

# Memorandum

# Florida Department of Environmental Protection

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TO: Joseph Kahn

THRU: Trina Vielhauer  
Jeff Koerner *JK*

FROM: Syed Arif *SA*

DATE: July 16, 2007

SUBJECT: CF Industries, Inc. – Plant City Phosphate Complex  
Air Permit No. PSD-FL-355  
Project No. 0570005-021-AC  
Sulfuric and Phosphoric Acid Production Increase

Attached for your approval and signature is the Final Permit for CF Industries, Inc., Plant City Phosphate Complex located in Plant City, Hillsborough County.

The Final permit authorizes increase in the production rate for B Sulfuric Acid Plant (SAP) to 1,600 tons per day (TPD) and for A and B Phosphoric Acid Plants (PAP) to 1,699 TPD and 2,530 TPD of 100-percent rock phosphorus pentoxide, respectively. The proposed project involves upgrading and/or replacement of plant equipment to accomplish the production increases, as described in the permit application.

The B SAP utilizes single-absorption technology. Sulfur dioxide and sulfuric acid mist emissions from the B SAP are controlled by a two-stage ammonia scrubber and a Brink's demister.

Fluoride (F) emissions from the A PAP are controlled by a cyclonic scrubber followed by a horizontal, cross-flow packed scrubber. F emissions from the B PAP are controlled by a horizontal, cross-flow packed scrubber.

The Public Notice was published on June 8, 2007 in the Tampa Tribune. No comments were received from the public, EPA Region 4, or the National Park Service. Comments were submitted by the applicant resulting in minor changes as described in the final determination.

We recommend your approval and signature.

JK/sa

Attachments

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
**NOTICE OF FINAL PERMIT**

In the Matter of an  
Application for Air Permit

Mr. Herschel E. Morris  
CF Industries, Inc. – Plant City Phosphate Complex  
Post Office Drawer L  
Plant City, Florida 33564

Air Permit No. PSD-FL-355  
Project No. 0570005-021-AC

Enclosed is the Final Permit which authorizes production rate increases for the B Sulfuric Acid Plant as well as A and B Phosphoric Acid Plants at Plant City Phosphate Complex in Plant City, Hillsborough County. This permit is issued pursuant to Chapter 403, Florida Statutes (F.S.) and Chapters 62-4 through 297 Florida Administrative Code (F.A.C.) and Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

Any party to this order (permit) has the right to seek judicial review of the permit pursuant to Section 120.68, F.S., by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the Department in the Legal Office; 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 of Appeal must be filed within 30 days from the date this order is filed with the Clerk of the Department.

Executed in Tallahassee, Florida.

Trina L. Vielhauer, Chief  
Bureau of Air Regulation

**CERTIFICATE OF SERVICE**

The undersigned duly designated deputy agency clerk hereby certifies that this Notice of Final Permit (including the Final Permit) and all copies were sent electronically (with received receipt) before the close of business on 7/23/07 to the persons listed:

Herschel E. Morris, CF Industries, Inc. ([hmorris@cfifl.com](mailto:hmorris@cfifl.com))  
Jim Little, EPA ([little.james@epa.gov](mailto:little.james@epa.gov))  
Kathleen Forney, EPA ([forney.kathleen@epa.gov](mailto:forney.kathleen@epa.gov))  
Dee Morse, NPS ([dee\\_morse@nps.gov](mailto:dee_morse@nps.gov))  
Cindy Zhang-Torres, DEP-SWD ([cindy.zhang-torres@dep.state.fl.us](mailto:cindy.zhang-torres@dep.state.fl.us))  
Diana Lee, HCEPC ([lee@epchc.org](mailto:lee@epchc.org))  
David Buff, Golder Associates, Inc. ([dbuff@golder.com](mailto:dbuff@golder.com))  
Joseph Marini, RMT, Inc. ([joseph.marini@rmtinc.com](mailto:joseph.marini@rmtinc.com))

Clerk Stamp

**FILING AND ACKNOWLEDGMENT FILED**, on this date, pursuant to §120.52, Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.

(Clerk)

7/23/07  
(Date)

## FINAL DETERMINATION

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### PERMITTEE

CF Industries, Inc.  
10608 Paul Buchman Highway  
Plant City, FL 33565

### PERMITTING AUTHORITY

Florida Department of Environmental Protection  
Division of Air Resource Management  
Bureau of Air Regulation, Air Permitting North Section  
2600 Blair Stone Road, MS #5505  
Tallahassee, Florida 32399-2400

### PROJECT

Air Permit No. PSD-FL-355  
Permit No. 0570005-021-AC  
Plant City Phosphate Complex

CF Industries proposes to modify its existing B Sulfuric Acid Plant (SAP) by increasing the production rate of the plant from 1,300 to 1,600 tons per day (TPD). The production rate increase will be accomplished through several plant improvements related to increasing air flow, increased process cooling, increased catalyst loading, and utilizing high-efficiency cesium-promoted catalyst in the fourth pass of the converter. The B SAP utilizes single-absorption technology.

CF Industries is also proposing to modify its existing A and B Phosphoric Acid Plants (PAP) by increasing the production rate of the A PAP from 1,416 to 1,699 TPD of 100-percent rock phosphorus pentoxide (P<sub>2</sub>O<sub>5</sub>) and of the B PAP from 2,107 to 2,530 TPD of 100-percent rock P<sub>2</sub>O<sub>5</sub>. The production rate increase will be accomplished through installation of additional reactor flash cooling equipment, increased evaporation capacity equipment and double-gypsum filtration.

### NOTICE AND PUBLICATION

The Department distributed an Intent to Issue Air Permit package on May 29, 2007. The applicant published the Public Notice of Intent to Issue Air Permit in the Tampa Tribune on June 8, 2007. The Department received the proof of publication on June 15, 2007.

### COMMENTS

No comments on the Draft Permit were received from the public, the Hillsborough County Environmental Protection Commission, the Department's Southwest District, the EPA Region 4 Office or the National Park Service

Comments were submitted by the applicant on July 9, 2007. The following summarizes their comments and the Department's response:

#### 1. **The language of Specific Condition 1 in Subsection C and D of the Draft Permit is confusing.**

The Department will adopt the language proposed by the applicant and Specific Condition 1 in Subsections C and D of the Draft Permit will be changed to read:

~~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 construction/modification permits which include restrictions and standards regarding capacities, production, operation, fuels, emissions, monitoring, record keeping, reporting, etc. for these units. Unless~~

## FINAL DETERMINATION

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otherwise specified, the facility remains subject to all of the requirements specified in the current Title V Permit No. 0570005-017-AV. [Rule 62-4.070(3), F.A.C.]

This permit supplements all previously issued air construction and operation permits for these emission units. Except for changes specified in the conditions below, the emission units remain subject to the conditions of all other valid air construction and operation permits. [Rule 62-4.070(3), F.A.C.]

### **2. Specific Condition 4 in Subsection C of the Draft Permit requires both hourly and daily production rate limits.**

The applicant requested that the hourly production limitations be replaced with daily limits and if an hourly rate is deemed necessary it should be a nominal amount higher (i.e., 10 percent) than the daily rate to allow for process fluctuations. This request was later withdrawn through an e-mail dated July 16, 2007.

The Department noted that an hourly production limit for B Sulfuric Acid Plant (SAP) was not included in the permit. An hourly production rate of 67 TPH will be added to Specific Condition 4 a. of Subsection C of the Draft Permit.

### **3. Setting up particulate tests for the A and B Shipping Baghouses would be very complex and expensive.**

The applicant commented that setting up a particulate test for A Shipping Baghouse (SB) would be very complex. There are no work platforms on the building that are adjacent to the SB exit area. A large crane (duct is 120 feet above ground level) would need to support a work platform where the stack test equipment could be set up. Modifications would have to be made to the outside wall structure to get the sample probe to the sampling area inside the building.

For the B-SB similar type construction and equipment will be required to conduct a particulate test.

Based on the above comments and the manufacturers' data for the A- and B-SB, the Department will require A- and B-SB to comply with a 5 percent visible emissions (VE) limit as well as grain loading requirement. Rule 62-297.620(4), Florida Administrative Code (F.A.C.) allows the Department to waive the particulate test for baghouses with potential emissions of less than 100 tons per year, provided the 5 percent VE limit is imposed. The Department will amend Specific Conditions 2 and 9 in Subsection D of the Draft Permit to reflect these requirements. Specific Condition 2 will read as follows:

~~Emissions of particulate matter (PM) from the A and B Shipping Baghouses shall not exceed 1.71 lb/hr each. Visible emissions from the A and B Shipping Baghouse exhausts shall not exceed 5% opacity. Each baghouse control system shall be designed and maintained to achieve an outlet grain loading of no more than 0.02 grains per actual cubic feet (gr./acf) for a nominal flow rate of approximately 10,000 actual cubic feet per minute (acfm). New and replacement bags shall meet these specifications based on vendor information. The permittee shall maintain records of the design specifications for the bags. No particulate matter emissions tests are required. {Permitting Note: Based on the baghouse design specifications, potential PM<sub>10</sub> emissions from each baghouse would be 1.71 lb/hour and 7.51 tons/year.} [Rules 62-212.400(5) 62-297.620(4) and 62-4.070(3), F.A.C.; Applicant Request Application No. 0570005-021-AC]~~

Specific Condition 9 will read as follows:

Initial PM and annual visible emissions compliance tests are required for the A and B Shipping Baghouses. If the initial tests demonstrate compliance with the PM and opacity standards, subsequent annual PM tests are not required. However, the The Compliance Authority may request "special compliance tests" in

## FINAL DETERMINATION

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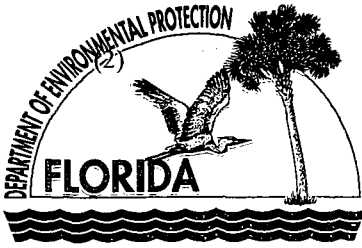
accordance with the requirements of Rule 62-297.310(7)(b), F.A.C. [Rules 62-297.620(4) and 62-297.310(7)(b), F.A.C.]

#### 4. **Submission of protocol to conduct the ambient monitoring for fluorides.**

The Department accepts the protocol submitted to conduct ambient monitoring for fluorides with the exception of submittal of reports. Specific Condition 23 in Subsection C of the Draft Permit required submittal of a separate report summarizing the results for pre-construction and post-construction phases within 45 days of completion of each phase of data gathering. The protocol submitted by the applicant suggests submitting one report that includes both pre-construction and post-construction phase results.

#### **CONCLUSION**

The final action of the Department is to issue the Final Permit with the minor revisions, corrections, and clarifications as described above.



# 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

## PERMITTEE:

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

<b>File No.</b>	0570005-021-AC
<b>Permit No.</b>	PSD-FL-355
<b>SIC No.</b>	2874
<b>Project:</b>	Sulfuric Acid and Phosphoric Acid Production Increase
<b>Expires:</b>	December 31, 2009

## Authorized Representative:

Herschel E. Morris  
V.P. Phosphate Operations & General Manager

## PROJECT AND LOCATION:

This permit authorizes modification of the Plant City Phosphate Complex to increase the production rate of the existing B Sulfuric Acid Plant (SAP) to 1,600 tons per day (TPD) and the A and B Phosphoric Acid Plants (PAP) to 1,699 and 2,530 TPD, respectively. The UTM coordinates are Zone 17; 388 km E; 3116 km N.

## STATEMENT OF BASIS:

This construction permit is issued under the provisions of Chapter 403 of the Florida Statutes (F.S.), and the Florida Administrative Code (F.A.C.) Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297. The above named permittee is authorized to modify the facility in accordance with the conditions of this permit and as described in the application, approved drawings, plans, and other documents on file with the Department of Environmental Protection (Department).

## ATTACHED APPENDICES ARE MADE A PART OF THIS PERMIT:

Appendix A Best Operational Start-up Procedures for Sulfuric Acid Plants  
Appendix BD BACT Determination  
Appendix GC Construction Permit General Conditions

Executed in Tallahassee, Florida

  
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Joseph Kahn, Director  
Division of Air Resource Management

July 20, 2007  
(Date)

## SECTION I. FACILITY INFORMATION

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### FACILITY DESCRIPTION

The 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

CF Industries proposes to modify its existing B SAP by increasing the production rate of the plant from 1,300 to 1,600 tons per day (TPD). The production rate increase will be accomplished through several plant improvements related to increasing air flow, increased process cooling, increased catalyst loading, and utilizing high-efficiency cesium-promoted catalyst in the fourth pass of the converter. The B SAP utilizes single-absorption technology. Sulfur dioxide (SO<sub>2</sub>) and sulfuric acid mist (SAM) emissions from the B SAP are controlled by a two-stage ammonia scrubber and a Brink's demister.

CF Industries is also proposing to modify its existing A and B PAP by increasing the production rate of the A PAP from 1,416 to 1,699 TPD of 100-percent rock phosphorus pentoxide (P<sub>2</sub>O<sub>5</sub>) and of the B PAP from 2,107 to 2,530 TPD of 100-percent rock P<sub>2</sub>O<sub>5</sub>. The production rate increase will be accomplished through installation of additional reactor flash cooling equipment, increased evaporation capacity equipment and double-gypsum filtration. Fluoride (F) emissions from the A PAP are controlled by a cyclonic scrubber followed by a horizontal, cross-flow packed scrubber. Fluoride emissions from the B PAP are controlled by a horizontal, cross-flow packed scrubber.

### REGULATORY CLASSIFICATION

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.

### RELEVANT DOCUMENTS:

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

## SECTION II. EMISSION UNIT(S) ADMINISTRATIVE REQUIREMENTS

1. Regulating Agencies: All documents related to applications for permits to operate, reports, tests, minor modifications and notifications shall be submitted to the Department's Southwest District Office, 13051 N. 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 PSD or Nonattainment Area (NAA) review requirements should be submitted to the Department, Bureau of Air Regulation (BAR), 2600 Blair Stone Road, MS 5505, Tallahassee, Florida 32399-2400 (phone number 850/488-0114).
2. General Conditions: The owner and operator are subject to and shall operate under the attached General Permit Conditions G.1 through G.15 listed in Appendix GC of this permit. General Permit Conditions are binding and enforceable pursuant to Chapter 403 of the F.S. [Rule 62-4.160, F.A.C.]
3. Terminology: The terms used in this permit have specific meanings as defined in the corresponding chapters of the F.A.C.
4. 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 F.A.C. Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296, 62-297 and Code of Federal Regulations (CFR) Title 40, Parts 60 and 63, adopted by reference in the 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.]
5. Expiration: The permittee may, for good cause, request that this construction permit be extended. Such a request shall be submitted to the Department 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.]
6. 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.]
7. 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



## SECTION II. EMISSION UNIT(S) ADMINISTRATIVE REQUIREMENTS

months or more, or if construction is not completed within a reasonable time. This provision does not apply to the time period between construction 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.]

8. 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 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)]
9. 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 Southwest District office and EPCHC by March 1st of each year.
10. Stack Testing Facilities: Stack sampling facilities shall be installed in accordance with Rule 62-297.310(6), F.A.C.
11. 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.]
12. Quarterly Reports: Quarterly excess emission reports, in accordance with 40 CFR 60.7(a)(7)(c) shall be submitted to the Department's Southwest District office and EPCHC.

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### SECTION III. EMISSION UNIT(S) SPECIFIC CONDITIONS

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**SUBSECTION A.            FACILITY-WIDE CONDITION**

As necessary, the permittee shall take necessary steps (watering, street sweeping, etc.) to prevent and minimize fugitive dust emissions from the plant's paved areas and roads. **[Rule 62-212.400(5), F.A.C.]**

**SUBSECTION B.            COMMON CONDITIONS**

The Common Conditions listed in this subsection apply to the following emission units:

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

The above emissions units remain subject to all applicable provisions of the 40 CFR 60 New Source Performance Standards for Wet-Process Phosphoric Acid Plants, Subpart T and for Sulfuric Acid (H<sub>2</sub>SO<sub>4</sub>) Plants, Subpart H; and, 40 CFR 63 Subpart AA, for phosphoric acid plants, as applicable. **[Rule 62-204.800, F.A.C.]**

### SECTION III. EMISSION UNIT(S) SPECIFIC CONDITIONS

#### SUBSECTION C. MODIFIED UNITS

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

EMISSION UNIT No.	EMISSION UNIT DESCRIPTION
003	B SAP
004	A PAP
009	B PAP

#### PREVIOUS APPLICABLE REQUIREMENTS

1. This permit supplements all previously issued air construction and operation permits for these emission units. Except for changes specified in the conditions below, the emission units remain subject to the conditions of all other valid air construction and operation permits.  
[Rule 62-4.070(3), F.A.C.]

#### AUTHORIZED WORK

2. The permittee is authorized to make the following modifications to the B SAP:
  - a. Modify or replace the existing main blower wheel and turbine in order to increase plant air flow.
  - b. Modify the existing superheater-economizer to improve heat transfer.
  - c. Replace the existing sulfur feed pumps with larger capacity pumps.
  - d. Modify the existing converter to maximize catalyst loading on all passes of the converter.
  - e. Eliminate the quench air injected after pass 2. Install a new superheater between pass 2 and pass 3 to replace the process gas cooling lost with the removal of quench air.
  - f. Install a new superheater after the primary boiler to provide additional cooling capacity.
  - g. Replace the No. 4 catalyst bed with cesium catalyst.
  - h. Replace the packing in the Absorption Tower with a new design low-pressure drop packing.
  - i. Add a third cell to the existing cross flow cooling tower. Add an additional cooling tower pump, and upgrade the existing pumps.  
[Design; Application No. 0570005-021-AC]
3. The permittee is authorized to make the following modifications to the A and B PAPs:
  - a. Install new piping, larger motors, and other Flash Cooler vessel modifications to increase the A PAP Flash Cooler reactor cooling capacity.
  - b. Install a third B PAP Flash Cooler pump and piping to increase the B PAP reactor cooling capacity.
  - c. Install steam system piping improvements to reduce steam system pressure drop.
  - d. Construct a new No. 6 evaporator for the B PAP as described in the application. The

### SECTION III. EMISSION UNIT(S) SPECIFIC CONDITIONS

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proposed new evaporator will be used in configurations which concentrate phosphoric acid from 40 percent P<sub>2</sub>O<sub>5</sub> to 54 percent P<sub>2</sub>O<sub>5</sub> in either one or two stages.

**[Design; Application No. 0570005-021-AC]**

#### PERMITTED CAPACITIES

4. The maximum operation rates shall not exceed:
  - a. B SAP – 67 tons per hour (TPH) of 100% H<sub>2</sub>SO<sub>4</sub> produced, 1,600 TPD of 100% H<sub>2</sub>SO<sub>4</sub> produced;
  - b. A PAP – 70.8 TPH of 100% P<sub>2</sub>O<sub>5</sub> input, 1,699 TPD of 100% P<sub>2</sub>O<sub>5</sub> input, and 620,208 tons per consecutive 12 months of 100% P<sub>2</sub>O<sub>5</sub> input.
  - c. B PAP – 105.4 TPH of 100% P<sub>2</sub>O<sub>5</sub> input, 2,530 TPD of 100% P<sub>2</sub>O<sub>5</sub> input, and 923,304 tons per consecutive 12 months of 100% P<sub>2</sub>O<sub>5</sub> input.

**[Rule 62-210.200, F.A.C. (Definitions - Potential Emissions)]**

5. The subject emission units are allowed to operate continuously (8760 hours/year).

**[Rule 62-210.200, F.A.C. (Definitions - Potential Emissions)]**

#### EMISSION AND PERFORMANCE REQUIREMENTS

6. Emissions of SO<sub>2</sub> from the B SAP shall not exceed 3.5 lb/ton 100% H<sub>2</sub>SO<sub>4</sub>, 3-hour rolling average, 233.3 lb/hr and 1,022 tons per year (TPY). **[Rule 62-212.400, F.A.C.]**
7. Emissions of SAM from the B SAP shall not exceed 0.075 lb/ton 100% H<sub>2</sub>SO<sub>4</sub>, 5.0 lb/hr and 21.9 TPY. **[Rule 62-212.400, F.A.C.]**
8. Emissions of nitrogen oxides (NO<sub>x</sub>) from the B SAP shall not exceed 0.12 lb/ton 100% H<sub>2</sub>SO<sub>4</sub>, 8.0 lb/hr and 35.0 TPY. **[Rule 62-212.400, F.A.C.]**
9. Emissions of total F from the A PAP shall not exceed 0.012 lb/ton P<sub>2</sub>O<sub>5</sub> input, 0.85 lb/hr and 3.7 TPY. **[Rule 62-212.400, F.A.C.]**
10. Emissions of total F from the B PAP shall not exceed 0.012 lb/ton P<sub>2</sub>O<sub>5</sub> input, 1.26 lb/hr and 5.5 TPY. **[Rule 62-212.400, F.A.C.]**
11. Visible emissions shall not exceed 10 percent opacity from the B SAP. **[Rule 62-212.400, F.A.C.]**
12. Best operational practices to minimize leaks of sulfur dioxide and sulfur trioxide, or other fugitive process emissions shall be adhered to and shall include regular inspections and prompt repair or correction of any leaks or other fugitive emissions. **[Rule 62-296.320, F.A.C.]**
13. Sulfuric acid plants are authorized to emit excess emissions from start-up for a period of three consecutive hours provided best operational practices to minimize emissions, in accordance

### **SECTION III. EMISSION UNIT(S) SPECIFIC CONDITIONS**

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with the agreement titled "Best Operational Start-Up Practices For Sulfuric Acid Plants" is followed. The provisions of the agreement issued by the Department are hereby added to this permit as Appendix A and shall be added to the Title V permit.

**[Rule 62-210.700, F.A.C., 40 CFR 60.7]**

14. No person shall cause, suffer, allow, or permit the discharge of air pollutants which cause or contribute to an objectionable odor. **[Rule 62-296.320, F.A.C.]**
15. No person shall circumvent any air pollution control device, or allow the emission of air pollutants without the applicable air pollution control device operating properly.  
**[Rule 62-210.650, F.A.C.]**
16. The emissions units shall be subject to the following:
  - a. Unless otherwise specified, excess emissions resulting from startup, shutdown or malfunction of any source 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 two hours in any 24 hour period unless specifically authorized by the Department for longer duration. **[Rule 62-210.700, F.A.C.]**
  - b. Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during startup, shutdown, or malfunction shall be prohibited. **[Rule 62-210.700, F.A.C.]**
  - c. In case of excess emissions resulting from malfunctions, each source shall notify the Department or the appropriate Local Program 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, F.A.C.]**

### **MONITORING AND TESTING REQUIREMENTS**

17. A continuous emissions monitoring system (CEMS) shall be installed, calibrated, maintained, operated, and used to determine compliance with the 3-hour rolling average emissions limit for SO<sub>2</sub> from the B SAP. The CEMS shall be installed and certified before the initial performance test and operated in compliance with 40 CFR 60, Appendix F, Quality Assurance Procedures or other Department-approved QA plan; 40 CFR 60, Appendix B, Performance Specification 2.

The CEMS shall calculate and record emission rates in units of pounds SO<sub>2</sub> per ton of 100 percent sulfuric acid produced. Each operating day, the rolling averages of the SO<sub>2</sub> emission rate for the 3 hours shall be calculated and recorded. Emissions shall be calculated in units of pounds of SO<sub>2</sub> per ton of 100 percent acid produced using one of the methods specified in 40 CFR 60.84. Averages are to be calculated as the arithmetic mean of each monitored operating hour in which sulfur is burned in the unit and at least two emission measurements are recorded at least 15 minutes apart. Data taken during periods of startup, or when the CEMS is out of control as defined in 40 CFR 60, Appendix F, Section 5.2, shall be excluded from the 3-hour

### SECTION III. EMISSION UNIT(S) SPECIFIC CONDITIONS

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rolling averages. Data recorded during periods of shutdown, malfunction, load change, and continuous operating periods shall be included in the calculation of the 3-hour rolling averages.

To the extent the monitoring system is available to record emissions data, the CEMS shall be operated and shall record data at all operating hours when sulfur is burned in the unit, including periods of startup, shutdown, load change, continuous operation and malfunction. Monitor downtimes and excess emissions based on 3-hour averages, which include startup emissions, shall be reported on a quarterly basis using the SUMMARY REPORT in 40 CFR 60.7. A detailed report of the cause, duration, magnitude, and corrective action taken or preventative measures adopted for each excess emission occurrence, and a listing of monitor downtime occurrences shall accompany the SUMMARY REPORT when the total duration of excess emissions is 1% or greater or if the monitoring system downtime is 5% greater of the total monitored operating hours.

The monitoring device shall meet the applicable requirements of Chapter 62-204, F.A.C., 40 CFR 60, Appendix F, and 40 CFR 60.13, including certification of each CEMS in accordance with 40 CFR 60, Appendix B, Performance Specifications and 40 CFR 60.7(a)(5) Notification Requirements. Data on monitoring equipment specifications, manufacturer, type calibration and maintenance requirements, and the proposed location of each stack probe shall be provided to the Department for review at least 30 days prior to installation of a new CEMS. **[Rules 62-4.070(3), F.A.C. and 62-204.800, F.A.C.]**

18. The permittee shall install, calibrate, operate and maintain monitoring devices that continuously measure and record the total pressure drop across each phosphoric acid plant scrubbing system. Accuracy of the monitoring devices shall be  $\pm 5\%$  over the operating range. **[Rules 62-297.310, 62-204.800, F.A.C.; 40 CFR 60.203]**
19. The permittee shall install, calibrate, maintain, and operate monitoring devices which can be used to determine the mass flow of phosphorus-bearing feed material to the phosphoric acid processes. The monitoring devices shall have an accuracy of  $\pm 5$  percent over the operating range. The permittee shall maintain a daily record of equivalent  $P_2O_5$  feed by first determining the total mass rate in metric ton/hour of phosphorus bearing feed using the flow monitoring device meeting the requirements of 40 CFR 60.203(a), and then by proceeding according to 40 CFR 60.204(b)(3) **[Rule 62-204.800, F.A.C.]**
20. Within 60 days after achieving the new permitted capacity, but not later than 180 days after completing the proposed work, the subject emission units shall be tested for compliance with the emission limits for B SAP and A and B PAP. 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

### **SECTION III. EMISSION UNIT(S) SPECIFIC CONDITIONS**

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consecutive days for the purposes of additional compliance testing to regain the permitted capacity in the permit. **[Rule 62-297.310, F.A.C.]**

21. The Department's Southwest District office and EPCHC in Tampa shall be notified in writing at least 15 days prior to the compliance tests. Written reports of the test results shall be submitted to those offices within 45 days of test completion. **[Rule 62-297.310, F.A.C.]**
22. The procedures for the initial compliance and annual compliance tests for visible emissions, SO<sub>2</sub>, NO<sub>x</sub>, SAM and F shall be in accordance with EPA Reference Methods 1, 2, 3, 4, 6C, 7E, 8, 9 and 13A or 13B, as appropriate, as published in 40 CFR 60, Appendix A. **[Rules 62-204.800 and 62-297.310(7)(c), F.A.C.]**
23. The permittee shall conduct pre-construction fluorides ambient monitoring for a minimum period of six months and post-construction fluorides ambient monitoring for a minimum period of one year. The data shall comply with the requirements of 40 CFR 52.21(m). The fluorides ambient monitor shall be installed at the latest by January 1, 2009. The fluorides ambient monitor shall be placed within the plant boundary and located downwind of the emission units. The permittee shall submit reports summarizing the results of the collected data to the Bureau of Air Regulation within 45 days of completing the pre-construction and post-construction monitoring periods. **[Rule 62-212.400(5), F.A.C., 40 CFR 52.21(m)]**

### **RECORDKEEPING AND REPORTING REQUIREMENTS**

24. All measurements, records, and other data required to be maintained by this facility shall be retained for at least five (5) years following the data on which such measurements, records, or data are recorded. These data shall be made available to the Department upon request. **[Rule 62-4.070(3), F.A.C.]**
25. No person shall cause, suffer, allow, or permit the discharge of air pollutants which cause or contribute to an objectionable odor. **[Rule 62-296.320, F.A.C.]**

### SECTION III. EMISSION UNIT(S) SPECIFIC CONDITIONS

#### SUBSECTION D. AFFECTED UNITS

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

EMISSION UNIT No.	EMISSION UNIT DESCRIPTION
002	A SAP
010	A Diammonium Phosphate/Monoammonium Phosphate (DAP/MAP) Plant
011	Z DAP/MAP
015	A Shipping Baghouse
018	B Shipping Baghouse

#### PREVIOUS APPLICABLE REQUIREMENTS

1. This permit supplements all previously issued air construction and operation permits for these emission units. Except for changes specified in the conditions below, the emission units remain subject to the conditions of all other valid air construction and operation permits. [Rule 62-4.070(3), F.A.C.]

#### EMISSION AND PERFORMANCE REQUIREMENTS

2. Visible emissions from the A and B Shipping Baghouse exhausts shall not exceed 5% opacity. Each baghouse control system shall be designed and maintained to achieve an outlet grain loading of no more than 0.02 grains per actual cubic feet (gr./acf) for a nominal flow rate of approximately 10,000 actual cubic feet per minute (acfm). New and replacement bags shall meet these specifications based on vendor information. The permittee shall maintain records of the design specifications for the bags. No particulate matter emissions tests are required. {Permitting Note: Based on the baghouse design specifications, potential PM<sub>10</sub> emissions from each baghouse would be 1.71 lb/hr and 7.51 tons per year.} [Rule 62-297.620(4) and 62-4.070(3), F.A.C., Application No. 0570005-021-AC]
3. Emissions of particulate matter (PM) from the A DAP/MAP shall not exceed 13.0 lb/hr and 56.9 TPY. [Rule 62-212.400(5), F.A.C., Applicant Request]
4. Emissions of PM from the Z DAP/MAP shall not exceed 15.0 lb/hr and 65.7 TPY. [Rule 62-212.400(5), F.A.C., Applicant Request]
5. As determined by CEMS data, emissions of SO<sub>2</sub> from the A SAP shall not exceed 250 lb/hr, 24-hour average. [Rule 62-212.400(5), F.A.C., Applicant Request]

#### TESTING AND REPORTING REQUIREMENTS

6. Within 60 days after achieving the new permitted capacities, but not later than 180 days after completing the proposed work, the subject emission units shall be tested for compliance with



### SECTION III. EMISSION UNIT(S) SPECIFIC CONDITIONS

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the above emission limits. 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. The Department's Southwest District office and EPCHC in Tampa shall be notified in writing at least 15 days prior to the compliance tests. Written reports of the test results shall be submitted to those offices within 45 days of test completion. **[Rule 62-297.310, F.A.C.]**
8. The procedures for the initial compliance and annual compliance tests for PM and visible emissions shall be in accordance with EPA Reference Methods 1, 2, 3, 4, 5 and 9, as appropriate, as published in 40 CFR 60, Appendix A. **[Rules 62-204.800 and 62-297.310(7)(c), F.A.C.]**
9. Initial and annual visible emissions compliance tests are required for the A and B Shipping Baghouses. The Compliance Authority may request "special compliance tests" in accordance with the requirements of Rule 62-297.310(7)(b), F.A.C. **[Rules 62-297.620(4) and 62-297.310(7)(b), F.A.C.]**
10. A SAP SO<sub>2</sub> emission limit shall be demonstrated initially and annually with a certified SO<sub>2</sub> CEMS. **[Rules 62-4.070(3), F.A.C. and 62-204.800, F.A.C.]**

APPENDIX A  
BEST OPERATIONAL START-UP PRACTICES  
FOR SULFURIC ACID PLANTS

---

1. Only one sulfuric acid plant at a facility should be started up and burning sulfur at a time. There are times when it will be acceptable for more than one sulfuric acid plant to be in the start-up mode at the same time, provided the following condition is met. It is not acceptable to initiate sulfur burning at one sulfuric acid plant when another plant at the same facility is emitting SO<sub>2</sub> at a rate in excess of the emission limits imposed by the permit or rule, as determined by the CEMs emission rates for the immediately preceding 20 minutes.
2. A plant start-up must be at the lowest practicable operating rate, not to exceed 70 percent of the designated operating rate, until the SO<sub>2</sub> monitor indicates compliance. Because production rate is difficult to measure during start-up, if a more appropriate indicator (such as blower pressure, furnace temperature, gas strength, blower speed, number of sulfur guns operating, etc.) can be documented, tested and validated, the Department will accept this in lieu of directly documenting of the suitable list of surrogate parameters to demonstrate and document the reduced operating rate on a plant-by-plant basis. Documentation that the plant is conducting start-up at the reduced rate is the responsibility of the owner or operator.
3. Sulfuric acid plants are authorized to emit excess emissions from start-up for a period of three consecutive hours provided best operational practices, in accordance with this agreement, to minimize emissions are followed. No plant shall be operated (with sulfur as fuel) out of compliance for more than three consecutive hours. Thereafter, the plant shall be shut down. the plant shall be shut down (cease burning sulfur) if, as indicated by the continuous emission monitoring system, the plant is not in compliance within three hours of startup. Restart may occur as soon as practicable following any needed repairs or adjustments, provided the corrective action is taken and properly documented.
4. Cold Start-Up Procedures.
  - a. Converter.
    - (1) The inlet and outlet temperature at the first two masses of catalyst shall be sufficiently high to provide immediate ignition when SO<sub>2</sub> enters the masses. In no event shall the inlet temperature to the first mass be less than 800°F or the outlet temperature to the first two masses be less than 700°F. These temperatures are the desired temperatures at the time the use of auxiliary fuel is terminated.
    - (2) The gas stream entering the converter shall contain SO<sub>2</sub> at a level less than normal, and sufficiently low to promote catalytic conversion to SO<sub>3</sub>.
  - b. Absorbing Towers.

The concentration, temperature and flow of circulating acid shall be as near to normal conditions as reasonably can be achieved. In no event shall the concentration be less than 96 percent H<sub>2</sub>SO<sub>4</sub>.
5. Warm Restart.

APPENDIX A  
BEST OPERATIONAL START-UP PRACTICES  
FOR SULFURIC ACID PLANTS

---

a. Converter

The inlet and outlet temperatures of the first two catalyst masses should be sufficiently high to ensure conversion. One of the following three conditions must be met:

- (1) The first two catalyst masses inlet and outlet temperatures must be at a minimum of 700°F;  
or
- (2) Two of the four inlet and outlet temperatures must be greater than or equal to 800°F; or
- (3) The inlet temperature of the first catalyst must be greater than or equal to 600°F and the outlet temperature greater than or equal to 800°F. Also, the inlet and outlet temperatures of the second catalyst must be greater than or equal to 700°F.

Failure to meet one of the above conditions, requires use of cold start-up procedures.

To allow for technologies improvements or individual plant conditions, alternative conditions will be considered by the Department in appropriate cases.

b. Absorbing Towers.

The concentration, temperature and flow of circulating acid shall be as near to normal conditions as reasonably can be achieved. In no event shall the concentration be less than 96 percent H<sub>2</sub>SO<sub>4</sub>.

**FINAL**  
**APPENDIX BD**  
**BEST AVAILABLE CONTROL TECHNOLOGY DETERMINATION (BACT)**

---

**CF Industries, Inc.**  
**Plant City Phosphate Complex**  
**PSD-FL-355/0570005-021-AC**  
**Plant City, Hillsborough County**

CF Industries, Inc. is proposing to modify the B Sulfuric Acid Plant (SAP) and the A and B Phosphoric Acid Plants (PAPs) at its Plant City Phosphate Complex in Plant City, Florida. The proposed project includes an increase in the production rate of the existing B SAP from 1,300 to 1,600 tons per day (TPD) of 100-percent H<sub>2</sub>SO<sub>4</sub>. The proposed changes will also include modifications to increase the A and B PAP maximum permitted production rate of phosphoric acid by 20 percent. This will allow the A PAP permitted process rate to increase from 1,416 to 1,699 TPD of 100-percent rock phosphorus pentoxide (P<sub>2</sub>O<sub>5</sub>). This will also allow the B PAP permitted process rate to increase from 2,107 to 2,530 TPD of 100-percent rock P<sub>2</sub>O<sub>5</sub>.

CF Industries, Inc. is classified as a Major or Title V Source of air pollution based on Rule 62-210.200(184), F.A.C. because emissions of at least one regulated air pollutant exceed 100 tons per year (TPY). The facility is also a major facility for hazardous air pollutants because emissions of hydrogen fluoride (HF) exceed 10 TPY.

As a result of this project, increases in emissions of fluoride (F), sulfur dioxide (SO<sub>2</sub>), nitrogen oxides (NO<sub>x</sub>), sulfuric acid mist (SAM), carbon monoxide (CO), volatile organic compounds (VOC), particulate matter (PM) and particulate matter less than or equal to 10 micrometers (PM<sub>10</sub>) from the proposed modifications may occur.

Additionally, based on this modification, potential emissions of F, SO<sub>2</sub>, NO<sub>x</sub>, SAM, PM, and PM<sub>10</sub> will exceed the significant emission rates listed in Rule 62-210.200(277), Florida Administrative Code (F.A.C.). The project is therefore subject to Prevention of Significant Deterioration (PSD) review for F, SO<sub>2</sub>, NO<sub>x</sub>, SAM, PM, and PM<sub>10</sub> in accordance with Rule 62-212.400, F.A.C.

A Best Available Control Technology (BACT) determination is part of the review required by Rules 62-210.200(40) and Rule 62-212.400(10), F.A.C. Rule 62-212.400(10)(c), F.A.C. requires BACT only for those emission units where a physical change or a change in the method of operation is proposed. Since the X, Y and Z DAP/MAP plants are not undergoing a physical change or change in the method of operation, BACT is not required for these units. Therefore, only the B SAP and the A and B PAPs require a BACT analysis. The B SAP emits SO<sub>2</sub>, SAM, and NO<sub>x</sub> and the PAPs only emit F. Therefore, only F emissions from the PAPs and SO<sub>2</sub>, SAM and NO<sub>x</sub> emissions from the B SAP require a BACT analysis.

Descriptions of the process, project, BACT determination, air quality effects, and rule applicability are given in the Technical Evaluation and Preliminary Determination, accompanying the Department's Intent to Issue.

The Department specifies the following as BACT:

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CF Industries, Inc.  
Plant City Phosphate Complex

DEP File No. 0570005-021-AC  
Permit No. PSD-FL-355

**FINAL  
APPENDIX BD  
BEST AVAILABLE CONTROL TECHNOLOGY DETERMINATION (BACT)**

*B Sulfuric Acid Plant*

POLLUTANT	EMISSION LIMIT	LIMIT BASIS	CONTROL TECHNOLOGY
SO <sub>2</sub>	233.3 lb/hr and 1,022 TPY	3.5 lb/ton of 100% H <sub>2</sub> SO <sub>4</sub> for 3-hour rolling average	Single-absorption system with two-stage ammonia scrubber
SAM	5.0 lb/hr and 21.9 TPY	0.075 lb/ton of 100% H <sub>2</sub> SO <sub>4</sub>	Mist eliminator
NO <sub>x</sub>	8.0 lb/hr and 35.0 TPY	0.12 lb/ton of 100% H <sub>2</sub> SO <sub>4</sub>	Good combustion practices

*A Phosphoric Acid Plant*

POLLUTANT	EMISSION LIMIT	LIMIT BASIS	CONTROL TECHNOLOGY
F	0.85 lb/hr and 3.7 TPY	0.012 lb F/ton P <sub>2</sub> O <sub>5</sub> input	Packed bed scrubber and wet cyclonic scrubber

*B Phosphoric Acid Plant*

POLLUTANT	EMISSION LIMIT	LIMIT BASIS	CONTROL TECHNOLOGY
F	1.26 lb/hr and 5.5 TPY	0.012 lb F/ton P <sub>2</sub> O <sub>5</sub> input	Packed bed scrubber

Compliance with the emission limits shall be demonstrated annually in accordance with the following EPA Reference Methods as contained in 40 CFR 60, Appendix A or as otherwise approved in writing by the Department:

EMISSION UNIT	POLLUTANT	EPA REFERENCE METHOD
B SAP	SO <sub>2</sub>	6 or 6C
	SAM	8
	NO <sub>x</sub>	7 or 7E
	VE	9

EMISSION UNIT	POLLUTANT	EPA REFERENCE METHOD
A and B PAP	F	13A or 13B

- G.1 The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. 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.
- G.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 or exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.
- G.3 As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey and 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 or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.
- G.4 This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and does 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.
- G.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.
- G.6 The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or 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.
- G.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 a reasonable time, access to the premises, where the permitted activity is located or conducted to:
  - (a) Have access to and copy and records that must be kept under the 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.

- G.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 non-compliance; and
  - (b) The period of noncompliance, including dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

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.

- G.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 403.73 and 403.111, Florida Statutes. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.
- G.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 rules.
- G.11 This permit is transferable only upon Department approval in accordance with Florida Administrative Code 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.
- G.12 This permit or a copy thereof shall be kept at the work site of the permitted activity.
- G.13 This permit also constitutes:
- (a) Determination of Best Available Control Technology (*X*)
  - (b) Determination of Prevention of Significant Deterioration (*X*); and
  - (c) Compliance with New Source Performance Standards (*X*).
- G.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 or 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:
    - 1. The date, exact place, and time of sampling or measurements;
    - 2. The person responsible for performing the sampling or measurements;
    - 3. The dates analyses were performed;
    - 4. The person responsible for performing the analyses;
    - 5. The analytical techniques or methods used; and
    - 6. The results of such analyses.
- G.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 that 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.

**Harvey, Mary**

Permit: 7/23/07

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**From:** Morris, Herschel [hmorris@cfifl.com]  
**Sent:** Friday, July 27, 2007 6:05 PM  
**To:** Harvey, Mary  
**Cc:** Brunk, Ron  
**Subject:** RE: CF Industries, Inc. - Plant City Phosphate Complex - Permit #0570005-021-AC-FINAL

Thank you. I have received your E-mail.  
Herschel Morris

-----Original Message-----

**From:** Harvey, Mary [mailto:Mary.Harvey@dep.state.fl.us]  
**Sent:** Thursday, July 26, 2007 2:56 PM  
**To:** Morris, Herschel; Joseph Marini, RMT, Inc.; Diana Lee, HCEPC  
**Subject:** FW: CF Industries, Inc. - Plant City Phosphate Complex - Permit #0570005-021-AC-FINAL

Good Afternoon:

On Monday, July 23<sup>rd</sup> Permit ##0570005-021-AC-FINAL was email to you. We want to make sure that everyone has received this permit. Please email me back so I can print the read receipt.

Thanks again,  
Mary

---

**From:** Harvey, Mary  
**Sent:** Monday, July 23, 2007 2:53 PM  
**To:** 'Herschel E. Morris, CF Industries, Inc.'; 'Jim Little, EPA'; 'Kathleen Forney, EPA'; 'Dee Morse, NPS'; Zhang-Torres; 'Diana Lee, HCEPC'; 'David Buff, Golder Associates, Inc.'; 'Joseph Marini, RMT, Inc.'  
**Cc:** Arif, Syed; Adams, Patty; Friday, Barbara; Gibson, Victoria  
**Subject:** CF Industries, Inc. - Plant City Phosphate Complex - Permit #0570005-021-AC-FINAL

Dear Sir/Madam:

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

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

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

7/30/2007



**Harvey, Mary**

**From:** Harvey, Mary  
**Sent:** Monday, July 23, 2007 2:53 PM  
**To:** 'Herschel E. Morris, CF Industries, Inc.'; 'Jim Little, EPA'; 'Kathleen Forney, EPA'; 'Dee Morse, NPS'; Zhang-Torres; 'Diana Lee, HCEPC'; 'David Buff, Golder Associates, Inc.'; 'Joseph Marini, RMT, Inc.'  
**Cc:** Arif, Syed; Adams, Patty; Friday, Barbara; Gibson, Victoria  
**Subject:** CF Industries, Inc. - Plant City Phosphate Complex - Permit #0570005-021-AC-FINAL  
**Attachments:** 0570005.021.AC.F\_pdf.zip

Tracking:	Recipient	Read
	'Herschel E. Morris, CF Industries, Inc.'	
	✓ 'Jim Little, EPA' ✓	
	✓ 'Kathleen Forney, EPA' ✓	
	✓ 'Dee Morse, NPS' ✓	
	✓ Zhang-Torres ✓	Read: 7/23/2007 2:58 PM
	✓ 'Diana Lee, HCEPC' ✓	
	✓ 'David Buff, Golder Associates, Inc.' ✓	
	✓ 'Joseph Marini, RMT, Inc.' ✓	
	✓ Arif, Syed ✓	
	✓ Adams, Patty ✓	
	✓ Friday, Barbara ✓	Read: 7/23/2007 2:59 PM
	✓ Gibson, Victoria ✓	

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

Thank you,

DEP, Bureau of Air Regulation

7/24/2007

## Harvey, Mary

---

**From:** Joseph Marini [Joseph.Marini@rmtinc.com]  
**Sent:** Thursday, July 26, 2007 3:07 PM  
**To:** Harvey, Mary  
**Subject:** Re: FW: CF Industries, Inc.@ - Plant City Phosphate Complex -Permit #0570005-021-AC-FINAL

received.

>>> "Harvey, Mary" <Mary.Harvey@dep.state.fl.us> 7/26/2007 1:56 PM >>>  
Good Afternoon:

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Thanks again,  
Mary

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**From:** Harvey, Mary  
**Sent:** Monday, July 23, 2007 2:53 PM  
**To:** 'Herschel E. Morris, CF Industries, Inc.'; 'Jim Little, EPA'; 'Kathleen Forney, EPA'; 'Dee Morse, NPS'; Zhang-Torres; 'Diana Lee, HCEPC'; 'David Buff, Golder Associates, Inc.'; 'Joseph Marini, RMT, Inc.'  
**Cc:** Arif, Syed; Adams, Patty; Friday, Barbara; Gibson, Victoria  
**Subject:** CF Industries, Inc. - Plant City Phosphate Complex - Permit #0570005-021-AC-FINAL

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Thank you,

7/26/2007

## Harvey, Mary

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**From:** Little.James@epamail.epa.gov  
**Sent:** Thursday, July 26, 2007 3:09 PM  
**To:** Harvey, Mary  
**Cc:** Forney.Kathleen@epamail.epa.gov  
**Subject:** Re: FW: CF Industries, Inc. - Plant City Phosphate Complex - Permit #0570005-021-AC-FINAL

We received it.

Jim Little  
(404) 562-9118

"Harvey, Mary"  
<Mary.Harvey@dep  
.state.fl.us>

07/26/2007 02:59  
PM

To  
James Little/R4/USEPA/US@EPA  
cc  
Subject  
FW: CF Industries, Inc. - Plant  
City Phosphate Complex - Permit  
#0570005-021-AC-FINAL

Jim please email me to let me know that you received Permit # 0570005-021-AC-FINAL. This permit was sent out on Monday, July 23rd.

Thanks,  
Mary

From: Harvey, Mary  
Sent: Monday, July 23, 2007 2:53 PM  
To: 'Herschel E. Morris, CF Industries, Inc.'; 'Jim Little, EPA'; 'Kathleen Forney, EPA'; 'Dee Morse, NPS'; Zhang-Torres; 'Diana Lee, HCEPC'; 'David Buff, Golder Associates, Inc.'; 'Joseph Marini, RMT, Inc.'  
Cc: Arif, Syed; Adams, Patty; Friday, Barbara; Gibson, Victoria  
Subject: CF Industries, Inc. - Plant City Phosphate Complex - Permit #0570005-021-AC-FINAL

Dear Sir/Madam:

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

## Harvey, Mary

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**From:** Zhang-Torres  
**To:** Harvey, Mary  
**Sent:** Monday, July 23, 2007 2:59 PM  
**Subject:** Read: CF Industries, Inc. - Plant City Phosphate Complex - Permit #0570005-021-AC-FINAL

Your message

**To:** 'Herschel E. Morris, CF Industries, Inc.'; 'Jim Little, EPA'; 'Kathleen Forney, EPA'; 'Dee Morse, NPS'; Zhang-Torres; 'Diana Lee, HCEPC'; 'David Buff, Golder Associates, Inc.'; 'Joseph Marini, RMT, Inc.'  
**Cc:** Arif, Syed; Adams, Patty; Friday, Barbara; Gibson, Victoria  
**Subject:** CF Industries, Inc. - Plant City Phosphate Complex - Permit #0570005-021-AC-FINAL  
**Sent:** 7/23/2007 2:53 PM

was read on 7/23/2007 2:58 PM.

## Harvey, Mary

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**From:** Dee\_Morse@nps.gov  
**Sent:** Monday, July 23, 2007 3:25 PM  
**To:** Harvey, Mary  
**Subject:** CF Industries, Inc. - Plant City Phosphate Complex - Permit #0570005-021-AC-FINAL

### Return Receipt

Your document: CF Industries, Inc. - Plant City Phosphate Complex - Permit #0570005-021-AC-FINAL

was received by: Dee Morse/DENVER/NPS

at: 07/23/2007 01:24:54 PM

## Harvey, Mary

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**From:** Forney.Kathleen@epamail.epa.gov  
**Sent:** Tuesday, July 24, 2007 9:11 AM  
**To:** Harvey, Mary  
**Subject:** Re: FW: CF Industries, Inc. - Plant City Phosphate Complex - Permit #0570005-021-AC-FINAL

Thanks.

-----  
Katy R. Forney  
Air Permits Section  
EPA - Region 4  
61 Forsyth St., SW  
Atlanta, GA 30024

Phone: 404-562-9130  
Fax: 404-562-9019

"Harvey, Mary"  
<Mary.Harvey@dep  
.state.fl.us>

07/23/2007 02:54  
PM

To  
James Little/R4/USEPA/US@EPA,  
Kathleen Forney/R4/USEPA/US@EPA

cc

"Adams, Patty"  
<Patty.Adams@dep.state.fl.us>,  
"Friday, Barbara"  
<Barbara.Friday@dep.state.fl.us>,  
"Arif, Syed"  
<Syed.Arif@dep.state.fl.us>

Subject

FW: CF Industries, Inc. - Plant  
City Phosphate Complex - Permit  
#0570005-021-AC-FINAL

From: Harvey, Mary  
Sent: Monday, July 23, 2007 2:53 PM  
To: 'Herschel E. Morris, CF Industries, Inc.'; 'Jim Little, EPA'; 'Kathleen Forney, EPA';  
'Dee Morse, NPS'; Zhang-Torres; 'Diana Lee, HCEPC'; 'David Buff, Golder Associates, Inc.';  
'Joseph Marini, RMT, Inc.'  
Cc: Arif, Syed; Adams, Patty; Friday, Barbara; Gibson, Victoria  
Subject: CF Industries, Inc. - Plant City Phosphate Complex - Permit #0570005-021-AC-FINAL

Dear Sir/Madam:

Please send a "reply" message verifying receipt of the attached document(s); this may be

## Harvey, Mary

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**From:** Lee, Diana [Lee@epchc.org]  
**To:** Harvey, Mary  
**Sent:** Friday, July 27, 2007 9:38 AM  
**Subject:** Read: FW: CF Industries, Inc. - Plant City Phosphate Complex - Permit #0570005-021-AC-FINAL

Your message

To: Lee@epchc.org  
Subject:

was read on 7/27/2007 9:38 AM.

## Harvey, Mary

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**From:** Buff, Dave [DBuff@GOLDER.com]  
**To:** undisclosed-recipients  
**Sent:** Tuesday, July 24, 2007 10:19 AM  
**Subject:** Read: CF Industries, Inc. - Plant City Phosphate Complex - Permit #0570005-021-AC-FINAL

Your message

To: DBuff@GOLDER.com  
Subject:

was read on 7/24/2007 10:19 AM.