



October 9, 2009

063-7558

Florida Department of Environmental Protection
Bureau of Air Regulation
2600 Blair Stone Road, MS #5505
Tallahassee, Florida 32399-2400

Attention: Mr. Trina Vielhauer, Chief

**RE: CF Industries, Inc.
Draft Permit No. 0570005-034-AC
CF Industries Plant City Phosphate Complex
Best Available Retrofit Technology (BART) Exemption Project
Comments on Draft BART Permit**

Dear Ms. Vielhauer:

CF Industries, Inc. (CFI) has received a draft air construction permit from the Florida Department of Environmental Protection (FDEP) for the Best Available Retrofit Technology (BART) eligible emissions units at the CFI Plant City Phosphate Complex facility, dated September 25, 2009. The draft permit package includes the public notice, Technical Evaluation and Preliminary Determination (TE&PD), and the draft permit. CFI and Golder Associates Inc. (Golder) have reviewed the draft permit package. Our comments on the draft permit package are presented below. We ask that the Department consider and incorporate each of these comments in issuing the final BART permit. We look forward to discussing these comments further with you and your staff.

Draft Permit

Page 5 of 16, Condition # 10: Three emission reduction scenarios were proposed in the BART exemption application dated July 2009 – A, B, and C. There is no reference to Scenario C.

Subsection A – Scenario A

Page 5 of 16, Condition #1, Administrative Requirements: It is said that the permittee is required to comply with the BART exemption limits under Scenario A as soon as possible but not later than September 1, 2010. It is our understanding that the limits do not apply until that later date. Please advise if this understanding is incorrect.

Page 6 of 16, Condition #2, Essential Potential To Emit (PTE) Parameters: The production capacity of EU ID Nos. 010, 011, 012, and 013 are shown in terms of tons per hour (TPH) of diammonium phosphate (DAP) and monoammonium phosphate (MAP). These should be corrected to TPH of DAP or MAP as "phosphorus pentoxide (P₂O₅) input".

Page 8 of 16, Footnote "c" of Condition #7 in Subsection A: This footnote explains that the SO₂ emissions limitations for the sulfuric acid plants are 24-hour block averages. We are requesting



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further clarification that the daily averages include non-operating hours (i.e., the BART emissions limits are actually based on lb/day emission rates). The permit should also clarify that the daily averages exclude startup, shutdown or malfunction periods. These periods are excluded from modeling analysis under the BART regulations, and therefore should be excluded from the emission limits.

Page 9 of 16, Emissions Testing: Condition #12, Compliance Test Schedule – The initial and annual tests condition requires initial and annual visible emission (VE) compliance testing for each SAP. Please note that this draft permit (0570005-034-AC) requires no VE limitations from the SAPs under “Emissions Standards and Limitations”. Therefore, we request that the VE compliance testing requirements be removed from Specific Condition No. 12 in Subsection A. It should be noted that Specific Condition No. B.3 of the current Title V permit No. 0570005-032-AV already limits VE from the SAPs to 10-percent opacity and compliance testing are conducted annually to comply with the requirement.

We also request that the VE test requirement be removed from the condition under “Initial and Special Test” for each SAP for the same reason that this draft permit does not require any VE limit for the SAPs. VE test is currently conducted annually for each SAP and each SAP complies with the existing VE standards.

Page 10 of 16, Emissions Testing: Condition #12, Compliance Test Schedule – The “Tests Prior to Renewal” condition requires SAM and NO_x tests within 12 months prior to renewing the Title V air operating permit. Please note that these tests are already required under the current Title V permit and are conducted as required.

Subsection B – Scenario B

Page 11 of 16, Condition #1, Administrative Requirements in Subsection B: This condition requires CFI to comply with the BART exemption limits for the D SAP under Scenario B no later than January 1, 2012, and for C SAP by September 30, 2013. We propose to comply with the BART exemption limits during the next turnaround for each SAP prior to December 31, 2013. Since the turnaround schedules are subject to change, we propose that the condition be amended to state “BART exemption limits for one of the C and D SAPs shall be complied with by December 31, 2012, and for the other SAP by December 31, 2013.

Page 11 of 16, Condition #2, Essential Potential To Emit (PTE) Parameters: The production capacity of EU ID Nos. 010, 011, 012, and 013 are shown in terms of TPH of DAP or MAP. These should be corrected to read TPH of DAP or MAP as “phosphorus pentoxide (P₂O₅) input”.

Page 14 of 16, Footnote “c” of Condition #10 of Subsection B: This footnote explains that the SO₂ emissions limitations for the sulfuric acid plants are 24-hour block averages. We are requesting further clarification that the daily averages include non-operating hours (i.e., the BART emissions limits are actually based on lb/day emission rates). The permit should also clarify that the daily averages exclude startup, shutdown or malfunction periods. These periods are excluded from modeling analysis under the BART regulations, and therefore should be excluded from the emission limits.

Page 15 of 16, Emissions Testing: Condition #15, Compliance Test Schedule – We have the same comments as the “Compliance Test Schedule” under Subsection A. We request that the VE compliance testing requirements be removed from Specific Condition No. 15 in Subsection B because this draft permit (0570005-034-AC) requires no VE limitations from the SAPs.

Thank you for consideration of these comments. If you have any questions, please do not hesitate to call me at (813) 782-1591.

Sincerely,

GOLDER ASSOCIATES INC.

SAL MOHAMMAD
for

David A. Buff, P.E., Q.E.P.
Principal Engineer

Enclosures

cc: R. Brunk
B. May
T. Edwards
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