Title V Air Operation Permit Renewal
Permit No. 0470002-077-AV

APPLICANT

The applicant for this project is White Springs Agricultural Chemicals, Inc. The applicant's responsible official and mailing address are: Terry L. Baker, General Manager, White Springs Agricultural Chemicals, Inc.- Suwannee River/Swift Creek Complex, P. O. Box 300, White Springs, Florida 32096.

FACILITY DESCRIPTION

The applicant operates the Suwannee River/Swift Creek Complex, which is located at White Springs Agricultural Chemicals, Inc.

This facility processes phosphate rock to produce several products at the Suwannee River/Swift Creek Complex (two plants). The facility consists of one rock grinder, two phosphoric acid plants, two defluorinated phosphate (DFP) plants, one monocal/dical process, two monoammonium/diammonium phosphate (MAP/DAP) plants, one Storage and Shipping building, one screening/shipping building, four sulfuric acid plants, two phosphoric acid filters, three superphosphoric acid plants, one green superphosphoric plant, the Swift Creek Mine (SCM) rock dryer, and one acid clarification plant. The facility also has storage silos associated with the Swift Creek Mine and the DFP plant.

Also included in this permit are miscellaneous unregulated/insignificant emissions units and/or activities.

PROJECT DESCRIPTION

The purpose of this permit is to renew the Title V air operation permit for the above referenced facility, to incorporate Air Construction No. 0470002-074-AC, and Air Permit No. 0470002-073-AC, to add the requirements of 40 CFR 63, Subpart JJJJ, 40 CFR 63, Subpart ZZZZ and 40 CFR 63, Subpart DDDDD (March 21, 2011) to the Title V permit for the above referenced facility.

PROCESSING SCHEDULE AND RELATED DOCUMENTS

Application for a Title V Air Operation Permit Renewal received December 6, 2011.
Additional Information Request dated January 17, 2012.
Additional Information Response received January 17, 2012.
Additional Information Response received February 2, 2012.
Additional Information Response received February 27, 2012.
Additional Information Response received March 1, 2012.
Notice of Intent to Issue Air Permit issued March 5, 2012.
OGC Order Granting Request for Time Extension of Time to File Petition for Hearing on April 22, 2012.
OGC closed the case after the facility withdrew their request for Time Extension on April 25, 2012.
Revised Notice of Intent to Issue Air Permit issued April 26, 2012
Comments Received April 30, 2012.
Public Notice Published May 10, 2012.

PRIMARY REGULATORY REQUIREMENTS

Title III: The facility is identified as a major source of hazardous air pollutants (HAP).

Title V: The facility is a Title V major source of air pollution in accordance with Chapter 62-213, Florida Administrative Code (F.A.C.).

PSD: The facility is a Prevention of Significant Deterioration (PSD)-major source of air pollution in accordance with Rule 62-212.400, F.A.C.

NSPS: The facility does operate units subject to the New Source Performance Standards (NSPS) of 40 Code of Federal Regulations (CFR) 60.

NESHAP: The facility does operate units subject to the National Emissions Standards for Hazardous Air Pollutants (NESHAP) of 40 CFR 63.

CAIR: The facility is/is not subject to the Clean Air Interstate Rule (CAIR) set forth in Rule 62-296.470, F.A.C.

CAM: Compliance Assurance Monitoring (CAM) applies to Units 003 and 038 are subject to CAM for the regulated emissions of particulate matter, SO2 and fluoride, which are each controlled by a Packed Scrubber.

PROJECT REVIEW

Brief description of any changes that were made as part of this renewal **OR** revision (i.e. reformatting, replacement of TV-6 with new Appendix TV, streamlining of EU sections by moving common conditions to the new appendices, etc.). Numerically list a discussion of the reasons for the changes being made as part of this project, followed by the conditions(s) being changed. Show the changes in the condition with a ~~strikethrough format~~ for deletions and a double underline format for additions.

No. 1. D. 008 "Y" Train-#1 MAP/DAP Plant

No. 2. J. 032 "Z"-Train #2 MAP/DAP Plant

No. 3. J.1. Permitted **Capacity**. The operation rate shall not exceed the Maximum 12-MRA Hourly Rate = 75 tons of product or Maximum Daily 1-Hour Average Rate = 83 tons of product. The P_2O_5 feed shall not exceed 45.7 tons per hour daily average (41.1 tons per hour 12-MRA).

12-MRA (MRA - Monthly Rolling Average) Hourly Rate Maximum shall not be exceeded by the 12-MRA hourly rate calculated by averaging each monthly hourly average with the previous 11 monthly hourly averages.

[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.; Construction Permit No. 0470002-032-AC; Construction Permit No. 0470002-034-AC]

No. 4. M.3. Total Fluorides. Total Fluoride emissions at the sample port from "B" SPA unit shall not exceed 5.0 gram/metric ton of equivalent P_2O_5 feed (0.010 lb/ton); ~~0.84~~ 0.46 lbs/hr and ~~3.68~~ 1.84 TPY. (This change reflects the removal of "A" SPA Fluoride emissions)

[Rule 62-204.800(7)(b), F.A.C.; 40 CFR 60.212; 40 CFR 63.602(b)(1)]

No. 5. EU036 ~~"A" &~~ "B" Superphosphoric Acid Plants.

No. 6. EU003 EU038 and 044 B.0., N.0. and R.0. In accordance with Rule 62-210.300(2)(a)3.c., F.A.C., the operation permit for an emissions unit which has been shut down for five years or more prior to the expiration date of the current operation permit shall be renewed for a maximum period not to exceed ten years from the date of shutdown, even if the emissions unit is not maintained in operational condition, provided the conditions given in sub-subparagraph 62-210.300(2)(a)3.b., F.A.C., are met and the owner or operator demonstrates to the Department that failure to renew the permit would constitute a hardship, which may include economic hardship:

(I) The owner or operator of the emissions unit demonstrates to the Department that the emissions unit may need to be reactivated and used, or that it is the owner's or operator's intent to apply to the Department for a permit to construct a new emissions unit at the facility before the end of the extension period; and

(II) The owner or operator of the emissions unit agrees to and is legally prohibited from providing the allowable emission permitted by the renewed permit as an emissions offset to any other person under Rule 62-212.500, F.A.C.; and

(III) The emissions unit was operating in compliance with all applicable rules as of the time the source was shut down.

***EU003 EU038 and 044 was last operated in July 2005. Therefore, Permit No. 0470002-077-AV extends EU003 EU038 and 044 expiration date only until July 2015. [Rule 62-210.300(2)(a)3.b and (a)3.c.]**

No. 7. The Fluoride emissions for EU061 Green SPA Plant has been corrected.

T.3. At sample port, fluoride emissions shall not exceed ~~0.2~~ 0.5 lb/hr and ~~12.2~~ 2.2 TPY. (This was incorrectly stated in Air Construction Permit No. 0470002-054-AC and subsequently in the Title V permit. The application for Air Construction Permit No. 0470002-054-AC stated 0.5 lb/hr and 2.2 TPY)

[Requested by applicant; Permit #AC24-205170; and Air Construction Application for Permit No. 0470002-054-AC]

No. 8. Correction, the Concrete Batch Plant is EU No. 75 and not 74.

No. 9. Added EU076 for the (15) RICE Emergency Engines.

Because this facility operates stationary reciprocating internal combustion engines, it is subject to regulation under 40 CFR 63, Subpart ZZZZ, - National Emissions Standards For Hazardous Air Pollutants For Stationary Reciprocating Internal Combustion Engines.

The specific conditions in this section apply to the following emissions units:

ID No.	Emission Unit Description
076	15 Emergency Engines

.....

Subsection KK

Any of the engines may be replaced by a like-kind units, as needed. The permittee shall comply with the applicable requirements under 40 CFR 63, Subpart JJJJ and ZZZZ and include the information on the units in the subsequent revision or renewal application (whichever comes first).

No. 10. The 2 small boilers fired with natural gas (1) 100HP York- Shipley w/ 4.25 MMBtu/ hr heat input; (1)100 HP FB-S 100 Fulton w/ 4.25 MMBtu/ hr heat input where originally going to be added to APPENDIX I. However, these units are now subject to the changes in 40 CFR 63, Subpart DDDDD for small boilers. This final rule became effective on May 20, 2011.

No. 11. Adding a new Limestone silo w/ baghouse at the waste water plant to the insignificant list (Appendix I)

The proposed limestone silo for the water treatment system, like the existing lime silo for the water treatment system, is exempt from air permitting requirements. As requested, the following emissions calculations indicate that the PM emissions are expected to be below the generic emissions unit exemption threshold of 5 tons per year, in accordance with Rule 62-210.300(3)(b)1, FAC.

Using uncontrolled PM emissions factor for sand transfer, from EPA reference AP-42, Table 11.12-2, the emissions can be estimated as follows (2 transfer points include one from truck to silo and one from silo to tank):

PM, uncontrolled = 0.0021lb/ton x 200,000 tons/yr x 2 transfers x ton/2000 lb = 0.4 tpy

No. 12. EU039 "C" Auxiliary Boiler, EU040 "D" Auxiliary Boiler and EU068 "E" Auxiliary Boiler

On September 13, 2004, EPA promulgated national emission standards for hazardous air pollutants (NESHAP) for industrial, commercial, and institutional boilers and process heaters.

On June 19, 2007, the United States Court of Appeals for the District of Columbia Circuit vacated and remanded the standards.

On March 21, 2011, EPA promulgated 40 CFR 63, Subpart DDDDD - National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters. This final rule became effective on May 20, 2011.

On May 18, 2011, EPA published a notice delaying the effective dates of the March 21, 2011 final rule until such time as judicial review is no longer pending or until EPA completes its reconsideration of the rules, whichever is earlier.

On December 23, 2011, EPA published the reconsideration proposal (40 CFR 63, subpart DDDDD, National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters). The EPA intends to finalize the reconsideration in the spring of 2012.

On January 9, 2012, the United States Court of Appeals for the District of Columbia Circuit issued a decision vacating and remanding the EPA May 18, 2011delay notice. As such, the March 21, 2011 promulgated 40 CFR 63, Subpart DDDDD - National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters is now effective.

No. 13. Applies to Condition No(s) D.20, G.16, J.21., M.10., V.13., AA.14 and BB.14.:

This emissions unit is subject to specific requirements of 40 CFR 63 Subpart BB, Appendix A to Subpart BB– Applicability to General Provisions to Subpart BB, and alternative MACT monitoring plan (Administrative Order No. 04-I-AP, dated October 4, 2004). The owner or operator is responsible for remaining in compliance with any updates made to Subpart A or BB. This EU is subject to Facility Wide Condition No. 10.

[40 CFR 63-Subpart A; 40 CFR 63-Subpart BB; and Administrative Order No. 04-I-AP, Alternate MACT Monitoring Plan]

No. 14. Applies to Condition No(s) O.2., P.2. V.2., and Z.2.:

Better Grade Fuel Oil. When No. 6 fuel oil is specified in this permit, a better grade may be substituted. A better grade fuel oil is defined as a fuel oil with a higher ranking in the following list:
Better Grade (Top of list)

New, No. 2 fuel oil, or No. 2 on-specification used oil
New, No. 3 fuel oil, or No. 3 on-specification used oil
New, No. 4 fuel oil, or No. 4 on-specification used oil
New, No. 5 fuel oil, or No. 5 on-specification used oil
New, No. 6 fuel oil, or No. 6 on-specification used oil

The use of Better Grade Fuel oils does not constitute the use of these fuels beyond "as stand-by fuels" as specified under each EU's fuel usage limits below.

No.15. Subsection S and DD Rule 62-296.411 was repealed and replaced with Rule 62-296.320, F.A.C.

{Permitting note(s): This emissions unit is regulated under Rule 62-296.320, F.A.C., General Pollutant Emission Limiting Standards.}

NO. 16. ALL OPERATING HOURS: 8760 hours/year (8784 in any Leap Year).

NO. 17. Changed description of "X" Train to (Monocal /Dical process)

NO. 18. Changed description of EU 010 to #1 ~~MAP/DAP~~ Storage and Shipping Building.

NO. 19. Changed description of EU 015 to ~~MAP/DAP~~ Granular Product Shipping and Screening.

NO. 20. EU004 Mode 2 - Changed description to monocalcium phosphate

C.2. Methods of Operation are as follows:

Mode 1 - Dical (dicalcium phosphate) with 18.5% P is produced.
Mode 2 - ~~Dical~~ Monocal (~~dicalcium phosphate~~ monocalcium phosphate) with 21.0% P is produced.
Mode 3 - The transfer of Monocal or Dical from railcar to trucks.

CONCLUSION

This project renews Title V air operation permit No. 0470002-075-AV, which was issued on June 4, 2007. This Title V air operation permit renewal is issued under the provisions of Chapter 403, Florida Statues (F.S.), and Chapters 62-4, 62-210 and 62-213, F.A.C.