



Department of Environmental Protection

Jeb Bush
Governor

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

Colleen M. Castille
Secretary

May 5, 2006

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
'A' Sulfuric Acid Plant (SAP) & 'A' and 'B' Phosphoric Acid Plants (PAPs) Production
Increase
Plant City Phosphate Complex

Dear Mr. Morris:

The Department has received the amended PSD application on April 6, 2006, for the Plant City Complex in Hillsborough County. Based on our initial 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. Attachment CF-Fl-C3 in the application states the "Precautions to Prevent Emissions of Unconfined Particulate Matter." Under examples of fugitive dust that may result from this project, unpaved roads and fugitive dust from the gypsum stack are listed. Please indicate where in the application emission rates and calculations from unpaved roads and fugitive dust from the gypsum stack are located or provide this information to the Department.
2. Please explain Fertilizer Throughput and Total Fertilizer Production in more detail. In Table 6-8 of the application, Annual Fertilizer Production will be 2,735,528 TPY. The Table also states that 33% of that Production will be shipped by truck. Truck Throughput is listed as 639,173 TPY, which is less than 24%. Please explain. Also, in Table A-10, the B Storage & Shipping Building shows a Maximum Fertilizer Throughput of 4,380,000 TPY. Please explain why the B Building has a higher Fertilizer Throughput than the Annual Fertilizer Production of 2,735,528 TPY listed in Table 6-8.
3. In Section 6.6 of the application, Meteorology Data, the application states "the FDEP consider this station to have surface meteorological data representative of the project

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site." Since the model used for this project, AERMOD, was established as the preferred model for this type of analysis late 2005, please verify that the statement quoted here was in reference to the new model, which is more sensitive to surface parameters, and provide the source of the statement. Otherwise, please provide land use characteristics for the NWS station used and the land use characteristics of the project site to further demonstrate that the NWS station surface parameters are representative of those at the project site.

4. Please explain further how the surface characteristics were determined in AERMET. What is the AERSURFACE program? How does it work? Is it an approved program for use by the Department and/or the EPA?
5. According to the application in 6.7.1, the modeling submitted with the application has fugitive emissions evaluated as a "line" source represented by "volume" source and "volume" source stack parameters. Please provide justification for using this type of source for the fugitives.
6. Please indicate the distance between the CF Industries Facility and the Chassahowitzka NWA. Section 6.1 of the application states that the distance is 70 km NW of the facility. Section C-1 states that the distance is 110 km NW of the facility.
7. In Table 2-4 of the application, "A" Shipping Baghouse and "B" Shipping Baghouse Stack and Operating Parameters (Stack Height for "B" and Velocity for "A") are different than the inputs in the modeling. Please explain.
8. Please explain how the Initial Vertical Dimension was determined for the volume sources, including trucks.
9. The modeled emission rate for the source "BLOAD Current" for the PM short term average does not match the rate listed in Table 6-3. Please explain.
10. Please provide any electronic maps used in determining the Base Elevation/Terrain for this modeling project.
11. Please provide the UTM coordinates for the "C SAP" stack location.
12. The PM short term Increment modeling shows a receptor grid concentrated to the north and east of the facility, where higher concentrations were found in the Significant Impact Analysis. However, there are some concentrations above the Significant Impact Level that were further east and south of this grid. Please extend the receptor grid to cover all areas that were "Significant" in the Significant Impact Analysis. Please do the same with the other Increment/AAQS analyses if needed.

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,

Debbie Nelson

Debbie Nelson, Meteorologist
Bureau of Air Regulation

/sa

cc: G. Worley, EPA
J. Bunyak, NPS
T. Edwards, CF Industries
M. Nasca, 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"> Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits. 	<p>A. Signature X- Sabrina R. Booker <input type="checkbox"/> Agent <input type="checkbox"/> Addressee</p> <p>B. Received by (Printed Name) Sabrina R. Booker</p> <p>C. Date of Delivery 5-10-06</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 1670 0013 3110 0239</p>	
<p>PS Form 3811, February 2004 Domestic Return Receipt 102595-02-M-1540</p>	

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

PS Form 3811, February 2004 See Reverse for Instructions