

Florida Department of
Environmental Protection

Memorandum

To: Trina Vielhauer, Bureau of Air Regulation
From: Syed Arif, New Source Review Section SA 6/16
Date: June 16, 2010
Subject: Draft Minor Source Air Construction Permit
Project No. 0570005-035-AC; PSD-FL-355A
CF Industries, Inc., Plant City Phosphate Complex
Installation of Two Acid Clarifier Tanks

Attached for your review is a draft minor air construction permit package for the existing Plant City Phosphate Complex, which is located in Hillsborough County at 10608 Paul Buchman Highway in Plant City, Florida. Briefly, the draft permit authorizes installation of two new acid clarifier tanks, one in A Phosphoric Acid Plant (PAP) and one in B PAP in order to maintain adequate acid clarification capacity and extends the previously issued PSD construction permit (PSD-FL-355) to allow for the installation of the proposed clarifiers. The attached Technical Evaluation and Preliminary Determination provides a detailed description of the project and the rationale for permit issuance. Day 90 of the permitting time clock is 7/20/2010. I recommend your approval of the attached draft permit package.

Attachments

P.E. CERTIFICATION STATEMENT

APPLICANT

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

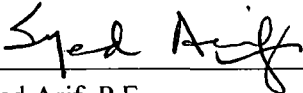
Air Permit No. PSD-FL-355A
Project No. 0570005-035-AC
Plant City Phosphate Complex
Two Acid Clarifier Tanks
Hillsborough County, Florida

PROJECT DESCRIPTION


The applicant proposes to install two new acid clarifier tanks, one in A Phosphoric Acid Plant (PAP) and one in B PAP in order to facilitate maintenance activity for various tanks and to maintain adequate acid clarification capacity. Auxiliary equipment and necessary piping will be installed to allow for acid feed, product acid, cleaning and acid sludge transfers. The auxiliary equipment will include flocculent storage, flocculent and acid mixing, clarified product pump tanks, clarified product tanks and sludge tanks. The proposed clarifiers and the auxiliary equipment will be ducted to the existing scrubber systems for the two phosphoric acid plants. Using damper controls, the additional air flow from the clarifiers is expected to be offset by a reduction in the air pulled from the other tanks. Consequently, no change in the air flow to the existing scrubber system is expected, therefore no increase in fluoride emissions are expected. The applicant is also requesting extension of air construction permit PSD-FL-355 to allow installation of the proposed clarifiers.

An air quality impact analysis was not required. No increase in ambient impacts due to the proposed modification is expected. Emissions from the facility will not significantly contribute to or cause a violation of any state or federal ambient air quality standards.

I HEREBY CERTIFY that the air pollution control engineering features described in the above referenced application and subject to the proposed permit conditions provide reasonable assurance of compliance with applicable provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 62-4 and 62-204 through 62-297. However, I have not evaluated and I do not certify aspects of the proposal outside of my area of expertise (including, but not limited to, the electrical, mechanical, structural, hydrological, geological, and meteorological features).



Syed Arif, P.E.
Registration No. 51861


6/16/2010
(Date)
CA



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

June 16, 2010

Sent by Electronic Mail – Received Receipt Requested

Mr. Herschel E. Morris, Vice President Phosphate Operations
CF Industries, Inc.
Post Office Drawer L
Plant City, Florida 33564

Re: Draft Air Permit No. PSD-FL-355A
Project No. 0570005-035-AC
Plant City Phosphate Complex
Installation of Two Acid Clarifier Tanks

Dear Mr. Morris:

On August 24, 2009, CF Industries submitted an application for an air construction permit to install two new acid clarifier tanks and to extend air construction permit PSD-FL-355 issued on July 23, 2007. The new acid clarifiers will provide adequate acid clarification capacity and the extension will allow the facility to install the proposed clarifiers. The clarifier tanks will be installed at the existing Plant City Phosphate Complex, which is located at 10608 Paul Buchman Highway, Plant City, Florida. Enclosed are the following documents:

- Written Notice of Intent to Issue Air Permit;
- Public Notice of Intent to Issue Air Permit;
- Technical Evaluation and Preliminary Determination; and
- Draft Permit.

The Public Notice of Intent to Issue Air Permit is the actual notice that you must have published in the legal advertisement section of a newspaper of general circulation in the area affected by this project. If you have any questions, please contact the Project Engineer, Syed Arif, at 850/921-9528.

Sincerely,

Trina Vielhauer, Chief
Bureau of Air Regulation

Enclosures

TLV/sa

WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

*In the Matter of an
Application for Air Permit by:*

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

Project No. 0570005-035-AC
Air Permit No. PSD-FL-355A
Plant City Phosphate Complex
Two Acid Clarifier Tanks
Hillsborough County, Florida

Authorized Representative:
Mr. Herschel E. Morris
Vice President Phosphate Operations

Facility Location: CF Industries, Inc. operates Plant City Phosphate Complex, which is located at 10608 Paul Buchman Highway in Hillsborough County, Florida.

Project: The applicant proposes to install two new acid clarifier tanks and requests extension of air construction permit PSD-FL-355 to allow installation of the proposed clarifiers. Details of the project are provided in the application and the enclosed Technical Evaluation and Preliminary Determination.

Permitting Authority: Applications for air construction permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4, 62-210 and 62-212 of the Florida Administrative Code (F.A.C.). The proposed project is not exempt from air permitting requirements and an air permit is required to perform the proposed work. The Bureau of Air Regulation is the Permitting Authority responsible for making a permit determination for this project. The Permitting Authority's physical address is: 111 South Magnolia Drive, Suite #4, Tallahassee, Florida. The Permitting Authority's mailing address is: 2600 Blair Stone Road, MS #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 address indicated above for the Permitting Authority. The complete project file includes the Draft Permit, the Technical Evaluation and Preliminary Determination, 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 or phone number listed above.

Notice of Intent to Issue Permit: The Permitting Authority gives notice of its intent to issue an air permit to the applicant for the project described above. The applicant has provided reasonable assurance that operation of the proposed equipment 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, 62-296 and 62-297, F.A.C. The Permitting Authority will issue a Final Permit in accordance with the conditions of the proposed Draft Permit unless a timely petition for an administrative hearing is filed under Sections 120.569 and 120.57, F.S. or unless public comment received in accordance with this notice results in a different decision or a significant change of terms or conditions.

Public Notice: Pursuant to Section 403.815, F.S. and Rules 62-110.106 and 62-210.350, F.A.C., you (the applicant) are required to publish at your own expense the enclosed Public Notice of Intent to Issue Air Permit (Public Notice). The Public 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 by this project. The newspaper used must meet 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 above address or phone number. Pursuant to Rule 62-110.106(5) and (9), F.A.C., the applicant shall provide proof of publication to the Permitting Authority at the above address within 7 days of publication. Failure to publish the notice and provide proof of publication may result in the denial of the permit pursuant to Rule 62-110.106(11), F.A.C.

WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

Comments: The Permitting Authority will accept written comments concerning the proposed Draft Permit for a period of 14 days from the date of publication of the Public Notice. Written comments must be received by the Permitting Authority by close of business (5:00 p.m.) on or before the end of this 14-day period. If written comments received result in a significant change to the Draft Permit, the Permitting Authority shall revise the 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, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. Petitions filed by the applicant or any of the parties listed below must be filed within 14 days of receipt of this Written Notice of Intent to Issue Air Permit. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S., must be filed within 14 days of publication of the attached Public Notice or within 14 days of receipt of this Written Notice of Intent to Issue Air Permit, 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 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 (in a proceeding initiated by another party) 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 when and how each petitioner received notice of the agency action or proposed decision; (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 including an explanation of how the alleged facts relate to the specific rules or statutes; 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 Written Notice of Intent to Issue Air Permit. 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 in this proceeding.

WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

Executed in Tallahassee, Florida.

Trina Vielhauer

Trina Vielhauer, Chief
Bureau of Air Regulation

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Written Notice of Intent to Issue Air Permit package (including the Public Notice, the Technical Evaluation and Preliminary Determination, and the Draft Permit) was sent by electronic mail (or a link to these documents made available electronically on a publicly accessible server) with received receipt requested before the close of business on 6/16/10 to the persons listed below.

- Herschel E. Morris, CF Industries, Inc. hmorris@cfifl.com
- Ronald L. Brunk, CF Industries, Inc. rbrunk@cfifl.com
- Pradeep Raval, Koogler and Associates, Inc. praval@kooglerassociates.com
- Cindy Zhang-Torres, DEP-SWD cindy.zhang-torres@dep.state.fl.us
- Diana Lee, HCEPC lee@epchc.org
- Vickie Gibson, DEP-BAR victoria.gibson@dep.state.fl.us (for read file)

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.

[Signature]

(Clerk)

6/16/10
(Date)

PUBLIC NOTICE OF INTENT TO ISSUE AIR PERMIT

Florida Department of Environmental Protection
Division of Air Resource Management, Bureau of Air Regulation
Draft Air Permit No. 0570005-035-AC; PSD-FL-355A
CF Industries, Inc. – Plant City Phosphate Complex
Hillsborough County, Florida

Applicant: The applicant for this project is CF Industries, Inc. The applicant's authorized representative and mailing address is: Mr. Herschel E. Morris, Vice President Phosphate Operations, Post Office Drawer L, Plant City, Florida 33564.

Facility Location: CF Industries, Inc. operates the existing Plant City Phosphate Complex, which is located in Hillsborough County at 10608 Paul Buchman Highway, Plant City, Florida.

Project: The applicant proposes to install two new acid clarifier tanks, one in A Phosphoric Acid Plant (PAP) and one in B PAP in order to facilitate maintenance activity for various tanks and to maintain adequate acid clarification capacity. Auxiliary equipment and necessary piping will be installed to allow for acid feed, product acid, cleaning and acid sludge transfers. The auxiliary equipment will include flocculent storage, flocculent and acid mixing, clarified product pump tanks, clarified product tanks and sludge tanks. The proposed clarifiers and the auxiliary equipment will be ducted to the existing scrubber systems for the two phosphoric acid plants. Using damper controls, the additional air flow from the clarifiers is expected to be offset by a reduction in the air pulled from the other tanks. Consequently, no change in the air flow to the existing scrubber system is expected, therefore no increase in fluoride emissions are expected. The applicant is also requesting extension of air construction permit PSD-FL-355 to allow installation of the proposed clarifiers.

An air quality impact analysis was not required. No increase in ambient impacts due to the proposed modification is expected. Emissions from the facility will not significantly contribute to or cause a violation of any state or federal ambient air quality standards.

Permitting Authority: Applications for air construction permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4, 62-210 and 62-212 of the Florida Administrative Code (F.A.C.). The proposed project is not exempt from air permitting requirements and an air permit is required to perform the proposed work. The Bureau of Air Regulation is the Permitting Authority responsible for making a permit determination for this project. The Permitting Authority's physical address is: 111 South Magnolia Drive, Suite #4, Tallahassee, Florida. The Permitting Authority's mailing address is: 2600 Blair Stone Road, MS #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 address indicated above for the Permitting Authority. The complete project file includes the Draft Permit, the Technical Evaluation and Preliminary Determination, 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. In addition, electronic copies of these documents are available on the following web site:
<http://www.dep.state.fl.us/air/emission/apds/default.asp>

Notice of Intent to Issue Air Permit: The Permitting Authority gives notice of its intent to issue an air permit to the applicant for the project described above. The applicant has provided reasonable assurance that operation of proposed equipment 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, 62-296 and 62-297, F.A.C. The Permitting Authority will issue a Final Permit in accordance with the conditions of the proposed Draft Permit unless a timely petition for an administrative hearing is filed under Sections 120.569 and 120.57, F.S. or unless public comment received in accordance with this notice results in a different decision or a significant change of terms or conditions.

(Public Notice to be Published in the Newspaper)

PUBLIC NOTICE OF INTENT TO ISSUE AIR PERMIT

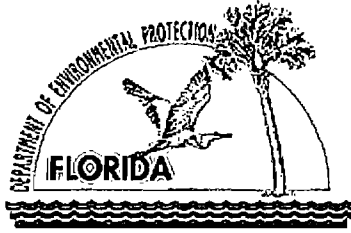
Comments: The Permitting Authority will accept written comments concerning the proposed Draft Permit for a period of 14 days from the date of publication of the Public Notice. Written comments must be received by the Permitting Authority by close of business (5:00 p.m.) on or before the end of this 14-day period. If written comments received result in a significant change to the Draft Permit, the Permitting Authority shall revise the 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 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 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 (in a proceeding initiated by another party) 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 when and how the petitioner received notice of the agency action or proposed decision; (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 including an explanation of how the alleged facts relate to the specific rules or statutes; 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 to Issue Air Permit. 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.



**TECHNICAL EVALUATION
&
PRELIMINARY DETERMINATION**

APPLICANT

CF Industries, Inc.
P.O. Drawer L
Plant City, FL 33564

Plant City Phosphate Complex
Facility ID No. 0570005

PROJECT

Project No. 0570005-035-AC
Air Permit No. PSD-FL-355A
Installation of Two Acid Clarifier Tanks

COUNTY

Hillsborough County, Florida

PERMITTING AUTHORITY

Florida Department of Environmental Protection (Department)
Division of Air Resource Management
Bureau of Air Regulation
New Source Review Section
2600 Blair Stone Road, MS#5505
Tallahassee, Florida 32399-2400
Telephone: 850-488-0114 Fax: 850-921-9533

June 16, 2010

1. GENERAL PROJECT INFORMATION

Air Pollution Regulations

Projects at stationary sources with the potential to emit air pollution are subject to the applicable environmental laws specified in Section 403 of the Florida Statutes (F.S.). The statutes authorize the Department of Environmental Protection (Department) to establish regulations regarding air quality as part of the Florida Administrative Code (F.A.C.), which includes the following applicable chapters: 62-4 (Permits); 62-204 (Air Pollution Control – General Provisions); 62-210 (Stationary Sources – General Requirements); 62-212 (Stationary Sources – Preconstruction Review); 62-213 (Operation Permits for Major Sources of Air Pollution); 62-296 (Stationary Sources - Emission Standards); and 62-297 (Stationary Sources – Emissions Monitoring). Specifically, air construction permits are required pursuant to Rules 62-4, 62-210 and 62-212, Florida Administrative Code (F.A.C.).

In addition, the U. S. Environmental Protection Agency (EPA) establishes air quality regulations in Title 40 of the Code of Federal Regulations (CFR). Part 60 specifies New Source Performance Standards (NSPS) for numerous industrial categories. Part 61 specifies National Emission Standards for Hazardous Air Pollutants (NESHAP) based on specific pollutants. Part 63 specifies NESHAP based on the Maximum Achievable Control Technology (MACT) for numerous industrial categories. The Department adopts these federal regulations on a quarterly basis in Rule 62-204.800, F.A.C.

Facility Description and Location

CF Industries, Inc. (CFI) is located at 10608 Paul Buchman Highway, Plant City, Hillsborough County. CFI is an existing phosphate fertilizers facility, which is categorized under Standard Industrial Classification Code No. 2874. The project site is located about 70 kilometers from the Chassahowitzka National Wildlife Refuge, a Class I Area. The UTM coordinates of this facility are Zone 17; 388.0 km E and 3116.0 km N. This site is in an area that is in attainment (or designated as unclassifiable) for all air pollutants subject to state and federal Ambient Air Quality Standards (AAQS).

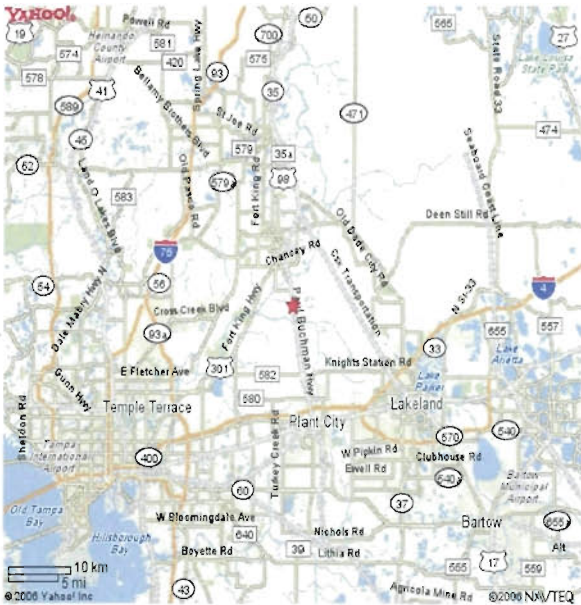


Figure 1 – Location of Facility



Figure 2 – Regional Location

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

CFI produces sulfuric acid (H₂SO₄), phosphoric acid, monoammonium phosphate (MAP) and diammonium phosphate (DAP). The sulfuric acid is produced on-site by burning elemental sulfur, converting the resulting sulfur dioxide to sulfur trioxide, and absorbing it into a recirculating sulfuric acid solution. Phosphoric acid is made by acidulation of phosphate rock with sulfuric acid. Waste gypsum is produced and stacked. The phosphoric acid is reacted with other chemicals to make fertilizers.

Facility Regulatory Categories

- The facility is a major source of hazardous air pollutants (HAP).
- The facility is a Title V major source of air pollution in accordance with Chapter 213, F.A.C.
- The facility is a major stationary source in accordance with Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.
- The facility operates units subject to the New Source Performance Standards (NSPS) of 40 Code of Federal Regulations (CFR) Part 60.

Project Description

CFI is requesting an extension of a previously issued PSD construction permit (Project No. 0570005-021-AC; PSD-FL-355) and proposing to install two new 80 feet diameter acid clarifier tanks, one in A Phosphoric Acid Plant (PAP) and one in B PAP in order to facilitate maintenance activity for various tanks and to maintain adequate acid clarification capacity. Auxiliary equipment and necessary piping will be installed to allow for acid feed, product acid, cleaning and acid sludge transfers. The auxiliary equipment will include flocculent storage, flocculent and acid mixing, clarified product pump tanks, clarified product tanks and sludge tanks.

The two clarifiers CFI proposes to install would either be rake settler clarifiers or lamella clarifiers. Lamella clarifiers have a smaller footprint than conventional rake clarifiers of equal capacity. A lamella clarifier consists of a series of inclined plate settlers. As in the case of a rake clarifier, the acid entering the lamella clarifier is mixed with a flocculent. The acid flows downward through the inlet chamber in the center of the unit and enters the plates through the sides. As the liquid flows upward, the solids settle on the incline plates and slide into a sludge hopper at the bottom of the unit. The acid and sludge are then fed to separate tanks.

Since the two clarifier tanks will be installed in the A and B Phosphoric Acid Plants, this project will be considered part of the previous PSD project. The extension to the construction permit will allow for the installation of the proposed acid clarifiers. There will be no changes to the existing plants' production rates as a result of the proposed project.

Phosphoric Acid Production

Briefly, phosphoric acid is made by reacting wet phosphate rock with sulfuric acid in agitated tanks, filtering the acid, then concentrating the weak phosphoric acid in vacuum evaporators. Waste gypsum (calcium sulfate) from the filtration process is pumped in slurry form with filter wash water to a gypsum pile (stack) where the water is collected and runs off to a cooling pond before being recirculated back to the process. Process water is used not only for filtration but in barometric condensers for vacuum cooling and evaporation. Clarification tanks remove impurities from the phosphoric acid before it is stored or used in making upgraded products. Air emissions of fluoride (F) evolved from the reactor and filter are controlled by scrubbers using pond water.

This project addresses the following emissions units:

EMISSION UNIT NO.	EMISSION UNIT DESCRIPTION
004	A PAP
009	B PAP

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

Processing Schedule

- 07/23/2009: Southwest District Office received the application for an air pollution construction permit.
- 08/21/2009: Applicant provided a waiver of 30-day time limit until 09/30/2009 for initial review of the application.
- 08/24/2009: Application transferred to Tallahassee for processing.
- 09/30/2009: Applicant provided a waiver of 30-day time limit until 02/26/2010 for initial review of the application.
- 01/27/2010: Department requested additional information.
- 04/21/2010: Applicant submitted a response to the Department's request for additional information of 01/27/2010. Application complete.

Permitting History

On July 23, 2007, the Department issued Air Construction Permit No. 0570005-021-AC (PSD-FL-355) for expansion of the facility. The project included an increase in the production rate of the existing B Sulfuric Acid Plant from 1,300 to 1,600 tons per day (TPD) of 100-percent H₂SO₄. The changes also included modifications to increase the A and B PAP maximum permitted production rate of phosphoric acid by 20 percent. This allowed the A PAP permitted process rate to increase from 1,416 to 1,699 TPD of 100-percent rock phosphorus pentoxide (P₂O₅). Also, the B PAP permitted process rate increased from 2,107 to 2,530 TPD of 100-percent rock P₂O₅.

2. DEPARTMENT REVIEW

Project Emissions

The existing CFI facility is located in an attainment area and is classified as a major facility. A modification to an existing major facility located in an attainment area which has a net emissions increase equal to or exceeding the significant emission rates listed in Rule 62-210.200, F.A.C., will be subject to PSD review.

For changes to existing emission units, such as the A and B PAPs, the determination of a net emission increase is based on a comparison of actual-to-projected actual emission rates. A significant emissions increase of a PSD pollutant will occur if the difference between the baseline actual emissions and projected actual emissions equals or exceeds the significant emissions rate for that pollutant. As defined by Rule 62-210.200, F.A.C., baseline actual emissions for an existing emissions unit (other than an electric utility steam generating unit) means the average rate, in tons per year, at which the unit actually emitted the pollutant during any consecutive 24-month period selected by the owner or operator within the 10-year period immediately preceding the date a complete permit application is received by the Department, except that the 10-year period shall not include any period earlier than November 15, 1990. Baseline actual emissions include fugitive emissions, to the extent quantifiable, as well as emissions associated with startups and shutdowns.

Projected actual emissions, as defined by Rule 62-210.200, F.A.C., means the maximum annual rate, in tons per year, at which an existing emissions unit is projected to emit a PSD pollutant in any one of the 5 years following the date the unit resumes regular operation after the project, or in any one of the 10 years following that date, if the project involves increasing the emissions unit's design capacity or its potential to emit that PSD pollutant and full utilization of the unit would result in a significant emissions increase or a significant net emissions increase at the major stationary source. Emissions that the unit could have accommodated during the 24-month baseline period and that are unrelated to the modification are excluded. As noted previously, there will be no changes to the existing plants' production rates. Accordingly, the applicable period for determining projected actual emissions for the project is the 5 years following installation of the clarifiers.

F emissions from the A PAP are controlled using a cyclonic scrubber followed by a horizontal, cross-flow packed-bed scrubber with "Kimre" packing. The scrubber system uses pond water as the scrubbing liquid. The typical gas flow rate through the scrubbers is approximately 49,900 actual cubic feet per minute (acfm). The

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

scrubber system's approximate normal operating parameters for liquid flow rate to the packed-bed scrubber is 1,000 to 2,000 gallons per minute (gpm). Total gas pressure drop across the scrubbers is approximately 5 to 20 inches water (H₂O). F emissions from the B PAP are controlled by a horizontal cross-flow, packed-bed scrubber with "Kimre" packing. The scrubber system uses pond water as the scrubbing liquid. The typical gas flow rate through the scrubber is approximately 34,300 acfm. The packed-bed scrubbers approximate normal water flow rate is 1,000 to 2,000 gpm, and normal pressure drop is about 2 to 15 inches H₂O.

The proposed clarifiers and the auxiliary equipment will be ducted to the existing scrubber systems for the two phosphoric acid plants. Using damper controls, the additional air flow from the clarifiers is expected to be offset by a reduction in the air pulled from the other tanks. Consequently, no change in the air flow to the existing scrubber system is expected, therefore no increase in fluoride emissions are expected.

Baseline actual emissions, projected actual emissions and net change in emissions are listed in the following tables:

**TABLE 1 - BASELINE ACTUAL EMISSIONS
A and B PHOSPHORIC ACID PLANTS**

YEAR	A PAP Annual Process Rate P ₂ O ₅ tons/yr	A PAP Tested Operation Rate P ₂ O ₅ tons/hr	A PAP Tested Emission Rate Fluoride(F) lb/hr	A PAP Tested Emission Rate F lb/ton	B PAP Annual Process Rate P ₂ O ₅ tons/yr	B PAP Tested Operation Rate P ₂ O ₅ tons/hr	B PAP Tested Emission Rate F lb/hr	B PAP Tested Emission Rate F lb/ton
2007	382961	64.7	0.48	0.0074	588062	102.2	0.56	0.0055
2008	367767	64.5	0.39	0.0060	653047	100.5	0.41	0.0041
2009	337277	68.0	0.41	0.0060	607629	98.2	0.44	0.0045
Baseline 2-yr period 2-yr avg.	2007-8 375364			2007-8 0.0067	2007-8 620555			2007-8 0.0048

Notes:

1. Emissions based on representative stack test results.
2. Baseline emissions calculations based on annual process rate and tested emissions.
3. A PAP baseline is 1.26 tons/yr (0.0067 lb/ton * 375364 tons/yr * 1 ton/2000 lb)
4. B PAP baseline is 1.48 tons/yr (0.0048 lb/ton * 620555 tons/yr * 1 ton/2000 lb)

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

**TABLE 2 - PROJECTED ACTUAL EMISSIONS
A and B PHOSPHORIC ACID PLANTS**

EMISSIONS DESCRIPTION	A PAP F tons/yr	B PAP F tons/yr
Permitted Emissions	3.70	5.50
Exclusion for Demand Growth (2), and Unit Capable of Accommodating (2)	ND ND	ND ND
Projected Actual Emissions	1.26	1.48
Baseline Actual Emissions (3)	1.26	1.48
Net Combined Emissions Increase (1)		0
PSD Significant Level		3
PSD Review Required?		NO

NOTES:

- (1) The proposed project is not expected to result in an emissions increase.
- (2) To be determined at a later date, if necessary.
- (3) Baseline emissions based on operations for 2007-8 (2-yr average).

The Department will require post construction compliance testing of Fluoride (F) emissions with the clarifiers operating and also when not operating to determine which mode maximizes F emissions. Subsequent annual compliance tests will be conducted under the mode that maximizes F emissions. The Department is also requiring special compliance testing when the clarifier is processing 54 percent phosphoric acid to gather information on F emissions with higher strength phosphoric acid.

The Department will require the applicant to maintain and submit to the Department on an annual basis for a period of five years from the date the two clarifiers are initially operated, information demonstrating in accordance with Rule 62-212.300(1)(e), F.A.C., that the installation of clarifiers did not result in significant emissions increase of 3 tons/yr of F ($1.26 + 3 = 4.26$ tons/yr for A PAP and $1.48 + 3 = 4.48$ tons/yr for B PAP) when compared with the baseline actual emissions for the period 2007-2008. Since A PAP permitted emissions limit is 3.70 tons/yr, that emissions limit cannot be exceeded.

3. RULE APPLICABILITY

Prevention of Significant Deterioration

New Source Review under PSD regulations is not applicable to the proposed project as the net increase in emissions due to this modification is less than the PSD significant emission rates listed in Rule 62-210.200, F.A.C. The net increase in emissions is determined based on the difference between the projected actual emissions and the baseline actual emissions.

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

Federal and State Emission Standards

The proposed project is subject to the applicable provisions of Chapter 403, F.S., Chapters 62-4, 62-210, 62-212 and 62-296, F.A.C. The facility is located in an area designated attainment or maintenance for all criteria pollutants in accordance with Rule 62-204.340, F.A.C. The project is subject to the monitoring, record keeping and reporting requirements of Rule 62-212.300(1)(e), F.A.C. The draft permit authorizes the construction of the two clarifiers for A and B PAPs and establishes specific monitoring conditions to determine whether the project resulted in significant net emissions increases.

The A & B PAPs are subject to federal NSPS under 40 CFR 60, Subpart T. Specifically, Subpart T applies to wet-process PAPs and regulates F emissions from such plants. The PAPs are also subject to the emission limitations of Rule 62-296.403(1)(a) F.A.C. pertaining to fluoride emissions from phosphate processing plants.

The PAPs are also subject to 40 CFR 63, Subpart AA, National Emission Standards for Hazardous Air Pollutants (NESHAP) for Phosphoric Acid Manufacturing Plants. Subpart AA regulates total F emissions from phosphoric acid plants.

4. AIR QUALITY ANALYSIS

According to the application and our review, the proposed project does not require an air quality analysis because there will be no net significant emissions increases.

5. CONCLUSION

The Department makes a preliminary determination that the proposed project will comply with all applicable federal and state air pollution regulations as conditioned by the draft permit. This determination is based on a technical review of the complete application, reasonable assurances provided by the applicant, and the conditions specified in the draft permit. Syed Arif is the project engineer responsible for reviewing the application and drafting the permit documents. Additional details of this analysis may be obtained by contacting the project engineer at the Department's Bureau of Air Regulation at Mail Station #5505, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400.

DRAFT PERMIT

PERMITTEE:

CF Industries, Inc.
P.O. Drawer L
Plant City, FL 33564

Primary Responsible Official:

Mr. Herschel E. Morris
Vice President Phosphate Operations

File No. 0570005-035-AC

Permit No. PSD-FL-355A

SIC No. 2874

Project: Plant City Phosphate Complex –
Installation of two Clarifiers

Expires: December 31, 2011

PROJECT AND LOCATION:

This is the final air construction permit, which authorizes the installation and operation of two 80 feet diameter acid clarifier tanks, one in A Phosphoric Acid Plant and one in B Phosphoric Acid Plant. The permit also extends the previously issued air construction permit (0570005-021-AC; PSD-FL-355) until December 31, 2011. The project is located at the Plant City Phosphate Complex at 10608 Paul Buchman Highway, Plant City, Hillsborough County. UTM coordinates are Zone 17; 388.0 km E and 3116.0 km N.

This final permit is organized into the following sections: Section I (General Information); Section II (Administrative Requirements); Section III (Emissions Unit Specific Conditions); Section IV (Appendices). Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of Section IV of this permit. As noted in the Final Determination provided with this final permit, only minor changes and clarifications were made to the draft permit.

STATEMENT OF BASIS:

This air pollution construction permit is issued under the provisions of: Chapter 403 of the Florida Statutes (F.S.) and Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297 of the Florida Administrative Code (F.A.C.). The permittee is authorized to conduct the proposed work in accordance with the conditions of this permit. This project is subject to the general preconstruction review requirements in Rule 62-212.300, F.A.C. and the preconstruction review requirements for major stationary sources in Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

Upon issuance of this final permit, 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 30 days after this order is filed with the clerk of the Department.

(DRAFT)

Joseph Kahn, Director
Division of Air Resource Management

Date

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Final Air Permit package (including the Final Determination and Final Permit with Appendices) was sent by electronic mail, or a link to these documents made available electronically on a publicly accessible server, with received receipt requested before the close of business on _____(DRAFT)_____ to the persons listed below.

- Herschel E. Morris, CF Industries, Inc. hmorris@cfifl.com
- Ronald L. Brunk, CF Industries, Inc. rbrunk@cfifl.com
- Cindy Zhang-Torres, DEP-SWD cindy.zhang-torres@dep.state.fl.us
- Diana Lee, HCEPC lee@epchc.org
- Pradeep Raval, Koogler and Associates, Inc. praval@kooglerassociates.com
- Vickie Gibson, DEP-BAR (victoria.gibson@dep.state.fl.us) (for read file)

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.

(DRAFT)

(Clerk)

(Date)

SECTION I – GENERAL INFORMATION (DRAFT PERMIT)

FACILITY DESCRIPTION

CF Industries (CFI) Plant City Phosphate Complex is an agricultural chemicals manufacturing facility. Phosphate rock is reacted with sulfuric acid to make phosphoric acid. The phosphoric acid is further processed into monoammonium phosphate (MAP) and diammonium phosphate (DAP).

PROJECT DESCRIPTION

CFI is requesting an extension of a previously issued PSD construction permit (Project No. 0570005-021-AC; PSD-FL-355) and proposing to install two new 80 feet diameter acid clarifier tanks, one in A Phosphoric Acid Plant (PAP) and one in B PAP in order to facilitate maintenance activity for various tanks and to maintain adequate acid clarification capacity. Auxiliary equipment and necessary piping will be installed to allow for acid feed, product acid, cleaning and acid sludge transfers. The auxiliary equipment will include flocculent storage, flocculent and acid mixing, clarified product pump tanks, clarified product tanks and sludge tanks. The proposed clarifiers and the auxiliary equipment will be ducted to the existing scrubber systems for the two phosphoric acid plants.

REGULATORY CLASSIFICATION

The Plant City Phosphate Complex is classified as a Major or Title V Source of air pollution because emissions of at least one regulated air pollutant, such as particulate matter (PM/PM₁₀), sulfur dioxide (SO₂), nitrogen oxides (NO_x), carbon monoxide (CO), or volatile organic compounds (VOC) exceed 100 tons per year (TPY).

The facility is subject to the following regulations:

Title III: This facility is a major source of hazardous air pollutants (HAP).

Title IV: The existing facility has no units subject to the acid rain provisions of the Clean Air Act.

Title V: The existing facility is a Title V major source of air pollution in accordance with Chapter 213, F.A.C.

Prevention of Significant Deterioration (PSD): The existing facility is a PSD-major stationary source of air pollution in accordance with Rule 62-212.400, F.A.C.

New Source Performance Standards (NSPS): The existing facility operates units subject to the New Source Performance Standards of 40 CFR 60.

APPENDICES

The following Appendices are attached as part of this permit.

Appendix A	Citation Formats and Glossary of Common Terms
Appendix B	General Conditions
Appendix C	Common Conditions
Appendix D	Common Testing Requirements

RELEVANT DOCUMENTS:

The permit request and additional information received to make it complete are not a part of this permit; however, the information is discussed in the technical evaluation which is issued concurrently with this permit.

SECTION II – ADMINISTRATIVE REQUIREMENTS (DRAFT PERMIT)

1. **Regulating Agencies:** All documents related to applications for permits to operate and minor modifications shall be submitted to the Department's Southwest District Office, 13051 North Telecom Parkway, Temple Terrace, Florida 33637-0926. Copies of all such documents shall also be sent to Environmental Protection Commission of Hillsborough County (EPCHC), 3629 Queen Palm Drive, Tampa, Florida 33619-1309. All applications for permits to construct or modify emissions unit(s) subject to the Prevention of Significant Deterioration or Nonattainment (NA) review requirements should be submitted to the Bureau of Air Regulation (BAR), Florida Department of Environmental Protection (FDEP), 2600 Blair Stone Road, MS 5505, Tallahassee, Florida 32399-2400 (phone number 850/488-0114).
2. **Compliance Authority:** All documents related to compliance activities such as reports, tests, and notifications should be submitted to the EPCHC and a copy to the Department's Southwest District Office.
3. **General Conditions:** The owner and operator are subject to and shall operate under the attached General Permit Conditions 1 through 15 listed in Appendix B of this permit. General Permit Conditions are binding and enforceable pursuant to Chapter 403 of the Florida Statutes. [Rule 62-4.160, F.A.C.]
4. **Terminology:** The terms used in this permit have specific meanings as defined in the corresponding chapters of the Florida Administrative Code.
5. **Applicable Regulations, Forms and Application Procedures:** Unless otherwise indicated in this permit, the construction and operation of the subject emissions unit shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of Chapter 403, F.S. and Florida Administrative Code Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296, 62-297 and the Code of Federal Regulations Title 40, Parts 60 and 63, adopted by reference in the Florida Administrative Code (F.A.C.) regulations. The permittee shall use the applicable forms listed in Rule 62-210.900, F.A.C. and follow the application procedures in Chapter 62-4, F.A.C. Issuance of this permit does not relieve the facility owner or operator from compliance with any applicable federal, state, or local permitting or regulations. [Rules 62-204.800, 62-210.300 and 62-210.900, F.A.C.]
6. **Expiration:** The permittee may, for good cause, request that this construction permit be extended. Such a request shall be submitted to the Bureau of Air Regulation prior to 60 days before the expiration of the permit. However, the permittee shall promptly notify the Department's Southwest District Office of any delays in completion of the project which would affect the startup day by more than 90 days. [Rule 62-4.090, F.A.C.]
7. **Application for Title V Permit:** This permit authorizes construction of the permitted emissions units and initial operation to determine compliance with Department rules. A Title V operation permit is required for regular operation of the permitted emissions unit. The permittee shall apply for a Title V operation permit at least 90 days prior to expiration, but no later than 180 days after commencing operation. To apply for a Title V operation permit, the applicant shall submit the appropriate application form, compliance test results, and such additional information as the Department may by law require. The application shall be submitted to the appropriate Permitting Authority with copies to the Compliance Authority. [Rules 62-4.030, 62-4.050, 62-4.220, and Chapter 62-213.420, F.A.C.]
8. **Source Obligation:** Authorization to construct shall expire if construction is not commenced within 18 months after receipt of the permit, if construction is discontinued for a period of 18 months or more, or if construction is not completed within a reasonable time. This provision does not apply to the time period between constructions of the approved phases of a phased construction project except that each phase must commence construction within 18 months of the commencement date established by the Department in the permit. [Rule 62-212.400(12)(a), F.A.C.].
9. **BACT Determination:** For phased construction projects, the determination of best available control technology shall be reviewed and modified as appropriate at the latest reasonable time which occurs no later

SECTION II – ADMINISTRATIVE REQUIREMENTS (DRAFT PERMIT)

than 18 months prior to commencement of construction of each independent phase of the project. At such time, the owner or operator of the applicable stationary source may be required to demonstrate the adequacy of any previous determination of best available control technology for the source. [40 CFR 52.21(j)(4)]

10. Annual Reports: Pursuant to Rule 62-210.370(3), F.A.C., Annual Operation Reports, the permittee is required to submit annual reports on the actual operating rates and emissions from this facility. Annual operating reports using DEP Form 62-210.900(5) shall be sent to the DEP's Southeast District office by April 1st of each year.
11. Stack Testing Facilities: Stack sampling facilities shall be installed in accordance with Rule 62-297.310(6), F.A.C.
12. New or Additional Conditions: For good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time. [Rule 62-4.080, F.A.C.]

SECTION III – EMISSION UNIT(S) SPECIFIC CONDITIONS (DRAFT PERMIT)

SUBSECTION A. SPECIFIC CONDITIONS

The Specific Conditions listed in this section apply to the following emission units:

EMISSION UNIT NO.	EMISSION UNIT DESCRIPTION
004	A PAP
009	B PAP

PREVIOUS APPLICABLE REQUIREMENTS

1. Permit Determination: This construction permit authorizes an extension until December 31, 2011, of a previously issued PSD construction permit (Project No. 0570005-021-AC; PSD-FL-355) to allow the installation of two new 80 feet diameter acid clarifier tanks. No additional work to any other emissions units is allowed under this construction permit. Unless otherwise specified, these conditions are in addition to all existing applicable permit conditions and regulatory requirements. The permittee shall continue to comply with the conditions of the original permit 0570005-021-AC (PSD-FL-355) which include restrictions and standards regarding capacities, production, operation, fuels, emissions, monitoring, record keeping and reporting related to the two emission units. [Rule 62-4.070, F.A.C.]

AUTHORIZED WORK

2. Acid Clarifier Tanks: The permittee is authorized to install two new 80 feet diameter acid clarifier tanks, one in A PAP and one in B PAP. The two clarifiers would either be rake settler clarifiers or lamella clarifiers. Auxiliary equipment and necessary piping will be installed to allow for acid feed, product acid, cleaning and acid sludge transfers. The auxiliary equipment will include flocculent storage, flocculent and acid mixing, clarified product pump tanks, clarified product tanks and sludge tanks. The proposed clarifiers will be ducted to the existing scrubber systems for the two phosphoric acid plants.

[Applicant Request; Design; and Rule 62-210.200(PTE), F.A.C.]

PERMITTED CAPACITIES

3. Phosphoric Acid Production: Phosphoric acid production in each A and B PAP shall not exceed 1,699 tons per day (TPD) of 100% phosphorus pentoxide (P_2O_5) input and 2,530 TPD of 100% P_2O_5 input, respectively. [Rule 62-210.200(PTE), F.A.C.]
4. Hours of Operation: A and B PAP clarifiers are allowed to operate continuously (8,760 hours per year). [Rule 62-210.200(PTE), F.A.C.]

PERFORMANCE REQUIREMENTS

5. Annual Fluoride (F) Emissions Projections: The permittee projected that the increase in actual annual emissions of F due to the project would not exceed the PSD significance level (i.e., 3 tons/year). The permittee shall demonstrate this by compiling and submitting the reports required by this permit. [Application; and Rules 62-212.300 and 62-210.370, F.A.C.]

{Permitting Note: The baseline actual emission of F for A PAP is 1.26 tons/year and for B PAP is 1.48 tons/year.}

EMISSIONS PERFORMANCE TESTING

6. Post Construction Performance Tests: Within 180 days after completing the proposed work, the subject emission units shall be tested for compliance with the emission limits for A and B PAP. Emissions from the

SECTION III – EMISSION UNIT(S) SPECIFIC CONDITIONS (DRAFT PERMIT)

two clarifiers shall be included for compliance testing. Compliance testing shall be done with the clarifiers processing phosphoric acid from A and B PAP followed by an additional test with the clarifiers not operating under the same operating conditions. Each compliance test shall consist of three individual runs. For the duration of all tests the emission unit shall be operating at permitted capacity. Permitted capacity is defined as 90-100 percent of the maximum operating rate allowed by the permit. If it is impracticable to test at permitted capacity, then the emission unit may be tested at less than permitted capacity (i.e., 90% of the maximum operating rate allowed by the permit); in this case, subsequent emission unit operation is limited to 110 percent of the test load until a new test is conducted. Once the emission unit is so limited, then operation at higher capacities is allowed for no more than 15 consecutive days for the purposes of additional compliance testing to regain the permitted capacity in the permit. [Rule 62-297.310, F.A.C.]

7. Annual Compliance Tests: Annual compliance testing for F emissions from A and B PAP shall be conducted under the mode which maximizes F emissions either with the clarifiers operating or when not operating as determined during the post construction performance test. [Rule 62-4.070, F.A.C.]
8. Special Compliance Test: The permittee shall perform a special compliance test within eighteen (18) months of the initial performance test on either A PAP or B PAP clarifier. The special compliance test shall be conducted when the clarifier is processing 54 percent phosphoric acid and A PAP or B PAP is operating. Emissions from the clarifier shall be included for the special compliance test. The Department may require additional special testing as deemed necessary. [Rule 62-297.310, F.A.C.]

NOTIFICATIONS, RECORDS AND REPORTS

9. Test Reports: The permittee shall prepare and submit reports for all required tests in accordance with the requirements specified in Rule 62-297.310, F.A.C. A comparison of F emissions shall be presented with the clarifiers operating and when not operating. [Rule 62-297.310(8), F.A.C.]
10. Annual F Emissions Reports: In accordance with Rule 62-212.300(1)(e), F.A.C., the permittee shall comply with the following monitoring, reporting and recordkeeping provisions:
 - a. On a calendar year basis, the permittee shall calculate and maintain a record of the annual emissions (tons per year) for a period of 5 years following resumption of regular operations after completing construction. Emissions shall be computed in accordance with Rule 62-210.370, F.A.C.
 - b. Within 60 days after each calendar year following completion of construction, the permittee shall report to the Compliance Authority the annual emissions for the unit for the preceding calendar year. The report shall contain the following:
 1. Name, address and telephone number of the owner or operator of the major stationary source;
 2. Annual emissions as calculated pursuant to subparagraph 62-212.300(1)(e)1., F.A.C.;
 3. If the emissions differ from the preconstruction projection, an explanation as to why there is a difference; and
 4. Any other information that the owner or operator wishes to include in the report.
 - c. The information required to be documented and maintained shall be submitted to the Compliance Authority, where it will be available for review by the general public.

[Rule 62-212.300(1)(e), F.A.C.]

SECTION IV. APPENDICES

Contents

Appendix A. Citation Formats and Glossary of Common Terms

Appendix B. General Conditions

Appendix C. Common Conditions

Appendix D. Common Testing Requirements

SECTION IV. APPENDIX A

Citation Formats and Glossary of Common Terms

CITATION FORMATS

The following illustrate the formats used in the permit to identify applicable requirements from permits and regulations.

Old Permit Numbers

Example: Permit No. AC50-123456 or Permit No. AO50-123456

Where: “AC” identifies the permit as an Air Construction Permit
“AO” identifies the permit as an Air Operation Permit
“123456” identifies the specific permit project number

New Permit Numbers

Example: Permit Nos. 099-2222-001-AC, 099-2222-001-AF, 099-2222-001-AO, or 099-2222-001-AV

Where: “099” represents the specific county ID number in which the project is located
“2222” represents the specific facility ID number for that county
“001” identifies the specific permit project number
“AC” identifies the permit as an air construction permit
“AF” identifies the permit as a minor source federally enforceable state operation permit
“AO” identifies the permit as a minor source air operation permit
“AV” identifies the permit as a major Title V air operation permit

PSD Permit Numbers

Example: Permit No. PSD-FL-317

Where: “PSD” means issued pursuant to the preconstruction review requirements of the Prevention of Significant Deterioration of Air Quality
“FL” means that the permit was issued by the State of Florida
“317” identifies the specific permit project number

Florida Administrative Code (F.A.C.)

Example: [Rule 62-213.205, F.A.C.]

Means: Title 62, Chapter 213, Rule 205 of the Florida Administrative Code

Code of Federal Regulations (CFR)

Example: [40 CFR 60.7]

Means: Title 40, Part 60, Section 7

GLOSSARY OF COMMON TERMS

° F: degrees Fahrenheit

µg: microgram

AAQS: Ambient Air Quality Standard

acf: actual cubic feet

acfm: actual cubic feet per minute

ARMS: Air Resource Management System
(Department’s database)

BACT: best available control technology

bhp: brake horsepower

Btu: British thermal units

CAM: compliance assurance monitoring

CEMS: continuous emissions monitoring system

cfm: cubic feet per minute

CFR: Code of Federal Regulations

CAA: Clean Air Act

SECTION IV. APPENDIX A

Citation Formats and Glossary of Common Terms

CMS: continuous monitoring system	NO_x: nitrogen oxides
CO: carbon monoxide	NSPS: New Source Performance Standards
CO₂: carbon dioxide	O&M: operation and maintenance
COMS: continuous opacity monitoring system	O₂: oxygen
DARM: Division of Air Resource Management	Pb: lead
DEP: Department of Environmental Protection	PM: particulate matter
Department: Department of Environmental Protection	PM₁₀: particulate matter with a mean aerodynamic diameter of 10 microns or less
dscf: dry standard cubic feet	ppm: parts per million
dscfm: dry standard cubic feet per minute	ppmv: parts per million by volume
EPA: Environmental Protection Agency	ppmvd: parts per million by volume, dry basis
ESP: electrostatic precipitator (control system for reducing particulate matter)	QA: quality assurance
EU: emissions unit	QC: quality control
F: fluoride	PSD: prevention of significant deterioration
F.A.C.: Florida Administrative Code	psi: pounds per square inch
F.A.W.: Florida Administrative Weekly	PTE: potential to emit
F.D.: forced draft	RACT: reasonably available control technology
F.S.: Florida Statutes	RATA: relative accuracy test audit
FGD: flue gas desulfurization	RBLC: EPA's RACT/BACT/LAER Clearinghouse
FGR: flue gas recirculation	SAM: sulfuric acid mist
ft²: square feet	scf: standard cubic feet
ft³: cubic feet	scfm: standard cubic feet per minute
gpm: gallons per minute	SIC: standard industrial classification code
gr: grains	SIP: State Implementation Plan
HAP: hazardous air pollutant	SNCR: selective non-catalytic reduction (control system used for reducing emissions of nitrogen oxides)
Hg: mercury	SO₂: sulfur dioxide
I.D.: induced draft	TPD: tons/day
ID: identification	TPH: tons per hour
kPa: kilopascals	TPY: tons per year
lb: pound	TRS: total reduced sulfur
MACT: maximum achievable technology	UTM: Universal Transverse Mercator coordinate system
MMBtu: million British thermal units	VE: visible emissions
MSDS: material safety data sheets	VOC: volatile organic compounds
MW: megawatt	
NESHAP: National Emissions Standards for Hazardous Air Pollutants	

SECTION IV. APPENDIX B

General Conditions

The permittee shall comply with the following general conditions from Rule 62-4.160, F.A.C.

1. The terms, conditions, requirements, limitations and restrictions set forth in this permit, are “permit conditions” and are binding and enforceable pursuant to Sections 403.141, 403.727, or 403.859 through 403.861, F.S. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.
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 403.987(6) and 403.722(5), F.S., the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither 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 is not 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 this permit.
4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and 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, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; 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 properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed and used by the permittee to achieve compliance with the conditions of this permit, as required 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 and at reasonable times, access to the premises where the permitted activity is located or conducted to:
 - a. Have access to and copy any records that must be kept under conditions of the permit;
 - b. Inspect the facility, equipment, practices, or operations regulated or required under this permit; and
 - c. Sample or monitor 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 provide the Department with the following information:
 - a. A description of and cause of noncompliance; and
 - b. The period of noncompliance, including dates and times; or, if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance. 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 for 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 as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by Sections 403.111 and 403.73, F.S. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.
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

SECTION IV. APPENDIX B

General Conditions

rules. A reasonable time for compliance with a new or amended surface water quality standard, other than those standards addressed in Rule 62-302.500, F.A.C., shall include a reasonable time to obtain or be denied a mixing zone for the new or amended standard.

11. This permit is transferable only upon Department approval in accordance with Rules 62-4.120 and 62-730.300, F.A.C., 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 or a copy thereof shall be kept at the work site of the permitted activity.
13. This permit also constitutes:
 - a. Determination of Best Available Control Technology (not applicable);
 - b. Determination of Prevention of Significant Deterioration (not applicable); and
 - c. Compliance with New Source Performance Standards (not applicable).
14. The permittee shall comply with the following:
 - a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
 - b. The permittee shall hold 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) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained 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:
 - (a) The date, exact place, and time of sampling or measurements;
 - (b) The person responsible for performing the sampling or measurements;
 - (c) The dates analyses were performed;
 - (d) The person responsible for performing the analyses;
 - (e) The analytical techniques or methods used;
 - (f) The results of such analyses.
15. 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 the 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 corrected promptly.

SECTION IV. APPENDIX C

Common Conditions

Unless otherwise specified in the permit, the following conditions apply to all emissions units and activities at the facility.

EMISSIONS AND CONTROLS

1. **Plant Operation - Problems:** If temporarily unable to comply with any of the conditions of the permit due to breakdown of equipment or destruction by fire, wind or other cause, the permittee shall notify each Compliance Authority as soon as possible, but at least within one working day, excluding weekends and holidays. The notification shall include: pertinent information as to the cause of the problem; steps being taken to correct the problem and prevent future recurrence; and, where applicable, the owner's intent toward reconstruction of destroyed facilities. Such notification does not release the permittee from any liability for failure to comply with the conditions of this permit or the regulations. [Rule 62-4.130, F.A.C.]
2. **Circumvention:** The permittee shall not circumvent the air pollution control equipment or allow the emission of air pollutants without this equipment operating properly. [Rule 62-210.650, F.A.C.]
3. **Excess Emissions Allowed:** Excess emissions resulting from startup, shutdown or malfunction of any emissions unit shall be permitted providing (1) best operational practices to minimize emissions are adhered to and (2) the duration of excess emissions shall be minimized but in no case exceed 2 hours in any 24-hour period unless specifically authorized by the Department for longer duration. Pursuant to Rule 62-210.700(5), F.A.C., the permit subsection may specify more or less stringent requirements for periods of excess emissions. Rule 62-210-700(Excess Emissions), F.A.C., cannot vary or supersede any federal NSPS or NESHAP provision. [Rule 62-210.700(1), F.A.C.]
4. **Excess Emissions Prohibited:** Excess emissions caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure that may reasonably be prevented during startup, shutdown or malfunction shall be prohibited. [Rule 62-210.700(4), F.A.C.]
5. **Excess Emissions - Notification:** In case of excess emissions resulting from malfunctions, the permittee shall notify the Compliance Authority in accordance with Rule 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the Department. [Rule 62-210.700(6), F.A.C.]
6. **VOC or OS Emissions:** No person shall store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds (VOC) or organic solvents (OS) without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department. [Rule 62-296.320(1), F.A.C.]
7. **Objectionable Odor Prohibited:** No person shall cause, suffer, allow or permit the discharge of air pollutants, which cause or contribute to an objectionable odor. An "objectionable odor" means any odor present in the outdoor atmosphere which by itself or in combination with other odors, is or may be harmful or injurious to human health or welfare, which unreasonably interferes with the comfortable use and enjoyment of life or property, or which creates a nuisance. [Rules 62-296.320(2) and 62-210.200(Definitions), F.A.C.]
8. **General Visible Emissions:** No person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity equal to or greater than 20% opacity. This regulation does not impose a specific testing requirement. [Rule 62-296.320(4)(b)1, F.A.C.]
9. **Unconfined Particulate Emissions:** During the construction period, unconfined particulate matter emissions shall be minimized by dust suppressing techniques such as covering and/or application of water or chemicals to the affected areas, as necessary. [Rule 62-296.320(4)(c), F.A.C.]

RECORDS AND REPORTS

10. **Records Retention:** All measurements, records, and other data required by this permit shall be documented in a permanent, legible format and retained for at least 5 years following the date on which such measurements, records, or data are recorded. Records shall be made available to the Department upon request. [Rule 62-213.440(1)(b)2, F.A.C.]
11. **Emissions Computation and Reporting:**
 - a. **Applicability.** This rule sets forth required methodologies to be used by the owner or operator of a facility for computing actual emissions, baseline actual emissions, and net emissions increase, as defined at Rule 62-210.200, F.A.C., and for computing emissions for purposes of the reporting requirements of subsection 62-210.370(3) and paragraph 62-212.300(1)(e), F.A.C., or of any permit condition that requires emissions be computed in accordance with this rule. This rule is not intended to establish methodologies for determining compliance with the emission

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Common Conditions

limitations of any air permit. [Rule 62-210.370(1), F.A.C.]

- b. *Computation of Emissions.* For any of the purposes set forth in subsection 62-210.370(1), F.A.C., the owner or operator of a facility shall compute emissions in accordance with the requirements set forth in this subsection.
- (1) **Basic Approach.** The owner or operator shall employ, on a pollutant-specific basis, the most accurate of the approaches set forth below to compute the emissions of a pollutant from an emissions unit; provided, however, that nothing in this rule shall be construed to require installation and operation of any continuous emissions monitoring system (CEMS), continuous parameter monitoring system (CPMS), or predictive emissions monitoring system (PEMS) not otherwise required by rule or permit, nor shall anything in this rule be construed to require performance of any stack testing not otherwise required by rule or permit.
 - (a) If the emissions unit is equipped with a CEMS meeting the requirements of paragraph 62-210.370(2)(b), F.A.C., the owner or operator shall use such CEMS to compute the emissions of the pollutant, unless the owner or operator demonstrates to the department that an alternative approach is more accurate because the CEMS represents still-emerging technology.
 - (b) If a CEMS is not available or does not meet the requirements of paragraph 62-210.370(2)(b), F.A.C., but emissions of the pollutant can be computed pursuant to the mass balance methodology of paragraph 62-210.370(2)(c), F.A.C., the owner or operator shall use such methodology, unless the owner or operator demonstrates to the department that an alternative approach is more accurate.
 - (c) If a CEMS is not available or does not meet the requirements of paragraph 62-210.370(2)(b), F.A.C., and emissions cannot be computed pursuant to the mass balance methodology, the owner or operator shall use an emission factor meeting the requirements of paragraph 62-210.370(2)(d), F.A.C., unless the owner or operator demonstrates to the department that an alternative approach is more accurate.
 - (2) **Continuous Emissions Monitoring System (CEMS).**
 - (a) An owner or operator may use a CEMS to compute emissions of a pollutant for purposes of this rule provided:
 - 1) The CEMS complies with the applicable certification and quality assurance requirements of 40 CFR Part 60, Appendices B and F, or, for an acid rain unit, the certification and quality assurance requirements of 40 CFR Part 75, all adopted by reference at Rule 62-204.800, F.A.C.; or
 - 2) The owner or operator demonstrates that the CEMS otherwise represents the most accurate means of computing emissions for purposes of this rule.
 - (b) Stack gas volumetric flow rates used with the CEMS to compute emissions shall be obtained by the most accurate of the following methods as demonstrated by the owner or operator:
 - 1) A calibrated flow meter that records data on a continuous basis, if available; or
 - 2) The average flow rate of all valid stack tests conducted during a five-year period encompassing the period over which the emissions are being computed, provided all stack tests used shall represent the same operational and physical configuration of the unit.
 - (c) The owner or operator may use CEMS data in combination with an appropriate f-factor, heat input data, and any other necessary parameters to compute emissions if such method is demonstrated by the owner or operator to be more accurate than using a stack gas volumetric flow rate as set forth at subparagraph 62-210.370(2)(b)2., F.A.C., above.
 - (3) **Mass Balance Calculations.**
 - (a) An owner or operator may use mass balance calculations to compute emissions of a pollutant for purposes of this rule provided the owner or operator:
 - 1) Demonstrates a means of validating the content of the pollutant that is contained in or created by all materials or fuels used in or at the emissions unit; and
 - 2) Assumes that the emissions unit emits all of the pollutant that is contained in or created by any material or fuel used in or at the emissions unit if it cannot otherwise be accounted for in the

SECTION IV. APPENDIX C

Common Conditions

process or in the capture and destruction of the pollutant by the unit's air pollution control equipment.

- (b) Where the vendor of a raw material or fuel which is used in or at the emissions unit publishes a range of pollutant content from such material or fuel, the owner or operator shall use the highest value of the range to compute the emissions, unless the owner or operator demonstrates using site-specific data that another content within the range is more accurate.
 - (c) In the case of an emissions unit using coatings or solvents, the owner or operator shall document, through purchase receipts, records and sales receipts, the beginning and ending VOC inventories, the amount of VOC purchased during the computational period, and the amount of VOC disposed of in the liquid phase during such period.
- (4) Emission Factors.
- a. An owner or operator may use an emission factor to compute emissions of a pollutant for purposes of this rule provided the emission factor is based on site-specific data such as stack test data, where available, unless the owner or operator demonstrates to the department that an alternative emission factor is more accurate. An owner or operator using site-specific data to derive an emission factor, or set of factors, shall meet the following requirements.
 - 1) If stack test data are used, the emission factor shall be based on the average emissions per unit of input, output, or gas volume, whichever is appropriate, of all valid stack tests conducted during at least a five-year period encompassing the period over which the emissions are being computed, provided all stack tests used shall represent the same operational and physical configuration of the unit.
 - 2) Multiple emission factors shall be used as necessary to account for variations in emission rate associated with variations in the emissions unit's operating rate or operating conditions during the period over which emissions are computed.
 - 3) The owner or operator shall compute emissions by multiplying the appropriate emission factor by the appropriate input, output or gas volume value for the period over which the emissions are computed. The owner or operator shall not compute emissions by converting an emission factor to pounds per hour and then multiplying by hours of operation, unless the owner or operator demonstrates that such computation is the most accurate method available.
 - b. If site-specific data are not available to derive an emission factor, the owner or operator may use a published emission factor directly applicable to the process for which emissions are computed. If no directly-applicable emission factor is available, the owner or operator may use a factor based on a similar, but different, process.
- (5) Accounting for Emissions During Periods of Missing Data from CEMS, PEMS, or CPMS. In computing the emissions of a pollutant, the owner or operator shall account for the emissions during periods of missing data from CEMS, PEMS, or CPMS using other site-specific data to generate a reasonable estimate of such emissions.
- (6) Accounting for Emissions During Periods of Startup and Shutdown. In computing the emissions of a pollutant, the owner or operator shall account for the emissions during periods of startup and shutdown of the emissions unit.
- (7) Fugitive Emissions. In computing the emissions of a pollutant from a facility or emissions unit, the owner or operator shall account for the fugitive emissions of the pollutant, to the extent quantifiable, associated with such facility or emissions unit.
- (8) Recordkeeping. The owner or operator shall retain a copy of all records used to compute emissions pursuant to this rule for a period of five years from the date on which such emissions information is submitted to the department for any regulatory purpose.

[Rule 62-210.370(2), F.A.C.]

c. *Annual Operating Report for Air Pollutant Emitting Facility*

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- (1) The Annual Operating Report for Air Pollutant Emitting Facility (DEP Form No. 62-210.900(5)) shall be completed each year for the following facilities:
 - a. All Title V sources.
 - b. All synthetic non-Title V sources.
 - c. All facilities with the potential to emit ten (10) tons per year or more of volatile organic compounds or twenty-five (25) tons per year or more of nitrogen oxides and located in an ozone nonattainment area or ozone air quality maintenance area.
 - d. All facilities for which an annual operating report is required by rule or permit.
- (2) Notwithstanding paragraph 62-210.370(3)(a), F.A.C., no annual operating report shall be required for any facility operating under an air general permit.
- (3) The annual operating report shall be submitted to the appropriate Department of Environmental Protection (DEP) division, district or DEP-approved local air pollution control program office by April 1 of the following year. If the report is submitted using the Department's electronic annual operating report software, there is no requirement to submit a copy to any DEP or local air program office.
- (4) Emissions shall be computed in accordance with the provisions of subsection 62-210.370(2), F.A.C., for purposes of the annual operating report.
- (5) Facility Relocation. Unless otherwise provided by rule or more stringent permit condition, the owner or operator of a relocatable facility must submit a Facility Relocation Notification Form (DEP Form No. 62-210.900(6)) to the Department at least 30 days prior to the relocation. A separate form shall be submitted for each facility in the case of the relocation of multiple facilities which are jointly owned or operated.

[Rule 62-210.370(3), F.A.C.]

SECTION IV. APPENDIX D

Common Testing Requirements

Unless otherwise specified in the permit, the following testing requirements apply to all emissions units that require testing.

COMPLIANCE TESTING REQUIREMENTS

1. **Required Number of Test Runs:** For mass emission limitations, a compliance test shall consist of three complete and separate determinations of the total air pollutant emission rate through the test section of the stack or duct and three complete and separate determinations of any applicable process variables corresponding to the three distinct time periods during which the stack emission rate was measured; provided, however, that three complete and separate determinations shall not be required if the process variables are not subject to variation during a compliance test, or if three determinations are not necessary in order to calculate the unit's emission rate. The three required test runs shall be completed within one consecutive five-day period. In the event that a sample is lost or one of the three runs must be discontinued because of circumstances beyond the control of the owner or operator, and a valid third run cannot be obtained within the five-day period allowed for the test, the Secretary or his or her designee may accept the results of two complete runs as proof of compliance, provided that the arithmetic mean of the two complete runs is at least 20% below the allowable emission limiting standard. [Rule 62-297.310(1), F.A.C.]
2. **Operating Rate During Testing:** Testing of emissions shall be conducted with the emissions unit operating at permitted capacity. If it is impractical to test at permitted capacity, an emissions unit may be tested at less than the maximum permitted capacity; in this case, subsequent emissions unit operation is limited to 110 percent of the test rate until a new test is conducted. Once the unit is so limited, operation at higher capacities is allowed for no more than 15 consecutive days for the purpose of additional compliance testing to regain the authority to operate at the permitted capacity. Permitted capacity is defined as 90 to 100 percent of the maximum operation rate allowed by the permit. [Rule 62-297.310(2), F.A.C.]
3. **Calculation of Emission Rate:** For each emissions performance test, the indicated emission rate or concentration shall be the arithmetic average of the emission rate or concentration determined by each of the three separate test runs unless otherwise specified in a particular test method or applicable rule. [Rule 62-297.310(3), F.A.C.]
4. **Applicable Test Procedures:**
 - a. **Required Sampling Time.**
 - (1) Unless otherwise specified in the applicable rule, the required sampling time for each test run shall be no less than one hour and no greater than four hours, and the sampling time at each sampling point shall be of equal intervals of at least two minutes.
 - (2) **Opacity Compliance Tests.** When either EPA Method 9 or DEP Method 9 is specified as the applicable opacity test method, the required minimum period of observation for a compliance test shall be sixty (60) minutes for emissions units which emit or have the potential to emit 100 tons per year or more of particulate matter, and thirty (30) minutes for emissions units which have potential emissions less than 100 tons per year of particulate matter and are not subject to a multiple-valued opacity standard. The opacity test observation period shall include the period during which the highest opacity emissions can reasonably be expected to occur. Exceptions to these requirements are as follows:
 - (a) For batch, cyclical processes, or other operations which are normally completed within less than the minimum observation period and do not recur within that time, the period of observation shall be equal to the duration of the batch cycle or operation completion time.
 - (b) The observation period for special opacity tests that are conducted to provide data to establish a surrogate standard pursuant to Rule 62-297.310(5)(k), F.A.C., Waiver of Compliance Test Requirements, shall be established as necessary to properly establish the relationship between a proposed surrogate standard and an existing mass emission limiting standard.
 - (c) The minimum observation period for opacity tests conducted by employees or agents of the Department to verify the day-to-day continuing compliance of a unit or activity with an applicable opacity standard shall be twelve minutes.
 - b. **Minimum Sample Volume.** Unless otherwise specified in the applicable rule or test method, the minimum sample volume per run shall be 25 dry standard cubic feet.
 - c. **Calibration of Sampling Equipment.** Calibration of the sampling train equipment shall be conducted in accordance

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Common Testing Requirements

with the schedule shown in Table 297.310-1, F.A.C.

- d. Calibration of Sampling Equipment. Calibration of the sampling train equipment shall be conducted in accordance with the schedule shown in Table 297.310-1.
- e. Allowed Modification to EPA Method 5. When EPA Method 5 is required, the following modification is allowed: the heated filter may be separated from the impingers by a flexible tube.

TABLE 297.310-1 CALIBRATION SCHEDULE			
ITEM	MINIMUM CALIBRATION FREQUENCY	REFERENCE INSTRUMENT	TOLERANCE
Liquid in glass thermometer	Annually	ASTM Hg in glass ref. thermometer or equivalent or thermometric points	+/-2%
Bimetallic thermometer	Quarterly	Calibration liquid in glass	5° F
Thermocouple	Annually	ASTM Hg in glass ref. thermometer, NBS calibrated reference and potentiometer	5° F
Barometer	Monthly	Hg barometer or NOAA station	+/-1% scale
Pitot Tube	When required or when damaged	By construction or measurements in wind tunnel D greater than 16" and standard pitot tube	See EPA Method 2, Fig. 2-2 & 2-3
Probe Nozzles	Before each test or when nicked, dented, or corroded	Micrometer	+/- 0.001" mean of at least three readings; Max. deviation between readings, 0.004"
Dry Gas Meter and Orifice Meter	1. Full Scale: When received, when 5% change observed, annually	Spirometer or calibrated wet test or dry gas test meter	2%
	2. One Point: Semiannually		
	3. Check after each test series	Comparison check	5%

[Rule 62-297.310(4), F.A.C.]

5. **Determination of Process Variables:**

- a. *Required Equipment.* The owner or operator of an emissions unit for which compliance tests are required shall install, operate, and maintain equipment or instruments necessary to determine process variables, such as process weight input or heat input, when such data are needed in conjunction with emissions data to determine the compliance of the emissions unit with applicable emission limiting standards.
- b. *Accuracy of Equipment.* Equipment or instruments used to directly or indirectly determine process variables, including devices such as belt scales, weight hoppers, flow meters, and tank scales, shall be calibrated and adjusted to indicate the true value of the parameter being measured with sufficient accuracy to allow the applicable process variable to be determined within 10% of its true value.

[Rule 62-297.310(5), F.A.C.]

6. **Sampling Facilities:** The permittee shall install permanent stack sampling ports and provide sampling facilities that meet

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Common Testing Requirements

the requirements of Rule 62-297.310(6), F.A.C. Sampling facilities include sampling ports, work platforms, access to work platforms, electrical power, and sampling equipment support. All stack sampling facilities must also comply with all applicable Occupational Safety and Health Administration (OSHA) Safety and Health Standards described in 29 CFR Part 1910, Subparts D and E.

- a. Permanent Test Facilities. The owner or operator of an emissions unit for which a compliance test, other than a visible emissions test, is required on at least an annual basis, shall install and maintain permanent stack sampling facilities.
- b. Temporary Test Facilities. The owner or operator of an emissions unit that is not required to conduct a compliance test on at least an annual basis may use permanent or temporary stack sampling facilities. If the owner chooses to use temporary sampling facilities on an emissions unit, and the Department elects to test the unit, such temporary facilities shall be installed on the emissions unit within 5 days of a request by the Department and remain on the emissions unit until the test is completed.
- c. Sampling Ports.
 - (1) All sampling ports shall have a minimum inside diameter of 3 inches.
 - (2) The ports shall be capable of being sealed when not in use.
 - (3) The sampling ports shall be located in the stack at least 2 stack diameters or equivalent diameters downstream and at least 0.5 stack diameter or equivalent diameter upstream from any fan, bend, constriction or other flow disturbance.
 - (4) For emissions units for which a complete application to construct has been filed prior to December 1, 1980, at least two sampling ports, 90 degrees apart, shall be installed at each sampling location on all circular stacks that have an outside diameter of 15 feet or less. For stacks with a larger diameter, four sampling ports, each 90 degrees apart, shall be installed. For emissions units for which a complete application to construct is filed on or after December 1, 1980, at least two sampling ports, 90 degrees apart, shall be installed at each sampling location on all circular stacks that have an outside diameter of 10 feet or less. For stacks with larger diameters, four sampling ports, each 90 degrees apart, shall be installed. On horizontal circular ducts, the ports shall be located so that the probe can enter the stack vertically, horizontally or at a 45 degree angle.
 - (5) On rectangular ducts, the cross sectional area shall be divided into the number of equal areas in accordance with EPA Method 1. Sampling ports shall be provided which allow access to each sampling point. The ports shall be located so that the probe can be inserted perpendicular to the gas flow.
- d. Work Platforms.
 - (1) Minimum size of the working platform shall be 24 square feet in area. Platforms shall be at least 3 feet wide.
 - (2) On circular stacks with 2 sampling ports, the platform shall extend at least 110 degrees around the stack.
 - (3) On circular stacks with more than two sampling ports, the work platform shall extend 360 degrees around the stack.
 - (4) All platforms shall be equipped with an adequate safety rail (ropes are not acceptable), toe board, and hinged floor-opening cover if ladder access is used to reach the platform. The safety rail directly in line with the sampling ports shall be removable so that no obstruction exists in an area 14 inches below each sample port and 6 inches on either side of the sampling port.
- e. Access to Work Platform.
 - (1) Ladders to the work platform exceeding 15 feet in length shall have safety cages or fall arresters with a minimum of 3 compatible safety belts available for use by sampling personnel.
 - (2) Walkways over free-fall areas shall be equipped with safety rails and toe boards.
- f. Electrical Power.
 - (1) A minimum of two 120-volt AC, 20-amp outlets shall be provided at the sampling platform within 20 feet of each sampling port.

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Common Testing Requirements

- (2) If extension cords are used to provide the electrical power, they shall be kept on the plant's property and be available immediately upon request by sampling personnel.

g. Sampling Equipment Support.

- (1) A three-quarter inch eyebolt and an angle bracket shall be attached directly above each port on vertical stacks and above each row of sampling ports on the sides of horizontal ducts.
- (a) The bracket shall be a standard 3 inch × 3 inch × one-quarter inch equal-legs bracket which is 1 and one-half inches wide. A hole that is one-half inch in diameter shall be drilled through the exact center of the horizontal portion of the bracket. The horizontal portion of the bracket shall be located 14 inches above the centerline of the sampling port.
- (b) A three-eighth inch bolt which protrudes 2 inches from the stack may be substituted for the required bracket. The bolt shall be located 15 and one-half inches above the centerline of the sampling port.
- (c) The three-quarter inch eyebolt shall be capable of supporting a 500 pound working load. For stacks that are less than 12 feet in diameter, the eyebolt shall be located 48 inches above the horizontal portion of the angle bracket. For stacks that are greater than or equal to 12 feet in diameter, the eyebolt shall be located 60 inches above the horizontal portion of the angle bracket. If the eyebolt is more than 120 inches above the platform, a length of chain shall be attached to it to bring the free end of the chain to within safe reach from the platform.
- (2) A complete monorail or dual rail arrangement may be substituted for the eyebolt and bracket.
- (3) When the sample ports are located in the top of a horizontal duct, a frame shall be provided above the port to allow the sample probe to be secured during the test.

[Rule 62-297.310(6), F.A.C.]

7. Frequency of Compliance Tests. The following provisions apply only to those emissions units that are subject to an emissions limiting standard for which compliance testing is required.

a. General Compliance Testing.

1. The owner or operator of a new or modified emissions unit that is subject to an emission limiting standard shall conduct a compliance test that demonstrates compliance with the applicable emission limiting standard prior to obtaining an operation permit for such emissions unit.
2. For excess emission limitations for particulate matter specified in Rule 62-210.700, F.A.C., a compliance test shall be conducted annually while the emissions unit is operating under soot blowing conditions in each federal fiscal year during which soot blowing is part of normal emissions unit operation, except that such test shall not be required in any federal fiscal year in which a fossil fuel steam generator does not burn liquid and/or solid fuel for more than 400 hours other than during startup.
3. The owner or operator of an emissions unit that is subject to any emission limiting standard shall conduct a compliance test that demonstrates compliance with the applicable emission limiting standard prior to obtaining a renewed operation permit. Emissions units that are required to conduct an annual compliance test may submit the most recent annual compliance test to satisfy the requirements of this provision. In renewing an air operation permit pursuant to sub-subparagraph 62-210.300(2)(a)3.b., c., or d., F.A.C., the Department shall not require submission of emission compliance test results for any emissions unit that, during the year prior to renewal:
- (a) Did not operate; or
- (b) In the case of a fuel burning emissions unit, burned liquid and/or solid fuel for a total of no more than 400 hours,
4. During each federal fiscal year (October 1 – September 30), unless otherwise specified by rule, order, or permit, the owner or operator of each emissions unit shall have a formal compliance test conducted for:
- (a) Visible emissions, if there is an applicable standard;
- (b) Each of the following pollutants, if there is an applicable standard, and if the emissions unit emits or has the

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potential to emit: 5 tons per year or more of lead or lead compounds measured as elemental lead; 30 tons per year or more of acrylonitrile; or 100 tons per year or more of any other regulated air pollutant; and

- (c) c. Each NESHAP pollutant, if there is an applicable emission standard.
5. An annual compliance test for particulate matter emissions shall not be required for any fuel burning emissions unit that, in a federal fiscal year, does not burn liquid and/or solid fuel, other than during startup, for a total of more than 400 hours.
 6. For fossil fuel steam generators on a semi-annual particulate matter emission compliance testing schedule, a compliance test shall not be required for any six-month period in which liquid and/or solid fuel is not burned for more than 200 hours other than during startup.
 7. For emissions units electing to conduct particulate matter emission compliance testing quarterly pursuant to paragraph 62-296.405(2)(a), F.A.C., a compliance test shall not be required for any quarter in which liquid and/or solid fuel is not burned for more than 100 hours other than during startup.
 8. Any combustion turbine that does not operate for more than 400 hours per year shall conduct a visible emissions compliance test once per each five-year period, coinciding with the term of its air operation permit.
 9. The owner or operator shall notify the Department, at least 15 days prior to the date on which each formal 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 for the owner or operator.
 10. An annual compliance test conducted for visible emissions shall not be required for units exempted from air permitting pursuant to subsection 62-210.300(3), F.A.C.; units determined to be insignificant pursuant to subparagraph 62-213.300(2)(a)1., F.A.C., or paragraph 62-213.430(6)(b), F.A.C.; or units permitted under the General Permit provisions in paragraph 62-210.300(4)(a) or Rule 62-213.300, F.A.C., unless the general permit specifically requires such testing.
 - (a) Special Compliance Tests. When the Department, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in a Department rule or in a permit issued pursuant to those rules is being violated, it shall require the owner or operator of the emissions unit to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to the Department.
 - (b) Waiver of Compliance Test Requirements. If the owner or operator of an emissions unit that is subject to a compliance test requirement demonstrates to the Department, pursuant to the procedure established in Rule 62-297.620, F.A.C., that the compliance of the emissions unit with an applicable weight emission limiting standard can be adequately determined by means other than the designated test procedure, such as specifying a surrogate standard of no visible emissions for particulate matter sources equipped with a bag house or specifying a fuel analysis for sulfur dioxide emissions, the Department shall waive the compliance test requirements for such emissions units and order that the alternate means of determining compliance be used, provided, however, the provisions of paragraph 62-297.310(7)(b), F.A.C., shall apply.

[Rule 62-297.310(7), F.A.C.]

REPORTS

8. Test Reports:
 - a. The owner or operator of an emissions unit for which a compliance test is required shall file a report with the Department on the results of each such test.
 - b. The required test report shall be filed with the Department as soon as practical but no later than 45 days after the last sampling run of each test is completed.
 - c. The test report shall provide sufficient detail on the emissions unit tested and the test procedures used to allow the Department to determine if the test was properly conducted and the test results properly computed. As a minimum, the test report, other than for an EPA or DEP Method 9 test, shall provide the following information.

SECTION IV. APPENDIX D
Common Testing Requirements

- (1) The type, location, and designation of the emissions unit tested.
- (2) The facility at which the emissions unit is located.
- (3) The owner or operator of the emissions unit.
- (4) The normal type and amount of fuels used and materials processed, and the types and amounts of fuels used and material processed during each test run.
- (5) The means, raw data and computations used to determine the amount of fuels used and materials processed, if necessary to determine compliance with an applicable emission limiting standard.
- (6) The type of air pollution control devices installed on the emissions unit, their general condition, their normal operating parameters (pressure drops, total operating current and GPM scrubber water), and their operating parameters during each test run.
- (7) A sketch of the duct within 8 stack diameters upstream and 2 stack diameters downstream of the sampling ports, including the distance to any upstream and downstream bends or other flow disturbances.
- (8) The date, starting time and duration of each sampling run.
- (9) The test procedures used, including any alternative procedures authorized pursuant to Rule 62-297.620, F.A.C. Where optional procedures are authorized in this chapter, indicate which option was used.
- (10) The number of points sampled and configuration and location of the sampling plane.
- (11) For each sampling point for each run, the dry gas meter reading, velocity head, pressure drop across the stack, temperatures, average meter temperatures and sample time per point.
- (12) The type, manufacturer and configuration of the sampling equipment used.
- (13) Data related to the required calibration of the test equipment.
- (14) Data on the identification, processing and weights of all filters used.
- (15) Data on the types and amounts of any chemical solutions used.
- (16) Data on the amount of pollutant collected from each sampling probe, the filters, and the impingers, are reported separately for the compliance test.
- (17) The names of individuals who furnished the process variable data, conducted the test, analyzed the samples and prepared the report.
- (18) All measured and calculated data required to be determined by each applicable test procedure for each run.
- (19) The detailed calculations for one run that relate the collected data to the calculated emission rate.
- (20) The applicable emission standard and the resulting maximum allowable emission rate for the emissions unit plus the test result in the same form and unit of measure.
- (21) A certification that, to the knowledge of the owner or his authorized agent, all data submitted are true and correct. When a compliance test is conducted for the Department or its agent, the person who conducts the test shall provide the certification with respect to the test procedures used. The owner or his authorized agent shall certify that all data required and provided to the person conducting the test are true and correct to his knowledge.

[Rule 62-297.310(8), F.A.C.]

MISCELLANEOUS

9. Stack and Duct: The terms stack and duct are used interchangeably in this rule. [Rule 62-297.310(9), F.A.C.]

Livingston, Sylvania

From: Livingston, Sylvania
Sent: Wednesday, June 16, 2010 2:30 PM
To: hmorris@cfifl.com
Cc: rbrunk@cfifl.com; cindy.zhang-torres@dep.state.fl.us; lee@epchc.org; praval@kooglerassociates.com; victoria.gibson@dep.state.fl.us; Sykes, John; Walker, Elizabeth (AIR)
Subject: CF Industries - Plant City Phosphate Complex; 0570005-035-AC/ PSD-FL-355A
Attachments: 0570005-035-AC_Intent.pdf

Dear Sir/ Madam:

Attached is the official **Notice of Intent to Issue** for the project referenced below. Click on the link displayed below to access the permit project documents and send a "reply" message verifying receipt of the document(s) provided in the link; 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".

Note: We must receive verification that you are able to access the documents. Your immediate reply will preclude subsequent e-mail transmissions to verify accessibility of the document(s).

Click on the following link to access the permit project documents:

http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf_permit_zip_files/0570005.035.AC.D_pdf.zip

Owner/Company Name: CF INDUSTRIES, INC., PLANT CITY PHOS

Facility Name: CF INDUSTRIES-PLANT CITY PHOSP COMPLEX

Project Number: 0570005-035-AC / PSD-FL-355A

Permit Status: DRAFT

Permit Activity: CONSTRUCTION

Facility County: HILLSBOROUGH

Processor: Syed Arif

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<http://www.dep.state.fl.us/air/emission/apds/default.asp>.

Permit project documents addressed in this email may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible, and verify that they are accessible. Please advise this office of any changes to your e-mail address or that of the Engineer-of-Record. If you have any problems opening the documents or would like further information, please contact the Florida Department of Environmental Protection, Bureau of Air Regulation

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

Note: The attached 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> .

Livingston, Sylvia

From: Brunk, Ron [rbrunk@cfifl.com]
Sent: Wednesday, June 16, 2010 2:51 PM
To: Livingston, Sylvia
Subject: RE: CF Industries - Plant City Phosphate Complex; 0570005-035-AC/ PSD-FL-355A

Received and viewed.

thanks,
ron

From: Livingston, Sylvia [mailto:Sylvia.Livingston@dep.state.fl.us]
Sent: Wednesday, June 16, 2010 2:30 PM
To: Morris, Herschel
Cc: Brunk, Ron; Zhang-Torres; lee@epchc.org; praval@kooglerassociates.com; Gibson, Victoria; Sykes, John; Walker, Elizabeth (AIR)
Subject: CF Industries - Plant City Phosphate Complex; 0570005-035-AC/ PSD-FL-355A

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Livingston, Sylvania

From: Morris, Herschel [hmmorris@cfifl.com]
Sent: Monday, June 21, 2010 8:10 AM
To: Livingston, Sylvania
Cc: Brunk, Ron; Zhang-Torres; lee@epchc.org; praval@kooglerassociates.com; Gibson, Victoria; Sykes, John; Walker, Elizabeth (AIR)
Subject: RE: CF Industries - Plant City Phosphate Complex; 0570005-035-AC/ PSD-FL-355A

I received your E-mail.
Herschel Morris

From: Livingston, Sylvania [mailto:Sylvia.Livingston@dep.state.fl.us]
Sent: Wednesday, June 16, 2010 2:30 PM
To: Morris, Herschel
Cc: Brunk, Ron; Zhang-Torres; lee@epchc.org; praval@kooglerassociates.com; Gibson, Victoria; Sykes, John; Walker, Elizabeth (AIR)
Subject: CF Industries - Plant City Phosphate Complex; 0570005-035-AC/ PSD-FL-355A

Dear Sir/ Madam:

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Owner/Company Name: CF INDUSTRIES, INC., PLANT CITY PHOS
Facility Name: CF INDUSTRIES-PLANT CITY PHOSP COMPLEX
Project Number: 0570005-035-AC / PSD-FL-355A
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Permit Activity: CONSTRUCTION
Facility County: HILLSBOROUGH
Processor: Syed Arif

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Livingston, Sylvia

From: Pradeep Raval [praval@kooglerassociates.com]
Sent: Wednesday, June 16, 2010 2:34 PM
To: Livingston, Sylvia; hmorris@cfifl.com
Cc: rbrunk@cfifl.com; Zhang-Torres; lee@epchc.org; Gibson, Victoria; Sykes, John; Walker, Elizabeth (AIR)
Subject: RE: CF Industries - Plant City Phosphate Complex; 0570005-035-AC/ PSD-FL-355A

Thanks, Sylvia.

Is it hot enough for you yet? It's close to 100 here!

Regards,

Pradeep Raval

Koogler and Associates, Inc.

4014 NW 13th Street

Gainesville, FL 32609

tel: 352-377-5822

cell: 352-317-8635

fax: 352-377-7158

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From: Livingston, Sylvia [mailto:Sylvia.Livingston@dep.state.fl.us]
Sent: Wednesday, June 16, 2010 2:30 PM
To: hmorris@cfifl.com
Cc: rbrunk@cfifl.com; Zhang-Torres; lee@epchc.org; praval@kooglerassociates.com; Gibson, Victoria; Sykes, John; Walker, Elizabeth (AIR)
Subject: CF Industries - Plant City Phosphate Complex; 0570005-035-AC/ PSD-FL-355A

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

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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.