

Florida Department of Environmental Protection

Bob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

January 27, 2010

Electronic Mail - Received Receipt Requested

Mr. Ronald L. Brunk,
Superintendent Environmental Affairs
CF Industries, Inc.
Post Office Drawer L
Plant City, Florida 33564

Re: DEP File No. 0570005-035-AC/PSD-FL-355A
Installation of Two Phosphoric Acid Clarifier Tanks
Plant City Phosphate Complex

Dear Mr. Brunk:

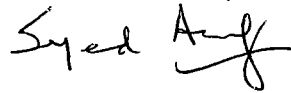
The above referenced project for the installation of acid clarifier tanks in each of the 'A' and 'B' Phosphoric Acid Plants was transferred from the Southwest District Office to the Bureau of Air Regulation for processing. A waiver of 30-day and 90-day periods for this project was submitted by Koogler & Associates on behalf of the applicant. The 30-day review period ends on February 26, 2010. The Department will process this application in conjunction with extension request for Permit Nos. 0570005-021-AC (PSD-FL-355). 'A' and 'B' Phosphoric Acid Plants went through a Prevention of Significant Deterioration (PSD) review (PSD-FL-355) for increase in production rates in July 2007.

Enclosed are comments submitted by Hillsborough County Environmental Protection Commission (HCEPC) in regards to the completeness issues for this project. Please submit the information as requested by HCEPC with a copy to the Department's Bureau of Air Regulation.

The Department will resume processing this application after receipt of the requested information. Rule 62-4.050(3), F.A.C. requires that all applications for a Department permit must be certified by a professional engineer registered in the State of Florida. This requirement also applies to responses to Department requests for additional information of an engineering nature. A new certification statement by the authorized representative or responsible official must accompany any material changes to the application. Rule 62-4.055(1), F.A.C. now requires applicants to respond to requests for information within 90 days.

If you have any questions regarding this matter, please call Mr. Syed Arif, P.E. at 850/921-9528 or Ms. Diana Lee, P.E. of Environmental Protection Commission of Hillsborough County (EPCHC) at 813/627-2600, Ext.1276.

Sincerely,



Syed Arif, P.E.
New Source Review Section

/sa

Enclosure

cc: Ronald L. Brunk, CF Industries, Inc.: rbrunk@cfifl.com
Kathleen Forney, EPA Region 4: forney.kathleen@epa.gov
Dee Morse, NPS: dee_morse@nps.gov
Cindy Zhang-Torres, P.E., Southwest District: cindy.zhang-torres@dep.state.fl.us
Diana M. Lee, EPCHC: lee@epchc.org
Pradeep Raval, Koogler & Associates, Inc.: praval@kooglerassociates.com
John B. Koogler, P.E., Koogler & Associates, Inc.: jkoogler@kooglerassociates.com

MEMORANDUM

DATE: August 17, 2009
TO: Cindy Zhang-Torres, P.E.
FROM: Roger Zhu **THRU:** Diana M. Lee, P.E.
SUBJECT: Construction Additional Acid Clarifier Tanks at "A" & "B" PAPs
CF Industries, Inc., Plant City Phosphate Complex
AC Permit No. 0570005-035-AC

On July 28, 2009, EPC received a copy of CF Industries AC Permit Application (Application) for construction of two new 80' diameter acid clarifier tanks, one in "A" Phosphoric Acid Plant (PAP) and one in "B" PAP. Below are our comments regarding this AC project:

1. According to the Application, Attachment 1, CF Industries is proposing to install two new 80ft diameter acid clarifier tanks one each, at "A" Phosphoric Acid Plant (PAP) and one in "B" PAP in order to facilitate maintenance activity from various tanks and to maintain adequate acid clarification capacity. Also, auxiliary equipment/piping will be installed for acid feed, product acid, cleaning and acid sludge transfer. The auxiliary equipment will include flocculent storage, flocculent/acid mixing, clarifier product pump tanks, clarifier product tanks and sludge tanks. As indicated in Pages 18 and 32 of the Application, the scrubber systems flow rates for "A" and "B" PAPs are 49,900 acfm and 34,300 acfm respectively. Pursuant to Rule 62-4.070(1), F.A.C., please provide detailed information and diagram on the operation of the damper control system and how will the dampers control the air flow from all the other clarifier tanks in order not to affect the air flow in to the existing scrubber system. In addition, please clarify whether the emissions from the auxiliary equipment will also be controlled by the existing scrubber system.

2. Pursuant to Rule 62-212.400(2)(a)1., F.A.C. a significant emissions increase of a PSD pollutant will occur if the difference between the projected actual emissions and the baseline actual emissions equals or exceeds the significant emissions rate for that pollutant. CF Industries did not submit baseline actual emissions and claimed that there will be no net changes in the F emissions since the actual emissions can be assumed to be equal to the allowable emissions. In order to determine if the installation of the additional tanks results in a PSD significant emissions increase in F emissions, a baseline actual emissions to projected actual emissions analysis should be submitted. Based on the 2007 and 2008 AOR reports, the average fluoride emissions were 1.7 TPY for EU 004 ("A" PAP) and 1.8 TPY for EU 009 ("B" PAP). Therefore, a net increase or difference between the actual emissions for "A" PAP is 2 TPY and for "B" PAP is 3.7 TPY. As a result, it appears that "B" PAP exceeded the 3.0 TPY of PSD significant increase rate pursuant to Rule 62-210.200(280)(a)1.g, F.A.C. , and therefore, a PSD Construction Permit application shall to be submitted with a BACT analysis as required by Rule 62-212.400, F.A.C.

Livingston, Sylvia

From: Livingston, Sylvia
Sent: Wednesday, January 27, 2010 10:49 AM
To: 'rbrunk@cfifl.com'
Cc: 'forney.kathleen@epa.gov'; 'dee_morse@nps.gov'; Zhang-Torres; 'lee@epchc.org'; 'praval@kooglerassociates.com'; 'jkoogler@kooglerassociates.com'
Subject: Request for Additional Information: CF Industries, Inc. - Plant City Phosphate Complex
Attachments: RAI 0570005-035-AC.pdf

Dear Sir/Madam:

Please send a "reply" message verifying receipt of the attached document(s); this may be done by selecting "Reply" on the menu bar of your e-mail software, *noting that you can view the documents*, and then selecting "Send". We must receive verification of receipt and your reply will preclude subsequent e-mail transmissions to verify receipt of the document(s).

The document(s) may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible.

The document is in Adobe Portable Document Format (pdf). Adobe Acrobat Reader can be downloaded for free at the following internet site: <<http://www.adobe.com/products/acrobat/readstep.html>> .

The Bureau of Air Regulation is issuing electronic documents for permits, notices and other correspondence in lieu of hard copies through the United States Postal System, to provide greater service to the applicant and the engineering community. Please advise this office of any changes to your e-mail address or that of the Engineer-of-Record.

Thank you,

Sylvia Livingston
Bureau of Air Regulation
Division of Air Resource Management (DARM)
Department of Environmental Protection
850/921-9506
sylvia.livingston@dep.state.fl.us

Tracking:

Livingston, Sylvia

From: Brunk, Ron [rbrunk@cfifl.com]
Sent: Wednesday, January 27, 2010 10:58 AM
To: Livingston, Sylvia
Subject: RE: Request for Additional Information: CF Industries, Inc. - Plant City Phosphate Complex

received

From: Livingston, Sylvia [mailto:Sylvia.Livingston@dep.state.fl.us]
Sent: Wednesday, January 27, 2010 10:49 AM
To: Brunk, Ron
Cc: forney.kathleen@epa.gov; dee_morse@nps.gov; Zhang-Torres; lee@epchc.org; praval@kooglerassociates.com; jkoogler@kooglerassociates.com
Subject: Request for Additional Information: CF Industries, Inc. - Plant City Phosphate Complex

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Thank you,

Sylvia Livingston
Bureau of Air Regulation
Division of Air Resource Management (DARM)
Department of Environmental Protection
850/921-9506
sylvia.livingston@dep.state.fl.us

The Department of Environmental Protection values your feedback as a customer. DEP Secretary Michael W. Sole is committed to continuously assessing and improving the level and quality of services provided to you. Please take a few minutes to comment on the quality of service you received. Simply click on [this link to the DEP Customer Survey](#). Thank you in advance for completing the survey.

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