

# Department of Environmental Protection

Jeb Bush  
Governor

Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Colleen M. Castille  
Secretary

June 15, 2005

CERTIFIED MAIL - RETURN 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 above referenced application on May 18, 2005, for the Plant City Complex in Hillsborough County. Based on our initial review of the proposed 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. The Department recently issued a PSD permit (PSD-FL-339) to CF Industries for production increase in "C" and "D" Sulfuric Acid Plants at the Plant City facility. The plants which were double absorption units were required to show compliance with SO<sub>2</sub> limit of 3.5 lb/ton of 100% H<sub>2</sub>SO<sub>4</sub>; 3-hour rolling average using continuous emissions monitoring system. The proposed Best Available Control Technology (BACT) for SO<sub>2</sub> for the "B" SAP is the existing single absorption unit with the ammonia scrubber. The proposed 3-hour SO<sub>2</sub> limit is 4.0 lb/ton, 100% H<sub>2</sub>SO<sub>4</sub>. This BACT limit is not consistent with recent BACT determination for "C" and "D" plants. The cost effectiveness figure of \$4,092 per ton of SO<sub>2</sub> removed as given in the application for converting the existing single absorption plant to a double absorption plant seems reasonable to the Department. If the existing SO<sub>2</sub> BACT limit of 3.5 lb/ton of 100% H<sub>2</sub>SO<sub>4</sub>; 3-hour rolling average cannot be met with the single absorption unit, then the Department will require converting it to a double absorption plant. Please provide reasonable assurance to the Department that CF will be able to comply with the existing BACT limit of SO<sub>2</sub>.
2. Please provide the Department with reasonable assurance that the efficiency of the absorber and the acid mist eliminator will not be degraded while operating at the higher process rate.
3. Please provide emissions data for SO<sub>2</sub> in lb/ton of 100% H<sub>2</sub>SO<sub>4</sub> 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.
4. Department's Southwest District Office expressed their concerns regarding truck traffic analysis in Section 2.3.2 of the application. They would like to see a more detailed analysis that includes actual to potential emissions increase for particulates (fugitive emissions) due to increased molten sulfur truck

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traffic (include the number of trucks coming in before and after the modification) and additional trucks hauling fertilizer back to the port.

5. Please provide electronic copies of all modeling files for this project.
6. It is stated in the application that all sources within 200 km of a Class I area must perform a Class I analysis. Please note that the Federal Land Manager has requested analyses for distances greater than 200 km, up to 300km.

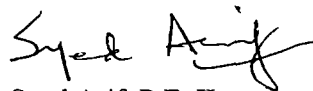
Any additional comments from EPA, Hillsborough County Environmental Protection Commission and the U.S. Fish and Wildlife Service will be forwarded to you after we receive them.

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. Mr. Syed Arif, P.E. is responsible for the technical review of the application. He 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. II  
North Permitting Section

/sa

cc: G. Worley, EPA  
J. Bunyak, NPS  
T. Edwards, CF Industries  
J. Smolen, DEP-SWD  
J. Campbell, EPCHC  
D. Buff, P.E., Golder Associates

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<ul style="list-style-type: none"> <li>Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.</li> <li>Print your name and address on the reverse so that we can return the card to you.</li> <li>Attach this card to the back of the mailpiece, or on the front if space permits.</li> </ul>	<p>A. Signature  <input checked="" type="checkbox"/> <i>Jennifer Perez</i> <input type="checkbox"/> Agent  <input checked="" type="checkbox"/> Addressee</p> <p>B. Received by (Printed Name): <i>J PEREZ</i> C. Date of Delivery: <i>6/17-05</i></p>
<p>1. Article Addressed to:</p> <p>Mr. Herschel E. Morris  Vice President  Phosphate Operations/General Manager  CF Industries, Inc.  Post Office Drawer L  Plant City, Florida 33564</p>	<p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes  If YES, enter delivery address below: <input type="checkbox"/> No</p> <p>3. Service Type  <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail  <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise  <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p> <p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>
<p>2. Article Number (Transfer from service label) 7000 2870 0000 7028 0610</p>	
<p>PS Form 3811, February 2004 Domestic Return Receipt 102595-02-M-1540</p>	

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<p>Sent To  Mr. Herschel E. Morris, Vice President  Street, Apt. No.; or PO Box No.  Post Office Drawer L  City, State, ZIP+4  Plant City, Florida 33564</p>											
PS Form 3800, May 2000 See Reverse for Instructions											

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