Arif, Syed

From:

Arif, Syed

Sent:

Thursday, August 20, 2009 11:24 AM

To:

'Mohammad, Sal'

Cc:

'Brunk, Ron'; Vielhauer, Trina; 'lee@epchc.org'; Rogers, Tom

Subject:

CFI BART Exemption

Sal,

I understand that you have not submitted the modeling files for the CFI BART exemption project to Tom Rogers yet. I have reviewed the application and as I indicated earlier that I want to issue the draft permit as quickly as possible. There are certain questions that have arisen during my review and since I don't want to stop the clock, I am sending this e-mail so you can provide us the information concerning the following issues:

- 1. The proposed SO₂ reduction under Scenario A and B recommends increasing the scrubbing rate to the two stage ammonia scrubber for the 'A' and 'B' SAPs. Please provide information concerning the scrubbing rate presently and the future scrubbing rate. CFI in the past had indicated that any increase in tail gas scrubbing will offset their ammonia balance in the MAP/DAP plants. How will they overcome that imbalance with the increase in the scrubbing rate now.
- 2. Is the catalyst loading rate being changed for the 'C' and 'D' SAPs under Scenario A. If so, please provide the modified loading rate in terms of liters per ton of sulfuric acid per day(L/TPD) and provide information on the catalyst.
- 3. The proposed SO₂ reduction under Scenario B recommends replacing the converter for the 'C' and 'D' SAPs. Please provide information concerning the catalyst and the catalyst loading ratios in L/TPD as it exists now and what will it be after the change.
- 4. Please provide schedule information on the turnarounds for the 'A', 'B', 'C' and 'D' SAPs. Additionally, provide the earliest dates that construction can be completed under Scenarios A and B.

The Department will appreciate a guick response. Please call me if there are any questions.

Thanks, Syed