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



November 23, 2004

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**BUREAU OF AIR REGULATION** 

Mr. Syed Arif
Bureau of Air Regulation,
Division of Air Resource Management
Department of Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Subject:

Permit No. PSD-FL-339

Dear Mr. Arif:

The Department of Environmental Protection issued Construction Permit No. PSD-FL-339 to CF Industries, Inc., (CF) on June 1, 2004, authorizing the modification of Sulfuric Acid Plants "C" and "D". CF completed the modification of the "C" plant during June, and plans to modify the "D" plant in February, 2005.

The five months of operating experience with the "C" plant have shown that the sustainable operating rate is significantly below the maximum permitted operating rate of 2,750 TPD of sulfuric acid. As a result of the lower-than-anticipated rate in the "C" plant, CF requests DEP authorization to replace the existing Monsanto Model ES-210 mist eliminator elements in the Interpass Tower of the "D" plant with Monsanto PSF-22120 elements. The improved elements are projected to allow a reduction in the plant pressure drop of 1.8 inches of water, 0.8% of the total pressure drop. The new elements are warranteed by Monsanto Enviro-chem Systems (letter attached) to perform at least as well as the existing elements.

CF does not request a change in the maximum permitted operating rate or in the emission limits already permitted.

Please feel free to call Bob May at (813) 364-5603 or Tom Edwards at (813) 365-5608 for discussion or additional information regarding this request.

Sincerely,

T. A. Edwards

Superintendent,

Environmental Affairs

TAE/gm

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cc: Jerry Kissel, DEP-SWD

Alice Harmon, HCEPC

David Buff, Golder Associates, Inc.





ENVIRO-CHEM SYSTEMB A MONBANTO COMPANY 14522 SOUTH OUTER FORLY ROAD CHESTERFIELD, MISSOURI 63017 P.O. Box 14547 St. Louis, Missouri 63178 PHONE (314) 275-5700 FAX (314) 275-5701 enviroch@monsanto.com www.enviro-chem.com

Nov. 22, 2004

Mr. Allen Hearn Chief Plant Engineer **CF** Industries P.O. Drawer L Plant City, FL 33564

Dear Mr. Hearn:

Pursuant to our phone conversation, Monsanto is offering the new Preferred Style Filter (PSF) Brink® Fiber Bed Mist Eliminator to CF Industries for demonstration of this new technology in Inter Pass Absorption (IPA) service. The PSF-22120 elements are made from the same materials of construction as standard Monsanto ES-210 elements currently in use for CF's IPA towers. Monsanto warranties the performance of these PSF-22120 elements, as related to removal of sulfuric acid mist from the process gas stream, to be at least as good as the existing ES's. A gas side pressure drop reduction of up to thirty (30%) percent is predicted as compared to the same number of new ES elements.

Please feel free to contact us if you should have any additional questions and/or concerns.

Best regards,

Steven R. Williams

Sales Account Manager

Monsanto Enviro-Chem Systems, Inc

813-661-2284