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KA 344-90-01

January 14, 1991

Mr. Clair H. Fancy
Florida Department of
Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Subject: CF Industries, Inc.
Sulfuric Acid Plants C and D
Permit File No. AC29-186931, PSD-FL-155

Dear Mr. Fancy:

This is in response to your letter dated November 13, 1990, concerning the air quality analysis for the above project.

The issues of concern to FDER were discussed with Mr. Cleve Holladay of your staff on December 17, 1990, and are documented below.

A justification was requested for considering computer modeling results from a previous CF project, PSD-FL-119, for comparison with the modeling conducted for the proposed project since the meteorological data sets used in the modeling of the two projects are different. It was noted that the 24-hour sulfur dioxide ambient air impacts were of primary concern.

The maximum 24-hour SO_2 impact from the proposed project is 2.0 ug/m^3, occurring at 90° and 1500 meters (east of the sulfuric acid plants) compared with the significant impact level of 5 ug/m^3 (see Attachment 1). The maximum 24-hour sulfur dioxide concentrations predicted by the previous modeling (resulting from all SO_2 sources) was 249 ug/m^3, occurring at approximately 10° and 600 meters (north of the sulfuric acid plants). This concentration level is below the 24-hour SO_2 ambient air quality standard of 260 ug/m^3.

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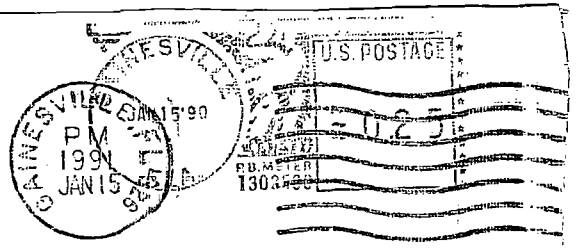

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In examining the predicted impacts from the proposed project in the area where the highest concentrations were predicted by the previous modeling (north of the plant), the highest impacts are less than 1 ug/m^3. Since the predicted air impacts from the proposed project are quite small, and since previous modeling predicted maximum impacts comfortably below the AAQS, additional modeling using another meteorological data set does not seem to be justified.

The second issue pertained to the accounting of new sources in the area beyond those included in the previous modeling. Based on our November 1990 updated SO_2 emission inventory for the area, to the best of our knowledge there are no new sources in the area which would have a significant impact on the project site.

The last issue pertained to the location of physical barriers at CF which preclude public access to plant property. The property boundary map, Attachment 2, indicates the barriers around the property boundary. The southern and eastern property boundary is fenced. The northern and western property boundary is posted with "no trespassing" signs and is patrolled by CF security personnel. These measures preclude public access onto CF property.

It is our understanding that this response along with CFI's December 7, 1990, response address all the FDER questions and requests for additional information on the proposed project.

If you have any questions, please do not hesitate to give me a call.

Very truly yours,

KOOGLER & ASSOCIATES

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

JBK:wa
Enc.

cc: Mr. J. E. Parsons
Mr. T. Edwards
C. Phillips
C. Holladay
B. Andrews
B. Thomas, SW Dist
J. Campbell, EPCHC

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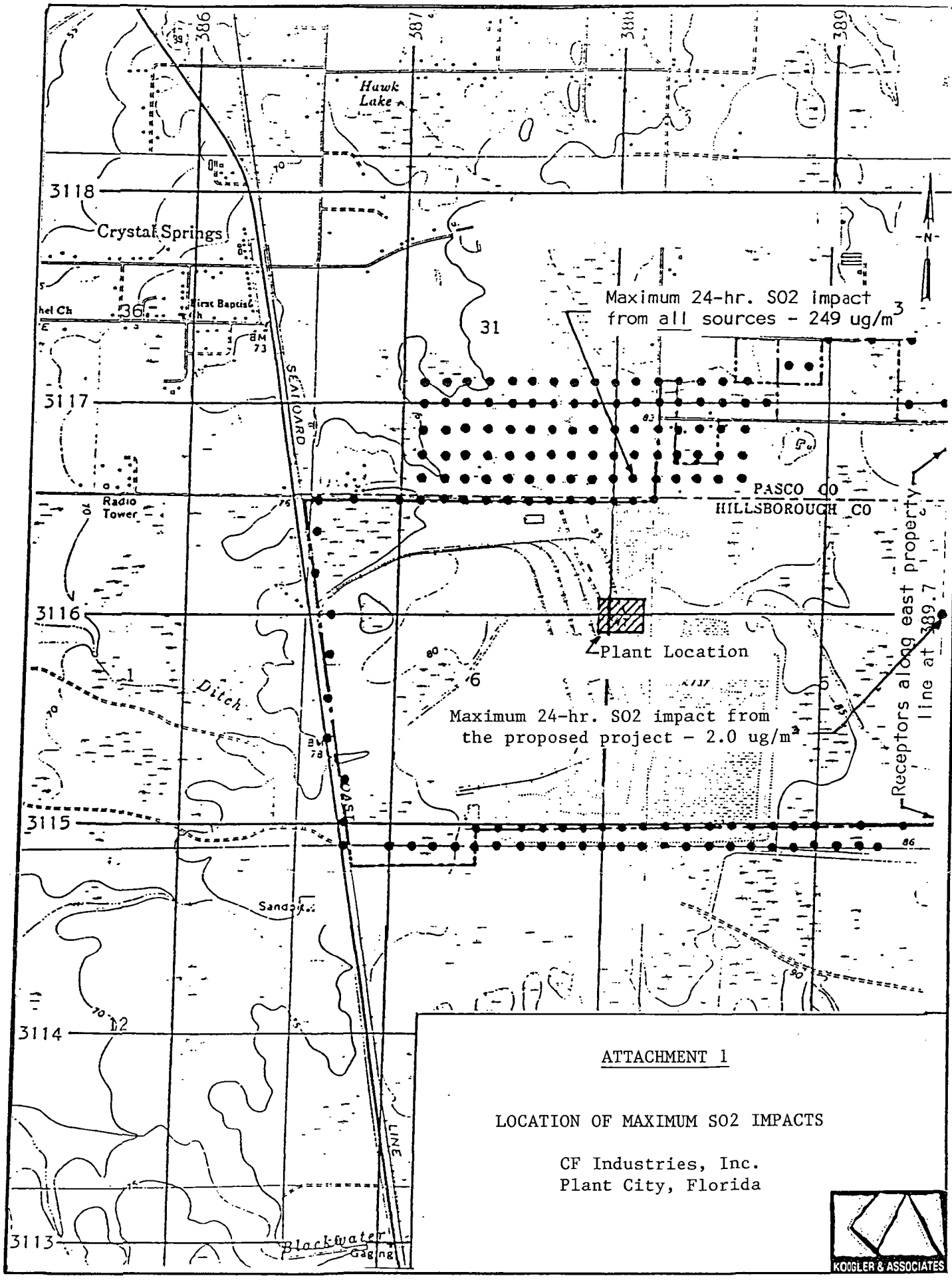

ATTACHMENT 1

LOCATION OF MAXIMUM SO2 IMPACTS

CF Industries, Inc.
Plant City, Florida

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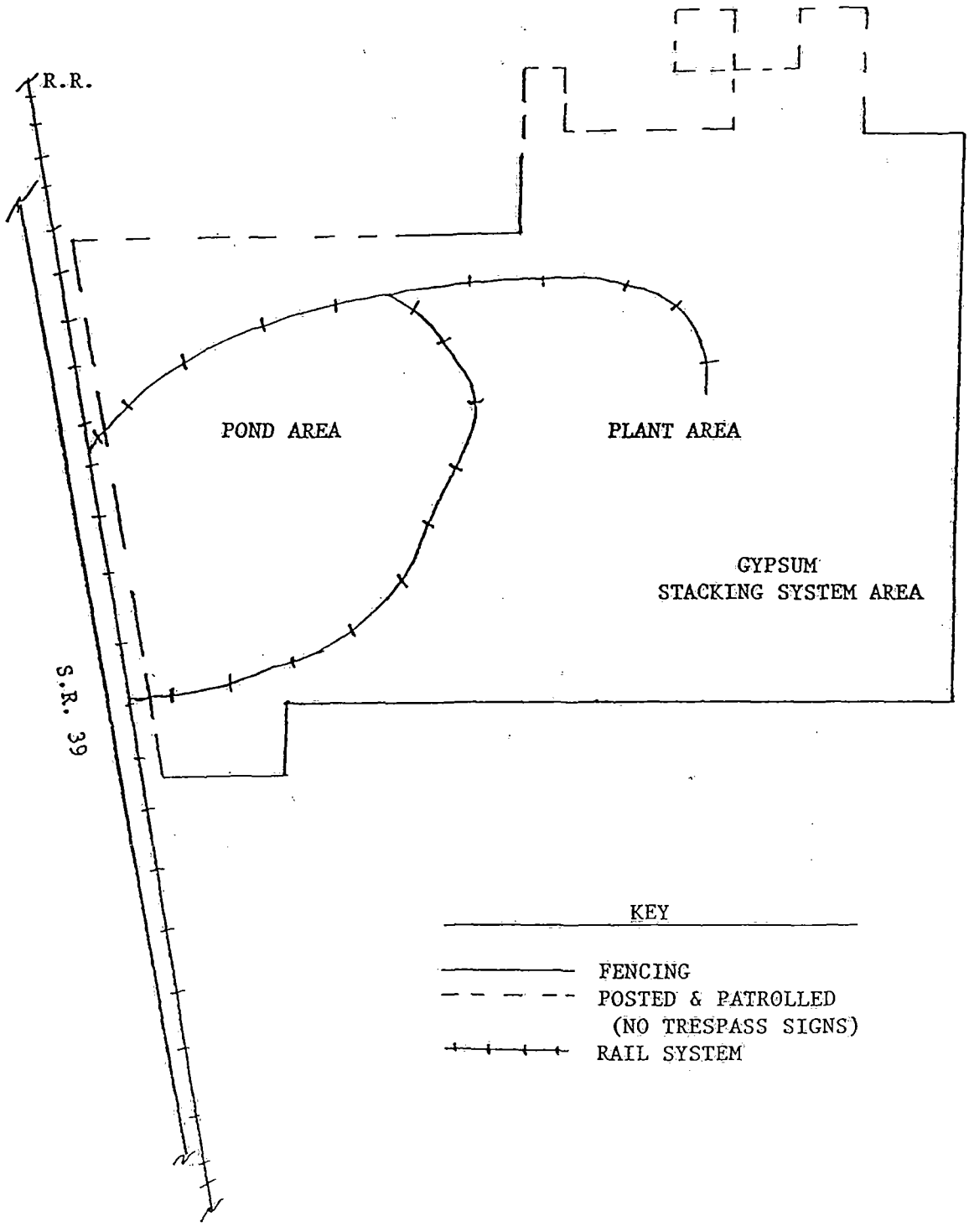
ATTACHMENT 2

PROPERTY BOUNDARY BARRIERS

CF Industries, Inc.
Plant City, Florida



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