

P.O. Drawer L.  
Plant City, Florida 33564-9007  
Telephone: 813/782-1591



**CF Industries, Inc.**  
Plant City Phosphate Complex

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MAY 17 2004

BUREAU OF AIR REGULATION

May 12, 2004

Mr. Syed Arif  
Permit Engineer  
Permitting South Section  
Department of Environmental Protection  
Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Subject: DEP File No. 0570005-019-AC; PSD-FL-339  
Sulfuric Acid Production Increase, Plant City, Phosphate Complex

Dear Mr. Arif:

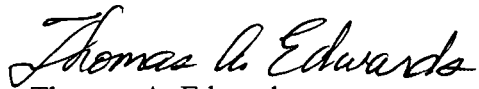
CF Industries, Inc., (CF) has reviewed the Draft Construction Permit package received on April 26, 2004, and provides the following comments.

With regard to the "Project Description" on Page 4 of the "Technical Evaluation and Preliminary Determination," the statement is made in the first bulleted paragraph that "The packing in the remaining four absorption towers may be replaced with "in kind" packing as the current packing exhibits high pressure drop and requires replacement." CF wishes to clarify that the four absorption towers referred to include the "C" Sulfuric Acid Plant's interpass tower and the "D" Sulfuric Acid Plant's drying, interpass, and final towers.

Also, regarding the "in kind" replacement of the packing in those towers, CF's proposal (re: Herschel E. Morris Letter of March 9, 2004, to A.A. Linero, CF Response 7) is to replace the existing packing in those towers with the Monsanto WavePak packing or other functionally equivalent "packing styles that have the same pressure drop and misting characteristics consistent with the proposed tower performance and design." CF would appreciate the Department's concurrence that these functionally equivalent systems would qualify as "in kind" replacements.

The environmental effects of the proposed project and its emission rates and production rates have undergone a thorough review in the current permitting process and have been found to be allowed under the applicable rules. The Monsanto WavePak tower packing has been evaluated by the DEP and authorized for use (upon issuance of the permit) in two of the absorption towers. CF believes there should be no objection to its use, or the use of a functionally equivalent product, in the same service in the other towers, if such use will not result in an increase in the permitted rates. CF will provide a letter notification to the DEP in advance of any packing change that is made during or beyond the term of the construction permit currently in process.

Sincerely,



Thomas A. Edwards  
Superintendent, Environmental Affairs

cc: D. Buff, Golder  
J.S. Alves, HGS