

Jeb Bush
Governor

Department of Environmental Protection

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

David B. Struhs
Secretary

Mr. Herschel E. Morris
General Manager
CF Industries, Inc.
P.O. Drawer L
Plant City, FL 33564

July 9, 1999 **RECEIVED**

JUL 14 1999

BUREAU OF AIR REGULATION

Dear Mr. Morris:

Re: Air Construction Permit Application, Dated June 11, 1999
Project: Increase Phosphoric Acid Production - A & B Phosphoric Acid Units
DEP File No.: 0570005-011-AC
Site Name: Plant City Phosphate Complex
Location: 10608 Paul Buchman Highway, Plant City, Hillsborough County

On June 11, 1999, the Department received the above referenced application. In order to continue processing the application, the Department will need the following additional information pursuant to Rule 62-4.070(1), F.A.C.:

1. If appropriate, please provide a letter of authorization from the facility owner or an officer of the facility that states that you qualify as a Responsible Official, which is defined as "...For a corporation, the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit under Chapter 62-213, F.A.C." If not, please have someone qualified to act as a Responsible Official sign the attached Responsible Official Statement for the above referenced application.

2. The proposed increases in A & B Phosphoric Acid Units can be processed as a minor source permit, with respect to Prevention of Significant Deterioration (PSD), under one of the following scenarios:

- Scenario 1: The project is not considered a modification, therefore PSD review is not triggered. From Rule 62-210.200, F.A.C., the definition of modification is (underlines added): "Any physical change in, change in the method of operation of, or addition to a facility which would result in an increase in the actual emissions of any air pollutant subject to regulation under the Act, including any not previously emitted, from any emissions unit or facility...." The key is that there cannot be an increase in actual emissions due to this project, both in the short term and long term. A preliminary look at the June 1999 stack tests

summary indicates that lb/hr and lb/ton P₂O₅ fluoride emissions do not increase compared to previous test results. However, an increase in annual emissions could still occur if the annual hours of operation or P₂O₅ input increases as a result of the project. To remedy this, you could propose caps on the annual hours of operation and P₂O₅ input, based on the average of the past two years of operation.

- Scenario 2: The project is considered a modification. PSD review can be avoided as outlined in the attached letter from Jerry Kissel, the Southwest District's Air Permitting Supervisor, to Tom Edwards.

Please indicate which permitting scenario CFI would like to pursue. If neither, the project could still be permitted as a major modification subject to PSD. In that case, the project would be processed out of our Tallahassee office.

3. Please explain why the predicted fluoride emissions do not increase, as shown in the emission analysis spreadsheet. With the increase in process rate, the fluoride input would increase. The fluoride removal efficiency would have to increase in order for there to be no increase in fluoride emissions.

4. What steps, if any, have been taken since the 1998 compliance tests to improve the scrubbers' fluoride removal efficiency?

5. Please address the items raised in the attached memo from the Hillsborough County Environmental Protection Commission.

Note: The June 1999 compliance test reports have not been received and therefore not reviewed. Additional requests for information related to the tests may be requested after their receipt.

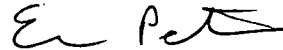
"NOTICE: Pursuant to the provisions of Section 120.60, F.S. and Chapter 62-12.070(5), F.A.C., if the Department does not receive a response to this request for information within 90 days of the date of this letter, the Department will issue a final order denying your application. You need to respond within 30 days after you receive this letter, responding to as many of the information requests as possible and indicating when a response to any unanswered question will be submitted. If the response will require longer than 90 days to develop, an application for new construction should be withdrawn and resubmitted when completed information is available. Or for operating permits, you should develop a specific timetable for the submission of the requested information for Department review and consideration. Failure to comply with a timetable accepted by the Department will be grounds for the Department to issue a Final Order of Denial for lack of timely response. A denial for lack of information or response will be unbiased as to the merits of the application. The applicant can reapply as soon as the requested information is available."

CF Industries, Inc.
Plant City Phosphate Complex

DEP File No.: 0570075-011-AC
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NOTE: Rule 62-4.050(3), F.A.C. requires that all applications for a Department permit must be certified by a professional engineer registered in the State of Florida. This requirement also applies to responses to Department requests for additional information of an engineering nature.

Sincerely,



Eric Peterson, P.E.
Air Permitting Engineer

Attachments

cc:

Mr. Noel Morera, Hillsborough Co. EPC

✓ Mr. Al Linero, P.E., DARM

Mr. George Thomas Cucchi, P.E., CF Industries, Inc.

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WETLANDS MANAGEMENT DIVISION
TELEPHONE (813) 272-7104

MEMORANDUM

DATE: July 9, 1999
TO: Eric Peterson, P.E.
FROM: Noel Morera
SUBJECT: CF Industries, Inc.

The Environmental Protection Commission of Hillsborough County has completed its review of CF Industries permit application received on June 14, 1999 and your draft incompleteness items faxed to us on July 9, 1999. The EPC wishes to have CF Industries address the following incompleteness items in addition to your list:

1. Specific Condition No. 6 of permits 0570005-008-AC and 0570005-009-AC state that Phosphoric acid plants A & B may operate continuously 8760 hours a year. In CF Industries permit application, Figure 5 section B of the sample calculations indicates that 8017 and 8217 hours a year of operation were used to calculate the emissions for Acid Plants A & B respectively. Does CF Industries wish to reduce their hours of operation?
2. CF Industries Inc. should look at the emissions changes up stream and down stream of Phosphoric Acid Plants A & B and take these changes into account when determining how their emissions will be effected relating to PSD issues.

nm

To: Tom Edwards, CF Industries, via fax

May 12, 1999

From: J. Kissel *JK*

Re: Phos Acid Expansion; 0570005, e.u. 004 (A plant) & 009 (B plant)

Following up on our meeting last week, we've reviewed the PSD applicability situation and verified this with Tallahassee. Summarizing the situation, this is a proposed production increase for two phos acid plants, which in turn supply four granulation plants.

The "debottlenecking" aspect of the PSD rules require that this be viewed in total, so that in order to avoid PSD, the new allowable fluoride emission limit for the six units in total, can not exceed the prior actual emissions for the six units, plus a 3 tpy increment. If you choose to go this way, the six units can be "bubbled" to a single allowable for PSD purposes, but individual limits like NSPS would still apply, where applicable. For the granulation unit that only ran 150 hours in recent years, you can not choose more representative years for that unit in isolation, but rather must choose representative years for the six units in total.

~~cc:~~ Ben Kalra, EPC
Joe Kahn, DEP
Eric Peterson, DEP

ajkhdlcf599

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MAY 25 1999

**EPC of HC
AIR MANAGEMENT**

Owner/Authorized Representative or Responsible Official

1. Name and Title of Owner/Authorized Representative or Responsible Official:
2. Owner/Authorized Representative or Responsible Official Mailing Address: Organization/Firm: Street Address: City: State: Zip Code:
3. Owner/Authorized Representative or Responsible Official Telephone Numbers: Telephone: () - Fax: () -
4. Owner/Authorized Representative or Responsible Official Statement: <i>I, the undersigned, am the owner or authorized representative*(check here [], if so) or the responsible official (check here [], if so) of the Title V source addressed in this application, whichever is applicable. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof. I understand that a permit, if granted by the Department, cannot be transferred without authorization from the Department, and I will promptly notify the Department upon sale or legal transfer of any permitted emissions unit.</i> _____ Signature Date

* Attach letter of authorization if not currently on file.

Professional Engineer Certification

1. Professional Engineer Name: Registration Number:
2. Professional Engineer Mailing Address: Organization/Firm: Street Address: City: State: Zip Code:
3. Professional Engineer Telephone Numbers: Telephone: () - Fax: () -