

Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Lawton Chiles, Governor

Carol M. Browner, Secretary

February 24, 1992

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

Mr. J. E. Parsons, General Manager
CF Industries, Inc.
Post Office Drawer L
Plant City, Florida 33564

Dear Mr. Parsons:

Attached is one copy of the revised Technical Evaluation and Preliminary Determination and proposed construction permit modification, for an increase in annual throughput to CF Industries, Inc. for the molten sulfur storage and handling system at the Plant City Phosphate Complex in Hillsborough County, Florida.

Please publish the attached "Notice of Intent to Issue" in the legal ad section of a newspaper of general circulation in the area affected and submit the proof of publication to the Department within seven days of publication, along with any written comments you wish to have considered concerning the Department's proposed action, to Mr. Preston Lewis of the Bureau of Air Regulation.

Sincerely,

C. H. Fancy, P.E.
Chief
Bureau of Air Regulation

CHF/MB/plm

Attachments

c: B. Thomas, SW District
C. Fred Deuel, P.E.
J. B. Koogler, P.E.
I. Choronenko, EPCHC

BEFORE THE STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

In the Matter of
Application for Permit by:

CF Industries, Inc.
Post Office Drawer L
Plant City, FL 33564

DER File No. AC 29-187327
Hillsborough County

INTENT TO ISSUE

The Department of Environmental Regulation hereby gives notice of its intent to issue a modified permit (copy attached) for the proposed project as detailed in the application specified above. The Department is issuing this Intent to Issue for the reasons stated in the attached Technical Evaluation and Preliminary Determination.

The applicant, CF Industries, Inc., applied on October 1, 1990, to the Department of Environmental Regulation for an increase in annual throughput for the existing molten sulfur storage and handling system located at CFI's facility in Plant City, Hillsborough County, Florida. The applicant later modified the construction permit application on March 7, 1991.

The Department has permitting jurisdiction under Chapter 403, Florida Statutes, and Florida Administrative Code Rules 17-2 and 17-4. The project is not exempt from permitting procedures. The Department has determined that an air construction permit is required for the proposed work.

Pursuant to Section 403.815, F.S. and DER Rule 17-103.150, F.A.C., you (the applicant) are required to publish at your own expense the enclosed Notice of Intent to Issue Permit. The notice shall be published one time only within 30 days, in the legal ad section of a newspaper of general circulation in the area affected. For the purpose of this rule, "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. The applicant shall provide proof of publication to the Department, at the address specified within 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 permit.

The Department will issue the permit with the attached conditions unless a petition for an administrative proceeding (hearing) is filed pursuant to the provisions of Section 120.57, F.S.

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400. Petitions filed by the permit applicant and the parties listed below must be filed within 14 days of receipt of this intent. Petitions filed by other persons must be filed within 14 days of publication of the public notice or within 14 days of receipt of this intent, whichever first occurs. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, Florida Statutes.

The Petition shall contain the following information;

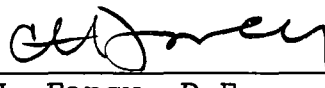
- (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed;
- (b) A statement of how and when each petitioner received notice of the Department's action or proposed action;
- (c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action;
- (d) A statement of the material facts disputed by Petitioner, if any;
- (e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action;
- (f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and
- (g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any decision of the Department with regard to the applicant have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of publication of this notice in the Office in General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this

proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, F.A.C.

Executed in Tallahassee, Florida

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION



C. H. Fancy, P.E.
Chief
Bureau of Air Regulation

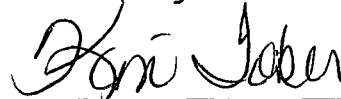
Copies furnished to:

- B. Thomas, SW District
- C. Fred Devel, P.E.
- J. B. Koogler, P.E.
- I. Choronenko, EPCHC

CERTIFICATE OF SERVICE

The undersigned duly designated deputy clerk hereby certifies that this NOTICE OF INTENT TO ISSUE and all copies were mailed before the close of business on 2-26-92.

FILING AND ACKNOWLEDGEMENT
FILED, on this date, pursuant to
§120.52(9), Florida Statute, with
the designated Department Clerk,
receipt of which is hereby
acknowledged.


Clerk

2-26-92
Date

State of Florida
Department of Environmental Regulation
Notice of Intent to Issue

The Department of Environmental Regulation hereby gives notice of its intent to issue a modified permit to CF Industries, Inc., Post Office Drawer L, Plant City, FL 33564, for the existing molten sulfur storage and handling system for an increase in molten sulfur annual throughput to 930,750 tons located at CFI's facility in Plant City, Hillsborough County, Florida. A determination of the Best Available Control Technology (BACT) was not required. The Department is issuing this Intent to Issue for the reasons stated in the revised Technical Evaluation and Preliminary Determination.

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, within fourteen (14) days of publication of this notice. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, Florida Statutes.

The Petition shall contain the following information:

- (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed;
- (b) A statement of how and when each petitioner received notice of the Department's action or proposed action;
- (c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action;
- (d) A statement of the material facts disputed by Petitioner, if any;
- (e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action;
- (f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and
- (g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this Notice. Persons whose substantial interests will be affected by any decision of the Department with regard to the application have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of publication of this notice in the Office of General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, F.A.C.

The application is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

Department of Environmental Regulation
Bureau of Air Regulation
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Department of Environmental Regulation
Southwest District Office
4520 Oak Fair Boulevard
Tampa, Florida 33610-7347

Environmental Protection Commission
of Hillsborough County
1410 North 21st Street
Tampa, Florida 33605

Any person may send written comments on the proposed action to Mr. Preston Lewis at the Department's Tallahassee address. All comments mailed within 14 days of the publication of this notice will be considered in the Department's final determination.

Revised
Technical Evaluation
and
Preliminary Determination

CF Industries, Inc.
Plant City, Hillsborough County
Florida

Molten Sulfur Storage and Handling System

Permit Number: AC 29-187327

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

February 24, 1992

I. Application

A. Applicant

CF Industries, Inc.
P. O. Drawer L
Plant City, Florida 33566

B. Project and Location

The applicant submitted a construction permit application on October 1, 1990, for an increase in the daily molten sulfur throughput from 2,250 tpd to 2,484 tpd and annual throughput from 825,000 tons to 908,700 tons. A Technical Evaluation and Preliminary Determination and proposed permit was issued on February 20, 1991.

A public notice was never published since CF Industries, Inc. wanted to further increase its daily and annual throughput. The construction permit application was amended on March 11, 1991, with a request to increase the daily throughput to 2,550 tpd average, and annual throughput to 930,750 tons. The daily molten sulfur throughput may not exceed 2,800 tpd on any day and for not more than 10 days during the year as long as the annual throughput does not exceed 930,700 tons, and a visible emissions test is conducted at this rate (2,800 tpd). Hence, a revised Technical Evaluation and Preliminary Determination and proposed permit is being issued.

The UTM coordinates of this facility are Zone 17, 388.3 km East and 3115.7 km North.

C. Facility Category

CFI's facility is major in accordance with Rule 17-2.100 of the Florida Administrative Code (F.A.C.). The molten sulfur storage and handling system consists of several existing minor sources within the facility. The Standard Industrial Classification (SIC) Code is Industry No. 2874, Sulfuric Acid/Phosphate Processing.

The NEDs Source Classification Code (SCC) is 3-01-070-02, Storage and Transfer, Industrial Inorganic Chemicals Production.

CFI applied for a modified construction permit on March 11, 1991, and the application was deemed complete on December 13, 1991.

II. Project Description

CFI's molten sulfur storage and handling system consists of a rail and two truck unloading system (the rail system is not currently in use); one 2600 short ton (ST) molten sulfur storage tank; 679 ST truck pit A; 679 ST truck pit B; and the associated transfer pumps and piping. All the molten sulfur received is used in the manufacture of sulfuric acid.

The venting configuration of the tank consists of one 24" vent at the center of the tank. There is a single 8" vent on each of the two truck pits.

The molten sulfur is delivered by 20 ton capacity trucks. Sulfur from the trucks is gravity fed to the truck receiving pits. The molten sulfur is then pumped to the molten sulfur storage tank. The sulfur is supplied to the four sulfuric acid plants as required. The pits and the storage tank are steam heated to keep the sulfur molten. The capacities of Plants A, B, C and D in tons per day 100% H₂SO₄ are 1300, 1300, 2600, and 2600, respectively. The corresponding daily molten sulfur requirement, when the acid plants are operated at their maximum combined permitted capacity of 7800 tons 100% acid per day, would be about 2550 tons per day, 930,750 tons per year (TPY).

The 2600 ST sulfur storage tank is 45 ft in diameter and 30 ft in height. The tank has one 24" center vent. Truck pits A and B are about 96 ft x 26 ft x 7 ft deep. There is no forced ventilation on any of the vents. A Cuppus Engineering #3 JectAir air eductor was installed on both A & B sulfur pit stacks to minimize truck driver exposure to fumes while unloading molten sulfur.

The expected emissions from the molten sulfur system include emissions of particulate matter (PM) and particulates less than 10 microns in size (PM₁₀), sulfur dioxide (SO₂), hydrogen sulfide (H₂S), reduced sulfur compounds (TRS), and volatile organic compounds (VOCs).

III. Rule Applicability

The existing CFI facility is major in accordance with F.A.C. Rule 17-2.100. The molten sulfur storage and handling system will emit particulate matter and will be permitted in accordance with F.A.C. Rules 17-2 and 17-4; and, Chapter 403 of the Florida Statutes.

The facility is located in Hillsborough County, an area designated as nonattainment for ozone and particulate matter; unclassifiable for sulfur dioxide; and attainment for the other criteria pollutants; in accordance with F.A.C. Rules 17-2.410, 17-2.430, and 17-2.420, respectively.

The project is not subject to the new source review requirements of F.A.C. Rule 17-2.500(5), Prevention of Significant Deterioration-Preconstruction Review Requirements, or F.A.C. Rule 17-2.510(4), nonattainment area review, because the projected emissions do not exceed significance levels in Table 500-2.

The project is subject to F.A.C. Rule 17-2.520, Sources Not Subject to PSD or Nonattainment Requirements.

The project is subject to F.A.C. Rule 17-2.600(11), Specific Emission Limiting and Performance Standards for Sulfur Storage and Handling Facilities, which lists specific operational emission reduction procedures that are to be followed. Visible emissions (VE) will be limited to 10% opacity. The sources are not subject to a weight emission limiting standard, in accordance with F.A.C. Rule 17-2.600(11)(e), since the sulfur particulate emissions from each individual source are less than 1 ton per year.

The project is subject to F.A.C. Rule 17-2.620, General Pollutant Emission Limiting Standards, which prohibits objectionable odors.

The project is subject to compliance testing and reporting requirements in accordance with F.A.C. Rule 17-2.700. Compliance testing for the sources shall be conducted using EPA Method 9 for visible emissions in accordance with F.A.C. Rule 17-2.700(6)(b)9. VE tests will be required to be conducted for every emission point in the sulfur system (every vent) for the initial compliance demonstration. Two or more emission points may be read simultaneously if approved in writing by the Department and if it meets the requirements of EPA Method 9. The Department will require a retest at the time of operation permit renewals.

IV. Source Impact Analysis

A. Emission Limitations

The maximum emissions from the molten sulfur system are estimated to be as follows, based on the Pennzoil study:

Source		Expected Emissions			
		PM/PM ₁₀	SO ₂	TRS/H ₂ S	VOC
Tank	lb/hr	0.317	1.02	0.45	0.68
	TPY	0.408	1.36	0.68	0.90
Truck Pit (each)	lb/hr	0.11	0.11	0.11	0.11
	TPY	0.11	0.11	0.11	0.11

Visible emissions will be limited to 10% opacity.

B. Air Quality Impacts

The increase in molten sulfur throughput from the sulfur storage and handling system will result in emissions increases of PM/PM₁₀, SO₂, H₂S, TRS, and VOCs which are less than the PSD significant emission rates for these pollutants. However, this project follows along with but after the approved production rate increases of the existing C and D sulfuric acid plants which were PSD significant for one of the above pollutants ---- SO₂.

Impacts from increases in SO₂ emissions from the C and D plants were modeled as part of the PSD review requirements for that

project. The impact of an increase in SO₂ emissions from the sulfur storage and handling system was not included in that modeling. Therefore, the Department requested the applicant model the impact of the SO₂ emissions increase from the storage and handling system along with the previously modeled SO₂ increases from the C and D sulfuric acid plants. (The applicant conservatively modeled the impact of SO₂ emissions from the entire storage and handling system.)

The EPA-approved Industrial Source Complex Short-Term (ISCST) dispersion model was used by the applicant to model these combined impacts on the surrounding ambient air. All recommended EPA default options were used. Direction-specific downwash parameters were used for the sulfur storage and handling system. No downwash analysis was done for the C and D increases since their stacks are high enough to be above the influence of nearby structures. Five years of sequential hourly surface and mixing depth data from the Tampa, Florida National Weather Service (NSW) station collected during 1982 through 1986 were used in the model. Dispersion modeling was performed with discrete receptors placed along the plant boundary and with a polar grid placed along the 36 standard radial directions (10 degrees apart) surrounding these sources at the following downwind distances: 1.0, 1.5, 2.0, 3.0, 4.0, and 5.0 kilometers. The results of this modeling presented below show that the combined increases in ambient ground-level concentrations for all averaging times are less than the PSD significant impact levels for SO₂.

<u>Averaging Time</u>	<u>Annual</u>	<u>3-hr</u>	<u>24-hr</u>
PSD Significance Level (ug/m ³)	1.0	25.0	5.0
Ambient Concentration Increase (ug/m ³)	0.46	17.7	3.9

Therefore, further dispersion modeling for comparison with the SO₂ AAQS and SO₂ Class II PSD increment consumption were not required for the sulfur storage and handling system.

However, the proposed National Park Service Class I significant impact levels are much smaller than the above significant impact levels. The closest Class I area to this project is the Chassahowitzka National Wilderness Area located 70 km away. The sulfur storage and handling system was modeled by itself for comparison of its impacts with these levels. (The C and D impacts along with all other sources on the Class I area were evaluated in the previous PSD modeling.)


The results are shown below:

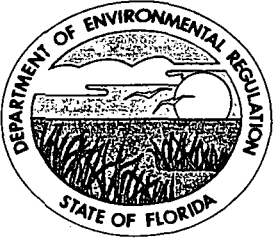
<u>Averaging Time</u>	<u>Annual</u>	<u>3-hr</u>	<u>24-hr</u>
Proposed Class I Significant Impact Level	0.025	.48	.07
Ambient Concentration Increase	0.0008	.13	.02

The maximum predicted increases are all below the proposed significant impact levels. Therefore, no further Class I modeling is required.

V. Conclusion

Based on the information provided by CF Industries, Inc., the Department has reasonable assurance that the existing molten sulfur storage and handling system, as described in this evaluation, and subject to the conditions proposed herein, will not cause or contribute to a violation of any air quality standard, PSD increment, or any other technical provision of Chapter 17-2 of the Florida Administrative Code.


41755



Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Lawton Chiles, Governor

Carol M. Browner, Secretary

PERMITTEE:
CF Industries, Inc.
Post Office Drawer L
Plant City, FL 33564

Permit Number: AC 29-187327
Expiration Date: Dec. 1, 1992
County: Hillsborough
Latitude/Longitude: 28°09'52"N
82°08'30"W
Project: Molten Sulfur Storage
and Handling System

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 17-2 and 17-4. 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 an increase in annual throughput at the molten sulfur storage and handling facility, consisting of a rail and two truck unloading systems (the rail system is not currently in use); one 2600 short ton (ST) molten sulfur storage tank; 679 ST truck pit A; 679 ST truck pit B; and the associated transfer pumps and piping. The maximum sulfur throughput shall not exceed 2550 TPD and 930,750 TPY. The increase in sulfur rate is to offset purchases of sulfuric acid. The molten sulfur system is located at the CFI facility in Plant City, Hillsborough County, Florida.

The UTM coordinates of this facility are Zone 17, 388.3 km East and 3115.7 km North. APIS number for the sulfur handling system is 40 HIL 29 000531.

The source was constructed in accordance with the permit application, plans, documents, amendments and drawings, except as otherwise noted in the General and Specific Conditions.

Attachments are listed below:

1. CF Industries, Inc.'s application received October 1, 1990.
2. DER's letter dated October 25, 1990.
3. CFI's response received December 10, 1990.
4. DER's Preliminary Determination dated February 11, 1991.
5. CFI's letter to amend the construction permit application dated March 5, 1991.
6. DER's letter dated April 5, 1991.
7. C. Fred Deuel & Associates, Inc.'s letter dated April 8, 1991.
8. Koogler & Associates' letter dated December 11, 1991.
9. CFI's letter dated January 30, 1992.

PERMITTEE:
CF Industries, Inc.

Permit Number: AC 29-187327
Expiration Date: December 1, 1992

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth herein are "Permit Conditions" and as such are binding upon the permittee and enforceable pursuant to the authority of Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is hereby placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of the "Permit Conditions" by the permittee, its agents, employees, servants or representatives.

2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.

3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Nor does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit does not constitute a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.

4. This permit conveys no title to land or water, does not constitute state recognition or acknowledgement of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the state. Only the Trustees of the Internal Improvement Trust Fund may express state opinion as to title.

5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, plant or aquatic life or property and penalties therefor caused by the construction or operation of this permitted source, nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.

6. The permittee shall at all times properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required

PERMITTEE:
CF Industries, Inc.

Permit Number: AC 29-187327
Expiration Date: December 1, 1992

GENERAL CONDITIONS:

by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.

7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law, access to the premises, at reasonable times, where the permitted activity is located or conducted for the purpose of:

- a. Having access to and copying any records that must be kept under the conditions of the permit;
- b. Inspecting the facility, equipment, practices, or operations regulated or required under this permit; and
- c. Sampling or monitoring any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

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

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

- a. a description of and cause of non-compliance; and
- b. the period of noncompliance, including exact dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source, which are submitted to the Department, may be used by the Department

PERMITTEE:
CF Industries, Inc.

Permit Number: AC 29-187327
Expiration Date: December 1, 1992

GENERAL CONDITIONS:

as evidence in any enforcement case arising under the Florida Statutes or Department rules, except where such use is prescribed by Sections 403.73 and 403.111, Florida Statutes.

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

11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 17-4.12 and 17-30.30, as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.

12. This permit is required to be kept at the work site of the permitted activity during the entire period of construction or operation.

13. The permittee shall comply with the following monitoring and record keeping requirements:

- a. Upon request, the permittee shall furnish all records and plans required under Department rules. The retention period for all records will be extended automatically, unless otherwise stipulated by the Department, during the course of any unresolved enforcement action.
- b. The permittee shall retain at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation), copies of all reports required by this permit, and records of all data used to complete the application for this permit. The time period of retention shall be at least three years from the date of the sample, measurement, report or application unless otherwise specified by Department rule.
- c. Records of monitoring information shall include:
 - the date, exact place, and time of sampling or measurements;
 - the person responsible for performing the sampling or measurements;

PERMITTEE:
CF Industries, Inc.

Permit Number: AC 29-187327
Expiration Date: December 1, 1992

GENERAL CONDITIONS:

- the date(s) analyses were performed;
- the person responsible for performing the analyses;
- the analytical techniques or methods used; and
- the results of such analyses.

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

SPECIFIC CONDITIONS:

1. CF Industries, Inc.'s molten sulfur storage and handling system shall be allowed to operate continuously (8760 hours/year).

2. The maximum molten sulfur throughput rate shall neither exceed 2550 tons per day (TPD) average, nor 930,750 tons per year (TPY), based on the combined maximum permitted sulfuric acid production rate of 7800 TPD 100% sulfuric acid for Plants A, B, C, and D. The maximum daily input shall not exceed 2800 tons/day on any day and for not more than 10 days during the year at this rate as long as the annual throughput does not exceed 930,750 tons and visible emissions test is conducted at this (2800 tpd) rate. A daily record shall be maintained showing the date, time, and amount of molten sulfur received by all trucks and railcars at this facility during the entire life of this facility.

3. Visible emissions (VE) shall not exceed 10% opacity from any source in the molten sulfur system.

4. The permittee shall employ procedures to minimize emissions, from the molten sulfur system pursuant to the applicable requirements of F.A.C. Rule 17-2.600(11)(a) [Molten Sulfur Storage and Handling Facilities]. The permittee shall also comply with other applicable provisions of F.A.C. Rules 17-2 and 17-4.

5. No objectionable odors shall be allowed, in accordance with F.A.C. Rule 17-2.620(2) [Objectionable Odor Prohibited].

6. Compliance tests for visible emissions shall be conducted at the higher rate of 2800 tpd, within 90 days of issuance of this permit in accordance with the July 1, 1988, version of 40 CFR 60, Appendix

PERMITTEE:
CF Industries, Inc.

Permit Number: AC 29-187327
Expiration Date: December 1, 1992

SPECIFIC CONDITIONS:

A, using EPA Method 9. The permittee may make a request to the Department for a temporary increase in sulfuric acid production rate, if necessary. The visible emissions tests shall be conducted while both trucks and railcar (when in operation) are being unloaded simultaneously for at least 60 minutes or the time it takes to completely unload a truck or a railcar, whichever is greater along with visible emissions tests at both truck pits, and each vent at sulfur storage tank. The Southwest District office shall determine if there are any fugitive emissions being emitted during its railcar unloading operations. The minimum requirements for stack sampling facilities, source sampling, and reporting shall be in accordance with F.A.C. Rule 17-2.700 and 40 CFR 60, Appendix A. The Department may require a retest annually if it deems necessary or at the time of permit renewal.

7. Any change in the method of operation, equipment or operating hours shall be submitted to the Hillsborough County Environmental Protection Commission (HCEPC) office for approval.

8. For emission inventory and PSD purposes, the maximum emissions from the molten sulfur system, based on the Pennzoil study are:

Source		Expected Emissions			
		PM/PM ₁₀	SO ₂	TRS/H ₂ S	VOC
Tank	lb/hr	0.317	1.02	0.45	0.68
	TPY	0.408	1.36	0.68	0.90
Truck Pit (each)	lb/hr	0.11	0.11	0.11	0.11
	TPY	0.11	0.11	0.11	0.11

9. A minimum of 15 days prior written notification of the compliance tests shall be given to the HCEPC office. The compliance test results shall be submitted to the HCEPC office within 45 days of test completion.

10. The permittee, for good cause, may request that this construction permit be extended. Such a request shall be submitted to the Bureau of Air Regulation (BAR) prior to 60 days before the expiration of the permit (F.A.C. 17-4.090).

PERMITTEE:
CF Industries, Inc.

Permit Number: AC 29-187327
Expiration Date: December 1, 1992

SPECIFIC CONDITIONS:

11. An application for an operation permit must be submitted to the EPCHC office at least 90 days prior to the expiration date of this construction permit or within 45 days after completion of compliance testing, whichever occurs first. To properly apply for an operation permit, the applicant shall submit the appropriate application form, fee, certification that construction was completed noting any deviations from the conditions in the construction permit, and compliance test reports as required by this permit (F.A.C. 17-4.220).

Issued this _____ day
of _____, 1992

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION

STEVE SMALLWOOD, P.E.
Director
Division of Air Resources
Management

P 832 538 783



Certified Mail Receipt
No Insurance Coverage Provided
Do not use for International Mail
(See Reverse)

PS Form 3800, June 1990

Sent to	
Mr. J. E. Parsons, CF Ind.	
Street & No.	
P. O. Drawer L	
P.O. State & ZIP Code	
Plant City, FL 33564	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Address of Delivery	
TOTAL Postage & Fees	\$
Postmark or Date	
Mailed: 2-26-92	
Permit: AC 29-187327	

SENDER:

- Complete items 1 and/or 2 for additional services.
- Complete items 3, and 4a & b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt Fee will provide you the signature of the person delivered to and the date of delivery.

I also wish to receive the following services (for an extra fee):

- 1. Addressee's Address
- 2. Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:

Mr. J. E. Parsons, Gen. Mgr.
CF Industries, Inc.
P O Drawer L
Plant City, FL 33564

4a. Article Number

P 832 538 783

4b. Service Type

- Registered Insured
- Certified COD
- Express Mail Return Receipt for Merchandise

7. Date of Delivery

2-28-92

5. Signature (Addressee)

6. Signature (Agent)

Carl Schell

8. Addressee's Address (Only if requested and fee is paid)