



Florida Department of Environmental Regulation

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8/1/91 TO: JIM MARTIN

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PAUL ROBERTS

STATE OF FLORIDA HAROLD FALLS

DEPARTMENT OF ENVIRONMENTAL REGULATION

NOTICE OF PERMIT AMENDMENT

CERTIFIED MAIL

Mr. J.E. Parsons
General Manager
CF Industries, Inc.
P.O. Drawer L
Plant City, FL 33564-9007

RECEIVED
CF INDUSTRIES, INC.
MGR. ENGINEERING

AUG 01 1991

Noted _____ Follow Up _____
Referred To _____
File _____

Dear Mr. Parsons:

Re: Hillsborough County - AP
AO29-181935

On January 28, 1991, the Department received a request to amend permit AO29-181935. As requested, Specific Condition No. 15 is changed as follows:

CHANGE FROM:

15. Pursuant to Subsection 17-4.070(3), F.A.C., this source shall comply with the following:

- A. Strained pond water to the reactor fume scrubbers, dryer fume scrubbers, and cooler scrubber shall be within the normal range of 78 to 84 p.s.i.g. to each scrubber. Operators shall read the gauge to each scrubber and record the value hourly.
- B. The dust scrubber, reactor fume scrubbers, dryer fume scrubbers and cooler scrubber shall each operate within the typical pressure drop range of 8 to 15 inches (normal is 12 inches). Each of the 4 scrubber units will have continuous monitors and be operated as required in Specific Condition No. 13.
- C. The Ducon tail gas packed bed abatement scrubber's liquid spray pump shall be operated within the normal range of 36 to 28 p.s.i.g. Operators shall read the gauge and record the value hourly. Additionally, the pH of the scrubbing liquid for this scrubber shall be continuously monitored and recorded. The pH of the scrubbing liquid shall not fall below 6.5, since the typical range is from 6.5 to 7.5 with a normal operating value of 7.0.

CHANGE TO:

15. CF Industries, Inc. shall monitor, maintain and record the following operational parameters and make them available to the Department or its designee upon request. The records shall be retained at the facility for at least three years from the date of measurement [Rule 17-4.070(3) and 17-4.160(14), F.A.C.]:

- A. Strained pond water to the reactor fume scrubbers, dryer fume scrubbers, and cooler scrubber shall not be lower than 50 psig for each scrubber. Operators shall read the gauge for each scrubber and record the value hourly.
- B. The pressure drop across the scrubbers shall operate within the ranges specified below:

<u>SCRUBBER</u>	<u>DELTA P*</u>
Dust	17-28 inches
Reactor Fume	23-36 inches
Dryer Fume	20-30 inches
Cooler	4-16 inches

Each of the four scrubber units shall have continuous monitors and be operated as required in Specific Condition No. 13.

*Note - The minimum delta P across each of the scrubbers shall be no less than 10% below the average delta P recorded during the last compliance test which demonstrated compliance. Based on the March 12, 1991 compliance test, the minimum delta P of the scrubbers are as follows: Dust - 18", Reactor Fume - 29.7", Dryer Fume - 21.78", Cooler - 7.7".

- C. The Ducon tail gas packed bed abatement scrubber's liquid spray pump shall be operated at a minimum pressure of 18 psig. Operators shall read the gauge and record the value hourly. Additionally, the pH of the scrubbing liquid for this scrubber shall be continuously monitored and recorded. The pH of the scrubbing liquid shall not fall below 5.5 and no less than 10% below the average pH recorded during the last compliance test which demonstrated compliance.
- D. In the event that the above operational parameters fall below the specified range or minimum value, the Department and the Environmental Protection Commission of Hillsborough County shall be notified promptly.

BEST AVAILABLE COPY

ATTACHMENT - GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations and restrictions set forth in this permit, are "permit conditions" and are binding and enforceable pursuant to Sections 403.141, 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.

2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.

3. As provided in subsections 403.087(6) and 403.722(5), F.S., the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, State, or local laws or regulations. This permit is not a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in this permit.

4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgement of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.

5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.

6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed and used by the permittee to achieve compliance with the conditions of this permit, are required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.

7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at reasonable times, access to the premises where the permitted activity is located or conducted to:

- (a) Have access to and copy any records that must be kept under conditions of the permit;
- (b) Inspect the facility, equipment, practices, or operations regulated or required under this permit; and

14. The permittee shall comply with the following:

- (a) Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
- (b) The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.
- (c) Records of monitoring information shall include:
 - 1. the date, exact place, and time of sampling or measurements;
 - 2. the person responsible for performing the sampling or measurements;
 - 3. the dates analyses were performed;
 - 4. the person responsible for performing the analyses;
 - 5. the analytical techniques or methods used;
 - 6. the results of such analyses.

15. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware the relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.