



Florida Department of Environmental Protection

Bob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

August 10, 2007

Electronically sent – Received Receipt requested.

hmorris@cfifl.com

Mr. Herschel Morris, General Manager
Vice President Phosphate Operations
CF Industries, Inc.
Post Office Drawer L
Plant City, Florida 33567-9007

Re: Request for Additional Information
DEP File No. 0570005-023-AC
Best Available Retrofit Technology (BART) Review

Dear Mr. Morris:

On July 12, 2007 we received the additional information regarding your application for an air construction permit to incorporate Best Achievable Retrofit Technology (BART) requirements for several emissions units at the Plant City Phosphate Complex in Hillsborough County.

Pursuant to Rules 62.296.340 (2), 62-4.055, and 62-4.070 F.A.C., Permit Processing, the Department requests submittal of the additional information prior to processing the application. Should your response to any of the below items require new calculations, please submit the new calculations, assumptions, reference material and appropriate revised pages of the application form.

Economic Analysis

1. In all the cost effectiveness calculations that were submitted with your response the project contingency was based on 25% of the Direct Capital Cost (DCC) plus the Indirect Capital Cost (ICC). Please explain for using such a high percentage of 25% when the EPA Cost Manual uses 3% contingency figure. Additionally, explain the reasons for using contingency based on DCC+ICC and not on Purchased Equipment Cost (PEC) as indicated in the manual.

Diammonium Phosphate/Monoammonium Phosphate (DAP/MAP) plants A, X, Y, and Z

2. For each DAP/MAP plant subject to BART, please submit the sulfur content of each allowable fuel (No. 2, No. 3, No.4 and No.5 fuel oil).


When we receive this information, we will continue processing your application. We are available to discuss the details of our request for additional 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.

Mr. Herschel Morris
August 10, 2007
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The processing of this application is under time constraints. The Division of Air Resource Management has a goal to finalize all BART determinations by October 1, 2007. The Department must submit a state implementation plan (SIP) to EPA by December 17, 2007, identifying all BART determinations. Because of the timing of the rule and submittal of the applications, you are being granted a limited time to submit the requested information. Please provide the additional information by August 31, 2007.

If there are any questions, please call Teresa Heron at 850/921-9529. Matters regarding modeling issues should be directed to Debbie Nelson at 850/921-9537.

Sincerely,



A.A. Linero, Program Administrator
Bureau of Air Regulation
Permitting South

AAL/th

cc: Gregg Worley, EPA: worley.gregg@epamail.epa.gov
Dee Morse, NPS: dee_morse@nps.gov
Meredith Bond, FWS: meredith_bond@fws.gov
Jim Kraus, FWS: chassahowitzka@fws.gov
Cindy Zhang-Torres, DEP SWD: Cindy.Zhang-Torres@dep.state.fl.us
David Buff, P.E., Golder Associates: dbuff@golder.com

Harvey, Mary

From: Harvey, Mary
Sent: Friday, August 10, 2007 2:15 PM
To: 'worley.gregg@epa.gov'; 'Mr. Dee Morse, National Park Service'; 'meredith_bond@fws.gov'; 'chassahowitzka@fws.gov'; Zhang-Torres; 'Mr. David Buff, Golder Associates'; 'Herschel E. Morris, CF Industries, Inc.'
Cc: Heron, Teresa; Adams, Patty; Gibson, Victoria
Subject: Letter - CF Industries - Mr. Herschel Morris - Project #0570005-023-AC
Attachments: Letter - CF Industries - Project #0570005-023-AC.pdf

Tracking:	Recipient	Read
	'worley.gregg@epa.gov'	
	'Mr. Dee Morse, National Park Service'	
	'meredith_bond@fws.gov'	
	'chassahowitzka@fws.gov'	
	Zhang-Torres	Read: 8/10/2007 2:28 PM
	'Mr. David Buff, Golder Associates'	
	'Herschel E. Morris, CF Industries, Inc.'	
	Heron, Teresa	Read: 8/10/2007 2:19 PM
	Adams, Patty	
	Gibson, Victoria	Read: 8/10/2007 2:22 PM

Dear Sir/Madam:

Please send a "reply" message verifying receipt of the attached document(s); this may be done by selecting "Reply" on the menu bar of your e-mail software and then selecting "Send". We must receive verification of receipt and your reply will preclude subsequent e-mail transmissions to verify receipt of the document(s).

The document(s) may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible.

The document is in Adobe Portable Document Format (pdf). Adobe Acrobat Reader can be downloaded for free at the following internet site:
<http://www.adobe.com/products/acrobat/readstep.html>.

The Bureau of Air Regulation is issuing electronic documents for permits, notices and other correspondence in lieu of hard copies through the United States Postal System, to provide greater service to the applicant and the engineering community. Please advise this office of any changes to your e-mail address or that of the Engineer-of-Record.

Thank you,

DEP, Bureau of Air Regulation

8/14/2007

Harvey, Mary

From: Zhang-Torres
To: Harvey, Mary
Sent: Friday, August 10, 2007 2:28 PM
Subject: Read: Letter - CF Industries - Mr. Herschel Morris - Project #0570005-023-AC

Your message

To: 'worley.gregg@epa.gov'; 'Mr. Dee Morse, National Park Service'; 'meredith_bond@fws.gov'; 'chassahowitzka@fws.gov'; Zhang-Torres; 'Mr. David Buff, Golder Associates'; 'Herschel E. Morris, CF Industries, Inc.'
Cc: Heron, Teresa; Adams, Patty; Gibson, Victoria
Subject: Letter - CF Industries - Mr. Herschel Morris - Project #0570005-023-AC
Sent: 8/10/2007 2:15 PM

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Harvey, Mary

From: Buff, Dave [DBuff@GOLDER.com]
To: undisclosed-recipients
Sent: Friday, August 10, 2007 3:06 PM
Subject: Read: Letter - CF Industries - Mr. Herschel Morris - Project #0570005-023-AC

Your message

To: DBuff@GOLDER.com
Subject:

was read on 8/10/2007 3:06 PM.

Harvey, Mary

From: Ivan_Vicente@fws.gov
Sent: Monday, August 13, 2007 11:39 AM
To: Harvey, Mary
Subject: Letter - CF Industries - Mr. Herschel Morris - Project #0570005-023-AC

Return Receipt

Your document: Letter - CF Industries - Mr. Herschel Morris - Project #0570005-023-AC

was received by: Ivan Vicente/R4/FWS/DOI

at: 08/13/2007 11:38:43 AM EDT

Harvey, Mary

From: Dee_Morse@nps.gov
Sent: Monday, August 13, 2007 11:15 AM
To: Harvey, Mary
Subject: Letter - CF Industries - Mr. Herschel Morris - Project #0570005-023-AC

Return Receipt

Your document: Letter - CF Industries - Mr. Herschel Morris - Project #0570005-023-AC

was received by: Dee Morse/DENVER/NPS

at: 08/13/2007 09:14:46 AM

Harvey, Mary

From: Gibson, Victoria
To: Harvey, Mary
Sent: Friday, August 10, 2007 2:22 PM
Subject: Read: Letter - CF Industries - Mr. Herschel Morris - Project #0570005-023-AC

Your message

To: 'worley.gregg@epa.gov'; 'Mr. Dee Morse, National Park Service'; 'meredith_bond@fws.gov'; 'chassahowitzka@fws.gov'; Zhang-Torres; 'Mr. David Buff, Golder Associates'; 'Herschel E. Morris, CF Industries, Inc.'
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Harvey, Mary

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Your message

To: 'worley.gregg@epa.gov'; 'Mr. Dee Morse, National Park Service'; 'meredith_bond@fws.gov'; 'chassahowitzka@fws.gov'; Zhang-Torres; 'Mr. David Buff, Golder Associates'; 'Herschel E. Morris, CF Industries, Inc.'
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