

**Golder Associates Inc.**

6241 NW 23rd Street, Suite 500  
Gainesville, FL USA 32653  
Telephone (352) 336-5600  
Fax (352) 336-6603  
www.golder.com

0570005-019-AC



February 27, 2007

0637647

Florida Department of Environmental Protection  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

RECEIVED  
FEB 28 2007  
BUREAU OF AIR REGULATION

Attention: Mr. Syed Arif, P.E., Air Permitting South Section

**RE: CF INDUSTRIES, INC.—PLANT CITY  
DEP FILE NO. 0570005-019-AC  
C & D SULFURIC ACID PLANTS MAIN BLOWERS**

Dear Mr. Arif:

On December 21, 2005, CF Industries, Inc. (CFI) received a modification to the previously-approved C- & D- Sulfuric Acid Plant (SAP) construction permit No. 0570005-019-AC in order to install new main blowers that would increase actual sulfuric acid production rates to more closely approach permitted production rates. The permit currently expires on June 1, 2007.

At the time of the request for the permit modification, CFI anticipated the new main blower for D-SAP would be installed in the fall of 2006 during a 5-day plant outage, while the C-SAP main blower would be installed during the scheduled 21-day plant turnaround in February, 2007. Since the original extension request, this plan has been determined to be unworkable.

The main blower manufacturer has been unable to deliver the equipment in a timely fashion. Both main blowers were originally to be on site by February, 2007; one blower in October, 2006, and the second blower in February, 2007. The first blower was actually received in mid-December, 2006. The second blower is now scheduled to be delivered in mid-May, 2007. In addition, the plant downtime required for installation of the blowers has been determined to be 10 days at best, as opposed to the original schedule of 5 days. Since both blowers were unavailable as originally scheduled, CFI has elected to install the first blower during the C-SAP turnaround in February, 2007. The D-SAP main blower is proposed to be installed during the next 21-day turnaround in the spring of 2008, thus requiring an extension of the construction permit.

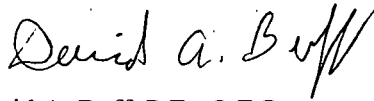
The late delivery of the second blower makes completion of the project by the permit expiration date of June 1, 2007 infeasible, particularly if the supplier is unable to meet the forecast delivery date. In addition, a 10-day plant outage to install the blower in late May, 2007, is not economically justified when the scheduled D-SAP turnaround is available in the spring of 2008. An extra 10-day outage would result in the loss of 26,000 tons of sulfuric acid production. The economic impact of this lost production is significant and can be avoided by installing the D-SAP main blower during the scheduled turnaround.

For these reasons, CFI requests the C- & D-SAP construction permit be extended by 12 months to expire on June 1, 2008.

Thank you for consideration of this request. If you have any questions, please do not hesitate to call me at (352) 336-5600.

Sincerely,

GOLDER ASSOCIATES INC.



David A. Buff, P.E., Q.E.P.  
Principal Engineer  
Florida P. E. #19011

DB/all

cc: Tom Edwards  
Bob May

Y:\Projects\2006\0637647 CF Industries\4.1\022607-647.doc