

Department of Environmental Protection

Jeb Bush
Governor

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

Colleen M. Castille
Secretary

P.E. Certification Statement

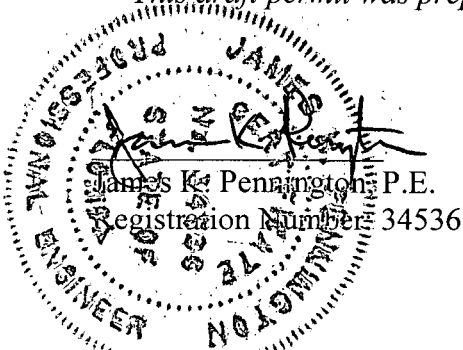
Permittee: CF Industries, Inc.
Bartow Phosphate Complex

DRAFT Permit No.: 1050052-009-AC

Project: Air Construction Permit to allow truck loading and unloading at the DAP/MAP/GTSP railcar storage and handling facility.

I HEREBY CERTIFY that the engineering features described in the above referenced application and subject to the proposed permit conditions provide reasonable assurance of compliance with applicable provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 62-4 and 62-204 through 62-297. However, I have not evaluated and I do not certify aspects of the proposal outside of my area of expertise (including but not limited to the electrical, mechanical, structural, hydrological, and geological features).

This draft permit was prepared under my direct supervision by Mr. Robert Bull of my staff.



11/9/04
Date

Permitting Authority:
Department of Environmental Protection
Bureau of Air Regulation
111 South Magnolia Drive, Suite 4
Tallahassee, Florida 32301
Telephone: 850/488-0144
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"More Protection, Less Process"

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TECHNICAL EVALUATION
AND
PRELIMINARY DETERMINATION

CF INDUSTRIES, INC.

DAP/MAP/GTSP Storage and Handling
Bartow Phosphate Complex
Polk County, Florida

DEP File Number
1050052-009-AC

Florida Department of Environmental Protection
Division of Air Resources Management
Bureau of Air Regulation

November 3, 2004

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

I. APPLICATION INFORMATION

A. Applicant

CF Industries, Inc.
P.O. Box 1480
Bartow, Polk County, Florida 33831
Authorized Representative: Mr. John Doran, Manager

B. Engineer

Dr. John B. Koogler, P.E.
Koogler and Associates
4014 NW 13th Street
Gainesville, FL 32609

C. Project and Location

CF Industries would like to add a Truck unloading and Transfer to its current DAP/MAP/GTSP Railcar Unloading and Transfer Operation. This would allow the Bartow Facility to receive and transfer product by truck to compliment the current railcar unloading and transfer operation. This will constitute a change in operation; however no physical changes will be made to the facility for these operations. CF Industries currently has a temporary authorization to operate in this manner due to recent weather events. The addition of the truck operation will not affect the current transfer rate of 130 tons per hour (TPH). Both the Railcar and Truck operations combined will be subject to the 130 TPH limit. Overall throughput shall not exceed those established in Air Construction Permit 1050052-006-AC and Title V Renewal Permit 1050052-008-AV.

D. Facility Location

The applicant's facility is located at Bonnie Mine Road, West of Bartow, Bartow, Polk County, Florida. Latitude and longitude are 27° 51' 99" North and 81° 55' 46" West, respectively. UTM coordinates of the site are: Zone 17, 408.3 km East and 3082.5 km North.

Facility Identification Code (SIC): Major Group No. 28, Industry Group Nos. 2874.

E. Process and Controls

The unloading/transfer of the product will occur at EU031, DAP/MAP/GTSP storage and handling. The particulate emissions from this operation are considered fugitive emissions. The product arrives pretreated with dust suppressant oil.

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

F. Reviewing and Process Schedule

10/1/04: Date of Receipt of Application
10/12/04 Phone request for Additional Information
10/26/04: Application complete

II. RULE APPLICABILITY

This project is subject to preconstruction review requirements of Chapter 403, Florida Statutes and Chapters 62-4 through 62-297, Florida Administrative Code:

Subject to	Y/N	Comments
Rule 62-212.300 Sources not subject to Prevention of Significant Deterioration (PSD) or Nonattainment Requirements, F.A.C.	Y	Not exempt for air permitting requirements
Rule 62-212.400, Prevention of Significant Deterioration, F.A.C.	Y	Facility is a PSD major. However this project is below significant levels.
Rule 62-296.320, General Particulate Emission Limiting Standards, F.A.C.	Y	Potential Source of odors; Emission Unit is not a source of Volatile Organic Compounds (VOC); facility is a source of PM emissions
Rules 62-296.401-417, Stationary Source Emission Standards, F.A.C.	N	Not a covered source category
Rules 62-296.500-570, Reasonably Available Control Technology (VOC), F.A.C.	N	Not a covered source category
Rules 62-296.700-712, Reasonably Available Control Technology (PM), F.A.C.	Y	Facility exempted from PM RACT under 62-296.700(2)(b)
Rule 62-204.800, Standards of Performance for New Stationary Sources, F.A.C.	N	Not subject to 40 CFR 60, no GTSP processed or at Bartow facility within 72 hours of processing
Rule 62-204.800, National Emission Standard for Hazardous Air Pollutants, F.A.C.	N	Not Major for HAPs; limits requested per applicant, Title V Renewal Permit 1050052-008-AV
Chapter 62.213, Operation Permits for Major Sources of Air Pollution, F.A.C.	Y	Facility is a Title V Source
Chapter 62-297, Stationary Sources- Emission Monitoring, F.A.C.	Y	Annual VE testing required

III. SUMMARY OF EMISSIONS

The emissions limits established in Air Construction Permit 1050052-006-AC are to remain unchanged. Paved Road Emissions and Material Loading/Unloading Emissions were calculated for any significant increases in Particulate Matter (PM) and PM₁₀ emissions due to this request. At a transfer rate of 300,000 tons per year (tpy), 8760 hours per year, the potential to emit for both paved road emissions and material loading/unloading was estimated at 3.0 tpy for PM₁₀ and 14.8 tpy for PM. This is not a significant increase.

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

Paved road emissions were based on miles of total trip distance of 0.4 miles on CF property. AP-42, Table 13.2.1-1, surface silt loading factor of 8.2 was used assuming the same emissions as a quarry.

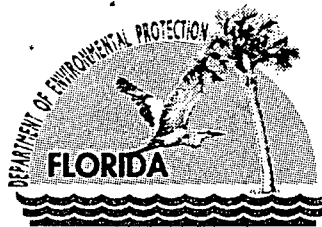
No significant emissions increase is noted, therefore, the current visible emissions limitation of 5% will remain unchanged. In accordance with Air Construction Permit 1050052-006-AC, the limitation on the annual amount of product transferred, 130 TPH for 8760 hours per year (700,800 tpy total and a maximum of 300,000 tpy for the truck operation) will apply to the total product transferred for the railcar and truck operations.

CONCLUSION

Based on the foregoing technical evaluation of the application and information submitted by CF Industries, Inc., the Department has made a preliminary determination that the proposed project will comply with all applicable state air pollution regulations of Chapters 62-204 through 62-297, F.A.C. The General and Specific Conditions are listed in the attached draft conditions of approval.

PROPOSED AGENCY ACTION

Pursuant to Sec. 403.087, Florida Statutes and Section 62-4.070, Florida Administrative Code, the Department hereby gives notice of its intent to construct the aforementioned air pollution source in accordance with the draft permit and its conditions as stipulated.



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2600 Blair Stone Road
Tallahassee, Florida 32399-2400

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PERMITTEE:

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

Draft Permit No.: 1050052-009-AC

County: Polk

Effective Date:

Expiration Date: December 1, 2006

Project: Addition of Truck
Unloading and Transfer Operation

This draft 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. 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]

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 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. 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

PERMITTEE:
CF Industries, Inc.
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Project: Addition of Truck
Unloading and Transfer Operation

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.]

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.]

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION

Michael G. Cooke, Director
Division of Air Resource Management

MGC/jkp/rlb