Title V Air Operation Permit Revision
Permit No. 0470002-085-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 incorporate Air Construction Permit No. 0470002-078-AC and the Time Extension Air Construction Permit No. 0470002-084-AC, which authorized the replacement of the drying tower acid cooler for the existing "D" Sulfuric Acid Plant (EU 022). Also, there are a few minor administrative changes addressed: The hours of operation for this emissions unit is allowed to operate continuously shall not exceed (8760 hours/year (8784 in any Leap Year); and adding FW12. The facility may choose to submit quarterly monitoring reports to satisfy the requirements for Facility-Wide Reporting Requirements Condition RR4 **(**semi-annual monitoring reports), provided the facility indicates it on the quarterly report closest to the next due semi-annual monitoring report, and that all requirements of the semi-annual report are included in the quarterly monitoring report.

This DRAFT/PROPOSED permit will only reflect the affected Subsections I, Testing Common Conditions FF for EUs 022, Subsections BB (EU070) and CC (EU071). The FINAL permit will be issued in its entirety.

PROCESSING SCHEDULE AND RELATED DOCUMENTS

Application for a Title V Air Operation Permit Revision received June 12, 2013.
Notice of Intent to Issue Air Permit issued July 3, 2013.
Public Notice Published xx/xx/xxxx in the _____paper.

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

Below is a brief numeric description of the changes that were made as part of this revision, followed by the conditions(s) being changed. The changes in the condition are shown with a blue ~~strikethrough~~ for deletions and a blue double underline for additions.

Change No. 1- Adding a condition to the Facility-Wide Conditions:

FW12. The facility may choose to submit quarterly monitoring reports to satisfy the requirements for Facility-Wide Reporting Requirements Condition RR4 **(**semi-annual monitoring reports), provided the facility indicates it on the quarterly report closest to the next due semi-annual monitoring report, and that all requirements of the semi-annual report are included in the quarterly monitoring report.

Change No. 2-

Subsection I-EU022 "D" Sulfuric Acid Plant

No Specific Conditions were affected by Air Permit No. 0470002-078-AC or 0470002-084-AC.

Facility requested wording change for hours of operation:

I.2. Hours of Operation. The hours of operation for this emissions unit is allowed to operate continuously ~~shall not exceed~~ (8760 hours/year (8784 in any Leap Year).

Change No. 3-

Subsection FF- Common Conditions - F.A.C. Test Requirements

No Specific Conditions were affected by Air Permit No. 0470002-078-AC or 0470002-084-AC.

Change No. 4-

Subsection BB. Emissions Unit 070 "C" & "D" Superphosphoric Acid (SPA) Plants

Subsection BB this section addresses the following emissions unit(s).

E.U. ID No.	Brief Description
070	"C" & "D" Superphosphoric Acid (SPA) Plants (Vacuum Evaporation Process)

"C" & "D" Superphosphoric Acid (SPA) Plants and east & west phosphoric acid storage tanks emit fluoride, and are controlled by a scrubber. ~~Since the Synspar Plant has no air emissions, the limerock (LR) bin associated with this emission unit is included here for recordkeeping purposes. The particulate matter emissions from this bin are controlled by a bag collector.~~ CAM does not apply for fluoride for this emissions unit.

Change No. 5-

BB.2. Hours of Operation. The hours of operation for this emissions unit is allowed to operate continuously ~~shall not exceed~~ (8760 hours/year (8784 in any Leap Year).

[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C., and PSD-FL-297]

Change No. 6-

BB.4. ~~**Visible Emissions**. Visible Emissions shall not exceed 5% opacity.~~ **RESERVED**

~~[Rule 62-297.620(4), F.A.C.]~~

Change No. 7-

~~From vent (LR):~~

BB.12. ~~**Visible Emissions**. Visible Emissions test method shall be EPA Method 9 incorporated and adopted by reference in Chapter 62-297, F.A.C. and be performed annually once each federal fiscal year.~~
~~[Rule 62-297.401, F.A.C. and Rule 62-297.310(7)(a)4.a., F.A.C.]~~ **RESERVED**

Subsection CC. Emissions Unit 071 Acid Clarification

Subsection CC. This section addresses the following emissions unit(s).

E.U. ID No.	Brief Description
071	Acid Clarification Plant

Acid Clarification Plant utilizes a series of 5 rotary drum filters and a belt filter to filter 48% P_2O_5 phosphoric acid prior to evaporation to superphosphoric acid. Fluoride emissions are controlled by a packed, counter-current, wet scrubber. Since the Synspar Plant has no air emissions, the limerock (LR) bin associated with this emission unit is included here for recordkeeping purposes. The particulate matter emissions from this bin are controlled by a bag collector. CAM does not apply for fluoride for this emissions unit.

Change No. 8-

CC.2. Hours of Operation. The hours of operation for this emissions unit is allowed to operate continuously ~~shall not exceed~~ (8760 hours/year (8784 in any Leap Year).

Hours of Operation. The Specific Conditions for all EUs allowed to operate for 8760 hours/year (8784 in a leap year), will be changed to reflect this new wording in the FINAL version of this permit: The hours of operation for this emissions unit is allowed to operate continuously ~~shall not exceed~~ (8760 hours/year (8784 in any Leap Year).

Change No. 9-

CC.3.a. Fluoride emissions shall not exceed (0.03 lb FL/ton P_2O_5 input) [1]; 3.3 lbs/hr and 13.1 TPY.

[Rule 62-210.200(42), F.A.C.; (BACT from AC24-2722 issued 02-28-78), and [1]PSD-FL-297]

From vent (LR):

CC.3.b. Visible Emissions. Visible Emissions shall not exceed 5% opacity.

[Rule 62-297.620(4), F.A.C.]

Change No. 10-

From vent (LR):

CC.4.b. Visible Emissions. Visible Emissions test method shall be EPA Method 9 incorporated and adopted by reference in Chapter 62-297, F.A.C. and be performed annually once each federal fiscal year.
[Rule 62-297.401, F.A.C. and Rule 62-297.310(7)(a)4.a., F.A.C.]

CONCLUSION

This project revises Title V air operation permit No. 0470002-080-AV, which was issued on March 5, 2013. 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.