:

Gerald Kissel, FDEP- SWD  
Jason Waters, FDEP- SWD  
U.S. EPA, Region 4

Clerk Stamp

**FILING AND ACKNOWLEDGMENT FILED**, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated agency Clerk, receipt of which is hereby acknowledged.

Barbara J. Friday 11/9/04  
(Clerk) (Date)



**CF Industries, Inc.**  
Bartow Phosphate Complex

P.O. Box 1480  
Bartow, Florida 33831  
Telephone: 863/533-3181  
Fax: 863/534-1841

RECEIVED

DEC 02 2004

BUREAU OF AIR REGULATION

November 29, 2004

Mr. Bobby Bull  
Florida Department of Environmental Protection  
Bureau of Air Regulation  
2600 Blair Stone Road  
MS 5505  
Tallahassee, FL 32399-2400

Re: Draft Title V Air Operation Permit Renewal Project No.: 1050052-008-AV  
Draft Air Construction Permit Project No.: 1050052-009-AC  
CF Industries, Bartow, Florida (Polk County)

Dear Mr. Bull

Attached is a copy of the Affidavit of Publication in reference to the above mentioned project.

If you require further information or have any questions/concerns, please contact Mr. John Doran at (863) 533-8048.

Sincerely,

Cheryl L. Peck  
Administrative Assistant

cc: File

**BEST AVAILABLE COPY**  
**AFFIDAVIT OF PUBLICATION**  
**THE LEDGER**  
**Lakeland, Polk County, Florida**

REC-20

DEC 12 2004

BUREAU OF AIR REGULATION

Case No .....

STATE OF FLORIDA)  
 COUNTY OF POLK)

Before the undersigned authority personally appeared C. Morgan Miller, who on oath says that he is Display Advertising Manager of The Ledger, a daily newspaper published at Lakeland in Polk County, Florida; that the attached copy of advertisement, being an

**Notice of Intent to Issue Permit**

.....  
 in the matter of Title V Air Operation Permit Renewal .....

.....  
 Concerning CF Industries, Inc. Bartow Phosphate Complex .....

.....  
 was published in said newspaper in the issues of 11-20; 2004 .....

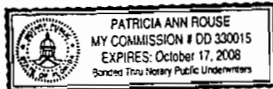
Affiant further says that said The Ledger is a newspaper published at Lakeland, in said Polk County, Florida, and that the said newspaper has heretofore been continuously published in said Polk County, Florida, daily, and has been entered as second class matter at the post office in Lakeland, in said Polk County, Florida, for a period of one year next preceding the first publication of the attached copy of advertisement; and affiant further says that he has neither paid nor promised any person, firm or corporation any discount, rebate, commission or refund for the purpose of securing this advertisement for publication in the said newspaper.

Signed..... *C. Morgan Miller*  
 C. Morgan Miller  
 Display Advertising Manager  
 Who is personally known to me.

Sworn to and subscribed before me this 22nd .....

day of NOVEMBER A.D. 20 04  
*Patricia Ann Rouse*

Notary Public



(Seal)

My Commission Expires 04 17 2008 .....

LC168285 L888

**Attach Ad Here**

**PUBLIC NOTICE OF INTENT TO ISSUE AN AIR CONSTRUCTION PERMIT AND A TITLE V AIR OPERATION PERMIT RENEWAL**

Permitting Authority  
 Department of Environmental Protection  
 Bureau of Air Regulation

Draft Title V Air Operation Permit Renewal Project No.: 105003-004-AV  
 Draft Air Construction Permit Project No.: 105003-007-AC  
 CF Industries, Inc.  
 Bartow Plant  
 Polk County

Applicants: The applicant for these projects is the CF Industries, Inc. Bartow Phosphate Complex, located at 2501 Bonnie Mine Road, Bartow, Polk County, Florida. The applicant's responsible official is Mr. John Doran, Manager CF Industries, Inc. Bartow Phosphate Complex, P.O. Box 1480, Bartow, FL 33631. Facility location: The applicant operates the Bartow phosphate Complex, which is a phosphate plant and located at 2501 Bonnie Mine Road, Bartow, Polk County, Florida.

Project: On February 28, 2003, the applicant applied to the Permitting Authority for a Title V Air Operation Permit (Permit) renewal, on October 2004, the applicant applied for an air construction permit (AC). Details of the project are provided in the application and the enclosed "Statement of Basis" for the Permit renewal, and the Technical Evaluation and Preliminary Determination, for the AC.

The Air Construction Permit 105003-007-AC is being issued to allow truck loading and unloading operations to take place at the DAP/MAP/GTSP rubber storage and handling facility, i.e. EU # 031.

The Permit renewal is being issued to allow continued commercial operation of the facility, as authorized by the final Permit, No. 105003-004-AV, and incorporate the terms of Air Construction Permits 105003-004-AC and 105003-007-AC.

Permitting Authority: Applications for Permits are subject to review in accordance with the provisions of Chapter 63B, Florida Statutes, and the Florida Administrative Code (F.A.C.). The proposed project is not exempt from air permitting requirements and an air permit is required to operate the facility. The Bureau of Air Regulation is the Permitting Authority responsible for issuing a permit determination regarding this project. The Permitting Authority's physical address is: 111 South Magnolia Drive, Suite 4, Tallahassee, Florida 32301. The Permitting Authority's mailing address is: 2000 Bear Stone Road, Mail Station 8506, Tallahassee, Florida 32399-3000. The Permitting Authority's telephone number is 850/921-9333.

Project File: A complete project file is available for public inspection during the normal business hours of 8:00 a.m. to 5:00 p.m., Monday through Friday (except legal holidays), at the address indicated above for the Permitting Authority. To complete project file review, the Permitting Authority will review the application and the information submitted by the applicant, exclusive of confidential records under Section 616.05, F.S. Interested persons may contact the Permitting Authority's project review engineer for additional information of the project and plan the number listed above, and may view the DRAFT Permit and file electronic comments by visiting the following website: <http://www.dep.state.fl.us/air/epd/permits.html>. A copy of the complete project file is also available at:

Permitting Authority: Department of Environmental Protection, 111 South Magnolia Drive, Suite 4, Tallahassee, Florida 32301. Telephone: 850/921-9333. Fax: 850/921-9333.

Affected District: South West District, 3834 Coconut Palm Drive, Tallahassee, Florida 32304. Telephone: 913/744-6100. Fax: 913/744-0084.

**Notice of Intent to Issue Air Permits:** The Permitting Authority gives notice of its intent to issue an AC and a Permit renewal to the applicant for the project described above. The applicant has provided reasonable assurance that operation of the facility will not adversely impact air quality and that the project will comply with all applicable provisions to the Department's Title V, 62-204, 62-210, 62-213, 62-214, 62-256, 62-257, 62-281, 62-296, and 62-297, F.A.C. The Permitting Authority will issue an AC and a Permit renewal if the applicant complies with the conditions of the attached DRAFT Permit, unless a response received in accordance with the following procedures results in a different decision or a significant change of terms or conditions.

Comments: The Permitting Authority will accept written comments concerning the proposed AC. Written comments should be provided to the permitting authority office. If written comments received result in a significant change of terms or conditions, the Permitting Authority will issue a Revised Draft AC and require, if applicable, another Public Notice. Any written comments filed shall be made available for public inspection.

The Permitting Authority will accept written comments concerning the Draft Permit for a period of thirty (30) days from the date of publication of the Public Notice. Written comments must be postmarked and all written comments must be received by the close of business (5:00 p.m.), on or before the end of the 30-day period. The Permitting Authority will review the comments and determine if a public meeting is warranted. If a public meeting is warranted, the Permitting Authority will hold a public meeting on the day of the meeting. Any person may also request that the Permitting Authority hold a public meeting on the day of the meeting. If the Permitting Authority determines there is sufficient interest for a public meeting, it will publish notice of the time, date, and location of the Department's public meeting. The notice will be published in the Florida State Register and in a newspaper of general circulation in the area affected by the permitting action. For additional information, contact the Permitting Authority at the above address or phone number. If written comments or comments received at a public meeting result in a significant change to the Draft Permit, the Permitting Authority shall issue a Revised DRAFT Permit and require, if applicable, another Public Notice. All comments filed will be made available for public inspection.

Petitions: A petitioner whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed with the Department's Agency Clerk at the Office of General Services, Department of Environmental Protection, 300 Commonwealth Boulevard, Mail Station 835, Tallahassee, FL 32399-3000. Petitions filed by any person other than those entitled to written notice under Section 120.569, F.S. must be filed within fourteen (14) days of publication of this Public Notice or receipt of a written notice, whichever occurs first. Under Section 120.569, F.S., however, any person who asked the Permitting Authority for notice of agency action may file a petition within fourteen (14) days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the permitting authority's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number; (b) The name, address and telephone number of the petitioner; name address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how petitioner's substantial rights will be affected by the agency determination; (c) A statement of how and when the petitioner received notice of the agency action or proposed action; (d) A statement of disputed issues of material fact, if there are none, the petition must so state; (e) A concise statement of the utility, public use, or other facts alleged, as well as the rules and statutes which entitle petitioner to relief; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and, (g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the agency to take with respect to the agency's proposed action.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Permitting Authority's final action may be different from the position taken by it in this notice of intent. Persons whose substantial interests will be affected by any such final decision of the permitting authority on the application have the right to petition to become a party to the proceeding in accordance with the requirements set forth above.

Mediation: Mediation is not available for this proceeding.

Objections: In addition to the above, pursuant to 42 United States Code (U.S.C.) Section 7661(a)(2)(C), any person may petition the administrator of the EPA within sixty (60) days of the expiration of the administrator's 45 (forty-five) day review period as established at 42 U.S.C. Section 7661(d)(1)(X), to object to the issuance of any Title V Air Operation Permit. Any petition shall be based only on objections to the permit that were raised with reasonable specificity during the thirty (30) day public comment period provided in the Public Notice, unless the petitioner demonstrates to the Administrator of the EPA that it was impracticable to raise such objections within the comment period or unless the grounds for such objection arose after the comment period. Filing of a petition with the Administrator of the EPA does not stay the effective date of any permit properly issued pursuant to the provisions of Chapter 62-213, F.A.C. Petitions filed with the Administrator of EPA must meet the requirements of 42 U.S.C. Section 7661(a)(2)(C) and must be filed with the Administrator of the EPA at: U.S. EPA, 401 M Street, S.W., Washington, D.C. 20460. For more information regarding objections, visit the EPA Region 4 web site at: [www.epa.gov/rls/airand/air/permits](http://www.epa.gov/rls/airand/air/permits).

L888 - 11-20-2004



**PUBLIC NOTICE OF INTENT TO ISSUE AN AIR CONSTRUCTION PERMIT AND A TITLE V AIR OPERATION PERMIT RENEWAL**

Permitting Authority  
Department of Environmental Protection  
Bureau of Air Regulation

DRAFT Title V Air Operation Permit Renewal Project No.: 1050052-008-AV  
Draft Air Construction Permit Project No.: 1050052-009-AC  
CF Industries, Inc.  
Bartow Plant  
Polk County

**Applicant:** The applicant for these projects is the CF Industries, Inc., Bartow Phosphate Complex, located at 2501 Bonnie Mine Road, Bartow, Polk County. The applicant's responsible official is: Mr. John Doran, Manager, CF Industries, Inc., Bartow Phosphate Complex, P.O. Box 1480, Bartow, FL., 33831

**Facility Location:** The applicant operates the Bartow Phosphate Complex, which is a phosphate plant and located at 2501 Bonnie Mine Road, Bartow, Polk County, Florida.

**Project:** On February 28, 2003, the applicant applied to the Permitting Authority for a Title V air operation permit (Permit) renewal. On October 4, 2004, the applicant applied for an air construction permit (AC). Details of the project are provided in the application and the enclosed "Statement of Basis", for the Permit renewal, and the Technical Evaluation and Preliminary Determination, for the AC.

The Air Construction Permit 1050052-009-AC is being issued to allow truck loading and unloading operation to take place at the DAP/MAP/GTSP railcar storage and handling facility, i.e. EU # 031.

The Permit renewal is being issued to allow continued commercial operation of the facility, as authorized by the initial Permit, No. 1050052-004-AV, and incorporate the terms of Air Construction Permits 1050052-006-AC and 1050052-009-AC.

**Permitting Authority:** Applications for Permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.), and Chapters 62-4, 62-210 and 62-213, Florida Administrative Code (F.A.C.). The proposed project is not exempt from air permitting requirements and a Permit is required to operate the facility. The Department's Bureau of Air Regulation is the Permitting Authority responsible for making a Permit determination regarding this project. The Permitting Authority's physical address is: 111 South Magnolia Drive, Suite 4, Tallahassee, Florida 32301. The Permitting Authority's mailing address is: 2600 Blair Stone Road, Mail Station #5505, Tallahassee, Florida 32399-2400. The Permitting Authority's telephone number is: 850/488-0114.

**Project File:** A complete project file is available for public inspection during the normal business hours of 8:00 a.m. to 5:00 p.m., Monday through Friday (except legal holidays), at the address indicated above for the Permitting Authority. The complete project file includes the DRAFT Permit, the Statement of Basis, the application, and the information submitted by the applicant, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Permitting Authority's project review engineer for additional information at the address and phone number listed, above, and may view the DRAFT Permit and file electronic comments by visiting the following website: <http://www.dep.state.fl.us/air/eproducts/ards/>. A copy of the complete project file is also available at:

**Permitting Authority:**  
Bureau of Air Regulation  
111 South Magnolia Drive, Suite 4  
Tallahassee, Florida 32301  
Telephone: 850/488-0114  
Fax: 850/921-9533

**Affected District:**  
Department of Environmental Protection  
Southwest District  
3804 Coconut Palm Drive  
Tampa, Florida  
Telephone: 813/744-6100  
Fax: 813/744-6084

**Notice of Intent to Issue Air Permits:** The Permitting Authority gives notice of its intent to issue an AC and a Permit renewal to the applicant for the project described above. The applicant has provided reasonable assurance

that operation of the facility will not adversely impact air quality and that the project will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-214, 62-256, 62-257, 62-281, 62-296, and 62-297, F.A.C. The Permitting Authority will issue an AC and a PROPOSED Permit and subsequent FINAL Permit, in accordance with the conditions of the attached Draft AC and DRAFT Permit, unless a response received in accordance with the following procedures results in a different decision or a significant change of terms or conditions.

**Comments:** The permitting authority will accept written comments concerning the proposed AC issuance action for a period of 14 (fourteen) days from the date of publication of the Public Notice. Written comments should be provided to the permitting authority office. If written comments received result in a significant change in this Draft AC, the permitting authority shall issue a Revised Draft AC and require, if applicable, another Public Notice. Any written comments filed shall be made available for public inspection.

The Permitting Authority will accept written comments concerning the DRAFT Permit for a period of thirty (30) days from the date of publication of the Public Notice. Written comments must be post-marked and all facsimile comments must be received by the close of business (5:00 pm), on or before the end of this 30-day period, by the Permitting Authority at the above address or facsimile. As part of his or her comments, any person may also request that the Permitting Authority hold a public meeting on this permitting action. If the Permitting Authority determines there is sufficient interest for a public meeting, it will publish notice of the time, date, and location on the Department's official web site for notices at <http://tlhora6.dep.state.fl.us/onw> and in a newspaper of general circulation in the area affected by the permitting action. For additional information, contact the Permitting Authority at the above address or phone number. If written comments or comments received at a public meeting result in a significant change to the DRAFT Permit, the Permitting Authority shall issue a Revised DRAFT Permit and require, if applicable, another Public Notice. All comments filed will be made available for public inspection.

**Petitions:** A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed with (received by) the Department's Agency Clerk in the Office of General Counsel of the Department of Environmental Protection at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S., must be filed within fourteen (14) days of publication of this Public Notice or receipt of a written notice, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Permitting Authority for notice of agency action may file a petition within fourteen (14) days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the Permitting Authority's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address and telephone number of the petitioner; the name address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial rights will be affected by the agency determination; (c) A statement of how and when the petitioner received notice of the agency action or proposed action; (d) A statement of all disputed issues of material fact. If there are none, the petition must so state; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and, (g) A statement of the relief sought by the petitioner, stating precisely the action the petitioner wishes the agency to take with respect to the agency's proposed action. A petition that does not dispute the material facts upon which the Permitting Authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Permitting Authority's final action may be different from the position taken by it in this Public Notice of intent. Persons whose substantial interests will be affected by any such final decision of the Permitting Authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

**Mediation:** Mediation is not available for this proceeding.

**Objections:** In addition to the above right to petition, pursuant to 42 United States Code (U.S.C.) Section 7661d(b)(2), any person may petition the Administrator of the EPA within sixty (60) days of the expiration of the Administrator's 45 (forty-five) day review period as established at 42 U.S.C. Section 7661d(b)(1), to object to the issuance of any Permit. Any petition shall be based only on objections to the Permit that were raised with reasonable specificity during the thirty (30) day public comment period provided in the Public Notice, unless the petitioner demonstrates to the Administrator of the EPA that it was impracticable to raise such objections within the comment period or unless the grounds for such objection arose after the comment period. Filing of a petition with the Administrator of the EPA does not stay the effective date of any Permit properly issued pursuant to the provisions of Chapter 62-213, F.A.C. Petitions filed with the Administrator of EPA must meet the requirements of 42 U.S.C. Section 7661d(b)(2) and must be filed with the Administrator of the EPA at: U.S. EPA, 401 M Street, S.W., Washington, D.C. 20460. For more information regarding objections, visit the EPA Region 4 web site at: [www.epa.gov/region4/air/permits](http://www.epa.gov/region4/air/permits).

## STATEMENT OF BASIS

CF Industries, Inc.  
Bartow Phosphate Complex  
**Facility ID No.:** 1050052  
Polk County

**DRAFT Permit No. 1050052-008-AV**  
(Initial Title V Permit No.: 1050052-004-AV)

The initial Title V Air Operation Permit No. 1050052-004-AV, was issued/effective on September 9, 1998 for the CF Industries, Bartow Phosphate Complex. This Title V Air Operation Permit Renewal is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210 and 62-213. The above named permittee is hereby authorized to operate the facility shown on the application and approved drawing(s), plans, and other documents, attached hereto or on file with the permitting authority, in accordance with the terms and conditions of this permit.

This facility consists of one active Sulfuric Acid Plant, two Monoammonium/Diammonium Phosphate (MAP)/DAP Shipping Plants including DAP/MAP Railcar/Truck Unloading and Transfer Operation, one Auxiliary Boiler, and a Molten Sulfur Storage and Handling System. The CAM Rule does not apply to these units. Additionally the facility consists of several process units which were excluded from the renewal by the permittee in accordance with Rule 62-210-300(2)(a)(3)(c), F.A.C., and are not permitted to operate. The units are one Sulfuric Acid Plant (unit 005), one Phosphoric Acid Plant No. 1 (unit 007), one Rock Surge Bin for Phosphoric Acid Plant No. 2 (unit 017), one Phosphoric Acid Clarification Plant (unit 022), one Phosphoric Acid Aging Tank (023), one Phosphoric Acid Storage Tank (unit 024) and one Rock Unloading facility (unit 026).

This renewal application will include changes to the Initial Title V Permit 1050052-004-AV. The renewal incorporates Air Construction Projects 1050052-006-AC and 1050052-009-AC. Project 1050052-006-AC increases the unloading and transfer rate for the DAP/MAP/GTSP Railcar Unloading and Transfer Operation from 80.0 tons per hour to 130.0 tons per hour. Project 1050052-009-AC incorporates truck operations at the DAP/MAP/GTSP Railcar Unloading and Transfer Operation. With the incorporation of Air Construction Permits 1050052-006-AC and 1050052-009-AC, the following changes have been made as follows:

### **a. Table of Contents**

**FROM:** 031 DAP/MAP/GTSP Railcar Unloading and Transfer Operation

**TO:** 031 DAP/MAP/GTSP Railcar/Truck Unloading and Transfer Operation

### **b. Section I, Subsection A, Facility Description**

**FROM:** This facility consists of one sulfuric acid plant, two monoammonium phosphate (MAP)/diammonium phosphate (DAP) shipping plants including DAP/MAP railcar unloading and transfer operation, one auxiliary boiler, and a molten sulfur storage and handling system.

**TO:** This facility consists of one sulfuric acid plant, two monoammonium phosphate (MAP)/diammonium phosphate (DAP) shipping plants including DAP/MAP railcar/truck unloading and transfer operation, one auxiliary boiler, and a molten sulfur storage and handling system.

**c. Section I, Subsection B**

**FROM:** DAP/MAP/GTSP Railcar Unloading and Transfer Operation

**TO:** DAP/MAP/GTSP Railcar/Truck Unloading and Transfer Operation

**d. Section II. Facility Wide Conditions**

**FROM: 6.** Reasonable precautions to prevent emissions of unconfined particulate matter at this facility include: only DAP/MAP/GTSP which has been treated with a dust suppressant shall be unloaded and transferred at the DAP/MAP/GTSP Railcar Unloading and Transfer Operation, and watering of plant areas on an as needed basis.

[Rule 62-296.320(4)(c)2., F.A.C.; Air Construction Permit AC53-246837]

**TO: 6.** Reasonable precautions to prevent emissions of unconfined particulate matter at this facility include: only DAP/MAP/GTSP which has been treated with a dust suppressant shall be unloaded and transferred at the DAP/MAP/GTSP Railcar/Truck Unloading and Transfer Operation, and watering of plant areas on an as needed basis.

[Rule 62-296.320(4)(c)2., F.A.C.; Air Construction Permit AC53-246837, Air Construction Permit 1050052-009-AC]

**e. Section III, Subsection D**

**FROM:**

**Subsection D. This section addresses the following emissions unit(s).**

**E.U. ID**

<b><u>No.</u></b>	<b><u>Brief Description</u></b>
-031	DAP/MAP/GTSP Railcar Unloading and Transfer Operation

The Diammonium Phosphate/Monoammonium Phosphate/Granulated Triple Super Phosphate (DAP/MAP/GTSP) Railcar Unloading and Transfer Operation has an unloading and transfer rate of 80.0 tons per hour of DAP/MAP/GTSP. The operation 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 to a conveyor system which conveys the material to a warehouse for storage.

**{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 Unloading and Transfer Operation shall not exceed 80.0 tons per hour.

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

**Emission Limitations and Standards**

**D.2.** All material transferred from the DAP/MAP/GTSP Railcar 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%.

[Rule 62-296.320(4)(a), F.A.C.]

**Test Methods and Procedures**

**D.3.** Each material transfer point associated with the DAP/MAP/GTSP railcar 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)4 and 62-4.070(4), F.A.C.]

**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.]

**Monitoring of Operations**

**D.5.** In order to provide reasonable assurance that the visible emission limitation of Condition D.2 is being met, the permittee shall record the amount and type (identification) of dust suppressant material used daily (daily record log). These records may be based on vendor supplied information.

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

**Recordkeeping and Reporting Requirements**

**D.6.** In order to document compliance with Condition D.1, the permittee shall maintain a daily record of the material unloading and transfer rate during operation and the hours of process operations. 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.]

**D.7.** The following information shall be reported along with each test report:

- a. The DAP/MAP/GTSP material unloading and transfer rate in tons/hour.
- b. The type of material transferred (DAP or MAP).
- c. Documentation that the material transferred was treated with a dust suppressant along with an explanation of the type/kind of dust suppressant applied. These records may be based on vendor supplied information.

Failure to submit the following with each test report may invalidate the test and fail to provide reasonable assurance of compliance.

Failure to submit the following with each test report may invalidate the test and fail to provide reasonable assurance of compliance.  
[Rule 62-4.070(3), F.A.C.]

**TO:**

**Subsection D. This section addresses the following emissions unit(s).**

**E.U. ID**

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

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 130.0 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 to a hopper located below the railcar/truck, from the railcar/truck hopper the DAP/MAP/GTSP is transferred to a conveyor system which conveys the material to a warehouse for storage.

{**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%.  
[Rule 62-296.320(4)(a), F.A.C.]

**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)4 and 62-4.070(4), F.A.C.]

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.]

**Monitoring of Operations**

**D.5.** In order to provide reasonable assurance that the visible emission limitation of Condition D.2 is being met, the permittee shall record the amount and type (identification) of dust suppressant material used daily (daily record log). These records may be based on vendor supplied information.

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

**Recordkeeping and Reporting Requirements**

**D.6.** In order to document compliance with Condition D.1, the permittee shall maintain a daily record of the material unloading and transfer rate during operation and the hours of process operations. 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.]

**D.7.** The following information shall be reported along with each test report:

- a. The DAP/MAP/GTSP material unloading and transfer rate in tons/hour.
- b. The type of material transferred (DAP or MAP).
- c. Documentation that the material transferred was treated with a dust suppressant along with an explanation of the type/kind of dust suppressant applied. These records may be based on vendor supplied information.

Failure to submit the following with each test report may invalidate the test and fail to provide reasonable assurance of compliance.

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

Also included in this permit are miscellaneous unregulated/insignificant emissions units and/or activities.

Based on the Title <sup>4</sup>V Air Operation Permit Renewal application received February 28, 2003 and additional information provided by the applicant, this facility is not a major source of hazardous air pollutants (HAPs).





Jeb Bush  
Governor

# Department of Environmental Protection

Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400  
April 2, 2004

Colleen M. Castille  
Secretary

CERTIFIED MAIL- RETURN RECEIPT REQUESTED

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

Re: Bartow Phosphate Complex Title V Renewal DEP File No.1050052-008-AV

Dear Mr. Doran,


On March 4, 2002, the Department received your additional information for the renewal of the Title V permit for the Bartow Phosphate Complex. Specifically, the following information remains outstanding:

1. The amount of hazardous air pollutants emissions from the site. In particular, please quantify the annual amount of HF emissions coming from the gypsum and cooling ponds located on the property. Please provide the fluoride concentrations and pH values of the ponds, and the total acres of pond water. If applicable, please also provide information concerning the closure of these ponds.
2. Your intended use, during the next 5 years, of the following Emissions Units:  
E.U. 00006, Sulfuric Acid Plant No. 6;  
E.U. 021, Boiler No. 1; and  
E.U.s 032-034, Molten Sulfur System.

As a reminder, 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.

Please submit all requested information immediately to Mr. Bobby Bull at FDEP Bureau of Air Regulation, MS 5505, 2600 Blair Stone Road, Tallahassee, FL 32399-2400. If you have any questions regarding this request for additional information, please contact Mr. Bull at [Robert.Bull@dep.state.fl.us](mailto:Robert.Bull@dep.state.fl.us) or (850) 921-9585.

Sincerely,

  
James K. Pennington, P.E.  
Bureau of Air Regulation

cc: Jason Waters, FDEP-SWD  
Pradeep Raval, Consultant, Kooger and Associates  
John B. Koogler, PhD., P.E., Kooger and Associates

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

2. Article  
 (7)  
 PS

**COMPLETE THIS SECTION ON DELIVERY**

A. Signature *Donna Lewis*  Agent  Addressee

B. Received by (Printed Name) *Donna Lewis* C. Date of Delivery *4/6/07*

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

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

4. Restricted Delivery? (Extra Fee)  Yes

102595-02-M-1540

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Sent To *Mr. John Doran*  
 Street, Apt. No.;  
 or PO Box No. *P.O. Box 1480*  
 City, State, ZIP+4 *Bartow, FL 33831*



Jeb Bush  
Governor

# Department of Environmental Protection

Southwest District  
3804 Coconut Palm Drive  
Tampa, Florida 33619

David B. Scrubs  
Secretary

## FACSIMILE TRANSMISSION SHEET

DATE 1/20/04

TO: Cindy Phillips / Bobby Ball

Department \_\_\_\_\_

Phone \_\_\_\_\_ Fax \_\_\_\_\_

FROM: Jason Waters

DEP Southwest District Office - Air Program  
Phone: (813) 744-6100 (SunCom 512-1042) Ext. 107

OPERATOR: DW

SUBJECT: FVI

DW

Total Number of Pages, Including Cover Page: \_\_\_\_\_

DEP SWD AIR PROGRAM FAX NUMBERS: (813) 744-6458  
(Suncom) 512-1073

"Protect, Conserve and Manage Florida's Environment and Natural Resources"



**CF Industries, Inc.**  
Bartow Phosphate Complex

P.O. Box 1480  
Bartow, Florida 33831  
Telephone: 863/578-1000  
Fax: 863/534-1841

January 13, 2004



Mr. Jason W. Waters  
Air Permitting Engineer  
Florida Department of Environmental Protection  
3804 Coconut Palm Drive  
Tampa, Florida 33619

**RE: CF Industries, Inc. (CFI) Bartow Phosphate Complex  
Title V Renewal Application  
Reference Permit No. 1050052-008-AV**

Dear Mr. Waters:

This correspondence is provided in response to the Department's letter dated October 13, 2003, which was received by CFI on October 17, 2003, and is attached for reference. The Department requested CFI address three additional items in order to complete the referenced renewal application. Each is enumerated below.

1. Application Responsible Official (R.O.) Certification. In accordance with the Department's comment, CFI's designated R.O., Mr. John Doran, obtained a Personal Identification Number (PIN) in November to allow completion of the appropriate online documentation for the application. On November 25, 2004, Mr. Doran completed the R.O. Certification Statement and submitted the application electronically.
2. Paper Application and EPSAF Applications. All material associated with the application has now been filed electronically.
3. April 17, 2003 Request for Additional Information. It is our understanding that DARM staff will identify any additional information that may be required after they complete their review of the updated application submitted on November 25, 2003.

Responsible Official (R.O.) Certification Statement:  
This certification has been submitted electronically and is complete.

Mr. Jason Waters  
January 13, 2004  
Page 2

Professional Engineer (P.E.) Certification  
Statement: This certification has been submitted  
electronically and is complete.

We look forward to the Department's completion of review of this application. If you have any additional questions or if you need additional information, please contact Craig Kovach at (863)533-8048, ext. 246.

Sincerely,



John Doran  
Manager

Cc: Pradeep Raval, Koogler & Associates

Dist: C. Kovach, Quiet Earth Consultants, Inc.  
J. Bunch  
L. Vadelund  
C. Peck/File



Jeb Bush  
Governor

# Department of Environmental Protection

Southwest District  
3804 Coconut Palm Drive  
Tampa, Florida 33619

David B. Struhs  
Secretary

## FACSIMILE TRANSMISSION SHEET

DATE 1-22-04

TO: ROBBY BULL  
Department DARM  
Phone \_\_\_\_\_ Fax \_\_\_\_\_

FROM: JIM McDONALD  
DEP Southwest District Office - Air Program  
Phone: (813) 744-6100 (SunCom 512-1042) Ext. 106

OPERATOR: \_\_\_\_\_

SUBJECT: RILL SCHROEDER OF OUR OFFICE HAD THIS  
NOTIFICATION FORM ATTACHED TO A  
STACK TEST REPORT

Total Number of Pages, Including Cover Page: 3

DEP SWD AIR PROGRAM FAX NUMBERS: (813) 744-6458

(Suncom) 512-1073



# Department of Environmental Protection

## Division of Air Resource Management

### RESPONSIBLE OFFICIAL NOTIFICATION FORM



**Note: A responsible official is not necessarily a designated representative under the Acid Rain Program. To become a designated representative, submit a certificate of representation to the U.S. Environmental Protection Agency (EPA) in accordance with 40 CFR Part 72.24.**

**Identification of Facility**

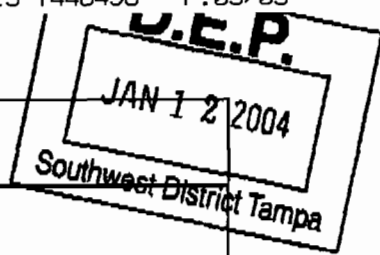
1. Facility Owner/Company Name: CF Industries, Inc.	
2. Site Name: Bartow Phosphate Complex	3. County: Polk
4. Title V Air Operation Permit/Project No. (leave blank for initial Title V applications): 1050052-007-AV	

**Notification Type (Check one or more)**

<input type="checkbox"/>	<b>INITIAL:</b> Notification of responsible officials for an initial Title V application.
<input type="checkbox"/>	<b>RENEWAL:</b> Notification of responsible officials for a renewal Title V application.
<input checked="" type="checkbox"/>	<b>CHANGE:</b> Notification of change in responsible official(s). Effective date of change in responsible official(s) <u>8/1/03</u>

**Primary Responsible Official**

1. Name and Position Title of Responsible Official: <b>J. M. Doran</b>		
2. Responsible Official Mailing Address: Organization/Firm: CF Industries, Inc., Bartow Phosphate Complex Street Address: 2501 Bonnie Mine Road City: Bartow State: FL Zip Code: 33830		
3. Responsible Official Telephone Numbers: Telephone: (863 ) 533-0528 Fax: (863 ) 534-1841		
4. Responsible Official Qualification (Check one or more of the following options, as applicable): <input checked="" type="checkbox"/> For a corporation, the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit under Chapter 62-213, F.A.C. <input type="checkbox"/> For a partnership or sole proprietorship, a general partner or the proprietor, respectively. <input type="checkbox"/> For a municipality, county, state, federal, or other public agency, either a principal executive officer or ranking elected official. <input type="checkbox"/> The designated representative at an Acid Rain source.		



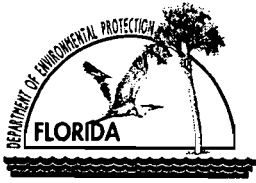
**Additional Responsible Official**

1. Name and Position Title of Responsible Official:			
2. Responsible Official Mailing Address: Organization/Firm: Street Address: City: State: Zip Code:			
3. Responsible Official Telephone Numbers: Telephone: ( ) - Fax: ( ) -			
4. Responsible Official Qualification <i>(Check one or more of the following options, as applicable):</i> <input type="checkbox"/> For a corporation, the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit under Chapter 62-213, F.A.C. <input type="checkbox"/> For a partnership or sole proprietorship, a general partner or the proprietor, respectively. <input type="checkbox"/> For a municipality, county, state, federal, or other public agency, either a principal executive officer or ranking elected official. <input type="checkbox"/> The designated representative at an Acid Rain source.			

**Additional Responsible Official**

1. Name and Position Title of Responsible Official:			
2. Responsible Official Mailing Address: Organization/Firm: Street Address: City: State: Zip Code:			
3. Responsible Official Telephone Numbers: Telephone: ( ) - Fax: ( ) -			
4. Responsible Official Qualification <i>(Check one or more of the following options, as applicable):</i> <input type="checkbox"/> For a corporation, the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit under Chapter 62-213, F.A.C. <input type="checkbox"/> For a partnership or sole proprietorship, a general partner or the proprietor, respectively. <input type="checkbox"/> For a municipality, county, state, federal, or other public agency, either a principal executive officer or ranking elected official. <input type="checkbox"/> The designated representative at an Acid Rain source.			





# Department of Environmental Protection

## Division of Air Resource Management

### RESPONSIBLE OFFICIAL NOTIFICATION FORM

**Note:** A responsible official is not necessarily a designated representative under the Acid Rain Program. To become a designated representative, submit a certificate of representation to the U.S. Environmental Protection Agency (EPA) in accordance with 40 CFR Part 72.24.

**Identification of Facility**

1. Facility Owner/Company Name:	
2. Site Name:	3. County:
4. Title V Air Operation Permit/Project No. <i>(leave blank for initial Title V applications)</i> :	

**Notification Type** *(Check one or more)*

<input type="checkbox"/> <b>INITIAL:</b> Notification of responsible officials for an initial Title V application.
<input type="checkbox"/> <b>RENEWAL:</b> Notification of responsible officials for a renewal Title V application.
<input type="checkbox"/> <b>CHANGE:</b> Notification of change in responsible official(s). Effective date of change in responsible official(s) _____

**Primary Responsible Official**

1. Name and Position Title of Responsible Official:
2. Responsible Official Mailing Address: Organization/Firm: Street Address: City: State: Zip Code:
3. Responsible Official Telephone Numbers: Telephone: ( ) - Fax: ( ) -
4. Responsible Official Qualification <i>(Check one or more of the following options, as applicable)</i> : <input type="checkbox"/> For a corporation, the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit under Chapter 62-213, F.A.C. <input type="checkbox"/> For a partnership or sole proprietorship, a general partner or the proprietor, respectively. <input type="checkbox"/> For a municipality, county, state, federal, or other public agency, either a principal executive officer or ranking elected official. <input type="checkbox"/> The designated representative at an Acid Rain source.
5. Responsible Official Statement:  <i>I, the undersigned, am a responsible official, as defined in Rule 62-210.200, F.A.C., of the Title V source addressed in this notification. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this notification are true, accurate and complete. Further, I certify that I have authority over the decisions of all other responsible officials, if any, for purposes of Title V permitting.</i>
<div style="display: flex; justify-content: space-between;"> <div style="width: 45%; text-align: center;">             _____ Signature           </div> <div style="width: 45%; text-align: center;">             _____ Date           </div> </div>

**Bull, Robert**

---

**From:** Vielhauer, Trina  
**Sent:** Monday, March 15, 2004 8:51 AM  
**To:** Bull, Robert  
**Subject:** call to cf bartow

Bobby,  
Could you call Craig Kovach at CF Bartow at 863-533-8048 Ext. 246 regarding their Title V renewal. I told him we'd get back with him regarding the non-operation for over 10 years issue.

Thanks,  
Trina

3/22/2004

**Bull, Robert**

ckovach@cfi.fi.com

**From:** Comer, Patricia  
**Sent:** Wednesday, March 31, 2004 10:48 AM  
**To:** Bull, Robert  
**Subject:** RE: Guidance on Support Facilities

Bobby

I don't think there is any such thing. Most of what you'll find is on the EPA website dealing with what is included in a PSD major source or a HAP major source. I also don't know if the CFI plants are "support facilities" of each other. If you look at EPA's website for guidance on what is a PSD source, you will find that "support facilities" included as part of the PSD major are typically plants owned by another entity that are co-located with the plant in question and function solely in support of the plant in question (two owners, one location, no other buyers or no other sellers). I think that what we have here is a bit different because it consists of two locations but one owner. If, in fact, the closed plant operates solely as part the other plant's operations it can be considered a single facility without dealing with "support facility" concepts. I suggested to Trina that we be certain it operates only as part of one other plant. If it operates as a general warehouse, it may not be part of any other plant but simply a separate warehouse.

Pat

-----Original Message-----

**From:** Bull, Robert  
**Sent:** Wednesday, March 31, 2004 10:31 AM  
**To:** Comer, Patricia  
**Subject:** Guidance on Support Facilities

Hey Pat,

I'm trying to find the Guidance Memo for support facilities to pass on to CFI. I checked the website and didn't see it. Would you have a copy of it?

Thanks,  
Bobby

3/31/2004



**KOGLER & ASSOCIATES**  
**ENVIRONMENTAL SERVICES**

4014 NW THIRTEENTH STREET  
GAINESVILLE, FLORIDA 32609  
352/377-5822 • FAX/377-7158

Project No. 344-04-01

# Fax

To: <u>Bobby Bull</u>	
<u>FDEB Tallahassee</u>	
Fax No.:	
From: <u>Pradeep Raval</u>	Fax No.: 352-377-7158
Date: <u>10-12-04</u>	Time: <u>5:30 P</u>
Sent By: <u>R</u>	

*This message consists of 1 page(s) PLUS this cover sheet.  
If you experience difficulties with this transmission, please call 352-377-5822.*

Remarks: <u>Per your request - R</u>
--------------------------------------

This message is intended for use only by the individual to whom it has been addressed, and may contain confidential or privileged information. If you are not the intended recipient, please note that the use, copying or distribution of this information is not permitted. If you have received this FAX in error, please destroy the original and notify the sender immediately at 352-377-5822 so we can prevent any recurrence. Thank you.



**KOOGLER & ASSOCIATES**  
ENVIRONMENTAL SERVICES

4014 NW THIRTEENTH STREET  
GAINESVILLE, FLORIDA 32609  
352/377-5822 ▪ FAX/377-7158

KA 344-04-01

October 12, 2004

Mr. Bobby Bull  
Florida Department of  
Environmental Protection  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

Subject: Additional Information  
Construction Permit Application for  
Fertilizer Truck Loading/Unloading  
C.F. Industries, Inc. - Bartow  
Facility No. 1050052

Dear Mr. Bull:

This is to confirm the information discussed with you this morning regarding the GTSP handling at the above referenced facility.

The CF Bartow Complex does not manufacture GTSP. Further, only cured GTSP product is handled and stored at this facility. The GTSP product is received more than 72 hours after manufacture.

If you have any additional questions, please call me.

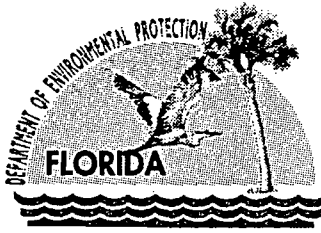
Very truly yours,

KOOGLER & ASSOCIATES

Pradeep Raval

Par.  
Encl.

C: John Doran, CF Bartow  
Craig Kovach, CF Bartow  
Jason Waters, FDEP Tampa



Jeb Bush  
Governor

# Department of Environmental Protection

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

Colleen M. Castille  
Secretary

December 27, 2004

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

Re: Title V Air Operation Permit Renewal  
PROPOSED Title V Air Operation Permit Renewal Project No.: 1050052-008-AV  
Bartow Phosphate Complex

Dear Mr. Doran:

One copy of the "PROPOSED Determination" for the renewal of a Title V Air Operation Permit for the Bartow Phosphate Complex located at 2501 Bonnie Mine Road, Bartow, Polk County, is enclosed. This letter is only a courtesy to inform you that the DRAFT Permit has become a PROPOSED Permit.

An electronic version of this determination has been posted on the Division of Air Resources Management's world wide web site for the United States Environmental Protection Agency (USEPA) Region 4 office's review. The web site address is:

"[http://www.dep.state.fl.us/air/permitting/airpermits/AirSearch\\_ltd.asp](http://www.dep.state.fl.us/air/permitting/airpermits/AirSearch_ltd.asp)"

Pursuant to Section 403.0872(6), Florida Statutes, if no objection to the PROPOSED Permit is made by the USEPA within 45 days, the PROPOSED Permit will become a FINAL Permit no later than 55 days after the date on which the PROPOSED Permit was mailed (posted) to USEPA. If USEPA has an objection to the PROPOSED Permit, the FINAL Permit will not be issued until the permitting authority receives written notice that the objection is resolved or withdrawn.

If you should have any questions, please contact Bobby Bull at 850/921-9585.

Sincerely,

Trina L. Vielhauer  
Chief  
Bureau of Air Regulation

TV/jkp/rlb

Enclosures

copy furnished to:  
John B. Koogler, PhD., P.E., Koogler and Associates  
Pradeep Raval, Consultant, Koogler and Associates  
Gerald Kissel, FDEP- SWD  
Jason Waters, FDEP- SWD  
USEPA, Region 4 (INTERNET E-mail Memorandum)

"More Protection, Less Process"

Printed on recycled paper.

## PROPOSED Determination

Title V Air Operation Permit Renewal  
PROPOSED Permit Project No.: 1050052-008-AV  
Page 1 of 5

### **I. Public Notice.**

An "INTENT TO ISSUE TITLE V AIR OPERATION PERMIT RENEWAL" to CF Industries, Inc. for the Bartow Phosphate Complex located at 2501 Bonnie Mine Road, Bartow, Polk County was clerked on November 8, 2004. The "PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT RENEWAL" was published in the The Ledger on November 20, 2004. The DRAFT Permit was available for public inspection at the Southwest District Office in Tampa and the permitting authority's office in Tallahassee. Proof of publication of the "PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT RENEWAL" was received on December 2, 2004.

### **II. Public Comment(s).**

Comments were received and the DRAFT Permit was changed. The comments were not considered significant enough to reissue the DRAFT Permit and require another Public Notice. Comments were received from one respondent during the 30 (thirty) day public comment period. Listed below is each comment letter in the chronological order of receipt and a response to each comment in the order that the comment was received. The comment(s) will not be restated. Where duplicative comments exist, the original response is referenced.

A. Letter from Mr. John M. Doran dated December 2, 2004, and received on December 9, 2004.

1. **Comment:** 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 0.5lb/hr and 2.1 tpy. [Rule 62-296.406]

**Response:** The condition will not be removed based upon Facility Wide Condition 27.

2. **Comment:** Please note the proposed truck unloading and 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 curtailed. 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.

**Response:** As a result of this comment, **Section III, Subsection D** is hereby changed:

**From:**

**Subsection D. This section addresses the following emissions unit(s).**

**E.U. ID**

**No.**

**Brief Description**

-031 DAP/MAP/GTSP Railcar/Truck Unloading and Transfer Operation

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 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 to a hopper located below the railcar/truck, from the railcar/truck hopper the DAP/MAP/GTSP is transferred to a conveyor system which conveys the material to a warehouse for storage.

{**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%.

[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.]

**Monitoring of Operations**

**D.5.** In order to provide reasonable assurance that the visible emission limitation of Condition D.2 is being met, the permittee shall record the amount and type (identification) of dust suppressant material used daily (daily record log). These records may be based on vendor supplied information.  
[Rule 62-4.070(3), F.A.C.]

**Recordkeeping and Reporting Requirements**

**D.6.** In order to document compliance with Condition D.1, the permittee shall maintain a daily record of the material unloading and transfer rate during operation and the hours of process operations. 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.]

**D.7.** The following information shall be reported along with each test report:

- a. The DAP/MAP/GTSP material unloading and transfer rate in tons/hour.
- b. The type of material transferred (DAP or MAP).
- c. Documentation that the material transferred was treated with a dust suppressant along with an explanation of the type/kind of dust suppressant applied. These records may be based on vendor supplied information.

Failure to submit the following with each test report may invalidate the test and fail to provide reasonable assurance of compliance.  
[Rule 62-4.070(3), F.A.C.]

**To:**  
**Subsection D. This section addresses the following emissions unit(s).**

**E.U. ID**

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

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~~ 130.0 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% for the railcar operation. 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 62-296.320(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.]

**Monitoring of Operations**

**D.5.** In order to provide reasonable assurance that the visible emission limitation of Condition D.2 is being met, the permittee shall record the amount and type (identification) of dust suppressant material used daily (daily record log). These records may be based on vendor supplied information.

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

**Recordkeeping and Reporting Requirements**

**D.6.** In order to document compliance with Condition D.1, the permittee shall maintain a daily record of the material unloading and transfer rate during operation and the hours of process operations. 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.]

**D.7.** The following information shall be reported along with each test report:

- a. The DAP/MAP/GTSP material unloading and transfer rate in tons/hour.

- b. The type of material transferred (DAP or MAP).
- c. Documentation that the material transferred was treated with a dust suppressant along with an explanation of the type/kind of dust suppressant applied. These records may be based on vendor supplied information.

Failure to submit the following with each test report may invalidate the test and fail to provide reasonable assurance of compliance.

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

**III. Document on file with the permitting authority:**

-Letter received December 9, 2004, from Mr. John M. Doran.

**IV. Conclusion.**

The permitting authority hereby issues the PROPOSED Permit, with any changes noted above.