Arif, Syed

From: Buff, Dave [DBuff@GOLDER.com]
Sent: Thursday, November 15, 2007 3:46 PM
To: Arif, Syed
Cc: May, Bob; Brunk, Ron; Edwards, Tom; Messina, Mike; Booth, Claire
Subject: C and D SAP Production Data
Attachments: CD SAP Production Data Graph.pdf

Syed, Claire relayed to me the conversation you had with her on the status of the CFI Plant City C & D SAP permit. It appears you are saying that C & D have completed construction under the current AC permit since the plants have been able to achieve 90% of the permitted rates of 2750 TPD. However, please consider the following:

1) The previous permitted rate of 2,600 TPD was already more than 90% of the new 2750 TPD rate, i.e., 2600/2750 = 95%. Therefore, if that is the only criteria, C&D SAP completed construction upon issuance of the new AC permit (obviously not correct).

2) The rule being cited, i.e., achieving 90% of the permitted production during a stack test, is for stack testing purposes only, and has nothing to do with PSD review. The requirement is that a unit be tested at 90% or more of the permitted rate, or the rate is limited to 100% of the tested rate until a new test is performed. However, this says nothing about the ability of the unit to achieve 100% of the permitted rate, or the frequency at which the rate can be achieved.

3) The purpose of the new AC permit was to allow production up to 2750 TPD on a consistent basis. Among other things, weather conditions play an important role in what a SAP can produce day in and day out. Also, production rates degrade over time following plant turnarounds as the catalyst degrades. These are reasons physical changes to the plants are needed to achieve the goal of 2750 TPD on a consistent basis. Being able to achieve rates close to 2750 from time to time is not the same thing as achieving it on a continuous basis. For C SAP, the last change was the main blower replacement in February 2007. Since that time, C SAP has been able to achieve 2750 on a more consistent basis (see attached graph). Before that change, 2750 could not be achieved on any consistent basis, and production decreased over time. Therefore it could be said that C SAP has now completed construction; however this did not occur until Feb. 2007. Note that the graph shows the point in time at which the new catalyst was installed in the two plants under the new AC permit. These occurred during plant turnarounds.

4) D SAP has not been able to achieve consistent production of 2750 TPD yet. Among other things, the main blower installation must be completed (scheduled for February-March 2008). Therefore, D SAP has not yet completed construction under the new AC permit.

5) Since construction on C SAP was not completed any sooner than Feb 2007, and D SAP has not yet completed construction, the PSD rules allow the potential emissions to be used for assessing PSD applicability for a new project.

I'm sure that CF can add additional information to my description above, if needed. Let me know what you think. Feel free to call me today at 352-514-5600 (my cell phone) if you need to discuss.

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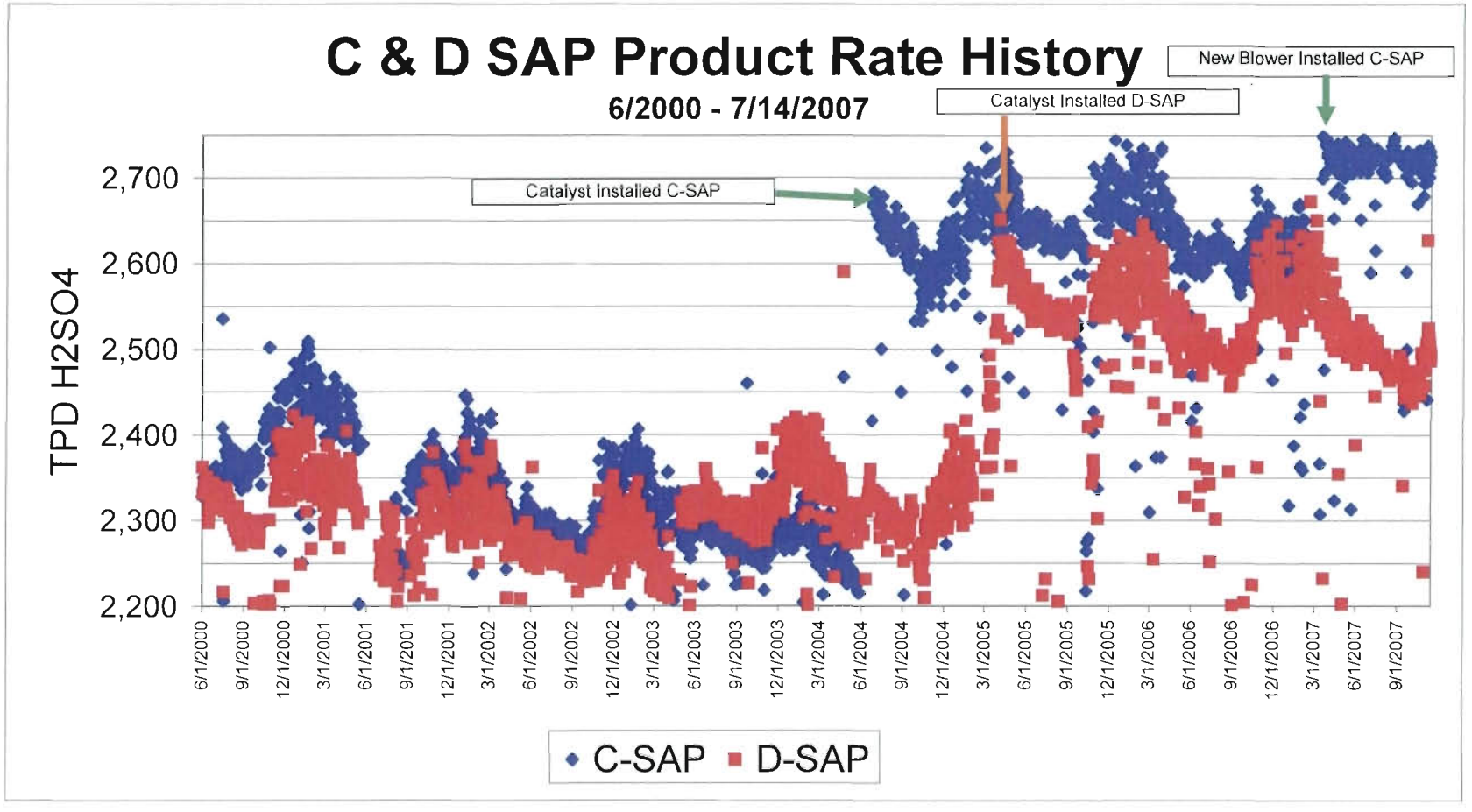
C & D SAP Product Rate History
6/2000 - 7/14/2007
New Blower Installed C-SAP
Catalyst Installed D-SAP
Catalyst Installed C-SAP
TPD H2SO4
2,700
2,600
2,500
2,400
2,300
2,200
6/1/2000
9/1/2000
12/1/2000
3/1/2001
6/1/2001
9/1/2001
12/1/2001
3/1/2002
6/1/2002
9/1/2002
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3/1/2007
6/1/2007
9/1/2007
C-SAP
D-SAP