



# Department of Environmental Protection

Division of Air Resource Management

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OCT 04 2004

## APPLICATION FOR AIR PERMIT - LONG TERM BOARD OF AIR REGULATION

### I. APPLICATION INFORMATION

**Air Construction Permit** – Use this form to apply for an air construction permit for a proposed project:

- subject to prevention of significant deterioration (PSD) review, nonattainment area (NAA) new source review, or maximum achievable control technology (MACT) review; or
- where the applicant proposes to assume a restriction on the potential emissions of one or more pollutants to escape a federal program requirement such as PSD review, NAA new source review, Title V, or MACT; or
- at an existing federally enforceable state air operation permit (FESOP) or Title V permitted facility.

**Air Operation Permit** – Use this form to apply for:

- an initial federally enforceable state air operation permit (FESOP); or
- an initial/revised/renewal Title V air operation permit.

**Air Construction Permit & Revised/Renewal Title V Air Operation Permit (Concurrent Processing Option)**

– Use this form to apply for both an air construction permit and a revised or renewal Title V air operation permit incorporating the proposed project.

To ensure accuracy, please see form instructions.

#### Identification of Facility

1. Facility Owner/Company Name: <b>CF Industries, Inc.</b>	
2. Site Name: <b>Bartow Phosphate Complex</b>	
3. Facility Identification Number: <b>1050052</b>	
4. Facility Location...: Street Address or Other Locator: <b>Bonnie Mine Rd, West of Bartow</b> City: <b>Bartow</b> County: <b>Polk</b> Zip Code: <b>33831</b>	
5. Relocatable Facility? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	6. Existing Title V Permitted Facility? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

#### Application Contact

1. Application Contact Name: <b>Pradeep Raval</b>	
2. Application Contact Mailing Address... Organization/Firm: <b>Koogler &amp; Associates, Inc.</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. Application Contact Telephone Numbers... Telephone: <b>(352) 377-5822</b> Fax: <b>(352) 377-7158</b>	
4. Application Contact Email Address: <b>praval@kooglerassociates.com</b>	

#### Application Processing Information (DEP Use)

1. Date of Receipt of Application:	<b>10-4-04</b>
2. Project Number(s):	<b>1050052-009-AC</b>
3. PSD Number (if applicable):	
4. Siting Number (if applicable):	

## APPLICATION INFORMATION

### Purpose of Application

**This application for air permit is submitted to obtain: (Check one)**

#### **Air Construction Permit**

Air construction permit.

#### **Air Operation Permit**

Initial Title V air operation permit.

Title V air operation permit revision.

Title V air operation permit renewal.

Initial federally enforceable state air operation permit (FESOP) where professional engineer (PE) certification is required.

Initial federally enforceable state air operation permit (FESOP) where professional engineer (PE) certification is not required.

#### **Air Construction Permit and Revised/Renewal Title V Air Operation Permit (Concurrent Processing)**

Air construction permit and Title V permit revision, incorporating the proposed project.

Air construction permit and Title V permit renewal, incorporating the proposed project.

**Note: By checking one of the above two boxes, you, the applicant, are requesting concurrent processing pursuant to Rule 62-213.405, F.A.C. In such case, you must also check the following box:**

I hereby request that the department waive the processing time requirements of the air construction permit to accommodate the processing time frames of the Title V air operation permit.

### Application Comment

**This application is submitted to add an alternate method of operation to allow truck loading and unloading of fertilizer products in addition to the existing rail capability. It is requested that the word 'truck' be added to this emissions unit in both the AC/AV permits as no physical modification is involved. FDEP has issued a temporary authorization to operate in this manner due to an emergency created by the recent storms. This request will enable the facility to have this capability whenever the need arises. There will be no change in the annual material handling rates.**

**APPLICATION INFORMATION**

**Scope of Application**

<b>Emissions Unit ID Number</b>	<b>Description of Emissions Unit</b>	<b>Air Permit Type</b>	<b>Air Permit Proc. Fee</b>
031	DAP/MAP/GTSP Storage and Handling	AC1E	0

**Application Processing Fee**

Check one:  Attached - Amount: \$ \_\_\_\_\_  Not Applicable

**APPLICATION INFORMATION**

**Owner/Authorized Representative Statement**

**Complete if applying for an air construction permit or an initial FESOP.**

1. Owner/Authorized Representative Name :
2. Owner/Authorized Representative Mailing Address... Organization/Firm: Street Address: City: State: Zip Code:
3. Owner/Authorized Representative Telephone Numbers... Telephone: ext. Fax:
4. Owner/Authorized Representative Email Address:
5. Owner/Authorized Representative Statement:  <i>I, the undersigned, am the owner or authorized representative of the facility 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 requirements identified in this application to which the facility 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.</i>  _____ Signature  _____ Date

**APPLICATION INFORMATION**

**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 of an Acid Rain source.	
3. Application Responsible Official Mailing Address...	
Organization/Firm:	<b>CF 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: <b>jdoran@cfifl.com</b>	
6. Application Responsible Official Certification:	
<p><i>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.</i></p>	
Signature	<i>John Doran</i>
Date	<b>10/01/04</b>

**APPLICATION INFORMATION**

**Professional Engineer Certification**

1. Professional Engineer Name: <b>John B. Koogler</b> Registration Number: <b>12925</b>
2. Professional Engineer Mailing Address... Organization/Firm: <b>Koogler &amp; Associates, Inc.</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: _____ Date: <u>10/1/04</u> (seal)

\* Attach any exception to certification statement.

## II. FACILITY INFORMATION

### A. GENERAL FACILITY INFORMATION

#### Facility Location and Type

1. Facility UTM Coordinates... Zone 17      East (km) <b>408.3</b> North (km) <b>3082.5</b>		2. Facility Latitude/Longitude... Latitude (DD/MM/SS) <b>27/51/59</b> Longitude (DD/MM/SS) <b>81/55/46</b>	
3. Governmental Facility Code: <b>0</b>	4. Facility Status Code: <b>A</b>	5. Facility Major Group SIC Code: <b>28</b>	6. Facility SIC(s): <b>2874</b>
7. Facility Comment :			

#### Facility Contact

1. Facility Contact Name: <b>Craig Kovach, Superintendent, Env. Affairs</b>
2. Facility Contact Mailing Address... Organization/Firm: <b>CF Industries, Inc.</b> Street Address: <b>Bonnie Mine Rd, West of Bartow</b> City: <b>Bartow</b> County: <b>Polk</b> Zip Code: <b>33831</b>
3. Facility Contact Telephone Numbers: Telephone: ( <b>863</b> ) <b>533-8048</b> Fax:      ( <b>813</b> ) <b>677-5026</b>
4. Facility Contact Email Address: <b>ckovach@cfifl.com</b>

#### Facility Primary Responsible Official

**Complete if an "application responsible official" is identified in Section I. that is not the facility "primary responsible official."**

1. Facility Primary Responsible Official Name:
2. Facility Primary Responsible Official Mailing Address... Organization/Firm: Street Address: City:                            State:                            Zip Code:
3. Facility Primary Responsible Official Telephone Numbers... Telephone: (    )      -      ext.      Fax:      (    )      -
4. Facility Primary Responsible Official Email Address:

## FACILITY INFORMATION

### Facility Regulatory Classifications

Check all that would apply *following* completion of all projects and implementation of all other changes proposed in this application for air permit. Refer to instructions to distinguish between a “major source” and a “synthetic minor source.”

1.	<input type="checkbox"/> Small Business Stationary Source	<input type="checkbox"/> Unknown
2.	<input type="checkbox"/> Synthetic Non-Title V Source	
3.	<input type="checkbox"/> Title V Source	
4.	<input checked="" type="checkbox"/> Major Source of Air Pollutants, Other than Hazardous Air Pollutants (HAPs)	
5.	<input type="checkbox"/> Synthetic Minor Source of Air Pollutants, Other than HAPs	
6.	<input type="checkbox"/> Major Source of Hazardous Air Pollutants (HAPs)	
7.	<input type="checkbox"/> Synthetic Minor Source of HAPs	
8.	<input checked="" type="checkbox"/> One or More Emissions Units Subject to NSPS (40 CFR Part 60)	
9.	<input type="checkbox"/> One or More Emissions Units Subject to Emission Guidelines (40 CFR Part 60)	
10.	<input type="checkbox"/> One or More Emissions Units Subject to NESHAP (40 CFR Part 61 or Part 63)	
11.	<input type="checkbox"/> Title V Source Solely by EPA Designation (40 CFR 70.3(a)(5))	
12.	Facility Regulatory Classifications Comment:	



**FACILITY INFORMATION**

**List of Pollutants Emitted by Facility**

1. Pollutant Emitted	2. Pollutant Classification	3. Emissions Cap [Y or N]?
PM/PM10	A	N
SO2	A	N
NOX	A	N
CO	A	N
VOC	B	N
FL	B	N

**FACILITY INFORMATION**

**B. EMISSIONS CAPS**

**Facility-Wide or Multi-Unit Emissions Caps**

1. Pollutant Subject to Emissions Cap	2. Facility Wide Cap [Y or N]? (all units)	3. Emissions Unit ID No.s Under Cap (if not all units)	4. Hourly Cap (lb/hr)	5. Annual Cap (ton/yr)	6. Basis for Emissions Cap
NA					

7. Facility-Wide or Multi-Unit Emissions Cap Comment:

## FACILITY INFORMATION

### C. FACILITY ADDITIONAL INFORMATION

#### Additional Requirements for All Applications, Except as Otherwise Stated

1. Facility Plot Plan: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Previously Submitted, Date: <u>AV App.</u>
2. Process Flow Diagram(s): (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Previously Submitted, Date: <u>AV App</u>
3. Precautions to Prevent Emissions of Unconfined Particulate Matter: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Previously Submitted, Date: <u>AV App</u>

#### Additional Requirements for Air Construction Permit Applications

1. Area Map Showing Facility Location: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable (existing permitted facility)
2. Description of Proposed Construction or Modification: <input checked="" type="checkbox"/> Attached, Document ID: <u>Att. 1</u>
3. Rule Applicability Analysis: <input checked="" type="checkbox"/> Attached, Document ID: <u>Att. 1</u>
4. List of Exempt Emissions Units (Rule 62-210.300(3)(a) or (b)1., F.A.C.): <input checked="" type="checkbox"/> Attached, Document ID: <u>Att. 1</u> <input type="checkbox"/> Not Applicable (no exempt units at facility)
5. Fugitive Emissions Identification (Rule 62-212.400(2), F.A.C.): <input checked="" type="checkbox"/> Attached, Document ID: <u>Att. 1</u> <input type="checkbox"/> Not Applicable
6. Preconstruction Air Quality Monitoring and Analysis (Rule 62-212.400(5)(f), F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
7. Ambient Impact Analysis (Rule 62-212.400(5)(d), F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
8. Air Quality Impact since 1977 (Rule 62-212.400(5)(h)5., F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
9. Additional Impact Analyses (Rules 62-212.400(5)(e)1. and 62-212.500(4)(e), F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
10. Alternative Analysis Requirement (Rule 62-212.500(4)(g), F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable

**FACILITY INFORMATION**

**Additional Requirements for FESOP Applications**

1. List of Exempt Emissions Units (Rule 62-210.300(3)(a) or (b)1., F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable (no exempt units at facility)
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**Additional Requirements for Title V Air Operation Permit Applications Submitted.**

1. List of Insignificant Activities (Required for initial/renewal applications only): <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable (revision application)
2. Identification of Applicable Requirements (Required for initial/renewal applications, and for revision applications if this information would be changed as a result of the revision being sought): <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable (revision application with no change in applicable requirements)
3. Compliance Report and Plan (Required for all initial/revision/renewal applications): <input type="checkbox"/> Attached, Document ID: _____ Note: A compliance plan must be submitted for each emissions unit that is not in compliance with all applicable requirements at the time of application and/or at any time during application processing. The department must be notified of any changes in compliance status during application processing.
4. List of Equipment/Activities Regulated under Title VI (If applicable, required for initial/renewal applications only): <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Equipment/Activities On site but Not Required to be Individually Listed <input type="checkbox"/> Not Applicable
5. Verification of Risk Management Plan Submission to EPA (If applicable, required for initial/renewal applications only) : <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable
6. Requested Changes to Current Title V Air Operation Permit: <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable

**Additional Requirements Comment**

<p><b>TV renewal already under FDEP review.</b></p>
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## EMISSIONS UNIT INFORMATION

Section [1] of [1]

### III. EMISSIONS UNIT INFORMATION

**Title V Air Operation Permit Application** - For Title V air operation permitting only, emissions units are classified as regulated, unregulated, or insignificant. If this is an application for Title V air operation permit, a separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each regulated and unregulated emissions unit addressed in this application for air permit. Some of the subsections comprising the Emissions Unit Information Section of the form are optional for unregulated emissions units. Each such subsection is appropriately marked. Insignificant emissions units are required to be listed at Section II, Subsection C.

**Air Construction Permit or FESOP Application** - For air construction permitting or federally enforceable state air operation permitting, emissions units are classified as either subject to air permitting or exempt from air permitting. The concept of an "unregulated emissions unit" does not apply. If this is an application for air construction permit or FESOP, a separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each emissions unit subject to air permitting addressed in this application for air permit. Emissions units exempt from air permitting are required to be listed at Section II, Subsection C.

**Air Construction Permit and Revised/Renewal Title V Air Operation Permit Application** - Where this application is used to apply for both an air construction permit and a revised/renewal Title V air operation permit, each emissions unit is classified as either subject to air permitting or exempt from air permitting for air construction permitting purposes and as regulated, unregulated, or insignificant for Title V air operation permitting purposes. **The air construction permitting classification must be used to complete the Emissions Unit Information Section of this application for air permit.** A separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each emissions unit subject to air permitting addressed in this application for air permit. Emissions units exempt from air construction permitting and insignificant emissions units are required to be listed at Section II, Subsection C.

If submitting the application form in hard copy, the number of this Emissions Unit Information Section and the total number of Emissions Unit Information Sections submitted as part of this application must be indicated in the space provided at the top of each page.

**EMISSIONS UNIT INFORMATION**

Section [1] of [1]

**A. GENERAL EMISSIONS UNIT INFORMATION**

**Title V Air Operation Permit Emissions Unit Classification**

1. Regulated or Unregulated Emissions Unit? (Check one, if applying for an initial, revised or renewal Title V air operation permit. Skip this item if applying for an air construction permit or FESOP only.)
- The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit.
  - The emissions unit addressed in this Emissions Unit Information Section is an unregulated emissions unit.

**Emissions Unit Description and Status**

1. Type of Emissions Unit Addressed in this Section: (Check one)
- This Emissions Unit 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).
  - 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.
  - 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.

2. Description of Emissions Unit Addressed in this Section:  
**DAP/MAP/GTSP Storage and Handling (to include rail and truck mode of transport)**

3. Emissions Unit Identification Number: **031**

4. Emissions Unit Status Code: <b>A</b>	5. Commence Construction Date: <b>NA</b>	6. Initial Startup Date: <b>NA</b>	7. Emissions Unit Major Group SIC Code: <b>28</b>	8. Acid Rain Unit? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
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9. Package Unit: **NA**  
Manufacturer: \_\_\_\_\_ Model Number: \_\_\_\_\_

10. Generator Nameplate Rating: **MW**

11. Emissions Unit Comment: **Add truck handling to already permitted rail handling of fertilizer.**

**EMISSIONS UNIT INFORMATION**

Section [1] of [1]

**Emissions Unit Control Equipment**

1. Control Equipment/Method(s) Description:  
**Dust suppressant oil (material is received pretreated with oil)**

2. Control Device or Method Code(s): **062**





**EMISSIONS UNIT INFORMATION**

Section [1] of [1]

**C. EMISSION POINT (STACK/VENT) INFORMATION**  
 (Optional for unregulated emissions units.)

**Emission Point Description and Type**

1. Identification of Point on Plot Plan or Flow Diagram: NA		2. Emission Point Type Code: 3	
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking: NA			
4. ID Numbers or Descriptions of Emission Units with this Emission Point in Common: NA			
5. Discharge Type Code: NA		6. Stack Height: NA feet	
		7. Exit Diameter: NA feet	
8. Exit Temperature: NA °F		9. Actual Volumetric Flow Rate: NA acfm	
		10. Water Vapor: NA %	
11. Maximum Dry Standard Flow Rate: NA dscfm		12. Nonstack Emission Point Height: NA feet	
13. Emission Point UTM Coordinates... NA Zone: East (km): North (km):		14. Emission Point Latitude/Longitude... Latitude (DD/MM/SS) Longitude (DD/MM/SS)	
15. Emission Point Comment: <b>No emission point. The loading/unloading to occur inside a building.</b>			

**EMISSIONS UNIT INFORMATION**

Section [1] of [1]

**D. SEGMENT (PROCESS/FUEL) INFORMATION**

**Segment Description and Rate:** Segment 1 of 1

1. Segment Description (Process/Fuel Type): <b>Truck loading/unloading operation</b>		
2. Source Classification Code (SCC): <b>3-05-105-97</b>		3. SCC Units: <b>Tons processed</b>
4. Maximum Hourly Rate: <b>130 tph</b>	5. Maximum Annual Rate: <b>300,000</b>	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur: <b>NA</b>	8. Maximum % Ash: <b>NA</b>	9. Million Btu per SCC Unit: <b>NA</b>
10. Segment Comment: <b>Segment to be added.</b>		

**Segment Description and Rate:** Segment \_\_\_\_\_ of \_\_\_\_\_

1. Segment Description (Process/Fuel Type):		
2. Source Classification Code (SCC):		3. SCC Units:
4. Maximum Hourly Rate:	5. Maximum Annual Rate:	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment:		

**EMISSIONS UNIT INFORMATION**

Section [1] of [1]

**E. EMISSIONS UNIT POLLUTANTS**

**List of Pollutants Emitted by Emissions Unit**

1. Pollutant Emitted	2. Primary Control Device Code	3. Secondary Control Device Code	4. Pollutant Regulatory Code
PM	062	000	NS
PM10	062	000	NS

F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION –  
POTENTIAL/ESTIMATED FUGITIVE EMISSIONS

(Optional for unregulated emissions units.)

Potential/Estimated Fugitive Emissions

Complete for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

1. Pollutant Emitted: <b>PM/PM10</b>	2. Total Percent Efficiency of Control:
3. Potential Emissions: lb/hour                                      tons/year	4. Synthetically Limited? <input type="checkbox"/> Yes <input type="checkbox"/> No
5. Range of Estimated Fugitive Emissions (as applicable): to                                      tons/year	
6. Emission Factor:  Reference:	7. Emissions Method Code: <b>3</b>
8. Calculation of Emissions: <b>See Att. 1 for discussion on emission calculation.</b>	
9. Pollutant Potential/Estimated Fugitive Emissions Comment:	

**F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -  
ALLOWABLE EMISSIONS**

**Complete if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.**

**Allowable Emissions** Allowable Emissions \_\_\_ of \_\_\_

1. Basis for Allowable Emissions Code: NA	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour                      tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

**Allowable Emissions** Allowable Emissions \_\_\_\_\_ of \_\_\_\_\_

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour                      tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

**Allowable Emissions** Allowable Emissions \_\_\_\_\_ of \_\_\_\_\_

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour                      tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

**EMISSIONS UNIT INFORMATION**

Section [1] of [1]

**G. VISIBLE EMISSIONS INFORMATION**

Complete if this emissions unit is or would be subject to a unit-specific visible emissions limitation. NA

**Visible Emissions Limitation:** Visible Emissions Limitation \_\_\_\_ of \_\_\_\_

1. Visible Emissions Subtype:	2. Basis for Allowable Opacity: <input type="checkbox"/> Rule <input type="checkbox"/> Other
3. Allowable Opacity: Normal Conditions:                      %      Exceptional Conditions:                      % Maximum Period of Excess Opacity Allowed:                      min/hour	
4. Method of Compliance:	
5. Visible Emissions Comment:	

**Visible Emissions Limitation:** Visible Emissions Limitation \_\_\_\_ of \_\_\_\_

1. Visible Emissions Subtype:	2. Basis for Allowable Opacity: <input type="checkbox"/> Rule <input type="checkbox"/> Other
3. Allowable Opacity: Normal Conditions:                      %      Exceptional Conditions:                      % Maximum Period of Excess Opacity Allowed:                      min/hour	
4. Method of Compliance:	
5. Visible Emissions Comment:	

**EMISSIONS UNIT INFORMATION**

Section [1] of [1]

**H. CONTINUOUS MONITOR INFORMATION**

Complete if this emissions unit is or would be subject to continuous monitoring.

**Continuous Monitoring System:** Continuous Monitor \_\_\_\_ of \_\_\_\_ NA

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	<input type="checkbox"/> Rule <input type="checkbox"/> Other
4. Monitor Information... Manufacturer: Model Number: Serial Number:	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment:	

**Continuous Monitoring System:** Continuous Monitor \_\_\_\_ of \_\_\_\_

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	<input type="checkbox"/> Rule <input type="checkbox"/> Other
4. Monitor Information... Manufacturer: Model Number: Serial Number:	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment:	

**EMISSIONS UNIT INFORMATION**

Section [1] of [1]

**I. EMISSIONS UNIT ADDITIONAL INFORMATION**

**Additional Requirements for All Applications, Except as Otherwise Stated**

1. Process Flow Diagram (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Previously Submitted, Date <b>TV App.</b>
2. Fuel Analysis or Specification (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date <b>NA</b>
3. Detailed Description of Control Equipment (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date <b>NA</b>
4. Procedures for Startup and Shutdown (Required for all operation permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date _____ <input checked="" type="checkbox"/> Not Applicable (construction application)
5. Operation and Maintenance Plan (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date _____ <input checked="" type="checkbox"/> Not Applicable
6. Compliance Demonstration Reports/Records <input type="checkbox"/> Attached, Document ID: _____ Test Date(s)/Pollutant(s) Tested: _____ <input type="checkbox"/> Previously Submitted, Date: _____ Test Date(s)/Pollutant(s) Tested: _____ <input type="checkbox"/> To be Submitted, Date (if known): _____ Test Date(s)/Pollutant(s) Tested: _____ <input checked="" type="checkbox"/> Not Applicable  Note: For FESOP applications, all required compliance demonstration records/reports must be submitted at the time of application. For Title V air operation permit applications, all required compliance demonstration reports/records must be submitted at the time of application, or a compliance plan must be submitted at the time of application.
7. Other Information Required by Rule or Statute <input checked="" type="checkbox"/> Attached, Document ID: <b>Att. 1</b> <input type="checkbox"/> Not Applicable



**EMISSIONS UNIT INFORMATION**

Section [1] of [1]

**Additional Requirements for Air Construction Permit Applications**

1. 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)) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
2. 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.) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
3. Description of Stack Sampling Facilities (Required for proposed new stack sampling facilities only) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable

**Additional Requirements for Title V Air Operation Permit Applications NA**

1. Identification of Applicable Requirements <input type="checkbox"/> Attached, Document ID: _____
2. Compliance Assurance Monitoring <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable
3. Alternative Methods of Operation <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable
4. Alternative Modes of Operation (Emissions Trading) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable
5. Acid Rain Part Application <input type="checkbox"/> Certificate of Representation (EPA Form No. 7610-1) <input type="checkbox"/> Copy Attached, Document ID: _____ <input type="checkbox"/> Acid Rain Part (Form No. 62-210.900(1)(a)) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date: _____ <input type="checkbox"/> Repowering Extension Plan (Form No. 62-210.900(1)(a)1.) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date: _____ <input type="checkbox"/> New Unit Exemption (Form No. 62-210.900(1)(a)2.) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date: _____ <input type="checkbox"/> Retired Unit Exemption (Form No. 62-210.900(1)(a)3.) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date: _____ <input type="checkbox"/> Phase II NOx Compliance Plan (Form No. 62-210.900(1)(a)4.) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date: _____ <input type="checkbox"/> Phase II NOx Averaging Plan (Form No. 62-210.900(1)(a)5.) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date: _____ <input type="checkbox"/> Not Applicable

**EMISSIONS UNIT INFORMATION**

**Section [1] of [1]**

**Additional Requirements Comment**

NA
----

## ATTACHMENT 1

### 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.

### Proposed Method of Operation

In addition to the current railcar capability, CFI is proposing truck loading/unloading of the same fertilizer products (treated with a dust suppressant) and to be conducted inside the storage building. The currently permitted material handling rate will not change.

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 is requested to be included in the Title V permit that is in the process of being renewed.

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. However, there will be fugitive emissions from the truck traffic on paved roads. The attached emissions calculations indicate that the fugitive emissions of PM and PM10 are expected to be well below the PSD significant levels.

As fugitive emissions from this activity are not regulated, FDEP may consider this method of operation an unregulated activity. This would simplify the administrative process of including this activity into the TV permit being renewed.

**CF Bartow Truck Loading/Unloading Emissions  
Estimates**

**Paved Road Emissions  
Estimation**

E = PM10 (lb/VMT)	1.0809	Note(1)
k = base emission factor for particle size	0.016	
E = PM (lb/VMT)	5.5397	Note (1)
k = base emission factor for particle size	0.082	
sL = surface silt loading (g/m <sup>2</sup> )	8.2	Note Ap-42 (2)
W = average weight of vehicles (tons), in-out	27	Note (3)
Customer road miles, round-trip	0.4	Note (4)
Material transfer rate, (tpy)	300000	
Capacity (tons) per truck	23	
Number of vehicles per year, avg.	13043	
Hours per year for loadout	8760	
Vehicle miles traveled per trip	0.40	
Vehicle miles traveled per year	5217	
PM10 Emission rate (lb/hr),avg	0.64	Note (5)
PM10 Emission rate (tpy)	2.8	Note (6)
PM Emission rate (lb/hr),avg	3.3	Note (5)
PM Emission rate (tpy)	14.5	Note (6)

**Material unloading/loading Emissions Estimation**

PM/PM10 Emissions from material dump

E=PM10 (lb/ton)	0.0011	Note (7)
k = base emission factor for particle size	0.35	
U, mean wind speed, mph	5	
M, moisture content, %	2	
Material handled, tpy	300000	
E=PM (lb/ton)	0.0024	Note (7)
k = base emission factor for particle size	0.74	
PM10 Emissions, tpy	0.17	
PM Emissions, tpy	0.36	
Total PM10 Emissions, tpy	3.0	Note (8)
PM10 PSD Significant level (tpy)	15	
Total PM Emissions, tpy	14.8	Note (8)
PM PSD Significant level (tpy)	25	

Notes:

(1) E =

$k * \text{POWER}((sL/2), 0.65) * \text{POWER}((W/3), 1.5)$

(2) AP-42, Table 13.2.1-1, assume same as for quarry

(3) Average weight when full/empty

(4) Two-way paved road in plant 0.2 mile.

(5) Calculation of PM/PM10, hr = E x VMT, yr / 8760 hrs/yr

(6) Calculation of PM/PM10, yr = E x VMT, yr

(7)  $E = k * 0.0032 * \text{POWER}((U/5), 1.3) / \text{POWER}((M/2), 1.4)$

(8) Total Emissions = Paved roads + Material handling

**MEMORANDUM**

TO: Michael G. Cooke  
THRU: Trina Vielhauer  
FROM: James K. Pennington *JKP*  
DATE: December 29, 2004  
SUBJECT: FINAL Permit No. **1050052-009-AC**  
CF Industries, Inc.  
**Bartow Phosphate Complex**

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

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

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

I recommend your approval and signature.

Attachment

TV/jkp/rlb

**SENDER: COMPLETE**

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

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

A. Signature  Agent  
 Addressee

B. Received by (Printed Name) C. Date of Delivery

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

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

4. Restricted Delivery? (Extra Fee)  Yes

2. Article Number 700Q 1670 0013 3109 9250  
 (Transfer from service label)

PS Form 3811, August 2001

Domestic Return Receipt

102595-02-M-1540

0526  
 907E  
 0100  
 0297  
 0002

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

OFFICIAL USE

Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
<b>Total Postage &amp; Fees</b>	<b>\$</b>

Postmark  
 Here

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

PS Form 3800, May 2000

See Reverse for Instructions

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
NOTICE OF FINAL PERMIT

In the Matter of an  
Application for Permit by:

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

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

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

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

Executed in Tallahassee, Florida.



Trina Vielhauer, Chief  
Bureau of Air Regulation





## 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.]

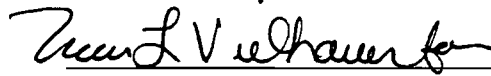
14. [Reserved]

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

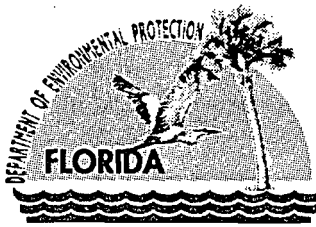
FINAL Permit No.: 1050052-009-AC  
Project: Addition of Truck  
Unloading and Transfer Operation

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**



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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)

**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).

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

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## 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 13<sup>th</sup> 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

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### 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 PM<sub>10</sub> 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 PM<sub>10</sub> and 14.8 tpy for PM. This is not a significant increase.

## TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

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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.



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

**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.  
Page 4 of 4

DRAFT Permit No.: 1050052-009-AC  
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.]

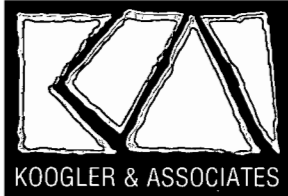
15. The permittee shall notify the Air Compliance Section of the Southwest District Office of the Department at least 15 days prior to the date on which each compliance test is to begin of the date, time, and place of each such test, and the test contact person who will be responsible for coordinating and having such test conducted.  
[Rule 62-297.310(7)(a)9, F.A.C.]

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL PROTECTION

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Michael G. Cooke, Director  
Division of Air Resource Management

MGC/jkp/rlb



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

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

KA 344-04-01

October 1, 2004

**RECEIVED**

OCT 04 2004

BUREAU OF AIR REGULATION

Mr. Jim Pennington, P.E.  
Florida Department of  
Environmental Protection  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

Subject: Construction Permit Application for  
Fertilizer Truck Loading/Unloading  
C.F. Industries, Inc. - Bartow  
Facility No. 1050052

Dear Mr. Pennington:

Enclosed are four copies of a construction permit application to allow truck loading/unloading of fertilizer, in conjunction with the Title V permit renewal currently under FDEP review, for the above referenced facility.

As discussed with Mr. Bobby Bull, a copy of this correspondence is also being sent to Mr. Jason Waters.

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