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April 24, 1991

RECEIVED
APR 29 1991
DER-BAQM

Mr. Mirza Baig
Florida Department of
Environmental Regulation
Division of Air Resource Management
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Re: C.F. Industries (CFI) Molten Sulfur Storage and Handling System
(AC29-187327)

Dear Mr. Baig:

As discussed recently, I have inspected the above referenced source. I found this source and the intimately related "C" and "D" Sulfuric Acid Plants in compliance with current or previous permits. No increased production/throughput and resulting emission increases have occurred. Note the attached production report of April 23, 1991. I would like to incorporate the following in the Notice of Permit:

.APIS number for the Sulfur Handling: 40 HIL 29 000531.

.Use the following phrase in this source description: "Increase in sulfur rate is to offset purchases of sulfuric acid."

I have no problem with CFI request to increase the molten sulfur rate to increase sulfuric acid production for plans "A" and "B". They should be applying for a permit to modify these plants in the near future. The resulting emission increase from the requested molten sulfur throughput appears to be insignificant, as stated in CFI letter of April 8, 1991. Finally, you may want to pass the information regarding "C" and "D" Sulfuric Acid Plants to Cindy Phillips, since she worked on that project.

Please call me, should you have any questions.

Sincerely,


Carlos Gonzalez,
Air Permit Engineer

ph

cc: J. Harry Kerns, P.E./SWDER

Enclosure

23-Apr-91

PRODUCTION REPORT

TUESDAY

BUDGET VAR.	PRODUCTION	TODAY	MTD	PLAN VAR.	SHIPMENTS	TODAY	MTD
(8,573)	H2SO4 A PLANT	1,831	23,138		H2SO4 (RECD)	446	9,751
	B PLANT	834	22,613		H2SO4 (SHFD)	0	0
	C PLANT	2,384	52,490		P205 (RECD)	0	0
	D PLANT	2,309	52,185		P205 (SHFD)	0	0
	TOTAL H2SO4	5,457	150,426	(4,824)	MERCHANT ACID	0	0
(1,394)	30% ACID A PLANT	1,011	22,565		GTSP (CUST)	0	0
	B PLANT	1,294	36,876		GTSP (CUST TKS)	0	0
0	TOTAL 30% ACID	2,305	59,441	(1,900)	GTSP (BARGE)	0	12,643
(4,100)	MERCHANT ACID	0	0	0	TOTAL GTSP	0	12,643
	URC (U308) (LBS)	2,229	55,232	(4,591)	GTSP (RR - PORT)	0	0
0	GTSP X TRAIN	0	0		GTSP (TKS - PORT)	0	2,789
	Y TRAIN	0	0		DAP (CUST)	2,900	60,117
	TOTAL GTSP	0	0	0	DAP (CUST TKS)	347	6,208
(1,412)	DAP A TRAIN	610	28,163		DAP (BARGE)	0	45,916
	X TRAIN	0	14,101		TOTAL DAP	3,247	112,241
	Y TRAIN	2,077	41,481		DAP (RR - PORT)	0	0
	Z TRAIN	1,315	38,261		DAP (TKS - PORT)	2,489	50,142
	TOTAL DAP	4,002	122,006	(3,919)	MAP (CUST)	0	0
0	MAP A TRAIN	0	0		MAP (CUST TKS)	0	0
	X TRAIN	0	0		MAP (BARTOW)	0	0
	Y TRAIN	0	0		TOTAL MAP	0	0
	Z TRAIN	0	0		MAP (RR - PORT)	0	0
	TOTAL MAP	0	0	0	MAP (TKS - BARTOW)	0	0

SULFURIC ACID	14,285
30% ACID (PAD & D.S.)	4,154
30% ACID (URC)	1,944
54% ACID (PAD & D.S.)	2,482
TOTAL PHOS ACID	8,579
MERCHANT ACID (TANK)	0
MERCHANT ACID (TRACK)	0
TOTAL MERCHANT ACID	0
GTSP (PLANT)	157
GTSP (PORT)	312
TOTAL GTSP	469
DAP (PLANT)	17,991
DAP (PORT)	15,453
TOTAL DAP	33,444
MAP (PLANT)	75
MAP (BARTOW)	637
TOTAL MAP	712

EX. EFF.
92.70 %
(TODAY)
96.65 %
MTD

EX. EFF. (U308)
DESIGN 2156 LB.S
ACTUAL 2229 LB.S
(TODAY)
ACTUAL 55232 LB.S
(MTD)

AMMONIA RECOVERY
92.68 %
(TODAY)
98.12 %
(MTD)

COOLING POND LEVEL : 89 2.0 " +/- 3.5 "
PREV. 24 HR. RAINFALL: 1.32 "

AMMONIA INVENTORY : 1,214 TONS
(NH4)2SO4 PRD. : 73,143
(NH4)2SO4 LIQUOR : FT: 49.33 : 32.7 %

SULFUR	TODAY	MTD
SULFUR CONSUMED	2,121	49,409
SULFUR RECD. - PASCO	0	0
- EXXON	0	3,302
- PENNZ	2,180	46,598
- OTHER	0	0
TOTAL RECD.	2,180	49,900
H2SO4 CONSUMED @ URC	0	0

TRACK INVENTORIES	
MERCHANT ACID	0
GTSP	0
DAP	2,494
MAP	0
BUILDING INVENTORIES	
GTSP	157
DAP	15,497
MAP	75