



FACILITY

WHITE SPRINGS AGRICULTURAL CHEMICALS, INC.
Suwannee River/Swift Creek Complex

Facility ID No. 0470002
Project No. 082

AIR CONSTRUCTION PERMIT

COUNTY

Hamilton, Florida

PERMITTING AUTHORITY

Florida Department of Environmental Protection
Air Resource Section
Northeast District Office
8800 Baymeadows Way West, Suite 100
Jacksonville, Florida 32256

Revised February 1, 2013

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION FOR REVIEW OF AIR CONSTRUCTION PERMIT

A. APPLICANT NAME AND ADDRESS

White Springs Agricultural
Chemicals, Inc.
P.O. Box 300
White Springs, Florida 32096

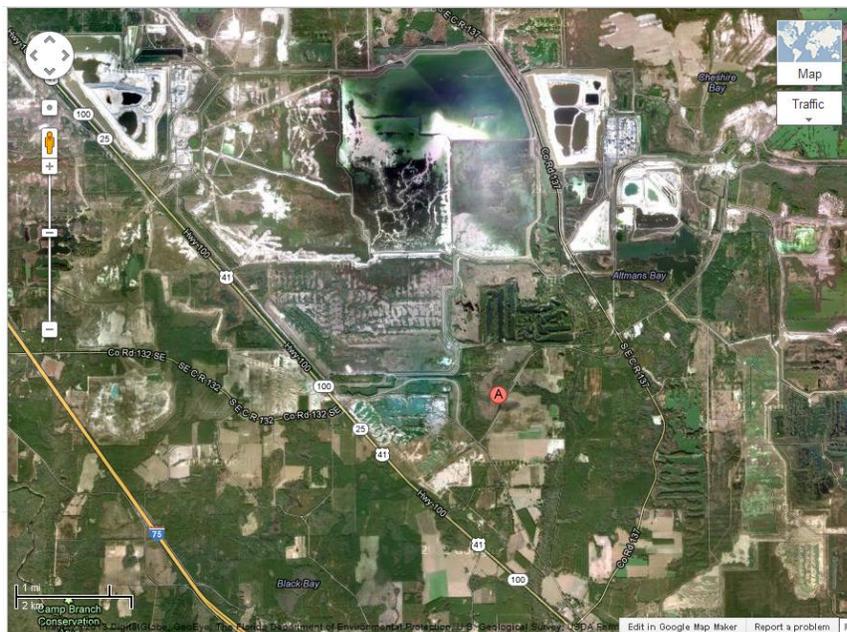


Image from: http://www.potashcorp.com/about/facilities/phosphate/white_springs/

Processing Schedule

12/12/2012	Department received the Application for Air Permit – Long Form
01/02/2013	Department received additional information.

B. FACILITY LOCATION



**Figure 1. Area Map -Location of the White Springs Agricultural, Inc.,
Suwannee River and Swift Creek Complex**

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The existing facility is located in Hamilton County at 15843 SE 78th Street, White Springs, Florida. This site is approximately 25 kilometers from the Okefenokee National Wilderness Area, a Class I Area. The UTM coordinates of this facility are Zone 17; 328.3 km E; 3368.8 km N; and, Latitude: 30° 26' 27" North and Longitude: 82° 47' 16" West

This site is in an area that is in attainment (or designated as unclassifiable) for all air pollutants subject to state and federal Ambient Air Quality Standards (AAQS).

C. FACILITY DESCRIPTION

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.

D. SCOPE OF REVIEW

On December 11, 2012, White Springs Agricultural Chemicals, Inc. submitted an application to the Department of Environmental Protection (Department) requesting a construction permit for the use of a rental steam generating boiler with a design capacity of up to 155 MMBtu per hour maximum. The boiler will be fired by either Natural Gas (NG) or Low sulfur No 2 fuel oil/diesel with a maximum sulfur content of 0.05 percent by weight. The rental unit will be brought onsite and operated during periods of emergency, unplanned loss in steam production from any of the existing steam generating boilers, EU Nos. 039, 040, and 068 (C Auxiliary Boiler, D Auxiliary Boiler, and E Auxiliary Boiler respectively). The emergency unit will be used for no more than 180 consecutive days in a given year.

On January 17, 2013, comments were received from the applicant on the January 11, 2013 draft permit package. The comments are stated below with the Department response:

1. The header to Permit Conditions A.3 and A4. should reflect NSPS and not NESHAP. The header to Permit Condition A.5. should state NESHAP.

Response: Based on the comments, the Department has made the requested changes to Permit Conditions A.3., A.4. and A.5.

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2. Please change the time period the rental boiler can be located onsite from four consecutive months (122 consecutive days) to less than 180 consecutive days instead. This time period will allow the rental boiler to meet the definition of a temporary boiler. The current fuel restrictions would ensure that the air emissions would still be appropriately limited.

Response: Based on the comment, the Department has change the time period to “no more than 180 consecutive days”. This time period is consistent with the temporary boiler definitions in 40 CFR 60 Subpart Db, and 40 CFR 60 Subpart Dc.

3. The draft permit, as currently written would require a VE compliance test when the boiler is operating on either natural gas or fuel oil. The facility presently has boilers that are not required to conduct visible emissions testing when firing natural gas. A visible emissions test is only required when fuel oil is fired for 400 hours per year or more. The facility would prefer the test condition to be revised/clarified to reflect that a VE would only be required if the boiler operates on oil.

Response: The proposed boiler is subject to a 20% opacity standard for visible emissions in accordance with Rule 62-296.406(1), F.A.C. Since this is an applicable, emission limiting standard, the draft permit requires that compliance with this standard be demonstrated by an initial visible emissions test in accordance with Rule 62-297.310(7)(a)1., F.A.C.

Rule 62-297.310(7)(a)1., F.A.C. states, “*The owner or operator of a new or modified emissions unit that is subject to an emission limiting standard shall conduct a compliance test that demonstrates compliance with the applicable emission limiting standard prior to obtaining an operation permit for such emissions unit.*”

Rules 62-210.200(127), (146) and (147), F.A.C.:

(127) “Emission Limiting Standard” or “Emission Standard” or “Emission Limitation” or “Performance Standard” – Any restriction established in or pursuant to a regulation adopted by the Department which limits the quantity, rate, concentration or opacity of any pollutant released, allowed to escape or emitted, whether intentionally or unintentionally, into the atmosphere, including any restriction which prescribes equipment, sets fuel specifications, or prescribes operation or maintenance procedures for an emissions unit to assure emission reduction or control.

(146) “Fossil Fuel” – Natural gas, petroleum, coal, or any form of solid, liquid, or gaseous fuel derived from such material.

(147) “Fossil Fuel Steam Generators” – A furnace or boiler which produces steam by combustion of oil, coal, or gas of fossil origin.

Based on these definitions, the visible emissions compliance test is required whether the proposed boiler is firing natural gas or low sulfur distillate fuel oil.

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Rule 62-297.310(7)(a)3., F.A.C. requires a compliance test to be conducted that demonstrates compliance with the emission limiting standard prior to the facility obtaining a renewed operation permit.

Rule 62-297.310(7)(a)3., F.A.C. - The owner or operator of an emissions unit that is subject to any emission limiting standard shall conduct a compliance test that demonstrates compliance with the applicable emission limiting standard prior to obtaining a renewed operation permit. Emissions units that are required to conduct an annual compliance test may submit the most recent annual compliance test to satisfy the requirements of this provision. In renewing an air operation permit pursuant to Rule 62-210.300(2)(a)3.b., c., or d., F.A.C., the Department shall not require submission of emission compliance test results for any emissions unit that, during the year prior to renewal:

- a. Did not operate; or
- b. In the case of a fuel burning emissions unit, burned liquid and/or solid fuel for a total of no more than 400 hours.

Rule 62-210.300(2)(a)3.b.,c., or d., F.A.C. pertains to renewing the operation permit for an emissions unit which has been shut down and an electrical utility generating unit on cold standby or long-term reserve shutdown. These situations are not applicable to this proposed unit. As such, there is not an applicable exception to the requirement for White Springs to conduct a visible emissions test at the proposed unit prior to obtaining renewed operation permit.

It is noted that Rules 62-297.310(7)(a)5.,6., and 7., F.A.C. waive the particulate matter emissions compliance testing for fuel burning (and fossil fuel steam generators) that burn liquid and/or solid fuel for less than 400 (200 or 100 hours as applicable) other than during startup. These rules do not waive the visible emissions compliance testing requirement.

However, it appears that Rule 62-297.310(7)(a)4., F.A.C., allows for exceptions to the requirement for an annual visible emissions compliance test if the exception is established by rule, order, or permit.

Rule 62-297.310(7)(a)4., F.A.C.- During each federal fiscal year (October 1 -- September 30), unless otherwise specified by rule, order, or permit, the owner or operator of each emissions unit shall have a formal compliance test conducted for:

- a. Visible emissions, if there is an applicable standard;
- b. Each of the following pollutants, if there is an applicable standard, and if the emissions unit emits or has the potential to emit: 5 tons per year or more of lead or lead compounds measured as elemental lead; 30 tons per year or more of acrylonitrile; or 100 tons per year or more of any other regulated air pollutant; and
- c. Each NESHAP pollutant, if there is an applicable emission standard.

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The draft permit condition is being revised to clarify that after demonstrating compliance with the visible emissions standard through initial visible emissions testing, a visible emissions compliance test will be required annually during each federal fiscal year if fuel oil is fired 400 or more hours in a given year, as allowed by Rule 62-297.310(7)(a)4., F.A.C., and prior to operation permit renewal consistent with Rule 62-297.310(7)(a)3, F.A.C. The annual compliance testing frequency will be established by permit.

Department Corrections:

1. The duration of the visible emissions test is being corrected to sixty (60) minutes consistent with Rule 62-297. 310(4)(a)2., F.A.C. because the visible emissions standard is a multiple-valued opacity standard.
2. The permit condition language in Conditions A.16. and A.17 have been revised to reflect that it will be assumed that the steam generating unit is in compliance with the BACT for particulate matter and sulfur dioxide emissions if the unit combusts natural gas and low sulfur fuel oil. Compliance with the sulfur content of the low sulfur fuel oil shall continue to be by either supplier certification of fuel oil analysis.

A.16. Compliance Determination -Particulate Matter: It shall be assumed that the steam generating unit is in compliance with the Best Available Control Technology Determination for particulate matter emissions stated in Condition Nos. A.11., if the unit combust natural gas and low sulfur No. 2 fuel oil.

[Rules 62-213.440 and 62-296.406(3), F.A.C.]

A.17. Compliance Demonstration – Sulfur Dioxide and Fuel Sulfur Content: It shall be assumed that the steam generating unit is in compliance with the Best Available Control Technology Determination for sulfur dioxide emissions stated in Condition Nos. A.12., if the unit combust natural gas and low sulfur No. 2 fuel oil.

The owner or operator shall demonstrate compliance with the sulfur content limitations for No.2 low sulfur fuel oil based on fuel supplier certification.

The fuel certification provided by the supplier shall include the sulfur content or maximum sulfur content of the delivered No.2 fuel oil. The sulfur content shall have been determined by a certified ASTM method adopted and incorporated by reference in Rule 62- 297.440(1), F.A.C. or another EPA approved method.

[Rule 62-4.070, F.A.C., Rule 62-297.440, F.A.C.]

3. The permit language in Specific Condition A.22. is revised to require records be maintained of the estimated CO, VOC, NO_x, SO₂, and PM emissions from each steam generating unit and replacement unit(s) that are operated at the facility.
4. A new permit condition is added to the draft permit to require the submittal to the Permitting Authority the records required by Specific Condition A.22. (with the exception of the visible emissions test results) within 15 days of removal of each steam generating unit and

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replacement unit(s) from the facility. The permit condition also requires the submittal of these records with the Annual Air Operation Report required by Rule 62-210.370(3), F.A.C.

This project will add the following emissions units.

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ID No.	Emission Unit Description
-077	Up to 155 MMBtu/hr rental, steam generating unit for emergency use during the loss of steam production from either of the C, D, or E Auxiliary Boilers.

E. Air Pollution Regulations

Projects at stationary sources with the potential to emit air pollution are subject to the applicable environmental laws specified in Section 403 of the Florida Statutes (F.S.). The statutes authorize the Department of Environmental Protection (Department) to establish regulations regarding air quality as part of the Florida Administrative Code (F.A.C.), which includes the following applicable chapters: 62-4 (Permits); 62-204 (Air Pollution Control – General Provisions); 62-210 (Stationary Sources – General Requirements); 62-212 (Stationary Sources – Preconstruction Review); 62-213 (Operation Permits for Major Sources of Air Pollution); 62-296 (Stationary Sources - Emission Standards); and 62-297 (Stationary Sources – Emissions Monitoring). Specifically, air construction permits are required pursuant to Rules 62-4, 62-210 and 62-212, F.A.C.

In addition, the U. S. Environmental Protection Agency (EPA) establishes air quality regulations in Title 40 of the Code of Federal Regulations (CFR). Part 60 specifies New Source Performance Standards (NSPS) for numerous industrial categories. Part 61 specifies National Emission Standards for Hazardous Air Pollutants (NESHAP) based on specific pollutants. Part 63 specifies NESHAP based on the Maximum Achievable Control Technology (MACT) for numerous industrial categories. The Department adopts these federal regulations on a quarterly basis in Rule 62-204.800, F.A.C.

F. Facility Regulatory Categories

- The facility is a major source of hazardous air pollutants (HAP).
- The facility has no units subject to the acid rain provisions of the Clean Air Act (CAA).
- The facility is a Title V major source of air pollution in accordance with Chapter 213, F.A.C.
- The facility is a major stationary source in accordance with Rule 62-212.400(PSD), F.A.C.

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National Emission Standards for Hazardous Air Pollutants (NESHAPs)

40 CFR 63 subpart DDDDD – National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters

The facility is classified as major source of Hazardous Air Pollutants pursuant to 40 CFR 63.2. The provisions of 40 CFR 63 subpart DDDDD – National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters are potentially applicable to the steam generating unit. However, the facility has self-imposed a restriction in the unit's operation while at the facility. The steam generating unit is authorized to operate onsite for no more than 180 consecutive days. Therefore, the steam generating unit will only operate as a temporary boiler as defined by the Subpart. As such, the steam generating unit is not subject to the Subpart provisions pursuant to the March 21, 2011 Amendments of 63.7491(j).

New Source Performance Standards

40 CFR Part 60, Subpart Db - Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units

The provisions of 40 CFR 60 Subpart Db – Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units is applicable to is each steam generating unit that commences construction, modification, or reconstruction after June 19, 1984, and that has a heat input capacity from fuels combusted in the steam generating unit of greater than 29 megawatts (MW) (100 million British thermal units per hour (MMBtu/hr)).

This Subpart is potentially applicable to the steam generating unit. However, the facility's self-imposed operation restriction of no more than 180 consecutive days while located at the facility, will be such that the steam generating unit will operate only as a temporary boiler as defined by the Subpart. As such, the steam generating unit is not subject to the Subpart provisions pursuant to §60.40b(m).

40 CFR Part 60, Subpart Dc - Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units

The provisions of 40 CFR 60 Subpart Dc – Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units is applicable to each steam generating unit for which construction, modification, or reconstruction is commenced after June 9, 1989 and that has a maximum design heat input capacity of 29 megawatts (MW) (100 million British thermal units per hour (MMBtu/h)) or less, but greater than or equal to 2.9 MW (10 MMBtu/h).

Depending upon the size of the actual rental boiler brought onsite, the steam generating unit may potentially subject to this Subpart. However, the facility's self-imposed operation restriction of no more than 180 consecutive days while located at the facility, will be such that the steam generating unit will operate only as a temporary boiler as defined by the Subpart. As such, the steam generating unit is not subject to the Subpart provisions pursuant to §60.40b(m).

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State of Florida Air Rules

62-296.406, F.A.C.- Fossil Fuel Steam Generators with less than 250 Million Btu per Hour Heat Input, New and Existing Emissions Units

The proposed steam generating unit is subject to Rule 62-296.406, F.A.C., for Fossil Fuel Steam Generators with less than 250 Million Btu per Hour Heat Input, New and Existing Emissions Units. The rules are applicable when the unit is firing either low sulfur No. 2 fuel oil or natural gas.

Pursuant to Rule 62-296.406(1), F.A.C., the unit is subject to a visible emissions limitation of up to a maximum of 20 percent opacity except for one two-minute period per hour during which opacity shall not exceed 40 percent. A compliance test will be required within 30 days of operation for each such rental boiler brought onsite.

Pursuant to Rules 62-296.406(2) and (3), F.A.C., the unit is also subject to Best Available Control Technology (BACT) determination for Particulate Matter and Sulfur Dioxide Emissions.

For this proposed project, the burning of low sulfur No.2 fuel oil with a maximum sulfur content of 0.05% by weight and natural gas is established as BACT. Compliance will be demonstrated with the sulfur content of the No. 2 fuel oil by either vendor certification or fuel oil analysis. The purchase records of both natural gas and No. 2 fuel oil are to be retained onsite.

General PSD Applicability

For areas currently in attainment with the state and federal AAQS or areas otherwise designated as unclassifiable, the Department regulates major stationary sources of air pollution in accordance with Florida's PSD preconstruction review program as defined in Rule 62-212.400, F.A.C.

Under preconstruction review, the Department first must determine if a project is subject to the PSD requirements ("PSD applicability review") and, if so, must conduct a PSD preconstruction review. A PSD applicability review is required for projects at new and existing major stationary sources.

In addition, proposed projects at existing minor sources are subject to a PSD applicability review to determine whether potential emissions *from the proposed project itself* will exceed the PSD major stationary source thresholds.

A facility is considered a major stationary source with respect to PSD if it emits or has the potential to emit:

- 5 tons per year or more of lead;
- 250 tons per year or more of any regulated air pollutant; or
- 100 tons per year or more of any regulated air pollutant and the facility belongs to one of the following 28 PSD-major facility categories: fossil fuel-fired steam electric plants of more than 250 million British thermal units per hour heat input, coal cleaning plants (with thermal dryers), Kraft pulp mills, portland cement plants, primary zinc smelters, iron and steel mill

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plants, primary aluminum ore reduction plants, primary copper smelters, municipal incinerators capable of charging more than 250 tons of refuse per day, hydrofluoric, sulfuric, and nitric acid plants, petroleum refineries, lime plants, phosphate rock processing plants, coke oven batteries, sulfur recovery plants, carbon black plants (furnace process), primary lead smelters, fuel conversion plants, sintering plants, secondary metal production plants, chemical process plants, fossil fuel boilers (or combinations thereof) totaling more than 250 million British thermal units per hour heat input, petroleum storage and transfer units with a total storage capacity exceeding 300,000 barrels, taconite ore processing plants, glass fiber processing plants and charcoal production plants.

Once it is determined that a project is subject to PSD preconstruction review, the project emissions are compared to the “significant emission rates” defined in Rule 62-210.200, F.A.C. for the following pollutants: carbon monoxide (CO); nitrogen oxides (NO_x); sulfur dioxide (SO₂); particulate matter (PM); particulate matter with a mean particle diameter of 10 microns or less (PM₁₀); volatile organic compounds (VOC); lead (Pb); fluorides (F); sulfuric acid mist (SAM); hydrogen sulfide (H₂S); total reduced sulfur (TRS), including H₂S; reduced sulfur compounds, including H₂S; municipal waste combustor organics measured as total tetra- through octa-chlorinated dibenzo-p-dioxins and dibenzofurans; municipal waste combustor metals measured as particulate matter; municipal waste combustor acid gases measured as SO₂ and hydrogen chloride (HCl); municipal solid waste landfills emissions measured as non-methane organic compounds (NMOC); and mercury (Hg). In addition, significant emissions rate also means any emissions rate or any net emissions increase associated with a major stationary source or major modification which would construct within 10 kilometers of a Class I area and have an impact on such area equal to or greater than 1 µg/m³, 24-hour average.

If the potential emission exceeds the defined significant emissions rate of a PSD pollutant, the project is considered “significant” for the pollutant and the applicant must employ the Best Available Control Technology (BACT) to minimize the emissions and evaluate the air quality impacts. Although a facility or project may be *major* with respect to PSD for only one regulated pollutant, it may be required to install BACT controls for several “significant” regulated pollutants.

PSD Applicability for this project

The existing facility, prior to this project, is classified as a major stationary source. The proposed steam generating unit is considered to be a new source. Therefore, pursuant to Rule 62-212.400(2)(a)2., F.A.C., the appropriate test for determining whether a major modification will occur for each PSD pollutant as a result of this project is the Baseline Actual-to-Potential Applicability Test for Construction of New Emissions Units.

The facility proposed in the additional information response received January 2, 2013, the following fuel usage restrictions:

Fuel	Maximum Fuel Usage	Averaging Period
Natural Gas	414,600,000 CF	during any consecutive 12-month period, rolling total
Low sulfur No. 2 Fuel Oil (maximum sulfur content 0.05% by weight)	3,040,000 gallons	during any consecutive 12-month period, rolling total

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The Department review confirms that these steam generating unit fuel usage restrictions are required to insure that a significant increase in the potential emissions of each PSD pollutant does not occur after completion of the project. Based on these fuel usage restrictions, PSD review is not required for this project.

The applicant stated in the January 2, 2013 additional information response that fuel usages will be monitored by fuel use meters. The usage of such fuel meters is a condition of the draft construction permit.

The project requires a minor air construction permit to authorize the use of a rental steam generating unit with a maximum design heat input of 155 MMBtu/hr.

Project Potential to Emit

The applicant estimated potential emissions from the proposed rental steam generating unit using emission factors from U.S. EPA's Compilation of Air Pollutant Emission Factors, 5th Edition, Supplement D (AP-42).

Table 1 -- Project Potential to Emit Summary:

Operating Parameters:

Heat Input Rate	155 MMBtu/hr
Hours of Operation	8,760 Hrs/yr
Natural Gas Heat Value	1,025 MMBtu/MMCf
No. 2 Fuel Oil Heat Value	140 MMBtu/TGB
Natural Gas Usage	0.15 MMCf/hr ⁽¹⁾
	414,600,000 CF during any consecutive 12-month period, rolling total
No. 2 Fuel Oil Usage	1.11 TGB/hr ⁽¹⁾
	3,040,000 gallons during any consecutive 12-month period, rolling total
No. 2 Fuel Oil sulfur Content ⁽²⁾	0.05% by weight

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Pollutant	Mode of Operation	Emission Factor	Emissions		PSD Significant Emission Rate	PSD Review Required ?
			PPH	TPY ⁽⁸⁾		
Particulate Matter	Natural Gas	7.6 lb/MMCf ⁽³⁾	1.15	1.58	25	N
	Fuel Oil	2 lb/TGB ⁽⁴⁾	2.21	3.04		
SO ₂	Natural Gas	0.6 lb/MMCf ⁽³⁾	0.09	0.12	40	N
	Fuel Oil	7.1 lb/TGB ⁽⁴⁾	7.86	10.79		
NO _x	Natural Gas	190.93 lb/MMCf ⁽⁵⁾	28.64	39.58	40	N
	Fuel Oil	24 lb/TGB ⁽⁶⁾	26.57	36.48		
CO	Natural Gas	84 lb/MMCf ⁽⁵⁾	12.70	17.41	100	N
	Fuel Oil	5 lb/TGB ⁽⁶⁾	5.54	7.6		
VOC	Natural Gas	5.5 lb/MMCf ⁽³⁾	0.83	1.14	40	N
	Fuel Oil	0.2 lb/TGB ⁽⁷⁾	0.22	0.30		

- (1) Fuel usage rate based on heat input rate divided by heat value.
(2) State BACT.
(3) Emission factor from AP-42, Table 1.4-2
(4) Emission factor from AP-42, Table 1.3-1, where S= -.5
(5) Emission factor from AP-42, Table 1.4-1.
(6) Emission factor from AP-42, Table 1.3-1
(7) Emission factor based on PA-42, Table 1.3-3
(8) Annual emissions based on annual fuel usage restrictions

G. Preliminary Determination

The Department makes a preliminary determination that the proposed project will comply with all applicable state and federal air pollution regulations as conditioned by the draft permit. This determination is based on a technical review of the complete application, reasonable assurances provided by the applicant, and the conditions specified in the draft permit. No air quality modeling analysis is required because the project does not result in a significant increase in emissions. Rita Felton-Smith is the project engineer responsible for reviewing the application and drafting the permit. Additional details of this analysis may be obtained by contacting the project engineer at the Florida Department of Environmental Protection, Northeast District Office, 8800 Baymeadows Way West, Suite 100, Jacksonville, FL 32256, Phone: 904/256-1700.