

25-Jun	Received request for extension of time	in OGC			
30-Jun	Asked for "T's" Input on this --- she discussed with Cindy P. and Bobby				
	Per "T" give them 30 more days	Cindy P. is working on the CAM issue			
2-Jul	order to grant drafted and I sent it to OGC today -- expires on 7/30				
	found out that Doug won't be in the office till 7/12				
9-Jul	Jack signed the order today and a copy was sent to us by fax				
	I notified Trina, Cindy P., Bobby (asked Cindy who in the District to notify)				
	Updated notes and Outlook				
12-Jul	updated LCT				
14-Jul	Cindy P. says to notify Jason Waters and Alie Harmon @ EPC				
	Bobby is not working on this permit -- just Cindy P.				
15-Jul	e-mailed the 15 days to go reminder				
16-Jul	Cindy P. sent some e-mails to Errin Pichard and Jason Waters in regards to				
	had either one of them heard anything from EPA				
27-Jul	e-mailed the 3 days to go reminder				
	Trina sent for information from Joe, Errin, Cindy P.				
28-Jul	Errin will get back with Trina on status with EPA				
30-Jul	OGC updated LCT today -- stating that they had received a request for				
	another extension of time				
2-Aug	Where is my copy????? Once I receive it let Trina know.				
12-Aug	Received our copy once Lisa got back from vacation				
16-Aug	Drafted the order to grant for an expiration date of 9/30/04				
	We will hold off sending to OGC until Trina can check in with Cindy P. & Errin				
8/25	Discuss w/ Trina				

9/1

will be on hold for some time per "T"
 a couple more months

9/22

discuss w/ "T" how to proceed

9/29

Rec'd request by OGC & they updated LCT

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

CF INDUSTRIES, INC.
PLANT CITY PHOSPHATE COMPLEX
FACILITY

Petitioner,

v.

OGC #02-0587
DEP Permit 0570005-7-AV

DEPARTMENT OF ENVIRONMENTAL
PROTECTION,

Respondent.

**ORDER GRANTING REQUEST FOR EXTENSION
OF TIME TO FILE PETITION FOR HEARING**

This cause has come before the Florida Department of Environmental Protection upon receipt of a request made by Petitioner CF INDUSTRIES, INC., PLANT CITY PHOSPHATE COMPLEX FACILITY, to grant an extension of time to file a petition for an administrative hearing to allow time to discuss with FDEP several specific conditions for its location in Hillsborough County, Florida. Because the request shows good cause for the extension of time,

IT IS ORDERED:

The request for an extension of time to file a petition for administrative proceeding is granted. Petitioner shall have until, September 30, 2004, to file a petition in this matter. Filing shall be complete on receipt by the Office of General Counsel, Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station 35, Tallahassee, Florida 32399-3000.

DONE AND ORDERED on this _____ day of August, 2004, in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION

JACK CHISOLM, Deputy General Counsel
3900 Commonwealth Boulevard. M.S. 35
Tallahassee, Florida 32399-3000
850-245-2242 facsimile 850-245-2302

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished via
__ U. S. Mail __ facsimile __ **only**, this ____ day of August, 2004, to:

James S. Alves
Hopping Green & Sams
P. O. Box 6526
Tallahassee, FL 32314

facsimile: 850-224-8551

W. Douglas Beason, Assistant General Counsel
STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION
3900 Commonwealth Boulevard - Mail Station 35
Tallahassee, FL 32399-3000
850-245-2242 facsimile 850-245-2302

with a courtesy copy to:

Trina L. Vielhauer
Chief
Bureau of Air Regulation

facsimile: 850-921-9533

BEST AVAILABLE COPY

Hopping Green & Sams

Attorneys and Counselors

July 29, 2004

Ms. Kathy Carter
Agency Clerk
Department of Environmental Protection
Office of the General Counsel
3900 Commonwealth Blvd.
Tallahassee, FL 32399-3000

Re: Request for Extension of Time
OGC Case No. 02-0587
Draft Revision to Title V Air Permit (0570005-007-AV)
CF Industries, Inc.
Plant City Phosphate Complex
Hillsborough County

Dear Ms. Carter:

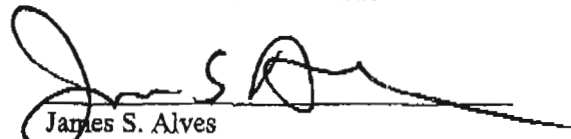
Please accept for filing with the Department this additional Request for Extension of Time on behalf of CF Industries, Inc. The status and history of this matter have been described in previous requests for extension of time, all of which have been granted by the Department. CF Industries and the Department have achieved conceptual agreement on permit language that would resolve the disputed issues. Also, CF Industries has filed a request for an alternative monitoring plan, which still has not been acted on.

Good cause for granting an additional extension of time, through September 30, 2004, is that such an extension would afford time to implement an amicable and appropriate resolution of the issues in dispute. There will be no prejudice caused by granting an additional extension of time.

In sum, CFI requests that the deadlines for filing a petition and for publishing notice be extended to September 30, 2004. Thank you for your attention to this matter.

Sincerely,

HOPPING GREEN & SAMS



James S. Alves
for CF Industries, Inc.

cc: Jerry Kissel, DEP-SW District
Douglas Beason, Esquire

Gibson, Victoria

From: Gibson, Victoria
Sent: Monday, August 02, 2004 2:08 PM
To: Carter, Kathy
Subject: Copies of the request for extension of time

Importance: High

Hi,

Would you please fax to me a copy of the request for extension of time on the following two items you might have received on July 30:

CF Industries/Plant City Phosphate 0570005-007-AV OGC # 02-0587, and

Indiantown Cogeneration LP 0850102-007-AV OGC # 14-1377

Thank you.

Vickie

Victoria Gibson, Administrative Secretary
Bureau Chief's Office
DEP/Bureau of Air Regulation
victoria.gibson@dep.state.fl.us
850-921-9504

Chronology of Activities

OGC Number **02 0587 29 AV** District **SOUTHWEST** County **HILLSBOROUGH**
Style of Case **CF INDUSTRIES, INC. (PLANT CITY PHOSPHATE COMPLEX) V DEP**
Program Area **AIR TITLE V** Mode **ADMINISTRATIVE**
Lead Attorney **DOUG D BEASON** Status **OPEN**
Forum Name _____ Forum Case Number _____
Permit Appl **0570005-007-AV** Final Order Number _____

Date *	Code	Activity Description
12/06/2002		ORDER GRANTING EXTENSION UNTIL 1/31/03
01/29/2003	REX7	RECEIVED SEVENTH REQUEST FOR EXTENSION OF TIME
03/27/2003		RECEIVED REQUEST FOR EXTENSION OF TIME
06/27/2003		RECEIVED REQUEST FOR EXTENSION OF TIME
08/27/2003		RECEIVED REQUEST FOR EXTENSION OF TIME
12/31/2003		RECEIVED REQUEST FOR EXTENSION OF TIME
03/31/2004		RECEIVED REQUEST FOR EXTENSION OF TIME
06/25/2004		RECEIVED REQUEST FOR EXTENSION OF TIME
07/09/2004		ORDER GRANTING EXTENSION UNTIL 7/30/04
07/30/2004		RECEIVED REQUEST FOR EXTENSION OF TIME

?
where's my fat copy

**Air Resource
Information**

**DEPARTMENT OF
ENVIRONMENTAL PROTECTION**

Air Permit Search

Last Updated: 01/28/02

[Help](#)

Facilities To Show [First](#) [Next](#)

Owner/Company Name	Site Name	City	SIC				
CF INDUSTRIES, INC., PLANT CITY PHOS	CF INDUSTRIES, INC., PLANT CITY PHOSP	PLANT CITY	2874				
Permit Number	Permit Activity	Issue Date	Expiration Date	Posting Date	Permit Status	Project Documents	Permit Application
0570005-016-AV	PERMIT REVISION			4/17/2002	DRAFT	Zip File	Summary
0570005-013-AV	ADMIN CORRECTION	8/17/2001	5/20/2003	8/21/2001	FINAL	Zip File	Summary
0570005-014-AV	PERMIT REVISION	5/15/2001	5/21/2003	5/21/2001	FINAL	Zip File	Summary

Facilities to show [First](#) [Next](#)

Search Results: 3 Permits Found as of 4/26/2004 2:32:52 PM

Last Updated: 01/29/04

Gibson, Victoria

From: Vielhauer, Trina
Sent: Wednesday, July 28, 2004 8:24 AM
To: Pichard, Errin; Phillips, Cindy
Cc: Kahn, Joseph; Gibson, Victoria; Holtom, Jonathan
Subject: RE: CF Industries - Extension of Time for 0570005-007-AV

Great- thank you.

-----Original Message-----

From: Pichard, Errin
Sent: Wednesday, July 28, 2004 7:59 AM
To: Vielhauer, Trina; Phillips, Cindy
Cc: Kahn, Joseph; Gibson, Victoria; Holtom, Jonathan
Subject: RE: CF Industries - Extension of Time for 0570005-007-AV

Trina-

I called Region 4 this morning. The person working on the CF request (Keith Goff) is out until tomorrow. I told him to call me ASAP with the status. As soon as I hear from him, I'll let you know.

Errin

-----Original Message-----

From: Vielhauer, Trina
Sent: Tuesday, July 27, 2004 2:53 PM
To: Phillips, Cindy
Cc: Pichard, Errin; Kahn, Joseph; Gibson, Victoria; Holtom, Jonathan
Subject: RE: CF Industries - Extension of Time for 0570005-007-AV

Errin,

Could you check in with EPA just to see where they are on processing the alternate monitoring request? It will be helpful to know that as we decide the timing on the upcoming permitting actions.

thx

-----Original Message-----

From: Phillips, Cindy
Sent: Tuesday, July 27, 2004 11:21 AM
To: Vielhauer, Trina
Cc: Pichard, Errin; Kahn, Joseph; Gibson, Victoria; Holtom, Jonathan
Subject: RE: CF Industries - Extension of Time for 0570005-007-AV

Jonathan has given me a CAM plan for CFI. Just a reminder... Thursday will be my last day in the office until I come back from vacation on August 9th. I will not be able to work on the CFI Title V revision/renewal until after I return.

The permit project number that is listed (0570005-007-AV) for the Extension of Time is for the initial Title V permit that was issued 5/21/98. The outstanding Title V permit revision and renewal projects are 0570005-016-AV and 0570005-017-AV, respectively.

-Cindy

-----Original Message-----

From: Vielhauer, Trina
Sent: Tuesday, July 27, 2004 9:43 AM

To: Kahn, Joseph; Pichard, Errin
Cc: Phillips, Cindy; Bull, Robert
Subject: FW: CF Industries - Extension of Time for 0570005-007-AV

Any word on alternate monitoring plan??

Are we still awaiting more CAM info on Plant City?

-----Original Message-----

From: Gibson, Victoria
Sent: Tuesday, July 27, 2004 9:34 AM
To: Phillips, Cindy; Waters, Jason; 'harman@epcjanus.epchc.org'
Cc: Vielhauer, Trina
Subject: CF Industries - Extension of Time for 0570005-007-AV

Good morning.

This is just a reminder that the extension of time for CF Industries will expire this Friday 7/30.

Thank you.

Vickie

Victoria Gibson, Administrative Secretary
Bureau Chief's Office
DEP/Bureau of Air Regulation
victoria.gibson@dep.state.fl.us
850-921-9504

Gibson, Victoria

Subject: CF Indus. 0570005-007-AV Extension of time will expire in 15 days on 7/30
Start: Thu 7/15/2004 8:00 AM
End: Thu 7/15/2004 8:30 AM
Recurrence: (none)

e-mailed Cindy P. on 7/9

e-mailed Jason ~~Shaw~~ Waters
7/15 • 9:40 AM - FYI

e-mailed Alice Harmon
7/15 • 10:20 AM - FYI

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STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

CF INDUSTRIES, INC.
PLANT CITY PHOSPHATE COMPLEX
FACILITY

Petitioner,

v.

OGC #02-0587
DEP Permit 0570005-7-AV

DEPARTMENT OF ENVIRONMENTAL
PROTECTION,

Respondent.

**ORDER GRANTING REQUEST FOR EXTENSION
OF TIME TO FILE PETITION FOR HEARING**

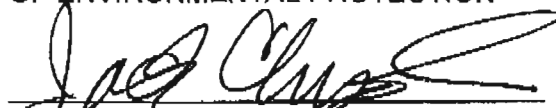
This cause has come before the Florida Department of Environmental Protection upon receipt of a request made by Petitioner CF INDUSTRIES, INC., PLANT CITY PHOSPHATE COMPLEX FACILITY, to grant an extension of time to file a petition for an administrative hearing to allow time to discuss with FDEP several specific conditions for its location in Hillsborough County, Florida. Because the request shows good cause for the extension of time,

IT IS ORDERED:

The request for an extension of time to file a petition for administrative proceeding is granted. Petitioner shall have until, **JULY 30, 2004**, to file a petition in this matter. Filing shall be complete on receipt by the Office of General Counsel, Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station 35, Tallahassee, Florida 32399-3000.

DONE AND ORDERED on this 7th day of July, 2004, in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION


JACK CHISOLM, Deputy General Counsel
3900 Commonwealth Boulevard, M.S. 35
Tallahassee, Florida 32399-3000
850-245-2242 facsimile 850-245-2302

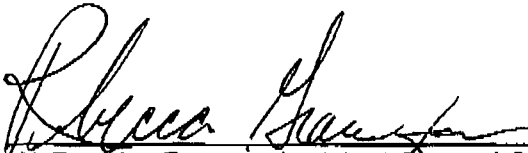
BEST AVAILABLE COPY

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished via
___ U. S. Mail ___ facsimile ___ only, this 9th day of July, 2004, to:

James S. Alves
Hopping Green & Sams
P. O. Box 6526
Tallahassee, FL 32314

facsimile: 850-224-8551

for 

W. Douglas Beason, Assistant General Counsel
STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION
3900 Commonwealth Boulevard - Mail Station 35
Tallahassee, FL 32399-3000
850-245-2242 facsimile 850-245-2302

with a courtesy copy to:

Trina L. Vielhauer
Chief
Bureau of Air Regulation

facsimile: 850-921-9533

Gibson, Victoria

From: Gibson, Victoria
Sent: Friday, July 02, 2004 3:16 PM
To: Vielhauer, Trina
Subject: FW: Orders to Grant Extension of Time for CF Industries and White Springs Agricultural

-----Original Message-----

From: Beason, Doug
Sent: Friday, July 02, 2004 3:15 PM
To: Gibson, Victoria
Subject: Out of Office AutoReply: Orders to Grant Extension of Time for CF Industries and White Springs Agricultural

I'll be out of the office from July 1st through July 9th. If you need help immediately, please call Lisa Glenn at 245-2276.

Gibson, Victoria

From: Gibson, Victoria
Sent: Friday, July 02, 2004 3:15 PM
To: Beason, Doug; Light, Lisa
Cc: Vielhauer, Trina
Subject: Orders to Grant Extension of Time for CF Industries and White Springs Agricultural

Importance: High



OrdToGrantCF.doc
(36 KB)



OrdToGrantWhiteS
pgs.doc (36 KB...

Have a nice long weekend.

Vickie

Victoria Gibson, Administrative Secretary
Bureau Chief's Office
DEP/Bureau of Air Regulation
victoria.gibson@dep.state.fl.us
50-921-9504

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

To OGC
7/2/04

CF INDUSTRIES, INC.
PLANT CITY PHOSPHATE COMPLEX
FACILITY

Petitioner,

v.

OGC #02-0587
DEP Permit 0570005-7-AV

DEPARTMENT OF ENVIRONMENTAL
PROTECTION,

Respondent.

_____ /

**ORDER GRANTING REQUEST FOR EXTENSION
OF TIME TO FILE PETITION FOR HEARING**

This cause has come before the Florida Department of Environmental Protection upon receipt of a request made by Petitioner CF INDUSTRIES, INC., PLANT CITY PHOSPHATE COMPLEX FACILITY, to grant an extension of time to file a petition for an administrative hearing **TO ALLOW TIME TO DISCUSS WITH FDEP SEVERAL SPECIFIC CONDITIONS** for its location in Hillsborough County, Florida. Because the request shows good cause for the extension of time,

IT IS ORDERED:

The request for an extension of time to file a petition for administrative proceeding is granted. Petitioner shall have until, **JULY 30, 2004**, to file a petition in this matter. Filing shall be complete on receipt by the Office of General Counsel, Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station 35, Tallahassee, Florida 32399-3000.

DONE AND ORDERED on this _____ day of July, 2004, in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION

JACK CHISOLM, Deputy General Counsel
3900 Commonwealth Boulevard. M.S. 35
Tallahassee, Florida 32399-3000
850-245-2242 facsimile 850-245-2302

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished via
__ U. S. Mail __ facsimile __ **only**, this ____ day of July, 2004, to:

James S. Alves
Hopping Green & Sams
P. O. Box 6526
Tallahassee, FL 32314

facsimile: 850-224-8551

W. Douglas Beason, Assistant General Counsel
STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION
3900 Commonwealth Boulevard - Mail Station 35
Tallahassee, FL 32399-3000
850-245-2242 facsimile 850-245-2302

with a courtesy copy to:

Trina L. Vielhauer
Chief
Bureau of Air Regulation

facsimile: 850-921-9533

Gibson, Victoria

From: Vielhauer, Trina
Sent: Thursday, July 01, 2004 9:01 AM
To: Gibson, Victoria
Subject: FW: Request for Extensions of Time

Vickie,

Let's give both CF and PCS 30-days. It sounds like we'll have the draft CF renewal permit by July 30 and we want to have a PCS settlement within 30 days, too.

THANKS!

-----Original Message-----

From: Phillips, Cindy
Sent: Thursday, July 01, 2004 8:59 AM
To: Vielhauer, Trina; Bull, Robert
Subject: RE: Request for Extensions of Time

Yes, I want to have the renewal drafted before I go on vacation (July 30th).

-----Original Message-----

From: Vielhauer, Trina
Sent: Thursday, July 01, 2004 8:54 AM
To: Phillips, Cindy; Bull, Robert
Subject: RE: Request for Extensions of Time

Great- so if I give CF maybe....30 days you think we'll have the renewal out? [they already have final ACs with the language in it so.....]

-----Original Message-----

From: Phillips, Cindy
Sent: Thursday, July 01, 2004 8:23 AM
To: Vielhauer, Trina; Bull, Robert
Subject: RE: Request for Extensions of Time

The CAM is just about ready. CFI has already submitted the information.

-----Original Message-----

From: Vielhauer, Trina
Sent: Wednesday, June 30, 2004 2:30 PM
To: Bull, Robert; Phillips, Cindy
Subject: FW: Request for Extensions of Time
Importance: High

Ok- I see we were supposed to have a CF response to CAM RAI by today. Did we receive anything? How is that renewal looking? I'm inclined to maybe give an extension only until the point in time we think we'll be sending out the draft renewal.

Did you guys have any thoughts or comments on the PCS settlement Stan sent [I'm still trying to get to that myself.]

-----Original Message-----

From: Gibson, Victoria
Sent: Wednesday, June 30, 2004 2:07 PM
To: Vielhauer, Trina
Cc: Adams, Patty
Subject: Request for Extensions of Time
Importance: High

Hi,

Today we received fax copies of these 2 requests for extension of time:

CF Industries - Plant City Phosphate Complex
Draft Revision of TV Air Permit 0570005-007-AV

White Springs Agricultural Chemicals
Suwannee River/Swift Creek Complex
Draft Revision to TV Air Permit 0470002-044-AV

Vickie

Victoria Gibson, Administrative Secretary
Bureau Chief's Office
DEP/Bureau of Air Regulation
victoria.gibson@dep.state.fl.us
850-921-9504

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Hopping Green & Sams

Attorneys and Counselors

June 25, 2004

Ms. Kathy Carter
Agency Clerk
Department of Environmental Protection
Office of the General Counsel
3900 Commonwealth Blvd.
Tallahassee, FL 32399-3000

Re: Request for Extension of Time
OGC Case No. 04-0587 ←
Draft Revision to Title V Air Permit (0570005-007-AV)
CF Industries, Inc.
Plant City Phosphate Complex
Hillsborough County

Dear Ms. Carter:

Please accept for filing with the Department this additional Request for Extension of Time on behalf of CF Industries, Inc. On April 19, 2002, CF Industries received from the Department's Southwest District Office an "Intent to Issue Revision to Title V Air Operation Permit" and "Public Notice of Intent to Issue Revision to Title V Air Operation Permit." As stated in the Intent to Issue, "This is a Department initiated project to revise the Title V air operation permit, 0570005-007-AV, for the Plant City Phosphate Complex . . . to incorporate requirements from the National Emission Standard for Hazardous Air Pollutants, 40 CFR 63, Subparts A, AA, BB as well as to correct typographical errors." CF Industries initially was afforded 14 days, or until May 3, 2002, to petition for a formal administrative hearing under Sections 120.569 and 120.57, Florida Statutes. Also, CF Industries was instructed to publish the notice as soon as possible and was afforded 7 days from the date of publication to provide proof of newspaper publication of the Notice. CF Industries initially requested extensions of time for both actions, extending to (and including) June 17, 2002. By Order dated June 4, 2002 that request was granted. Thereafter, there were additional extensions, through January 31, 2003, while representatives of the Department, CF Industries, and the Phosphate Council addressed and discussed technical issues related to HF fugitive emission rates and "major source" applicability. Thereafter, CF Industries requested additional extensions of time, to and through December 31, 2003; the Department did not rule in those extension of time requests and accordingly the deadline automatically was extended. Good cause for granting an additional extension, to and including August 30, 2004 is as follows:

- On October 17, 2003, following a series of meetings and written communications, the Department forwarded a draft Settlement Agreement to CFI that set forth a potential series of steps and procedures for achieving concurrence on quantifying hydrogen fluoride emissions from the Plant City Phosphate Complex.
- On December 11, 2003 representatives of CFI, other companies, and the Florida Phosphate Council met with the Department to discuss the status of this matter. The

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Ms. Kathy Carter
June 25, 2004
Page 2

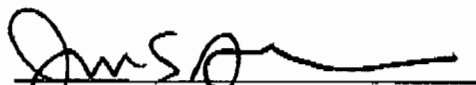
Department emphasized the need to come to closure on finalizing a Settlement Agreement or proceeding to an administrative hearing. Also, the Department indicated that it would be supportive of Florida Phosphate Council efforts, with the Environmental Protection Agency, to address the outcome of ascribing major source status and imposing monitoring requirements on affected sources with scant hydrogen fluoride emissions on account of fugitive hydrogen fluoride emissions associated with unregulated plant pond systems. The Department, upon hearing from several companies that the earlier draft Settlement Agreement was not viable, encouraged the submittal of alternative language. CFI submitted a counterproposal on December 31, 2003.

- The parties have reached agreement on additional permit language that would resolve the HF MACT issue. The parties are continuing to work on alternative monitoring. This extension is filed as a placeholder until the permit is issued reflecting the parties' agreement.
- An extension of time to file a petition for hearing would afford an opportunity for finalizing agreement on all issues.
- Conservation of resources and administrative efficiency weigh in favor of not publishing notice of the agency action until the parties have had a thorough opportunity to come to agreement on whether the agency action is justified.
- Neither the Department nor the public will be prejudiced by an extension of time.
- Department attorney Douglas Beason was contacted to determine whether the Department objects to an extension of time.

In sum, CFI requests that the deadlines for filing a petition and for publishing notice be extended to August 30, 2004. Thank you for your attention to this matter.

Sincerely,

HOPPING GREEN & SAMS

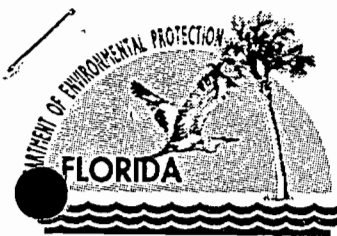


James S. Alves
for CF Industries, Inc.

cc: Jerry Kissel, DEP-SW District
Douglas Beason, Esquire

Hopping Green & Sams

Attorneys and Counselors



Jeb Bush
Governor

Department of Environmental Protection

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Colleen M. Castille
Secretary

April 21, 2004

CERTIFIED MAIL – RETURN RECEIPT REQUESTED

Stan Posey
Manager Environmental Affairs
PCS Phosphate- White Springs
PO Box 300
White Springs, FL 32096

Re: Letter dated April 7, 2004 and potential settlement of HF MACT

Dear Mr. Posey:

Thank you for your April 7, 2004 proposal regarding resolution of the HF MACT case. The Department remains amenable to resolving this case and believes the following elements are key to that resolution.

First, as we've discussed previously, the Department remains willing to entertain an alternate monitoring plan for the PCS White Springs facility. We have forwarded to you for your review conditions from Cargill's alternate monitoring plan that was finalized earlier this year. We encourage you to submit an alternate monitoring request as soon as possible. It behooves PCS to have this alternate monitoring plan in final form prior to a final Title V revision or the draft Title V renewal.

Second, the Department previously identified the language it is willing to add to the major source determination in the draft Title V renewal. It is important that these phosphate MACT cases are resolved in a consistent manner. Therefore, the language we have agreed upon with IMC is the language we would utilize here as well. This language is as follows:


If additional testing and modeling demonstrate that the facility is not and has never been a major source of hazardous air pollutants since at least June 10, 2002, the permittee shall have the right to request that the Department revise the permit to remove those requirements and conditions that are applicable because the facility is a major source of hazardous air pollutants as determined by the Department.

"More Protection, Less Process"

Printed on recycled paper.

Please let me know if this approach is acceptable to PCS on or before April 30, 2004. If you have any questions, please don't hesitate to contact me at 850/488-0114.

Sincerely,

A handwritten signature in black ink that reads "Trina L. Vielhauer". The signature is written in a cursive style with a large initial 'T'.

Trina L. Vielhauer, Chief
Bureau of Air Regulation

cc: Doug Beason; Pat Comer, OGC

Al Linero, Cindy Phillips, Bobby Bull, Jim Pennington, Joe Kahn, Errin Pichard, Russell Wider,
Michael Cooke, DARM

Chronology of Activities

OGC Number **02 0587** **29** **AV** District **SOUTHWEST** County **HILLSBOROUGH**

Style of Case **CF INDUSTRIES, INC. (PLANT CITY PHOSPHATE COMPLEX) V DEP**

Program Area **AIR TITLE V** Mode **ADMINISTRATIVE**

Lead Attorney **DOUG** **D** **BEASON** Status **OPEN**

Forum Name Forum Case Number

Permit Appl **0570005-007-AV** Final Order Number

Date *	Code	Activity Description
11/13/2002		ORDER GRANTING REQUEST UNTIL 12/4/02
11/26/2002	REX6	RECEIVED SIXTH REQUEST FOR EXTENSION OF TIME
12/06/2002		ORDER GRANTING EXTENSION UNTIL 1/31/03
01/29/2003	REX7	RECEIVED SEVENTH REQUEST FOR EXTENSION OF TIME
03/27/2003		RECEIVED REQUEST FOR EXTENSION OF TIME
06/27/2003		RECEIVED REQUEST FOR EXTENSION OF TIME
08/27/2003		RECEIVED REQUEST FOR EXTENSION OF TIME
12/31/2003		RECEIVED REQUEST FOR EXTENSION OF TIME
03/31/2004		RECEIVED REQUEST FOR EXTENSION OF TIME
06/25/2004		RECEIVED REQUEST FOR EXTENSION OF TIME

no further updates as of 7/7

