

Walker, Elizabeth (AIR)

From: Arif, Syed
Sent: Wednesday, September 23, 2009 10:29 AM
To: Walker, Elizabeth (AIR)
Subject: FW: CFI BART Exemption

From: Brunk, Ron [mailto:rbrunk@cfifl.com]
Sent: Tuesday, September 08, 2009 9:08 AM
To: Arif, Syed
Cc: May, Bob; Charlot, Randy; Sal_Mohammad@golder.com
Subject: FW: CFI BART Exemption

Syed,

In response to your additional informal questions re: BART, the following is the original answer and additional info (in blue italics) combined:

1. The proposed SO₂ reduction under Scenario A and B recommends increasing the scrubbing rate to the two stage ammonia scrubber for the 'A' and 'B' SAPs. Please provide information concerning the scrubbing rate presently and the future scrubbing rate. CFI in the past had indicated that any increase in tail gas scrubbing will offset their ammonia balance in the MAP/DAP plants. How will they overcome that imbalance with the increase in the scrubbing rate now.

CF is currently selling excess ammonium sulfate to local farmers, or storing it in a separate lined pond on top of the stack for future consumption and/or sales. In addition, CF is contemplating a modification to a DAP plant that will produce a new sulfur enhanced DAP that will require additional ammonium sulfate.

2. Is the catalyst loading rate being changed for the 'C' and 'D' SAPs under Scenario A. If so, please provide the modified loading rate in terms of liters per ton of sulfuric acid per day(L/TPD) and provide information on the catalyst.

No change is anticipated.

3. The proposed SO₂ reduction under Scenario B recommends replacing the converter for the 'C' and 'D' SAPs. Please provide information concerning the catalyst and the catalyst loading ratios in L/TPD as it exists now and what will it be after the change.

Current loadings are 137.3 liters/tpd C-SAP 140.5 liters/tpd D-SAP.

Here are the details on the current bed loadings.

C SAP

*1st mass: 70,200L conventional V2O5 catalyst
2nd mass: 76,800L conventional V2O5 catalyst
3rd mass: 94,600L conventional V2O5 catalyst
4A mass: 80,000L cesium promoted V2O5 catalyst
4B mass: 85,000L cesium promoted V2O5 catalyst*

D SAP

*1st mass: 70,200L conventional V2O5 catalyst
2nd mass: 82,800L conventional V2O5 catalyst
3rd mass: 96,800L conventional V2O5 catalyst
4A mass: 80,800L cesium promoted V2O5 catalyst
4B mass: 85,600L cesium promoted V2O5 catalyst*

After the modification it is estimated to be 200 l/tpd. but may change slightly once the specifics on the converter design and bed loadings have been determined.

4. Please provide schedule information on the turnarounds for the 'A', 'B', 'C' and 'D' SAPs. Additionally, provide the earliest dates that construction can be completed under Scenarios A and B.

Since the changes to A&B do not require physical changes to the facility, the operational changes to increase ammonia scrubbing can be accomplished after the permit is issued. Changes to the D sulfuric acid plant could be accomplished by the end of 2011, and changes to C sulfuric could be accomplished by the end of 2013.

The information you requested on PAP-A&B construction projects and stack tests is still being gathered.

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