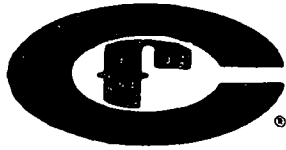


P.O. Drawer L.
Plant City, Florida 33564-9007
Telephone: 813/782-1591



CF Industries, Inc.

Plant City Phosphate Complex
March 7 1991

RECEIVED
MAR 11 1991

DER-BAQM

Mr. C. H. Fancy, P.E.
Chief, Bureau of Air Regulations
Florida Department of Environmental Regulations
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Re: DER | File No. AC 29-187327 (Corrected and Revised Copy
of March 5, 1991 Letter to C. H. Fancy)

Dear Mr. Fancy:

Jim Martin spoke with Mr. Baig on March 4, 1991 regarding your February 20, 1991 letter. He suggested we address our comments to you.

Since submitting the application for revision, we have been advised that the sulfur throughput should be 2550 TPD instead of the 2484 requested, and 930,750 TPY throughput. With this in mind, we suggest the following corrections and changes:

Technical Evaluation and Preliminary Determination

- (1) Title Page - There are no periods after the C and F of CF Industries, Inc.
- (2) I.A. - No periods after C and F.
- (3) I.B. - Sulfur throughput should be - "from 2255 TPD to 2550 TPD and from 825,000 TPY to 930,750 TPY."
- (4) I.C. - SIC Code should be 2874.
- (5) II. Paragraph 3, starting at Line 6: "The capacities of Plants A, B, C and D in tons per day 100% H₂SO₄ are 1300, 1300, 2600, and 2600, respectively. The corresponding daily molten sulfur requirement, when the acid plants are operated at their maximum combined permitted capacity of 7800 tons 100% acid per day, would be about 2550 tons per day, 930,750 tons per year (TPY)."
- (6) II. Paragraph 4, Last line: As submitted to the Department, there is a small eductor on the two pit stacks venting the unloading chute.
- (7) IV.A - No revisions needed because increased emissions would be insignificant. Emissions are less than proportioned to throughput.

Permit - Page 1 of 7, Paragraph 2

Maximum throughput of 2484 TPD should be changed to 2550 TPD average and 908,700 TPY should be changed to 930,750 TPY.

Specific Conditions

- (1) Condition 2 - Maximum throughput rate should be changed from 2484 (TPD) average to 2550 (TPD) average. Maximum TPY should be changed to 930,750. Combined maximum production rate should be changed from 7600 TPD to 7800 TPD 100% sulfuric acid.
- (2) Condition 6 - The compliance test at higher rates will have to be conducted by increasing the unloading rate for the period of the test because the permits for increased sulfuric production will not be issued by this 90-day deadline. Railcar unloading has not been used recently, and is not expected to be used in the near future. There would not be any emissions from the railcar unloading because a hose is connected and unloading is by pipeline to the tanks.
- (3) Condition 7 - Changes would need to be submitted to DER as well as HCEPC.

Notice of Intent to Issue

Paragraph 1 - Annual throughput should be 930,750 tons.

The Notice of Intent to Issue will not be published in a newspaper until a response is received from you regarding the suggested changes.

If you have any questions, please call Jim Martin at 813/782-1591.

Sincerely,



J. E. Parsons
General Manager

JEP/CJM/jc

cc: P. R. Roberts

C. J. Martin/Env. File

DERAC29

cc: M. Baig
B. Thomas, SW Dist
G. Campbell, EPC HC
CHF/BA

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Plant City, Florida 33564-9007
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DERAC29

TOM EDWARDS - ENV. SUPERVISOR.