Compliance Plan CP-4
White Springs Agricultural Chemicals, Inc.
Suwannee River/Swift Creek Complex
Facility ID No.: 0470002
Title V Revision 0470002-080-AV
Hamilton County

The Permittee shall conduct all testing required by Construction Permit Nos. 0470002-079-AC and comply with the following conditions regarding the testing requirements:

Construction Permit No. 0470002-079-AC-

EUs 008 and 032:

1. The facility will conduct a test to determine the feasibility of using non contact deep well cooling water medium first on the dryer cooler scrubber circuit for EU032 and then EU008. The test will use re-circulating fresh water liquid stream to be cooled with non contact heat exchangers in lieu of the once through pond water currently used on the dryer cooler scrubbers in the MAP plants.

2. If the feasibility test is successful, the facility will began construction to change the scrubber liquid in the EU032 "Z"-Train Reaction Cooler Scrubber, "Z"-Train Dryer Cooler Scrubber, "Z"-Train Dust Cooler Scrubber, EU008 "Y"-Train Reaction Cooler Scrubber, "Y"-Train Fluorine Abatement Scrubber from once-through pond water to re-circulating fresh water for EUs 008 and 032; the addition of heat exchanger(s) and water tanks for the indirect contact cooling of the re-circulating water.

3. Upon completion of construction the emissions units shall be tested to demonstrate initial compliance with the emissions standards for Fluoride and PM. The initial tests shall be conducted within 60 days after achieving permitted capacity, but not later than 180 days after initial operation of the unit.

   [Rules 62-4.070(3) and 62-297.310(7)(a)1, F.A.C.]

4. Operating Rate During Testing. Unless otherwise stated in the applicable emission limiting standard rule, testing of emissions shall be conducted with the emissions unit operation at permitted capacity as defined below. Permitted capacity is defined as 90 to 100 percent of the maximum operation rate allowed by the permit. If it is impractical to test at permitted capacity, an emissions unit may be tested at less than the minimum permitted capacity; in this case, subsequent emissions unit operation is limited to 110 percent of the test load until a new test is conducted. Once the unit is so limited, operation at higher capacities is allowed for no more than 15 consecutive days for the purpose of additional compliance testing to regain the authority to operate at the permitted capacity.

   [Rule 62-297.310, F.A.C.]

5. The Permittee shall meet all of the notifications, testing and reporting requirements of Rule 62-297, F.A.C.

6. Compliance with this Compliance Plan CP-4. Upon completion of construction and demonstration of compliance, the facility is authorized to use re-circulating fresh water in the EU032 “Z”-Train Reaction Cooler Scrubber, “Z”-Train Dryer Cooler Scrubber, “Z”-Train Dust Cooler Scrubber, EU008 “Y”-Train Reaction Cooler Scrubber, “Y”-Train Fluorine Abatement Scrubber in the MAP plants.