



Jeb Bush
Governor

Department of Environmental Protection

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

Colleen M. Castille
Secretary

March 29, 2004

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. 0570005-019-AC; PSD-FL-339
Sulfuric Acid Production Increase
Plant City Phosphate Complex

Dear Mr. Morris:

The Department has received the additional information on March 11, 2004, in response to our request for information letter dated February 20, 2004. Based on our review of this information, 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 approaches used in the economic analysis for BACT are flawed. Two approaches were utilized, first was a reduction in DAP production rate necessary to meet the lower limits in the sulfuric acid plants and the second approach compares the cost of sulfuric acid purchased to make up the loss in sulfuric acid production. The Department would like to see an economic analysis whereby the applicant sets 2,750 TPD of sulfuric acid production with a 3.5 lb/ton of SO₂ emission rate as a base case and looks at additional cost of adding more cesium catalyst in different converter passes to achieve 3.0 lb/ton of SO₂ emissions or lower. The \$/ton of SO₂ removed using this approach will be more meaningful to the Department.
2. The economic analysis was done using Enviro-Chem's SCX-2000 super cesium catalyst. Please provide the Department with similar analysis as outlined in Item 1 above utilizing Haldor Topsoe's VK69 or newer generation cesium-promoted vanadium catalyst.
3. Please provide annual change in SO₂ emissions due to ammonia scrubbing for C and D Sulfuric acid plants.

Any additional comments from EPA, Southwest District Office and the U.S. Fish and Wildlife Service will be forwarded to you after we receive them. The responses to modeling issues are still being reviewed by Ms. Debbie Nelson, and she will send a letter if any additional information is required.

"More Protection, Less Process"

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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 can 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.
Permit Engineer
Permitting South Section

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

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HERSCHEL E. MORRIS
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 GENERAL MANAGER
 INDUSTRIES, INC.
 OFFICE DRAWER L
 PLANT CITY, FLORIDA 33564

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Sent To *Herschel E. Morris*
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 City, State, ZIP+4 *Plant City FL - 33564*