Title V Air Operation Permit Revision
Permit No. 0470002-075-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, 15843 SE 78th Street, White Springs, Florida, 32096.

FACILITY DESCRIPTION

The applicant operates the Suwannee River/Swift Creek Complex, which is located at 15843 SE 78th Street, White Springs, Florida.

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 dical process, two diammonium phosphate (DAP) plants, one monoammonium (MAP)/DAP storage building, one MAP/DAP screen/shipping building, four sulfuric acid plants, two phosphoric acid filters, four 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 permitting project is to revise the existing Title V permit for the above referenced facility.

PROCESSING SCHEDULE AND RELATED DOCUMENTS

Initial Title V Permit Application received 06-13-96
Initial Title V Permit Application Attachments received 03-24-97
Application for a Title V Air Operation Permit Revision received October 4, 2010
Waiver of 90-day Time Clock received December 8, 2010
Additional Information Submitted on April 1, 2011
Notice of Intent to Issue Air Permit issued 4/5/2011
Public Notice Published 4/14/2011

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

CAM: Compliance Assurance Monitoring (CAM) Emissions Units 003- "A" Defluorinated Phosphate (DFP) Plant "A" DFP Plant CAM does apply to this emission unit for fluoride, particulate matter and sulfur dioxide. Particulate matter emissions are controlled by a Cross-Flow Packed Scrubber (13A); 038- "B" Defluorinated Phosphate (DFP) Plant emits fluoride and particulate matter emissions, and is controlled by a Cross-Flow Packed Scrubber (13B). CAM applies for particulate matter, sulfur dioxide and fluoride; & 042- Defluorinated Phosphate (DFP) Feed Prep. CAM does apply for particulate matter, sulfur dioxide and fluoride for this emissions unit.

The same pieces of equipment are regulated under the MACT 40 CFR 63, Subpart BB and the CAM Plan. Different monitoring approaches could lead to confusion with daily operations. For these reasons, only one monitoring approach is used for these emissions units and is patterned after the MACT.

PROJECT REVIEW

This permit revision is being issued for the purpose of incorporating air construction permit numbers:

0470002-054-AC extended in project 0470002-056-AC: Project No. 054: Authorized the Green SPA to increase the maximum 12 month rolling average processing input rate from 25.2 TPH as, 100% P_2O_5 to 40 TPH, as, 100% P_2O_5. The maximum daily one-hour average will be 44.0 TPH. The physical changes to the plant will include a modification to enlarge the primary oxidation tank and any changes associated with piping and pumps to handle the greater production rate. For Informational Purposes: NO_x potential emissions are 88 TPY, which is a 29 TPY increase plant-wide.

Testing conducted on July 28, 2010 (incompliance).

0470002-061-AC: This project consists of the addition of a liquid separator to the existing "A" DFP Cooler for improved particulate matter control. This liquid separator will be installed downstream of the existing cyclone and Cooler fan.

EU is shut down and will be tested upon startup, as per permit condition. See Compliance Plan CP-3.

0470002-064-AC: This project consists of installing a pipe reactor in the existing Z Train (MAP/DAP) to allow an alternate mode of operation to the tank reactor. `

Testing conducted August 6, 2010 (incompliance).

0470002-066-AC: This project consists of adding a third mode of operation to the existing X Train to transfer Monocal or Dical from railcar to trucks. This will be a non-production Mode involving the transfer of Monocal or Dical from railcars to the Dical silos using a portion of the existing X-Train transfer equipment. There will be no change to the operation of the Shipping and Handling Facilities as a result of this change. The associated pollution control equipment shall be operated normally during any loading operations. The railcar Monocal or Dical will be a finished product that has already been screened for dust prior to shipment.

No testing was required.

0470002-069-AC: Authorized the replacement of "J" Rotary Drum filter with an equivalent belt filter at the Acid Clarification Plant (EU071).

Testing- See Compliance Plan CP-3.

0470002-072-AC: Authorized unloading of limestone from the existing limestone storage silo back into trucks for other uses.

Testing conducted on October 27, 2010 (incompliance).

0470002-073-AC: Authorized the additional use of fuel oil Nos. 2, 3, 4 and 5 as a better fuel oil grade for EUs. 039 "C" Auxiliary Boiler, EU040 "D" Auxiliary Boiler, EU064 SCM Rock Dryer and EU068 "E" Auxiliary Boiler.

No testing required at this time.

0470002-074-AC: Authorized construction of a concrete batch plant for the purpose of filling in a sinkhole which occurred at the facility in early 2010.

Testing

Also, TV-6 was replaced with the new Appendix TV.

CONCLUSION

This project revises Title V air operation permit No. 0470002-060-AV, which was issued on June 4, 2007. This Title V air operation permit revision is issued under the provisions of Chapter 403, Florida Statues (F.S.), and Chapters 62-4, 62-210 and 62-213, F.A.C.