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BUREAU OF AIR REGULATION

October 1, 2008

Mr. Syed Arif, P.E.  
Florida Department of Environmental Protection  
Bureau of Air Regulation  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

Subject: DEP File 0570005 CF Industries Inc. Plant City  
Best Available Retrofit Technology (BART) Exemption and Schedule

Dear Mr. Arif:

As has been discussed extensively with you in recent weeks, CFI is reviewing alternative scenarios that would increase sulfuric acid production to meet potential internal business plans and simultaneously decrease sulfur dioxide emissions from the existing BART-eligible sulfuric acid plants to levels that would result in visibility impacts for the BART-eligible emissions units that meet the 0.5 deciview BART exemption threshold. The four scenarios currently under consideration are outlined in the attachment, each of which would result in visibility impacts that meet the BART exemption threshold. CFI is currently in the process of completing preliminary engineering and rough cost estimates of the four scenarios and anticipates that selection of the preferred scenario among those four will take place in October or November 2008.

As you are aware, decisions to implement projects of this significance are not made without extensive engineering and economic studies to more precisely determine the overall feasibility and cost. As mentioned above, after preliminary engineering has been completed and costs roughly estimated, a selection of a preferred alternative will be made for further analysis. The preferred alternative must then have additional detailed engineering completed to provide an accurate cost estimate suitable for management approval. Completion of the additional detailed engineering required to support a cost estimate is expected to require approximately six months.

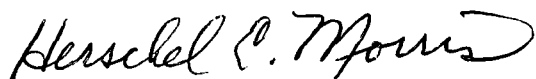
In addition, due to our corporate structure, once the preferred scenario is selected and the engineering and economic studies are completed (which will include a suggested construction schedule), the project must be submitted to CFI's Board of Directors for final approval. The process of developing information for Board approval includes not only the construction project and costs, but all other considerations such as market forecasts, raw materials support and availability, etc. Much of this economic analysis activity can be completed in parallel

with the detailed construction cost estimate. Assuming this schedule can be achieved, the proposal could be submitted to the Board as early as July, 2009. As we are sure you will appreciate, the Board may approve the recommendation, suggest an alternative that must be further studied and submitted at the following Board meeting, or deny the recommendation altogether. Because we anticipate Board approval, CFI will begin preparing the construction permit application as information becomes available so that once the approval is made, the application will be ready for submittal to the Department.

In summary, the schedule outlined above indicates CFI anticipates providing to FDEP by the end of the year a scenario for sulfur dioxide emission reductions from the facility that would result in visibility impacts due to the BART-eligible emissions units below the BART exemption threshold. At that time, CFI will immediately begin detailed engineering and economic studies and be in a better position to initiate preparation of an air construction permit application to reflect the project that will be proposed to the Board of Directors. Assuming the project is approved by the Board in the 3<sup>rd</sup> quarter of 2009, CF anticipates construction could be completed and the associated emission reductions in place by January 1, 2013.

Please feel free to contact Ron Brunk at (813) 364-5608 if you have any questions.

Sincerely,



Herschel E. Morris  
Vice President Phosphate Operations

Enclosure      BART Exemption Scenario Table

cc:      A. Uhland, HGS  
          D. Buff, Golder

CF INDUSTRIES, INC.  
 PLANT CITY PHOSPHATE COMPLEX  
 SUMMARY OF BART EXEMPTION OPTIONS

Option	Description	Facility H <sub>2</sub> SO <sub>4</sub> Production (TPD)	Sulfuric Acid Facility SO <sub>2</sub> Emissions (lb/hr, daily avg.)	Revised BART Air Modeling Impact*	Production Increase Triggers PSD	Potential Modifications to Achieve Emissions Reduction (Not Currently Permitted)
1	Operate ABCD Sulfuric Acid Plants	8,824	631	0.4995 dev	NA	Ammonia scrubbing in C & D-SAP Increased ammonia scrubbing in A & B-SAP
2	Operate ABCD Sulfuric Acid Plants. Increases sulfuric acid production in A-SAP	9,124	632	0.492 dev	No	Ammonia scrubbing in C & D-SAP Cesium catalyst in A-SAP Increased ammonia scrubbing in A & B-SAP
3	Operate BCD Sulfuric Acid Plants Construct new sulfuric acid plant to replace A Increases total sulfuric acid production	10,000	782	0.488 dev	No	Reduced rates on C & D-SAP Increased ammonia scrubbing in B-SAP
4	Operate CD Sulfuric Acid Plants Construct new sulfuric acid plant to replace A and B-SAP Increases total sulfuric acid production	10,000	841	0.492 dev	No	Reduced rates on C & D-SAP

\*Note: CFI intends to request a #SO<sub>2</sub>/hr multi-unit emission limit to allow maximum flexibility and consistent facility-wide production while ensuring visibility impacts are below the 0.5 deciview BART exemption threshold