



Florida Department of Environmental Protection

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Michael W. Sole
Secretary

February 15, 2007

ELECTRONIC MAIL – RECEIVED RECEIPT REQUESTED

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

Re: DEP File No. 0570005-021-AC; PSD-FL-355
“B” Sulfuric Acid Plant (SAP) Production Increase
Plant City Phosphate Complex

Dear Mr. Morris:

The Department has received the amended PSD application on January 18, 2007, for the Plant City Complex in Hillsborough County. Based on our review of the amended project, we have determined that additional information is needed in order to continue processing this application package. Please submit the information requested below to the Department’s Bureau of Air Regulation:

1. This information was requested after the review of the initial application package but was not provided to the Department as the scope of the project had changed. Now, that ‘B’ Sulfuric Acid Plant (SAP) is being considered again for modification, please provide emissions data for SO₂ in lb/ton of 100% H₂SO₄ for the last year (3-hour CEM averages) of operation for the “B” SAP. In providing this data, please present it in a graphical representation against time. On the same graph, indicate the production rate for the plant (3-hour averages) and indicate the turn-around date, if any, for the ‘B’ SAP on the time axis.
2. Please provide Table 3-3 of the application as it relates to the amended project.
3. The Department is still not clear for the need to authorize the construction of the sixth evaporator prior to issuing the permit for the amended project. Your letter of January 11, 2007, clearly states that an increase in evaporation capacity is required to accommodate the increase of total permitted phosphoric acid production capacity of this project. Therefore, the need for the sixth evaporator does not arise until the Department authorizes the increase in the phosphoric acid production capacity as requested in this project. The increase of MAP production from 6 percent to 20 percent for the current year does not explain as to why such an increase cannot be accomplished with the current evaporators. Please explain.

4. The electronic modeling files for the amended project were received by the Department on February 13, 2007. The Department has 30 days from the received date to ask additional modeling questions as it relates to the amended project.

Please respond to the following comments and concerns that were submitted by Hillsborough County Environmental Protection Commission:

1. CF states the permitted rates of the "X", "Y", and "Z" plants will not increase and the "A" DAP/MAP plant will not be required to operate. In Table 6-3 provided, it shows the current actual emissions for all three combined as 42.86 tons per year of PM₁₀. The potential for these units is 174.6 tons per year of PM₁₀. This is greater than the significance level of 15 tons per year. Similar analyses can be performed for the other pollutants. Therefore, the facility should be subject to BACT review for these units as they are being modified, unless the facility requests the current actual to future actual provision of 62-212.200, which was not referenced in the updated application. No data was provided for the "A" DAP/MAP plant, however the operational scenario to limit below PSD when used as a backup to the "X", "Y", and "Z" plants should be provided to ensure it remains below the significant level. Please address accordingly and provide BACT review analyses for all the granulation plants, "X", "Y", and "Z" plants and the "A" DAP/MAP plant, as part of this modification project.
2. This comment affected debottlenecking of the Acid plants for PSD purposes and they should be considered one plant. CF states they operate independently from one another. However, it is EPC staff opinion that all four plants are dependent upon on another. Just as the modification of the "B" SAP may debottleneck the two PAPs and X, Y and Z DAP/MAP Plants, because all four SAPs share common acid tanks, an increase in sulfuric acid production at the "B" SAP may cause more weak acid to be available to the "A", "C" and "D" SAPs, which could in turn cause an increase in their production and actual emissions. Because of the uniqueness of CF's common sulfuric acid storage system, the physical change (modification) at the "B" SAP could result in emissions increases throughout the facility, but more specifically in SO₂ and SAM emissions from the other three SAPs. Therefore, CF needs to submit emissions calculations detailing the increases in actuals and, if the increase is significant, apply BACT to each plant that shows an increase.

Any additional comments from EPA and the U.S. Fish and Wildlife Service will be forwarded to you after we receive them.

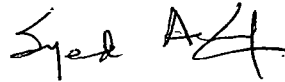
The Department will resume processing this application after receipt of the requested information. Rule 62-4.050(3), F.A.C. requires that all applications for a Department permit must be certified by a professional engineer registered in the State of Florida. This requirement also applies to responses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

Please note that in accordance with Rule 62-4.055(1), "The applicant shall have **ninety days** after the Department mails a timely request for additional information to submit that information to

the Department ... Failure of an applicant to provide the timely requested information by the applicable date **shall** result in denial of the application.”

We will be happy to meet and discuss the details with you and your staff. I may be contacted at 850/921-9528. You may discuss the modeling requirements with Ms. Debbie Nelson at 850/921-9537.

Sincerely,



Syed Arif, P.E.
North Permitting Section

/sa

cc: G. Worley, EPA (worley.gregg@epa.gov)
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