



Jeb Bush
Governor

Department of Environmental Protection

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

Colleen M. Castille
Secretary

October 26, 2005

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Thomas A Edwards
Superintendent, Environmental Affairs
CF Industries, Inc.
Post Office Drawer L
Plant City, Florida 33564-9007

Re: Extension Request/DEP File No. 0570005-019-AC (PSD-FL-339)
Plant City Phosphate Complex

Dear Mr. Edwards:

The Department reviewed your request of September 29, 2005 submitted by Golder Associates on your behalf to extend the expiration date of the above referenced construction permit from April 30, 2006 to June 1, 2007. The extension of the construction permit will allow CF Industries (CF) to replace the main blowers (fans) at the 'C' and 'D' Sulfuric Acid Plants (SAPs). This replacement will allow CF to achieve the permitted production rate.

Per Rule 62-4.080(3), F.A.C., an extension for a construction permit shall be granted if the applicant can demonstrate reasonable assurances that upon completion, the extended permit will comply with the standards and conditions required by applicable regulation as well as standards and conditions required by the construction permit.

We already have fairly extensive information about the facility and the control equipment. To complete the reasonable assurance requirement allowing extension of the permit, please submit the following information:

1. Please submit the compliance tests for both 'C' and 'D' SAPs.
2. Please submit the Second Quarter 2005 SO₂ CEM/Production Data as required by Specific Condition No. 22 of the construction permit.
3. Specific Condition 10 of the construction permit required CF to install approximately 165,000 liters of cesium promoted vanadium catalyst in the 4th converter pass of the 'C' and 'D' SAPs. Please provide documentation (work orders, purchase requisitions, etc.) to show that the condition was complied with.

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4. Please provide the specifications of the existing blowers as well as the specifications for the replacement blowers. Indicate how much increase in production will take place due to the replacement blowers.
5. The request indicated that D-SAP blower will be replaced by December 2006 and the C-SAP blower by May 2007. Please explain the excessive length of time required for replacing the 'C' and 'D' SAP blowers.
6. The Department in November 2004 issued an authorization letter to CF based on their request for replacing mist eliminators in the Interpass Tower of the D-SAP. This change was to result in a reduction in the plant pressure drop and help CF in achieving the maximum permitted operating rate of 2,750 TPD. Please explain the reasons for not being able to achieve the stated purpose of the request.

If the Department makes a determination to extend the construction permit, then a new specific condition will be added to the permit which will state that "The Department reserves the right to view future projects at the 'C' and 'D' sulfuric acid plants in conjunction with this modification of replacing blowers".

According to Rule 62-4-080(3), the permit will remain in effect until the Department takes final action. Permit applicants are advised that Rule 62-4.055(1), F.A.C. now requires applicants to respond to requests for information within 90 days. If you have any questions regarding this matter, please call me at 850/921-9528.

Sincerely,



Syed Arif, P.E.

North Permitting Section

cc: Mara Nasca, DEP-SWD
Alice Harmon, HCEPC
Dave Buff, Golder Associates Inc.

Golder Associates Inc.

6241 NW 23rd Street, Suite 500
Gainesville, FL USA 32653
Telephone (352) 336-5600
Fax (352) 336-6603
www.golder.com



September 29, 2005

0437632

Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2400

RECEIVED

OCT 11 2005

Attention: Mr. Syed Arif, P.E., Air Permitting South Section

BUREAU OF AIR REGULATION

RE: CF INDUSTRIES, INC.—PLANT CITY
DEP FILE NO. 0570005-019-AC
C & D SULFURIC ACID PLANTS MAIN BLOWERS

Dear Mr. Arif:

On June 1, 2004, CF Industries Plant City Phosphate Complex received construction permit No. 0570005-019-AC/PSD-FL-339 for the modification of "C" and "D" Sulfuric Acid Plants (SAPs) to increase the existing production rate to 2,750 tons per day (TPD), for each of the plants. CF has implemented the changes allowed under that permit with the exception of an oxygen generation and injection system which was determined to be uneconomical, but in spite of these improvements, CF has not been able to achieve the permitted sulfuric acid production rate. The plants have been able to achieve only 2,620 to 2,700 TPD as a daily maximum production rate.

CF has further investigated measures to achieve the permitted production rate, and has identified the main blowers (fans) as the primary limitation. Therefore, CF is requesting a minor modification to the permit to allow replacing the main blowers at the C & D SAPs to be able to achieve production rates for each SAP of up to 2,750 TPD. Replacement of the main blowers was not included in the list of proposed modifications described in the permit application for the permit No. 0570005-019-AC submitted to the FDEP in January, 2004. CF estimates the replacement of the D-SAP blower to be completed by December, 2006 and the C-SAP blower replacement to be completed by May, 2007. An extension of the construction permit term is therefore requested to June 1, 2007, in order to allow time for these replacements.

Thank you for consideration of this request. If you have any questions, please do not hesitate to call me at (352)336-5600.

Sincerely,

GOLDER ASSOCIATES INC.

A handwritten signature in black ink that reads "David A. Buff".

David A. Buff, P.E., Q.E.P.
Principal Engineer
Florida P. E. #19011

DB/all

cc: Tom Edwards
Bob May

Y:\Projects\2004\0437632 CF Industries\4.1\NL092905.doc

