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KOOGLER & ASSOCIATES, *Environmental Services*

4014 N.W. 13th Street • Gainesville, Florida 32609 • 904/377-5822

DER

JAN 29, 1988 (m)

KA 344-85-01

January 28, 1988

BAQM

Mr. C.H. Fancy
Deputy Chief
Bureau of Air Quality Management
Florida Department
of Environmental Regulation
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Subject: Central Phosphates, Inc.
Modification of Sulfuric Acid Plants A, B, C and D
Permit Nos. AC29-132155, AC29-132157, and PSD-FL119

Dear Mr. Fancy:

We have finally resolved the problems that were brought about by changing air quality models from ISC Version V to ISC Version VI and are responding to your completeness review letter of May 15, 1987. To overcome the modeling problems, the stack heights of the A and B sulfuric acid plant were increased from 90 feet to 110 feet. This stack height increase allowed the sulfur dioxide emission rates from these two plants to be increased from 7.25 pounds per ton of acid produced to 8.0 pounds per ton of acid produced. The stack height increase does not contradict any of the requirements for Good Engineering Practice stack height and the sulfur dioxide emission rate increase to 8.0 pounds per ton of acid produced still represents a decrease from baseline in sulfur dioxide emissions from the A and B plants. No changes have been made in the sulfuric acid mist emissions from the A and B plants or to emission rates or stack dimensions of the C and D acid plants. In the following paragraphs, we respond to the specific requests of your letter of May 15, 1987.

FDER Request No. 1

Modeling results using the ISC VI Air Quality Model.

~~RE~~
~~RE~~ } FBI

1-29-88

(M)

Mr. C.H. Fancy
Re: Central Phosphates, Inc.

January 28, 1988
Page 2

Response:

All modeling has been redone using the ISC Version VI Model, incorporating the regulatory default option. The results of the air quality modeling are summarized in the attached tables and figures. To expedite review, the proposed and existing operating rates and parameters for all sulfuric acid plants are also summarized (Table 1).

Under current permitted conditions, the A and B sulfuric acid plants are permitted to operate at a rate of 1000 tons per day of 100 percent sulfuric acid, each, at an emission rate of 10 pounds of sulfur dioxide and 0.3 pounds of acid mist per ton of acid produced. The existing stack heights of the A and B sulfuric acid plants are 78 feet. Under proposed conditions, the A and B sulfuric acid plants will operate at a rate of 1050 tons per day of 100 percent sulfuric acid, each, with an emission rate of 8.0 pounds of sulfur dioxide and 0.2 pounds of acid mist per ton of acid produced. Additionally, the stack heights of the A and B sulfuric acid plants will be raised to 110 feet.

The C and D sulfuric acid plants are presently permitted to operate at a rate of 1900 tons per day of 100 percent sulfuric acid, each, with an emission rate of 4.0 pounds of sulfur dioxide and 0.15 pounds of acid mist per ton of acid produced. The stack height of each of these plants is 198.5 feet and will remain unchanged. Under proposed conditions, the C and D sulfuric acid plants will operate at 2400 tons of 100 percent sulfuric acid per day, each, with an emission rate of 4.0 pounds of sulfur dioxide and 0.15 pounds of acid mist per ton of acid produced.

The initial modeling effort was to evaluate the change in the ambient impacts of sulfur dioxide emissions resulting from the changes in operating and emission rates of the CPI sulfuric acid plants described in the previous paragraph. The results of this modeling are summarized in Table 2. The results of the modeling demonstrate that for the annual period, there will be a net reduction in ambient sulfur dioxide levels. For the three-hour and 24-hour periods, the proposed changes will result in slight increases in ambient sulfur dioxide levels; a 1.2 micrograms per cubic meter increase for the three-hour period and a 0.2 micrograms per cubic meter increase for the 24-hour period. Significant impact levels for sulfur dioxide are defined as 1 microgram per cubic meter for the annual period, 5 micrograms per cubic meter for the 24-hour period and 25 micrograms per cubic meter for the three-hour period. The modeling results therefore indicate that the proposed changes in sulfuric acid plant operating conditions will result in changes in the ambient sulfur dioxide levels that are below the significant levels.

Mr. C.H. Fancy
Re: Central Phosphates, Inc.

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Modeling was also conducted to determine the impact of sources that would expand or consume PSD increments in the vicinity of the CPI plant. Results of this modeling are summarized in Table 3. The modeling shows that the PSD increment consuming and expanding sources will result in a maximum annual sulfur dioxide increase of 0.8 micrograms per cubic meter, a maximum three-hour increase of 53 micrograms per cubic meter and a maximum 24-hour increase of 14 micrograms per cubic meter. The locations of these impacts are shown in Figure 1. These increases in ambient sulfur dioxide levels compare with Class II PSD increments of 20 micrograms per cubic meter for the annual period, 512 micrograms per cubic meter for the three-hour period and 91 micrograms per cubic meter for the 24-hour period. The impact of PSD increment consuming and expanding sources in the vicinity of CPI are well below the allowable Class II PSD increments.

The final modeling exercise was to compare the impacts of all existing sources in the vicinity of the CPI plant with ambient air quality standards for sulfur dioxide. Results of this modeling are summarized in Table 4 and Figure 1. The results of the modeling show that the annual impact of all existing sources is 45 micrograms per cubic meter, compared with an ambient air quality standard for sulfur dioxide of 60 micrograms per cubic meter. The modeling also shows that the maximum three-hour impact of all sources is 817 micrograms per cubic meter, compared with an air quality standard of 1300 micrograms per cubic meter and that the maximum 24-hour impact is 245 micrograms per cubic meter, compared with an air quality standard of 260 micrograms per cubic meter. The data submitted with the original permit application package demonstrate that the background sulfur dioxide levels in the vicinity of the CPI plant are 0.0. Figure 1 shows the locations of the maximum annual, three-hour and 24-hour sulfur dioxide impacts.

The impacts of sulfuric acid mist emissions were determined for the conditions representative of the worst-case 24-hour impact. The meteorological data used for this analysis were from day 270, 1975 and are representative of the meteorological conditions under which the highest second-high 24-hour impact from the CPI sources is expected. The modeling demonstrated that the maximum 24-hour acid mist impact will be 5.6 micrograms per cubic meter. This impact is greater than the guideline impact (see original permit application) of one microgram per cubic meter, 24-hour average, but represents an estimated 58 percent reduction in the maximum acid mist impact expected under present operating conditions. Since no adverse acid mist effects have been observed under present conditions, no adverse impacts are anticipated under the proposed conditions.

The initial modeling exercise demonstrated that the impact proposed changes to the four CPI sulfuric acid plants resulted in impacts that were not significant for the annual, 24-hour and three-hour periods. Because of this, no significant impacts would be expected on any Class I PSD area or any sulfur dioxide Non-attainment Area.

Mr. C.H. Fancy
Re: Central Phosphates, Inc.

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Page 4

The stack height of the A and B sulfuric acid plants, as proposed, will be 110 feet while the stack heights of the C and D plants are, and will be, 198.5 feet. All of these stack heights are less than 213 feet (65 meters) which is considered the minimum Good Engineering Practice (GEP) stack height. As a result, none of the GEP stack height requirements apply to the CPI sulfuric acid plant stacks. The air quality modeling conducted using the ISC Version VI Model incorporated the regulatory default options which included stack tip down-wash.

A copy of all air quality modeling data is attached.

FDER Request No. 2

For A and B plants, explain how you intend to reduce emissions of sulfur dioxide from 10 to 7.25 pounds per ton of 100 percent acid. Also, explain how you intend to reduce acid mist emissions from 0.3 to 0.2 pounds per ton of 100 percent acid.

Response:

Under proposed conditions, the sulfur dioxide emissions from the A and B plants will be 8.0 pounds per ton of acid produced, rather than the originally proposed 7.25 pounds per ton of acid produced. Both the sulfur dioxide and acid mist emissions from the A and B sulfuric acid plants are controlled by ammonia scrubbers. The emission rates of both of these pollutants can be reduced by increasing the ammonia feed rate to the scrubbers. It should be noted that only on rare occasions do the sulfur dioxide emissions exceed 8.0 pounds per ton or do acid mist emissions exceed 0.2 pounds per ton. Thus, CPI has already demonstrated that the A and B plants can operate within the proposed emission limits. To assure that the proposed emission limits will not be exceeded in the future, the pH level in the ammonia scrubbers will be increased above 7.0 before plant start-up.

It should be noted that CPI has used EPA Method 8 to determine compliance with sulfur dioxide and acid mist emission limits. The literature documents that ammonia (from the ammonia scrubbers) interferes in the titration for sulfur dioxide and acid mist, resulting in a result that is biased high. Since CPI has had no trouble in demonstrating compliance in the past, even with this interference, no correction for ammonia interference has been requested or discussed with the Department. Should compliance become a problem in the future, a correction for the ammonia bias could be considered.

Mr. C.H. Fancy
Re: Central Phosphates, Inc.

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Page 5

FDER Request No. 3

State the start-up procedures you intend to use to minimize ambient impacts of sulfur dioxide and acid mist from sulfuric acid plants A, B, C and D. Will there be a specific sequence in start-up of one plant relative to another?

Response:

Should one or more of the sulfuric acid plants be down at the same time, CPI will not start more than one plant at a time. The plant being started would have to achieve compliance before the start-up of the next plant was initiated.

Additionally, CPI follows the procedures outlined below to minimize emissions during sulfuric acid plant start-up:

1. Steam from the auxiliary boiler is used to pre-heat the system before sulfur burning is initiated,
2. Where possible, only hot acid from another sulfuric acid plant is used for start-up. This should reduce the heat-up period during start-ups and result in sulfur dioxide emissions below 8.0 pounds per ton of sulfuric acid produced within the same time frame as compliance is reached under existing permit conditions, and
3. The pH in the scrubbers will increased to 7.0 or greater as stated in the previous response.

No particular plant start-up sequence is proposed since emissions from each of the plants are comparable.

FDER Request No. 4

Submit construction permit applications for Plants A and B, to enable independent review.

Response:

Applications are being prepared and will be submitted to the Department within one week.

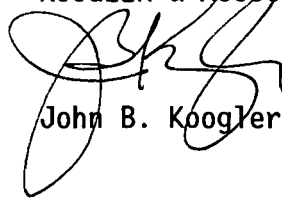
Mr. C.H. Fancy
Re: Central Phosphates, Inc.

January 28, 1988
Page 6

We trust that the information contained herein will permit you to complete your review of the subject construction permit applications for the C and D sulfuric acid plants. As stated herein, separate applications for the A and B plants will be submitted shortly. If you have any questions regarding the information contained herein, please do not hesitate to contact me.

Very truly yours,

KOGLER & ASSOCIATES



John B. Koogler, Ph.D., P.E.

JBK:mab

cc: Mr. Paul Roberts, Central Phosphates, Inc.
Mr. C. J. Martin, Central Phosphates, Inc.

Copied: Pradcep Raval }
Tom Roger } 10
CHF/BT }
Wayne Aronson-EPA }
Miguel Flores-UPS } 2.3.88
Jimmy Andrews }

TABLE 1

PRESENT AND PROPOSED PRODUCTION RATES AND
EMISSION RATES FOR CPI SULFURIC ACID PLANTS

CENTRAL PHOSPHATES INC.
HILLSBOROUGH COUNTY, FLORIDA

	SULFURIC ACID PLANT			
	A	B	C	D
Date Permitted	1965	1965	1973	1973
<u>Current Permit Conditions</u>				
Rate (tpd)	1000	1000	1900	1900
SO ₂ (lb/ton)	10.0	10.0	4.0	4.0
(lb/hr)	416.7	416.7	316.7	316.7
(tpy)	1825	1825	1387	1387
Mist (lb/ton)	0.3	0.3	0.15	0.15
(lb/hr)	12.5	12.5	11.9	11.9
(tpy)	54.8	54.8	52.0	52.0
Operating Factor	1.0	1.0	1.0	1.0
<u>Actual Conditions (1)</u>				
Rate (tpd)	1000	1000	1900	1900
SO ₂ (lb/ton)	10.0	10.0	3.79	3.79
(lb/hr)	416.7	416.7	300.0	300.0
(tpy)	1774	1774	1276	1276
Mist (lb/ton)	0.22	0.22	0.15	0.15
(lb/hr)	9.2	9.2	11.9	11.9
(tpy)	39.0	39.0	50.5	50.5
Operating Factor	0.972	0.972	0.971	0.971
Stack Height (ft)	78	78	198.5	198.5
<u>Proposed Conditions</u>				
Rate (tpd)	1050	1050	2400	2400
SO ₂ (lb/ton)	8.0	8.0	4.0	4.0
(lb/hr)	350.0	350.0	400.0	400.0
(tpy)	1533	1533	1752	1752
Mist (lb/ton)	0.2	0.2	0.15	0.15
(lb/hr)	8.8	8.8	15.0	15.0
(tpy)	38.8	38.8	65.7	65.7
Operating Factor	1.0	1.0	1.0	1.0
Stack Height (ft)	110	110	198.5	198.5

(1) Actual conditions documented in original permit application

TABLE 2

DETERMINATION OF THE SIGNIFICANCE OF IMPACTS OF
SULFUR DIOXIDE EMISSIONS FROM PROPOSED
SULFURIC ACID PLANT MODIFICATIONS

CENTRAL PHOSPHATES, INC.
HILLSBOROUGH COUNTY, FLORIDA

MET DATA YEAR	MAXIMUM EXPECTED IMPACT (ug/m3)(1)		
	Annual	3-hour	24-hour
1973	0	1.0	0.1
1974	0	0.9	0.1
1975	0	1.0	0.1
1978	0	1.2	0.2
1979	0	1.1	0.2
Significant Impacts (2)	1	25	5

(1) Impact determined with ISC-ST model with receptors spaced between 1.0 and 15.0 km from sources. Emission rates represent actual changes (increase or decrease) in emissions from the four sulfuric acid plants.

(2) Defined by Rule 17-2.100(171), FAC

TABLE 3

IMPACT OF PSD INCREMENT EXPANDING AND
CONSUMING SOURCES NEAR CPI

CENTRAL PHOSPHATES INC.
HILLSBOROUGH COUNTY, FLORIDA

<u>YEAR</u>	<u>MAXIMUM EXPECTED IMPACT (ug/m3)</u>		
	<u>Annual</u>	<u>3-hour</u>	<u>24-hour</u>
1973	0.8	53	11
1974	0.4	46	10
1975	0.5	52	13
1978	0.0	41	10
1979	0.6	52	14
Class II PSD Increment	20	512	91

TABLE 4

IMPACT OF ALL CURRENT SO₂ EMITTING
FACILITIES AT CPI

CENTRAL PHOSPHATES, INC.
HILLSBOROUGH COUNTY, FLORIDA

YEAR	MAXIMUM EXPECTED IMPACT (ug/m3)		
	Annual	3-hour	24-hour
1973	36	765	204
1974	38	741	204
1975	45	772	245
1978	39	817	230
1979	40	717	229
NAAQS	60	1300	260

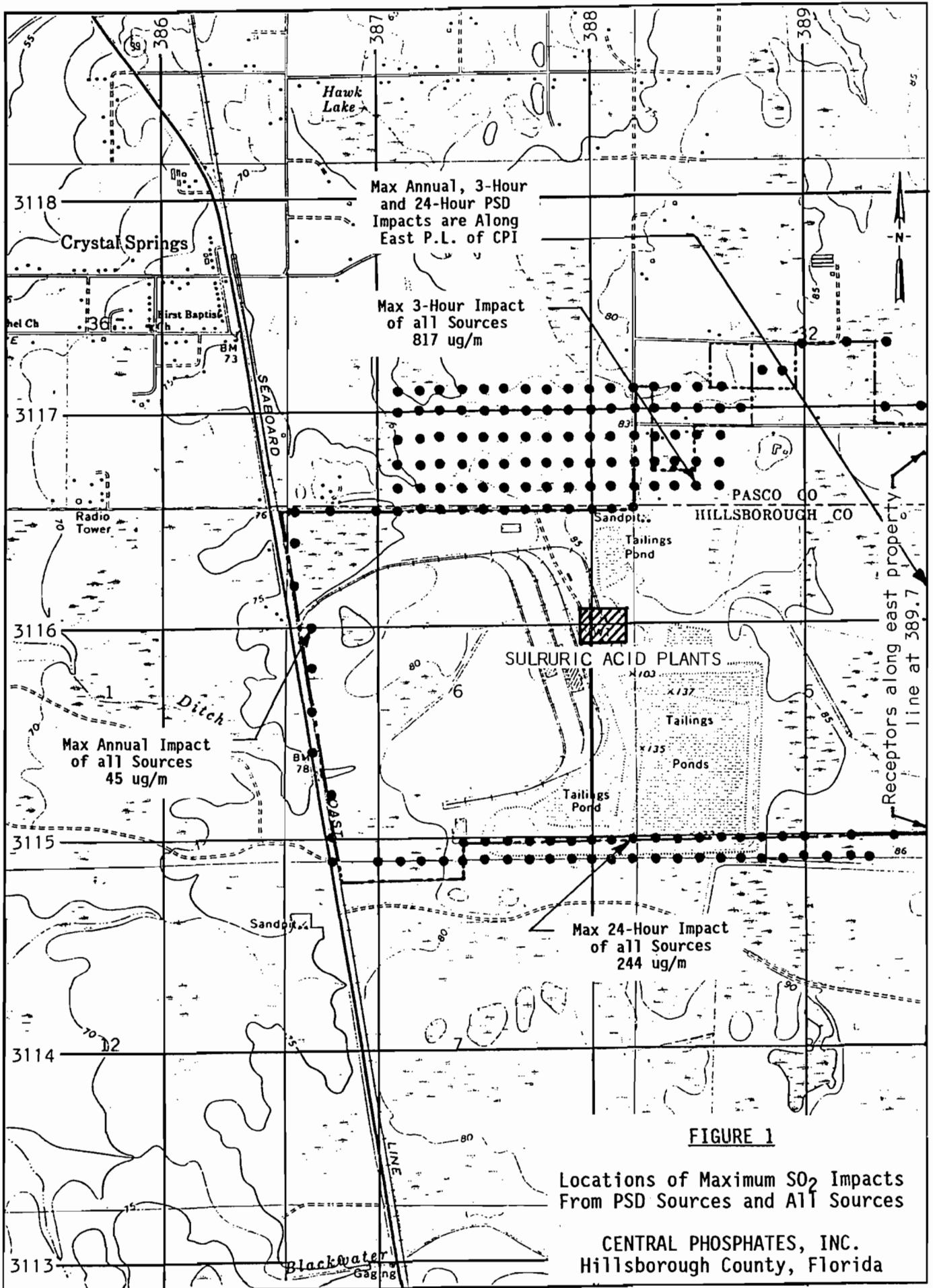


FIGURE 1

Locations of Maximum SO₂ Impacts From PSD Sources and All Sources

CENTRAL PHOSPHATES, INC.
Hillsborough County, Florida

Federal Express
6683652264
Mailed: 3/2/88

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KA 344-85-01

March 1, 1988

Mr. C. H. Fancy
Deputy Chief
Bureau of Air Quality Management
Florida Department of
Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Subject: Central Phosphates, Inc.
Amendment to Permit Conditions for Sulfuric Acid Plants A and B
Permits A029-65041 and A029-65042

Dear Mr. Fancy:

Central Phosphates, Inc. (CPI) has previously submitted applications to modify two existing sulfuric acid plants at their phosphate fertilizer complex north of Plant City, Florida. The two plants for which modifications have been requested are the C and D sulfuric acid plants. The construction permit numbers for these plants assigned by the Department are AC29-132155, AC29-132157 and PSD-FL119.

In addition to modifying the operating conditions of the C and D sulfuric acid plants, CPI also wishes to amend the operating conditions of the A and B sulfuric acid plants. The A and B sulfuric acid plants are single absorption sulfuric plants permitted in 1965 to operate at a production rate of 1,000 tons per day of 100 percent sulfuric acid, each. The present sulfur dioxide and sulfuric acid mist emission limits for the plants are 10.0 pounds per ton and 0.3 pounds per ton of 100 percent sulfuric acid for SO₂ and acid mist, respectively.

CPI proposes to increase the production rate of both the A and B sulfuric acid plants to 1050 tons of 100 percent sulfuric acid per day. This increase in production rate will be accompanied by a reduction in the sulfur dioxide emission limit to 8.0 pounds per ton of 100 percent acid and a reduction in the acid mist emission limit to 0.20 pounds per ton of 100 percent acid. Additionally, the stack heights of both the A and B sulfuric acid plants will be increased from 78 feet to 110 feet, above grade.

1031

FEDERAL EXPRESS

QUESTIONS? CALL 800-238-5355 TOLL FREE.

AIRBILL NUMBER

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From (Your Name) Please Print C F INDUSTRIES		Your Phone Number (Very Important) () () () () () ()		To (Recipient's Name) Please Print MR. C. H. FANCY		Recipient's Phone Number (Very Important)	
Company C F INDUSTRIES		Department/Floor No.		Company FLORIDA DEPT. OF ENVIRONMENTAL REGULATIONS		Department/Floor No.	
Street Address HWY 39				Exact Street Address (Use of P.O. Boxes or P.O. Zip Codes Will Delay Delivery And Result in Extra Charge.) 2600 BLAIR STONE RD.			
City ZEPHYR HILLS		State FL		City TALLAHASSEE		State FL.	
ZIP Required For Correct Invoicing 32950		ZIP Street Address Zip Required 32399-2400					
3 YOUR BILLING REFERENCE INFORMATION (FIRST 24 CHARACTERS WILL APPEAR ON INVOICE.)							
PAYMENT <input checked="" type="checkbox"/> Bill Sender <input type="checkbox"/> Bill Recipient's FedEx Acct. No. <input type="checkbox"/> Bill 3rd Party FedEx Acct. No. <input type="checkbox"/> Bill Credit Card <input type="checkbox"/> Cash				4 HOLD FOR PICK-UP AT THIS FEDERAL EXPRESS LOCATION: Street Address (See Service Guide or Call 800-238-5355) City State			
4 SERVICES CHECK ONLY ONE BOX				DELIVERY AND SPECIAL HANDLING CHECK SERVICES REQUIRED			
1 <input type="checkbox"/> PRIORITY 1 Overnight Delivery Using Your Packaging		6 <input type="checkbox"/> OVERNIGHT LETTER* (Our Packaging) 9 1/2" x 12 1/2"		1 <input type="checkbox"/> HOLD FOR PICK-UP (Fill in Section 4 at night)		2 <input checked="" type="checkbox"/> DELIVER WEEKDAY	
2 <input checked="" type="checkbox"/> Overnight Delivery USING OUR PACKAGING Courier-Pak Overnight Envelope* 12" x 15 1/2"		3 <input type="checkbox"/> Overnight Box 12 1/2" x 17 1/2" x 3" A		3 <input type="checkbox"/> DELIVER SATURDAY (Extra charge)		4 <input type="checkbox"/> PACKAGES 1 3	
3 <input type="checkbox"/> Overnight Tube 38" x 6" x 6" B		4 <input type="checkbox"/> Overnight Tube 38" x 6" x 6" B		4 <input type="checkbox"/> WEIGHT		5 <input type="checkbox"/> YOUR DECLARED VALUE	
4 <input type="checkbox"/> STANDARD AIR Delivery not later than second business day		5 <input type="checkbox"/> DANGEROUS GOODS (P-1 and Standard Air Packages only. Extra charge)		5 <input type="checkbox"/> CONSTANT SURVEILLANCE SERVICE (CSS) (Extra charge) (Do Not Complete Section 5)		6 <input type="checkbox"/> OVER SIZE	
5 <input type="checkbox"/> SERVICE COMMITMENT PRIORITY 1 - Delivery is scheduled early next business morning in most locations. It may take two or more business days if the destination is outside our primary service areas. STANDARD AIR - Delivery is generally next business day or not later than second business day. It may take three or more business days if the destination is outside our primary service areas.		6 <input type="checkbox"/> DRY ICE Lbs.		7 <input type="checkbox"/> OTHER SPECIAL SERVICE		7 <input type="checkbox"/> ZIP Zip Code of Street Address Required	
8 <input type="checkbox"/> SATURDAY PICK-UP (Extra charge)		9 <input type="checkbox"/> OTHER SPECIAL SERVICE		8 <input type="checkbox"/> OTHER SPECIAL SERVICE		8 <input type="checkbox"/> ZIP Zip Code of Street Address Required	
9 <input type="checkbox"/> OTHER SPECIAL SERVICE		10 <input type="checkbox"/> OTHER SPECIAL SERVICE		9 <input type="checkbox"/> OTHER SPECIAL SERVICE		9 <input type="checkbox"/> ZIP Zip Code of Street Address Required	
10 <input type="checkbox"/> OTHER SPECIAL SERVICE		10 <input type="checkbox"/> OTHER SPECIAL SERVICE		10 <input type="checkbox"/> OTHER SPECIAL SERVICE		10 <input type="checkbox"/> ZIP Zip Code of Street Address Required	
Sender authorizes Federal Express to deliver this shipment without obtaining a delivery signature and shall indemnify and hold harmless Federal Express from any claims resulting therefrom. Release Signature:				Received At 1 <input type="checkbox"/> Regular Stop 2 <input type="checkbox"/> On-Call Stop 3 <input type="checkbox"/> Drop Box 4 <input type="checkbox"/> B.S.C. 5 <input type="checkbox"/> Station Federal Express Corp. Employee No.			
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9 Mar 1988
Gainesville, FL



KOOGLER & ASSOCIATES, Environmental Services

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KA 344-85-01

March 8, 1988

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MAR 14 1988

DER-BAQM

Mr. Bill Thomas
Florida Department of
Environmental Regulation
Bureau of Air Quality Management
2600 Blair Stone Road
Tallahassee, FL 32301

Subject: Central Phosphates, Inc.
Sulfuric Acid Plants A and B
Permits A029-65041 and A029-65042

Dear Bill:

Under cover of letter dated March 1, 1988, applications were submitted to your office to amend permit conditions of sulfuric acid plants A and B operated by Central Phosphates, Inc. (CPI) at their phosphate fertilizer complex north of Plant City, Florida. Among other things, it was noted in the applications that the stack heights of the two plants would be increased from 78 feet to 110 feet, above grade.

Beginning March 12, 1988, CPI will begin a planned shutdown of the A and B sulfuric plants for scheduled maintenance. During this shutdown, CPI would like to proceed with the installation of the stack extensions. I spoke with you by telephone regarding this matter on March 3, 1988, and it is my understanding that you stated that it would be acceptable for CPI to proceed with the stack extensions during the scheduled maintenance. You further stated that there was to be no increase in the production rate of either plant (as addressed in the permit applications for the two plants) until the applications for amendment had been reviewed by your office and construction permits issued for the two plants. You reasoned that CPI could proceed with the stack extensions as an increase in stack height (within the confines of good engineering practice stack height limitations) with no increase in emissions would result in a reduction in ambient impacts.

In reviewing the applications that were submitted under cover letter dated March 1, 1988, typographical errors were noted on pages 2 and 2a. I am attaching revised copies of these pages, four sets for each of the two applications, to be inserted in the permit applications.

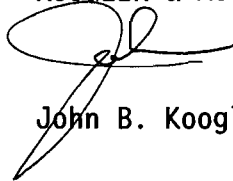
Mr. Bill Thomas
Florida Department of
Environmental Regulation

March 8, 1988
Page 2

If there are any questions regarding these matters or if I have misinterpreted your comments on the stack height extensions, please do not hesitate to contact me.

Very truly yours,

KOOGLER & ASSOCIATES



John B. Koogler, Ph.D., P.E.

JBK:wa
Enc.

cc: Mr. W. C. Thomas, FDER, Tampa
Mr. Victor San Agustin, Hillsborough County
Environmental Protection Agency
Mr. Paul Roberts, CPI
Mr. C. J. Martin, CPI

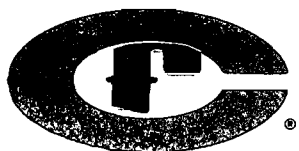
Copied: John Reynolds }
CHF/ST - letter only } 3-15-88 ms

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22 April 1988
Crystal Springs, FL

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P.O. Drawer L.
Plant City, Florida 33566
Telephone: 813/782-1591

CENTRAL PHOSPHATES, INC., Subsidiary of



CF Industries, Inc.

Plant City Phosphate Complex

April 22, 1988

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APR 25 1988

Mr. Bill Thomas
Bureau of Air Quality Management
Florida Department of Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

DER-BAQM

RE: Central Phosphates, Inc.
Amendment to Construction Permit
Conditions for Sulfuric Acid Plants A, B, C, & D
Permits: AC 29-146176, AC 29-146177,
AC 29-132155, AC 29-132157

Dear Mr. Thomas:

Construction for the subject project will not be completed until August 31, 1988. In order to allow one (1) month for compliance testing and preparation of the operating permit application, plus the required 90 days for approval, we are requesting the expiration date for the construction permits be extended from September 30, 1988 to December 31, 1988.

We have reviewed the April 5, 1988 Technical Evaluation and Preliminary Determination and proposed permits and have no comments other than the request for extension of the expiration date.

Sincerely,

Paul R. Roberts
Manager Engineering

PRR/tjj
cc: J. Koogler, P.E.
Pradee Raval, DER

Copied: CHF/BT
Pradeep Raval } 4.25.88 (mm)

CF Industries, Inc.

PLANT CITY PHOSPHATE COMPLEX
P. O. DRAWER L
PLANT CITY, FLORIDA 33566

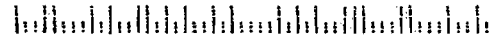
4/25/88

~~CFI~~
~~CFI~~ } F4I

Permu ext. (i)



Mr. Bill Thomas
Bureau of Air Quality Management
Florida Dept. of Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400



PM
25 Apr. 1988
Tampa, FL

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THE TAMPA TRIBUNE

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Published Daily
Tampa, Hillsborough County, Florida

APR 27 1988

DER - BAQM

State of Florida }
County of Hillsborough } ss.

Before the undersigned authority personally appeared
G. T. Gleason, who on oath says that he is Controller of The Tampa Tribune, a daily
newspaper published at Tampa in Hillsborough County, Florida; that the attached copy
of advertisement being a

LEGAL NOTICE

in the matter of Notice of Intent

was published in said newspaper in the issues of
April 19, 1988

Affiant further says that the said The Tampa Tribune is a newspaper published at
Tampa, in said Hillsborough County, Florida, and that the said newspaper has
heretofore been continuously published in said Hillsborough County, Florida, each day
and has been entered as second class mail matter at the post office in Tampa, in said
Hillsborough County, Florida, for a period of one year next preceding the first publica-
tion of the attached copy of advertisement; and affiant further says that he has neither
paid nor promised any person, firm, or corporation any discount, rebate, commission or
refund for the purpose of securing this advertisement for publication in the said
newspaper.

G. T. Gleason

Sworn to and subscribed before me, this 25th day
of April, A.D. 1988

Deborah Bouchard
Notary Public, State of Florida

(SEAL)

My Commission Expires Jan. 6, 1989
Bonded thru Troy Fain - Insurance, Inc.

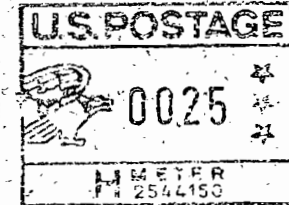
Copied: Pradeep Raval
Tom Rogers
Barry Andrews
Wayne Aronson, EPA
Miguel Hous, UPS
Bill Thomas, SW Dist
I. Chotomko, EPA/C

4.28.88

Permits: A = AC 29-146176
B = AC 29-146177
C = AC 29-132155
D = AC 29-132157
PSD-FL-119

State of Florida
Department of
Environmental Regulation
Notice of Intent
The Department of Environ-
mental Regulation hereby
gives notice of its intent to
issue permits to Central
Phosphates, Inc. to install
cogeneration capability at
their existing facility located
in Hillsborough County, Flori-
da. Energy enhancements in-
clude increases in the produc-
tion rates of Sulfuric Acid
Plants A and B from 1000 tons
per day (TPD) to 1050 TPD
(100% acid), and Plants C and
D from 1900 TPD to 2400 TPD
(100% acid). The project will
involve changes in pump
sizes, piping, catalyst quantity
and installation of a steam
turbine. The project will result
in a significant increase in
emissions of sulfur dioxide
(SO2) and sulfuric acid mist.
The Department is issuing this
intent to issue for the reasons
stated in the Technical Evalua-
tion and Preliminary Determi-
nation.
Persons whose substantial
interests are affected by the
Department's proposed per-
mitting decision may petition
for an administrative determi-
nation (hearing) in accordance
with Section 120.57, Florida
Statutes. The petition must
conform to the requirements
of Chapters 17-103 and 28-5,
Florida Administrative Code,
and must be filed (received) in
the Department's Office of
General Counsel, 2600 Blair
Stone Road, Tallahassee, Flori-
da 32399-2400, within
fourteen (14) days of publica-
tion of this notice. Failure to
file a petition within this time
period constitutes a waiver of
any right such person has to
request an administrative de-
termination (hearing) under
Section 120.57, Florida Stat-
utes.
If a petition is filed, the ad-
ministrative hearing process
is designed to formulate agen-
cy action. Accordingly, the
Department's final action may
be different from the pro-
posed agency action. There-
fore, persons who may not
wish to file a petition may
wish to intervene in the pro-
ceeding. A petition for inter-
vention must be filed pursuant
to Rule 28-5.207, Florida Ad-
ministrative Code, at least five
(5) days before the final hear-
ing and be filed with the hear-
ing officer if one has been as-
signed at the Division of Ad-
ministrative Hearings, Depart-
ment of Administration, 2009
Apalachee Parkway, Tallahas-
see, Florida 32301. If no hear-
ing officer has been assigned,
the petition is to be filed with
the Department's Office of
General Counsel, 2600 Blair
Stone Road, Tallahassee, Flori-
da 32399-2400. Failure to
petition to intervene within
the allowed time frame
constitutes a waiver of any
right such person has to re-
quest a hearing under Section
120.57, Florida Statutes.
The application is available
for public inspection during
normal business hours, 8:00
a.m. to 5:00 p.m., Monday
through Friday, except legal
holidays, at:
Dept. of
Environmental Regulation
Bureau of Air
Quality Management
2600 Blair Stone Road
Tallahassee,
Florida 32399-2400
Dept. of
Environmental Regulation
Southwest District Office
4520 Live Oak Fair Blvd.
Tampa, Florida 33610-7347
Hillsborough County
Environmental
Protection Commission
1410 N. 21st Street
Tampa, Florida 33605
Any person may send writ-
ten comments on the pro-
posed action to Mr. Bill Thom-
as at the Department's Tallah-
hassee address. All comments
mailed within 30 days of the
publication of this notice will
be considered in the Depart-
ment's final determination.
4040 4/19/88

The Tampa Tribune



Mr. Bill Thomas
Bureau of Air Quality Mgmt
Department of Environmental Regulation
2600 Blair Stone Road
Tallahassee FL 32399-2400

202 S. Parker Street
Tampa, FL 33606
PO Box 191, Tampa, FL 33601





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET
ATLANTA, GEORGIA 30335

PH
9 May 1988
Atlanta, GA

File Copy

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MAY 09 1988

MAY 11 1988

4APT-APB

DER-BAQM

C. H. Fancy, P.E., Deputy Chief
Bureau of Air Quality Management
Florida Department of Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Re: Preliminary Determination for Central Phosphates, Inc. (PSD-FL-131)

Dear Mr. Fancy:

This is to acknowledge our receipt of your preliminary determination and draft permit for the proposed modification of the A, B, C, and D sulfuric acid plants at Central Phosphates, Inc. After reviewing the preliminary determination package, we concur with your analysis and will not subject this determination to review under the Region IV Overview of State Programs policy.

Please submit copies of the final determination and final permit when they are issued. If you have any further comments, please contact me or Gary Ng of my staff at (404) 347-2864.

Sincerely yours,

Bruce P. Miller

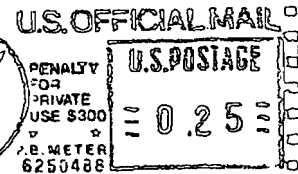
Bruce P. Miller, Chief
Air Programs Branch
Air, Pesticides, and Toxics
Management Division

Copied: Pradeep Raval
Bill Thomas, SW Dist.
Jerry Campbell, EPCHC
Tom Rogers
Barry Andrews } 5.12.88

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION IV
345 COURTLAND STREET
ATLANTA, GEORGIA 30365

OFFICIAL BUSINESS
PENALTY FOR PRIVATE USE: \$300
AIR-4

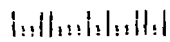
C. H. Fancy, P.E., Deputy Chief
Bureau of Air Quality Management
Florida Department of Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400



5-12-88

~~CHP~~
~~DE~~ → FYI

(M)





State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

For Routing to Other Than The Addressee	
To: _____	Location: _____
To: _____	Location: _____
To: _____	Location: _____
Page: _____	Date: _____

Interoffice Memorandum

TO: Dale Twachtmann

FROM: Howard L. Rhodes *[Signature]*

SUBJ: Approval of Central Phosphates Inc.'s Sulfuric Acid Plants A, B, C, and D

State Construction Permit Numbers: AC 29-146176, -146177, -132155, -132157

Federal Permit Number: PSD-FL-119

DATE: May 25, 1988

Attached for your approval and signature are permits prepared by Central Air Permitting for the above mentioned company to install cogeneration capability at their facility while increasing the production rates of sulfuric acid plants A, B, C, and D.

The facility is located in Plant City, Hillsborough County, Florida. Comments were received during the public notice period and have been addressed in the Final Determination.

Day 90, after which these permits will be issued by default, is May 31, 1988.

I recommend your approval and signature.

HLR/aqm/pr
attachments

25 May
RECEIVED
 MAY 25 1988
 DER-BAQ

RECEIVED

MAY 25 1988

Office of the Secretary

Federal Express
6683652264
Mailed: 3/21/88

File Copy
2252

Ka

KOOGLER & ASSOCIATES, Environmental Services

4014 N.W. 13th Street • Gainesville, Florida 32609 • 904/377-5822

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DER-MAIL ROOM
1988 MAR -3 AM 10:59

KA 344-85-01

March 1, 1988

Mr. C. H. Fancy
Deputy Chief
Bureau of Air Quality Management
Florida Department of
Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Subject: Central Phosphates, Inc.
Amendment to Permit Conditions for Sulfuric Acid Plants A and B
Permits A029-65041 and A029-65042

Dear Mr. Fancy:

Central Phosphates, Inc. (CPI) has previously submitted applications to modify two existing sulfuric acid plants at their phosphate fertilizer complex north of Plant City, Florida. The two plants for which modifications have been requested are the C and D sulfuric acid plants. The construction permit numbers for these plants assigned by the Department are AC29-132155, AC29-132157 and PSD-FL119.

In addition to modifying the operating conditions of the C and D sulfuric acid plants, CPI also wishes to amend the operating conditions of the A and B sulfuric acid plants. The A and B sulfuric acid plants are single absorption sulfuric plants permitted in 1965 to operate at a production rate of 1,000 tons per day of 100 percent sulfuric acid, each. The present sulfur dioxide and sulfuric acid mist emission limits for the plants are 10.0 pounds per ton and 0.3 pounds per ton of 100 percent sulfuric acid for SO₂ and acid mist, respectively.

CPI proposes to increase the production rate of both the A and B sulfuric acid plants to 1050 tons of 100 percent sulfuric acid per day. This increase in production rate will be accompanied by a reduction in the sulfur dioxide emission limit to 8.0 pounds per ton of 100 percent acid and a reduction in the acid mist emission limit to 0.20 pounds per ton of 100 percent acid. Additionally, the stack heights of both the A and B sulfuric acid plants will be increased from 78 feet to 110 feet, above grade.

1031

Mr. C.H. Fancy
Re: Central Phosphates, Inc.

March 1, 1988
Page 2

The increase in the acid production rate accompanied by the reduction in the SO₂ and acid mist emission limits will result in a net reduction in the emission rates of both SO₂ and acid mist. Nitrogen oxide emissions will increase slightly (2.8 tons per year) as a result of the production rate increase. Since the production rate increases in both plants can be accomplished with no significant physical changes to the plants and since the increases in production rate will be accompanied by reductions in sulfur dioxide and acid mist emissions and a de minimis increase in nitrogen oxide emissions, the changes can be considered amendments to permit conditions rather than modifications as defined by rule.

The request for amendments is being submitted in the form of construction permit applications however so the amended permit conditions and all of the conditions associated with the operations of the two plants will be federally recognizable and federally enforceable. The construction permit applications for both the A and B sulfuric acid plants are attached hereto and include all information necessary to review the requested amendments. Air quality modeling demonstrating that the proposed emission rates from the A and B plants will not cause or contribute to violations of ambient air quality standards has been submitted with the construction permit applications for the C and D sulfuric acid plants.

Since the operating permits for both the A and B sulfuric acid plants expire on March 31, 1988, CPI has filed applications to renew these operating permits. It is expected that the amendments requested in the attached construction permit applications will become amendments to the renewed operating permits for the two plants.

If there are any questions regarding these applications or any additional information is necessary to complete your review of the applications, please do not hesitate to contact me.

Very truly yours,

KOGLER & ASSOCIATES


John B. Koogler, Ph.D., P.E.

JBK:wa

cc: Mr. Paul Roberts, CPI
Mr. C. J. Martin, CPI
Mr. Jerry Campbell, Hillsborough County Environmental
Protection Commission

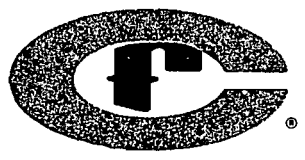
Copied: John Reynolds } note to JR to advise y
CHF/BT } copies of permit should
be sent to EPA ENPS. (m) 3/5/88

PM
22 April 1988
Crystal Springs, FL

File Copy

P.O. Drawer L.
Plant City, Florida 33566
Telephone: 813/782-1591

CENTRAL PHOSPHATES, INC., Subsidiary of



CF Industries, Inc.
Plant City Phosphate Complex

April 22, 1988

RECEIVED

APR 25 1988

Mr. Bill Thomas
Bureau of Air Quality Management
Florida Department of Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

DER-BAQIM

RE: Central Phosphates, Inc.
Amendment to Construction Permit
Conditions for Sulfuric Acid Plants A, B, C, & D
Permits: AC 29-146176, AC 29-146177,
AC 29-132155, AC 29-132157

Dear Mr. Thomas:

Construction for the subject project will not be completed until August 31, 1988. In order to allow one (1) month for compliance testing and preparation of the operating permit application, plus the required 90 days for approval, we are requesting the expiration date for the construction permits be extended from September 30, 1988 to December 31, 1988.

We have reviewed the April 5, 1988 Technical Evaluation and Preliminary Determination and proposed permits and have no comments other than the request for extension of the expiration date.

Sincerely,

Paul R. Roberts
Paul R. Roberts
Manager Engineering

PRR/tjj
cc: J. Koogler, P.E.
Pradee Raval, DER

Copied: CHF/BT
Pradeep Raval } 4-25-88