

From: [Moulik, Pratim](mailto:Moulik.Pratim)
To: Ryan.Kahn@cfindustries.com
Subject: IDEM OAQ Contact Information for Application No. 023-47885-00044 for CF Industries Distribution Facilities, LLC - Frankfort Terminal
Date: Wednesday, May 29, 2024 11:51:00 AM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)
[image007.png](#)
[image008.png](#)
[image009.png](#)

Dear Ryan Kahn,

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Thank you in advance for your time and assistance. I look forward to working with you.

Sincerely,

Pratim Moulik



Pratim Moulik
Environmental Manager 2

(317) 234-6871 • PMoulik@idem.IN.gov

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Subject: RE: IDEM OAQ Contact Information for Application No. 023-47885-00044 for CF Industries Distribution Facilities, LLC - Frankfort Terminal
Date: Wednesday, June 5, 2024 9:50:21 AM
Attachments: [image010.png](#)
[image011.png](#)
[image013.png](#)
[image014.png](#)
[image015.png](#)
[image017.png](#)
[image018.png](#)
[image019.png](#)
[image020.png](#)
[image021.png](#)
[image022.png](#)
[image002.png](#)
[Frankfort Flare Emissions Calculations.xlsx](#)
[CFI2201-EDS-350-001 Pilot Data Sheet - Rev 1 \(1\).pdf](#)

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Please don't hesitate to reach out if I can help with anything else!

Warm Regards,
Ryan



Ryan Kahn

Superintendent, Environmental Engineering

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Sent: Wednesday, May 29, 2024 10:51 AM

To: Kahn, Ryan <ryan.kahn@cfindustries.com>

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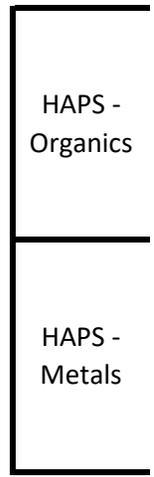
CF Industries
 Frankfort Terminal
 Flare Emissions Calculations

# Pilots (new)	2
Natural Gas Design Flow, SCFH	50
Total Natural Gas Usage, SCFH	100
Total Natural Gas Usage, SCF/year	876000

EPA Emission Factors (AP 42 Chapter 1.4)

Source: <https://www3.epa.gov/ttnchie1/ap42/ch01/final/c01s04.pdf>

Pollutant	Emission Factor (lb/10 ⁶ scf)
CO2	120000
Lead	0.0005
N2O	2.2
PM (total)	7.6
PM (condensable)	5.7
PM (filterable)	1.9
SO2	0.6
TOC	11
Methane	2.3
VOC	5.5
Benzene	0.0021
Dichlorobenzene	0.0012
Formaldehyde	0.075
Hexane	1.8
Toluene	0.0034
Total - Organics	-
Lead	0.0005
Cadmium	0.0011
Chromium	0.0014
Manganese	0.00038
Nickel	0.0021
Total - Metals	-



*the five hi

New Flare Potential Emissions	lbs/year	tons/year
CO2	1.05E+05	5.26E+01
Lead	4.38E-04	2.19E-07
N2O	1.93E+00	9.64E-04
PM (total)	6.66E+00	3.33E-03
PM (condensable)	4.99E+00	2.50E-03
PM (filterable)	1.66E+00	8.32E-04
SO2	5.26E-01	2.63E-04
TOC	9.64E+00	4.82E-03
Methane	2.01E+00	1.01E-03
VOC	4.82E+00	2.41E-03
Benzene	1.84E-03	9.20E-07
Dichlorobenzene	1.05E-03	5.26E-07
Formaldehyde	6.57E-02	3.29E-05
Hexane	1.58E+00	7.88E-04
Toluene	2.98E-03	1.49E-06
Total - Organics	1.65E+00	8.24E-04
Lead	4.38E-04	2.19E-07
Cadmium	9.64E-04	4.82E-07
Chromium	1.23E-03	6.13E-07
Manganese	3.33E-04	1.66E-07
Nickel	1.84E-03	9.20E-07
Total - Metals	4.80E-03	2.40E-06

ghest organic and metal HAPs emission factors are provided above, additional HAPs emission factors are

is available in AP-42 Chapter 1.4



Pilot Assembly



Client:	CF Industries	Rev	Desc	Date	By	Chkd	Equip Tag(s):	-
Location:	See Note 1	1	IFU	10/13/2023	RKA	RLH	Document No.:	CFI2201-EDS-350-001
Project Name:	Flare Replacement						Qty Req:	Thirty-two (32) Pilots, Ten (10) Retrofits
Project No:	CFI2201							

1	GENERAL INFORMATION							
2	Manufacturer	John Zink Hamworthy			Model	WindPROOF ZEUS		
3	Service	Ammonia Flare			Location	Outside		
4	DESIGN INFORMATION							
5	Heat Release, BTU/hr	50,000			Wind Resistance, mph	> 145		
6	Number of Thermocouples, ea	One (1)			Rain Resistance, in/hr	> 30		
7	Thermocouple Type	K			Overall Length	8' - 9 1/4"		
8	Natural Gas Design Flow, SCFH	50			Weight, lb	70		
9	Natural Gas Pressure Range, psig	10						
10	MATERIALS OF CONSTRUCTION							
11	Pilot Tip Assembly	310 SS			Lower Bracket	310 SS		
12	Fuel Line	310 SS			Mixer	316 SS		
13	Ignition Line	310 SS			Strainer	316 SS		
14	Upper Bracket	310 SS						
15	ADDITIONAL REQUIREMENTS							
16	Windproof, Y/N	Yes			Zeus Electronic Tip Ignition, Y/N	Yes		
17	Anti-hoar Frost Heaters, Y/N	Yes						
18	NOZZLES							
19	ITEM	QTY	SIZE	SERVICE	Location	Class	Type	NOTES
20	1	1	1"	Pilot Gas Inlet	See Vendor Dwg.	--	Plain End	
21	2	1	1"	Ignition Inlet	See Vendor Dwg.	150#	Capped	
22	3	1	3/4"	Spark Ignition Probe (Zeus)	See Vendor Dwg.	N/A	NPTF	
23	4	1	3/4"	Thermocouple Connection	See Vendor Dwg.	N/A	NPTF	
24								
25	NOTES							
26	Items marked with an "*" are to be provided by vendor.							
27	1	See CFI2201-SCOPE-350-001 for specific terminal locations to ship the pilot assemblies to. The document identifies for each location whether complete pilot assemblies with junction boxes and control panel are required or retrofit assemblies with thermocouples only.						
28	2	Vendor to break-up the price by terminal and include shipping costs to each terminal.						
29	3	Please provide one additional pilot as an option for the Terre Haute & Pine Bend terminals as requested in CFI2201-SCOPE-350-001.						
30	4	For the new pilot assemblies, the pilot's body does not need to be an overall length of 16', and the inlets, pilot air mixer, and TC GUAC do not need to be moved to the bottom. The most recently purchased pilot assemblies by CF Industries can be provided with 16' of thermocouple to the vendor provided junction box.						
31	5	The thermocouple sheath diameter shall be 5/16", and the sheath's material shall be 310 SS to provide protection at 1,600°F for at least 20 minutes.						
32								
33								
34								
35								
36								
37								
38								

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To: [Kahn, Ryan](#)
Subject: RE: IDEM OAQ Contact Information for Application No. 023-47885-00044 for CF Industries Distribution Facilities, LLC - Frankfort Terminal
Date: Wednesday, June 5, 2024 1:44:00 PM
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Environmental Manager 2

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Sent: Wednesday, June 5, 2024 9:48 AM
To: Moulik, Pratim <PMoulik@idem.IN.gov>
Subject: RE: IDEM OAQ Contact Information for Application No. 023-47885-00044 for CF Industries Distribution Facilities, LLC - Frankfort Terminal

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Date: Monday, June 10, 2024 9:51:57 AM
Attachments: [image004.png](#)
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[EXTERNAL Flare calcs for phone discussion today.msg](#)

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Pratim,

Sounds great, thank you very much.

One thing to add as well, we are planning to do this project at one of our other sites in Indiana.

Donald McQuigg performed these calculations (attached). Wanted to share this in case if lightens your workload since this is the same equipment/emissions that we are planning to have at both sites.

Warm Regards,

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Industries Distribution Facilities, LLC - Frankfort Terminal

Good morning Ryan,

Thank you for the response. As of now, I am presuming that the temporary flare will have the same combustion as the current flare at 0.01 MMBTU and working off of that.

With Regards,
Pratim Moulik



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I am the permit writer assigned to the current application No. 023-47885-00044 for CF

Industries Distribution Facilities, LLC - Frankfort Terminal. I would like to extend to you my contact information so that we may have continued communication until your new permit is issued. Please keep this information at hand. It is common for questions to arise, and oftentimes, further clarification is needed during the permit review process.

To expedite the review process, please e-mail me the electronic copy of your calculations (preferably in excel format) and other supporting documents used as part of your application.

IDEM, OAQ will notify you when a draft permit has been submitted for public notice and/or when a final permit has been issued. As part of the notification, IDEM, OAQ will provide information on how to access the draft and/or final permit electronically on IDEM's website. If CF Industries Distribution Facilities, LLC - Frankfort Terminal would prefer to receive paper copies of the entire draft and/or final permit, please let me know prior to the end of the applicant review period. If you prefer to receive paper copies of the entire permit, IDEM, OAQ will mail a paper copy of the draft permit and/or original signed final permit to the source contact. If you do not request to receive paper copies of the entire permit, IDEM, OAQ will only mail a paper copy of the original signed final permit signature page to the source contact.

Please feel free to contact me at any time if you have questions, concerns, or important information regarding your permit. For your convenience, my section chief (Josiah Balogun) may be contacted at 317-234-1203 or jbalogun@idem.IN.gov.

Thank you in advance for your time and assistance. I look forward to working with you.

Sincerely,

Pratim Moulik



Pratim Moulik
Environmental Manager 2

(317) 234-6871 • PMoulik@idem.IN.gov

 |  |  |  |  | www.idem.IN.gov

Scan the QR code to leave your feedback.

We appreciate your input!



From: [MCQUIGG, DONALD](#)
To: [Kahn, Ryan](#)
Cc: [MCQUIGG, DONALD](#)
Subject: [EXTERNAL] Flare calcs for phone discussion today
Date: Thursday, June 6, 2024 1:46:30 PM
Attachments: [image002.png](#)
[image003.png](#)
[Copy of Terre Haute Flare Emissions Calculations.xlsx](#)



Donald McQuigg
Environmental Manager
Office of Air Quality, Permits Branch
Indiana Department of Environmental Management

(317) 234-4240 • dmcquigg@idem.IN.gov

Help us improve!
IDEM values your feedback



**Appendix A: Emissions Calculations
Potential to Emit for Flare Upgrade**

Company Name: CF Industries Distribution Facilities, LLC - Terre Haute Terminal
Source Address: 9905 US Highway 41 North, Rosedale, Indiana 47874
MSOP AA No.: M167-47886-00002
Permit Reviewer: Donald McQuigg

1. Flare upgrade project is adding two (2) new pilot rings to existing process flare operation.

# Pilots (new)	2	Heat Input Capacity	HHV	Potential Thr
Natural Gas Design Flow, SCFH	50	MMBtu/hr	MMBtu	MMCF/yr
Total Natural Gas Usage, SCFH	100		mmscf	
Total Natural Gas Usage, SCF/year	876000	0.102	1020	0.88
Pollutant				

CF Industries
 Terre Haute Terminal
 Flare Emissions Calculations

# Pilots (new)	2
Natural Gas Design Flow, SCFH	50
Total Natural Gas Usage, SCFH	100
Total Natural Gas Usage, SCF/year	876000

EPA Emission Factors (AP 42 Chapter 1.4)

Source: <https://www3.epa.gov/ttnchie1/ap42/ch01/final/c01s04.pdf>

Pollutant	Emission Factor (lb/10 ⁶ scf)	New Flare Potential Emissions	lbs/year	tons/year	
CO2	120000	CO2	1.05E+05	5.26E+01	
Lead	0.0005	Lead	4.38E-04	2.19E-07	
N2O	2.2	N2O	1.93E+00	9.64E-04	
PM (total)	7.6	PM (total)	6.66E+00	3.33E-03	
PM (condensable)	5.7	PM (condensable)	4.99E+00	2.50E-03	
PM (filterable)	1.9	PM (filterable)	1.66E+00	8.32E-04	
SO2	0.6	SO2	5.26E-01	2.63E-04	
TOC	11	TOC	9.64E+00	4.82E-03	
Methane	2.3	Methane	2.01E+00	1.01E-03	
VOC	5.5	VOC	4.82E+00	2.41E-03	
Benzene	0.0021	HAPS - Organics	Benzene	1.84E-03	9.20E-07
Dichlorobenzene	0.0012		Dichlorobenzene	1.05E-03	5.26E-07
Formaldehyde	0.075		Formaldehyde	6.57E-02	3.29E-05
Hexane	1.8		Hexane	1.58E+00	7.88E-04
Toluene	0.0034		Toluene	2.98E-03	1.49E-06
Total - Organics	-	Total - Organics	1.65E+00	8.24E-04	
Lead	0.0005	HAPS - Metals	Lead	4.38E-04	2.19E-07
Cadmium	0.0011		Cadmium	9.64E-04	4.82E-07
Chromium	0.0014		Chromium	1.23E-03	6.13E-07
Manganese	0.00038		Manganese	3.33E-04	1.66E-07
Nickel	0.0021		Nickel	1.84E-03	9.20E-07
Total - Metals	-	Total - Metals	4.80E-03	2.40E-06	

*the five highest organic and metal HAPs emission factors are provided above, additional HAPs emission factors are available in AP-42 Chapter 1.4

From: [Moulik, Pratim](#)
To: [Kahn, Ryan](#)
Subject: RE: IDEM Information for Application No. 023-47885-00044 for CF Industries Distribution Facilities, LLC - Frankfort Terminal
Date: Tuesday, June 11, 2024 12:44:00 PM
Attachments: [image002.png](#)
[image004.png](#)
[image006.png](#)
[image007.png](#)
[image008.png](#)
[image009.png](#)
[image010.png](#)
[image014.png](#)
[image015.png](#)
[image016.png](#)
[image018.png](#)
[image003.png](#)

Good afternoon Ryan,

Thank you for the response. IDEM uses the worst case scenario for the whole year for our calculations. IDEM cannot use average vehicles per day, instead IDEM has to go with max number of vehicles and apply it for the whole year which means 160 vehicles every day the whole year. The calculated PM emissions are over 25 tons per year. As a result, this registration would have to transition to MSOP because of PM emissions threshold. Please let me know how CF Industries would like to proceed.

With Regards,
Pratim Moulik



Pratim Moulik
Environmental Manager 2

(317) 234-6871 • PMoulik@idem.IN.gov

 |  |  |  |  | www.idem.IN.gov

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We appreciate your input!



From: Kahn, Ryan <ryan.kahn@cfindustries.com>
Sent: Tuesday, June 11, 2024 12:02 PM
To: Moulik, Pratim <PMoulik@idem.IN.gov>
Subject: RE: IDEM Information for Application No. 023-47885-00044 for CF Industries Distribution Facilities, LLC - Frankfort Terminal

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click links from unknown senders or unexpected email. ****

Good morning Pratim,

Would it be possible to instead use an average number of vehicles per day, based on previous years' information? While 160 vehicles is roughly our maximum, we are a very seasonal site and will typically have significantly less vehicles traveling through our site.

Warm Regards,
Ryan



Ryan Kahn

Superintendent, Environmental Engineering

Cell: 1.224.279.4960

Ryan.Kahn@cfindustries.com

2375 Waterview Drive | Northbrook, Illinois 60062



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From: Moulik, Pratim <PMoulik@idem.IN.gov>

Sent: Tuesday, June 11, 2024 10:38 AM

To: Kahn, Ryan <ryan.kahn@cfindustries.com>

Subject: [EXTERNAL] IDEM Information for Application No. 023-47885-00044 for CF Industries Distribution Facilities, LLC - Frankfort Terminal

Dear Ryan Kahn,

Please find attached my calculations for the fugitive emissions (paved and unpaved roads) using the public template. I was just wondering if the fugitive calculation inputs I put were correct. Please let me know if any of the values is different like max trips per day and vehicle weight. Hoping to hear from you soon.

With Regards,
Pratim Moulik

Pratim Moulik
Environmental Manager 2



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| www.idem.IN.gov

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We appreciate your input!



From: [Kahn, Ryan](#)
To: [Moulik, Pratim](#)
Cc: [Bledsoe, Eric](#); [Howard, Kennith](#)
Subject: RE: IDEM Information for Application No. 023-47885-00044 for CF Industries Distribution Facilities, LLC - Frankfort Terminal
Date: Wednesday, June 12, 2024 11:30:46 AM
Attachments: [image001.png](#)
[image005.png](#)
[image012.png](#)
[image013.png](#)
[image015.png](#)
[image017.png](#)
[image018.png](#)
[image019.png](#)
[image020.png](#)
[image021.png](#)
[image022.png](#)
[image003.png](#)
[Copy of Road fugitives.xlsx](#)

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Good afternoon Pratim,

I just spoke with our site superintendent (Eric, cc'd) to verify these values. From our conversation, could you please change the following datapoints:

- Our maximum number of Ammonia Trucks that we had onsite in any given day last year was 142 vehicles. Would it be possible to update the 160 to this value of 142?
- The maximum weight looks accurate
- The maximum distance that an ammonia truck (unloaded, entering plant) would travel is 320 feet on paved roads and 453 feet on unpaved roads (compared to the listing of 520 & 273, respectively).
- The maximum distance that an ammonia truck (loaded, leaving plant) would travel is 320 feet on paved roads and 123 feet on unpaved roads (compared to the listing of 273 and 140, respectively)
- We only have 6 employees working at this site, and therefore a maximum of 6 employee vehicles (compared to the listed 10)
- We can only imagine a maximum of 10 contractor vehicles at our site at any given time (compared to the listed 20)

Please find a route layout, attached. We have paved the road with more blacktop since this Google earth picture has been taken.

Please let me know if making these changes will change our PTE to below 25 tpy. I'm having issues with making edits to this spreadsheet, otherwise I would be happy to.

Warm Regards,
Ryan



Ryan Kahn

Superintendent, Environmental Engineering

Cell: 1.224.279.4960

Ryan.Kahn@cfindustries.com

2375 Waterview Drive | Northbrook, Illinois 60062



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From: Moulik, Pratim <PMoulik@idem.IN.gov>

Sent: Tuesday, June 11, 2024 11:44 AM

To: Kahn, Ryan <ryan.kahn@cfindustries.com>

Subject: [EXTERNAL] RE: IDEM Information for Application No. 023-47885-00044 for CF Industries Distribution Facilities, LLC - Frankfort Terminal

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With Regards,

Pratim Moulik



Pratim Moulik

Environmental Manager 2

(317) 234-6871 • PMoulik@idem.IN.gov



www.idem.IN.gov

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From: Kahn, Ryan <ryan.kahn@cfindustries.com>
Sent: Tuesday, June 11, 2024 12:02 PM
To: Moulik, Pratim <PMoulik@idem.IN.gov>
Subject: RE: IDEM Information for Application No. 023-47885-00044 for CF Industries Distribution Facilities, LLC - Frankfort Terminal

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Would it be possible to instead use an average number of vehicles per day, based on previous years' information? While 160 vehicles is roughly our maximum, we are a very seasonal site and will typically have significantly less vehicles traveling through our site.

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Ryan



Ryan Kahn
Superintendent, Environmental Engineering
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2375 Waterview Drive | Northbrook, Illinois 60062



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From: Moulik, Pratim <PMoulik@idem.IN.gov>
Sent: Tuesday, June 11, 2024 10:38 AM
To: Kahn, Ryan <ryan.kahn@cfindustries.com>
Subject: [EXTERNAL] IDEM Information for Application No. 023-47885-00044 for CF Industries Distribution Facilities, LLC - Frankfort Terminal

Dear Ryan Kahn,

Please find attached my calculations for the fugitive emissions (paved and unpaved roads) using the public template. I was just wondering if the fugitive calculation inputs I put were correct. Please let me know if any of the values is different like max trips per day and vehicle weight. Hoping to hear from you soon.

With Regards,
Pratim Moulik



Pratim Moulik
Environmental Manager 2

(317) 234-6871 • PMoulik@idem.IN.gov

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Fugitive Dust Emissions - Unpaved Roads

This calculation is for illustrative purposes only. The emission factors and other data/methodologies used in these calculations are from US EPA's AP-42 Compilation of Air Pollutant Emission Factors. The emission factors, data, methodologies, and assumptions used in these calculations may not be representative/appropriate for a given emission unit/activity. For additional information, please refer to US EPA's AP-42 Compilation of Air Pollutant Emission Factors.

IDEM OAQ does not guarantee the accuracy of these calculations or the emission factors used.

All emission factors and calculations submitted as part of a permit application shall be reviewed by IDEM OAQ Permit Branch for accuracy, completeness, robustness, and appropriateness as part of the permit application review process and a final determination shall be made by the OAQ, Permits Branch.

Unpaved Roads at Industrial Site

The following calculations determine the amount of emissions created by unpaved roads, based on 8,760 hours of use and AP-42, Ch 13.2.2 (11/2006).

Vehicle Information (provided by source)

Type	Maximum number of vehicles	Number of one-way trips per day per vehicle	Maximum trips per day (trip/day)	Maximum Weight of Loaded Vehicle (tons/trip)	Total Weight driven per day (ton/day)	Maximum one-way distance (feet/trip)	Maximum one-way distance (mi/trip)	Maximum one-way miles (miles/day)	Maximum one-way miles (miles/yr)
Ammonia truck (unloaded Entering plant)	160.0	1.0	160.0	19.5	3120.0	520	0.098	15.8	5751.5
Ammonia truck (loaded, leaving plant)	160.0	1.0	160.0	40.0	6400.0	140	0.027	4.2	1548.5
			0.0		0.0		0.000	0.0	0.0
			0.0		0.0		0.000	0.0	0.0
			0.0		0.0		0.000	0.0	0.0
			0.0		0.0		0.000	0.0	0.0
			0.0		0.0		0.000	0.0	0.0
			0.0		0.0		0.000	0.0	0.0
			0.0		0.0		0.000	0.0	0.0
			0.0		0.0		0.000	0.0	0.0
			0.0		0.0		0.000	0.0	0.0
			0.0		0.0		0.000	0.0	0.0
			0.0		0.0		0.000	0.0	0.0
			0.0		0.0		0.000	0.0	0.0
			0.0		0.0		0.000	0.0	0.0
			0.0		0.0		0.000	0.0	0.0
			0.0		0.0		0.000	0.0	0.0
Totals			320.0		9520.0			20.0	7300.0

Average Vehicle Weight Per Trip = 29.8 tons/trip
 Average Miles Per Trip = 0.06 miles/trip

Unmitigated Emission Factor, $E_f = k \cdot [(s/12)^a] \cdot [(W/3)^b]$ (Equation 1a from AP-42 13.2.2)

	PM	PM10	PM2.5	
where k =	4.9	1.5	0.15	lb/mi = particle size multiplier (AP-42 Table 13.2.2-2 for Industrial Roads)
s =	6.0	6.0	6.0	% = mean % silt content of unpaved roads (AP-42 Table 13.2.2-1 Iron and Steel Production)
a =	0.7	0.9	0.9	= constant (AP-42 Table 13.2.2-2 for Industrial Roads)
W =	29.8	29.8	29.8	tons = average vehicle weight
b =	0.45	0.45	0.45	= constant (AP-42 Table 13.2.2-2 for Industrial Roads)

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor, $E_{ext} = E \cdot [(365 - P)/365]$ (Equation 2 from AP-42 13.2.2)

Mitigated Emission Factor, $E_{ext} = E \cdot [(365 - P)/365]$
 where P = 125 days of rain greater than or equal to 0.01 inches (see Fig. 13.2.2-1)

	PM	PM10	PM2.5	
Unmitigated Emission Factor, $E_f =$	8.47	2.26	0.23	lb/mile
Mitigated Emission Factor, $E_{ext} =$	5.57	1.48	0.15	lb/mile
Dust Control Efficiency =	TBD	TBD	TBD	(pursuant to control measures outlined in fugitive dust control plan)

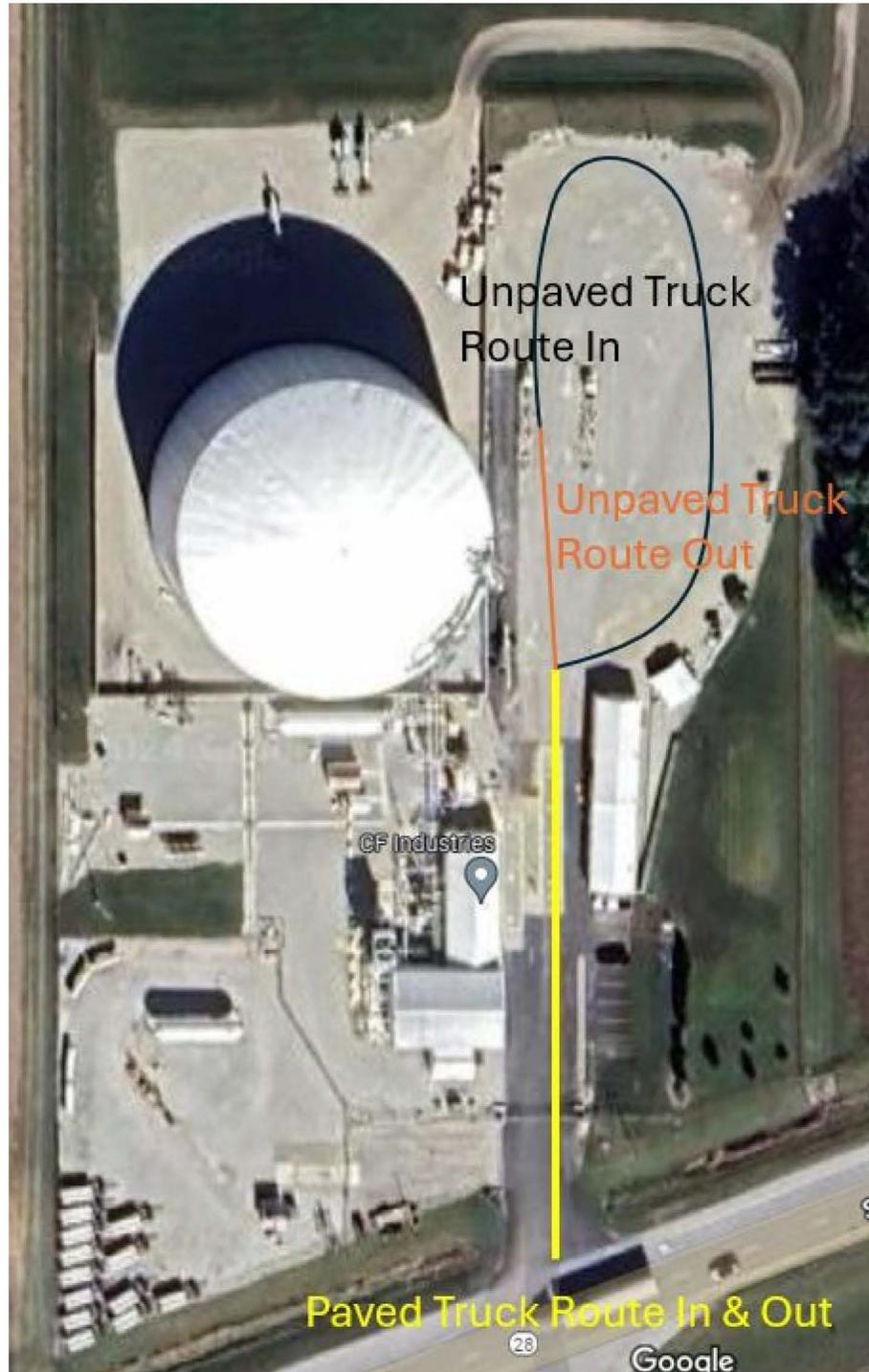
Process	Mitigated PTE of PM (Before Control) (tons/yr)	Mitigated PTE of PM10 (Before Control) (tons/yr)	Mitigated PTE of PM2.5 (Before Control) (tons/yr)	Mitigated PTE of PM (After Control) (tons/yr)	Mitigated PTE of PM10 (After Control) (tons/yr)	Mitigated PTE of PM2.5 (After Control) (tons/yr)
Vehicle (entering plant) (one-way trip)	16.01	4.27	0.43	#VALUE!	#VALUE!	#VALUE!
Vehicle (leaving plant) (one-way trip)	4.31	1.15	0.11	#VALUE!	#VALUE!	#VALUE!
	0.00	0.00	0.00	#VALUE!	#VALUE!	#VALUE!
	0.00	0.00	0.00	#VALUE!	#VALUE!	#VALUE!
	0.00	0.00	0.00	#VALUE!	#VALUE!	#VALUE!
	0.00	0.00	0.00	#VALUE!	#VALUE!	#VALUE!
	0.00	0.00	0.00	#VALUE!	#VALUE!	#VALUE!
	0.00	0.00	0.00	#VALUE!	#VALUE!	#VALUE!
	0.00	0.00	0.00	#VALUE!	#VALUE!	#VALUE!
	0.00	0.00	0.00	#VALUE!	#VALUE!	#VALUE!
	0.00	0.00	0.00	#VALUE!	#VALUE!	#VALUE!
	0.00	0.00	0.00	#VALUE!	#VALUE!	#VALUE!
	0.00	0.00	0.00	#VALUE!	#VALUE!	#VALUE!
	0.00	0.00	0.00	#VALUE!	#VALUE!	#VALUE!
	0.00	0.00	0.00	#VALUE!	#VALUE!	#VALUE!
Totals	20.33	5.42	0.54	#VALUE!	#VALUE!	#VALUE!

Methodology

Total Weight driven per day (ton/day) = [Maximum Weight of Loaded Vehicle (tons/trip)] * [Maximum trips per day (trip/day)]
 Maximum one-way distance (mi/trip) = [Maximum one-way distance (feet/trip)] / [5280 ft/mile]
 Maximum one-way miles (miles/day) = [Maximum trips per year (trip/day)] * [Maximum one-way distance (mi/trip)]
 Average Vehicle Weight Per Trip (ton/trip) = SUM[Total Weight driven per day (ton/day)] / SUM[Maximum trips per day (trip/day)]
 Average Miles Per Trip (miles/trip) = SUM[Maximum one-way miles (miles/day)] / SUM[Maximum trips per year (trip/day)]
 Mitigated PTE (Before Control) (tons/yr) = (Maximum one-way miles (miles/yr)) * (Mitigated Emission Factor (lb/mile)) * (ton/2000 lbs)
 Mitigated PTE (After Control) (tons/yr) = (Mitigated PTE (Before Control) (tons/yr)) * (1 - Dust Control Efficiency)

Abbreviations

PM = Particulate Matter
 PM10 = Particulate Matter (<10 um)
 PM2.5 = Particulate Matter (<2.5 um)
 PTE = Potential to Emit



Unpaved Truck Route In

Unpaved Truck Route Out

CF Industries

Paved Truck Route In & Out

Google

28

From: [Moulik, Pratim](#)
To: [Kahn, Ryan](#)
Subject: Applicant Review for Registration AA No. 023-47885-00044 for CF Industries Distribution Facilities, LLC - Frankfort Terminal
Date: Tuesday, June 18, 2024 11:18:00 AM
Attachments: [47885AR.zip](#)
[image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)
[image007.png](#)
[image008.png](#)
[image009.png](#)
Importance: High

Dear Ryan Kahn:

Attached please find the draft Registration AA and supporting documents for review. As a courtesy, this draft is being provided to you for an opportunity to review and provide comments prior to the issuance of the permit approval.

The time clock for Registration AA permit No.: 023-47885-00044 will be stopped during your review until you either provide comments or indicate that you do not have any comments. Due to permit accountability and IDEM's intention to issue the permit in a timely manner, you are being allotted one (1) week to provide comments in writing. If you have any conflicts or special circumstances that would impede your review process during the time allotted, please notify me directly at the email address or phone number listed below as soon as possible. If you have not responded on or before June 25, 2024, IDEM will assume that you have no comments pertaining to this draft and all files will be forwarded for issuance.

During this review period, I will be available to address your concerns, answer any questions that you may have, or make necessary revisions to this draft.

Pursuant to 326 IAC 2-1.1-7, the fee for this permitting action is expected to be \$0, which is based on the following:

\$0	Registration Administrative Amendment
-----	---------------------------------------

Please note: This is not a bill. This represents the anticipated fee and is subject to change if additional review is required or the permit level changes for some reason (e.g. an additional NESHAP review is required). You will receive a final bill from the OAQ Permits Administration and Support Section.

Sincerely,
Pratim Moulik



Pratim Moulik
Environmental Manager 2

(317) 234-6871 • PMoulik@idem.IN.gov

     | www.idem.IN.gov

Scan the QR code to leave your feedback.
We appreciate your input!



From: [Kahn, Ryan](#)
To: [Moulik, Pratim](#)
Subject: RE: Applicant Review for Registration AA No. 023-47885-00044 for CF Industries Distribution Facilities, LLC - Frankfort Terminal
Date: Tuesday, June 18, 2024 5:50:06 PM
Attachments: [image010.png](#)
[image011.png](#)
[image013.png](#)
[image014.png](#)
[image015.png](#)
[image017.png](#)
[image018.png](#)
[image019.png](#)
[image020.png](#)
[image021.png](#)
[image022.png](#)
[image001.png](#)

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Good afternoon Pratim,

My IT allowed for this email to bypass our filters. Thank you again for sending this over, and I apologize for the delay.

I will share this with my operations team and my boss for their review, and I will be back in touch no later than June 25th.

Thank you again for all of your help!

Warm Regards,
Ryan



Ryan Kahn

Superintendent, Environmental Engineering

Cell: 1.224.279.4960

Ryan.Kahn@cfindustries.com

2375 Waterview Drive | Northbrook, Illinois 60062



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From: Moulik, Pratim <PMoulik@idem.IN.gov>

Sent: Tuesday, June 18, 2024 10:18 AM

To: Kahn, Ryan <ryan.kahn@cfindustries.com>

Subject: [[Released From Quarantine]] [EXTERNAL] Applicant Review for Registration AA No. 023-

47885-00044 for CF Industries Distribution Facilities, LLC - Frankfort Terminal

Importance: High

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The time clock for Registration AA permit No.: 023-47885-00044 will be stopped during your review until you either provide comments or indicate that you do not have any comments. Due to permit accountability and IDEM's intention to issue the permit in a timely manner, you are being allotted one (1) week to provide comments in writing. If you have any conflicts or special circumstances that would impede your review process during the time allotted, please notify me directly at the email address or phone number listed below as soon as possible. If you have not responded on or before June 25, 2024, IDEM will assume that you have no comments pertaining to this draft and all files will be forwarded for issuance.

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Sincerely,
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Environmental Manager 2

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From: [Kahn, Ryan](#)
To: [Moulik, Pratim](#)
Cc: [Howard, Kenneth](#); [Bledsoe, Eric](#); [Pervaiz, Muhammad](#)
Subject: RE: Applicant Review for Registration AA No. 023-47885-00044 for CF Industries Distribution Facilities, LLC - Frankfort Terminal
Date: Monday, June 24, 2024 11:27:22 PM
Attachments: [image010.png](#)
[image011.png](#)
[image013.png](#)
[image014.png](#)
[image015.png](#)
[image017.png](#)
[image018.png](#)
[image019.png](#)
[image020.png](#)
[image021.png](#)
[image022.png](#)
[image001.png](#)

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Good evening Pratim,

After discussing with my operations team, we did not identify any concerns with this draft permit and therefore do not have any comments.

I look forward to next steps in this process.

Warm Regards,
Ryan



Ryan Kahn

Superintendent, Environmental Engineering

Cell: 1.224.279.4960

Ryan.Kahn@cfindustries.com

2375 Waterview Drive | Northbrook, Illinois 60062



The information contained in this communication is intended solely for the use of the addressee and may contain Highly Confidential CF Data within the definition of CF's Handling Restricted Data and Highly Confidential Data Policy.

From: Moulik, Pratim <PMoulik@idem.IN.gov>

Sent: Tuesday, June 18, 2024 10:18 AM

To: Kahn, Ryan <ryan.kahn@cfindustries.com>

Subject: [[Released From Quarantine]] [EXTERNAL] Applicant Review for Registration AA No. 023-

47885-00044 for CF Industries Distribution Facilities, LLC - Frankfort Terminal

Importance: High

Dear Ryan Kahn:

Attached please find the draft Registration AA and supporting documents for review. As a courtesy, this draft is being provided to you for an opportunity to review and provide comments prior to the issuance of the permit approval.

The time clock for Registration AA permit No.: 023-47885-00044 will be stopped during your review until you either provide comments or indicate that you do not have any comments. Due to permit accountability and IDEM's intention to issue the permit in a timely manner, you are being allotted one (1) week to provide comments in writing. If you have any conflicts or special circumstances that would impede your review process during the time allotted, please notify me directly at the email address or phone number listed below as soon as possible. If you have not responded on or before June 25, 2024, IDEM will assume that you have no comments pertaining to this draft and all files will be forwarded for issuance.

During this review period, I will be available to address your concerns, answer any questions that you may have, or make necessary revisions to this draft.

Pursuant to 326 IAC 2-1.1-7, the fee for this permitting action is expected to be \$0, which is based on the following:

\$0	Registration Administrative Amendment
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Please note: This is not a bill. This represents the anticipated fee and is subject to change if additional review is required or the permit level changes for some reason (e.g. an additional NESHAP review is required). You will receive a final bill from the OAQ Permits Administration and Support Section.

Sincerely,
Pratim Moulik



Pratim Moulik
Environmental Manager 2

(317) 234-6871 • PMoulik@idem.IN.gov

 |  |  |  |  | www.idem.IN.gov

Scan the QR code to leave your feedback.

We appreciate your input!



BILLING WORKSHEET
MSOP, Registration, Exemptions

For Applications Received On and After October 1, 2019

Permit #: 023-47885-00044
 Permit Reviewer: Pratim Moulik
 Application Received Date: 28-May-24

Instructions: Permit Reviewers will fill out yellow-highlighted cells (as necessary) and check the appropriate box or fill in the number of reviews. The total fee will be calculated at the bottom and transferred to the billing amount on the first page. Permit Reviewers will change the bottom worksheet tab color to yellow to indicate the permit billing worksheet that was filled out. PASS staff will fill out the green-highlighted cells (as necessary).

Note: See "Transition scenarios - permits and fees" document located in SharePoint for more information on handling transition permits and associated fees.

MSOP Fees			
<input type="checkbox"/>		\$100	MSOP
<input type="checkbox"/>		\$600	MSOP w/NSR (120)*
<input type="checkbox"/>		\$3,500	MSOP w/NSR (120)*
<input type="checkbox"/>		\$600	MSOP Min Permit Revision (45)
<input type="checkbox"/>		\$100	MSOP Renewal
<input type="checkbox"/>		\$600	MSOP Renewal / Minor NSR (120)*
<input type="checkbox"/>		\$3,500	MSOP Renewal / Sig NSR (120)*
<input type="checkbox"/>		\$3,500	MSOP NSC (Minor PSD/EO) (120)
<input type="checkbox"/>		\$6,000	MSOP NSC (Major PSD/EO) (270)
<input type="checkbox"/>		\$3,500	MSOP SPR (Minor PSD/EO) (120)
<input type="checkbox"/>		\$6,000	MSOP SPR (Major PSD/EO) (270)
<input type="checkbox"/>		\$100	MSOP Relocation

* Bill \$600 when the permit includes a modification (new or modified equipment) at MPR levels. Bill \$3500 when the permit includes a modification (new or modified equipment) at SPR levels.

Registration Fees			
<input type="checkbox"/>		\$600	Registration – (New Source subject to 326 IAC 2-5.1-2)
<input type="checkbox"/>		\$100	Registration Relocation
<input type="checkbox"/>		\$600	Registration Revision and Re-Registration – (Existing Sources subject to 326 IAC 2-5.5)

Exemption Fees			
<input type="checkbox"/>		\$100	Exemption

NSPS / NESHAP / 326 IAC 8-1-6 BACT / 326 IAC 2-4.1 MACT Review			
Number of Reviews	Total Fee	Fee	See "NSPS-NESHAP-BACT Billing Info" document for instructions.
		\$500	for each review for an applicable NSPS
		\$500	for each review for an applicable NESHAP
		\$600	times each 326 IAC 8-1-6 BACT and each 326 IAC 2-4.1 MACT
For each best available control technology (BACT) analysis for VOC under 326 IAC 8-1-6 and for each maximum achievable control technology (MACT) under 326 IAC 2-4.1. [326 IAC 2-1.1-7(m)(5)]			

Other Fees			
<input type="checkbox"/>		\$500	Interim – Any type
<input type="checkbox"/>		\$500	Public Hearing

\$0 Total Applicable Fee

OAQ Permits Branch Invoice Worksheet

Instructions: Permit Reviewers will fill out yellow-highlighted cells (as necessary). Permit Reviewers will change the bottom worksheet tab color to yellow to indicate the permit billing worksheet that was filled out. PASS staff will fill out the green-highlighted cells (as necessary).

Source Name: CF Industries Distribution Facilities, LLC - Frankfc

TEMPO AI: 14863

Permit #: 023-47885-00044

CST #: _____

Credit for permit fees: \$ _____

Credit Received Date: _____

Note: IDEM's accounting office requires that fee bills or refunds, be sent to the accounts Department at the billing address listed on application. If a courtesy copy is needed, please indicate at the bottom of this page.

Permit Reviewer please indicate applicable fees on page #2. Total will carry over to this page.

Total Due: \$ \$0

Total Credit: \$ \$0

Total Permitting Fees Applicable: \$ \$0

Total Refund Due: \$ _____

Reason for Refund:

Adjustments to Applicable Fees: \$ _____

Explanation of adjustments:

A courtesy copy of the billing has been requested by the applicant, please send to:

Name/Title: _____

Address: _____

Permit Reviewer: Pratim Moulik

Date: 6/18/2024