

STATEMENT OF BASIS

Title V Air Operation Permit Revision
Permit No. 0470002-087-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.0470002-055-AC to satisfy the requirements of Best Available Retrofit Technology (BART) determination pursuant to Rule 62-296.340, Florida Administrative Code F.A.C. into the Title V air operation permit and to make minor administrative changes.

This DRAFT/PROPOSED permit will only reflect the affected Subsections A, B, C, D, E, F, H, I, J, N, Q, R, S, U, V, and W. The FINAL permit will be issued in its entirety.

PROCESSING SCHEDULE AND RELATED DOCUMENTS

Application for a Title V Air Operation Permit Revision received December 30, 2013.

Notice of Intent to Issue Air Permit issued Month xx, 2014.

Public Notice Published xx/xx/xxxx in the _____ paper.

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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 summary description of the changes that were made as part of this revision₅.

Change No. 1- Administrative Changes:

Minor revisions to language in Appendix RR

Added the following facility wide condition:

FW11. Compliance Plan CP-5. EUs 001, 003, 038, 042, 044, 062, 064, and 065 - Project 0470002-055-AC: The compliance testing required under Permit No. 0470002-055-AC shall be completed in accordance with a ~~blue~~ strikethrough for deletions and a blue double underline for additions the milestones set forth in Appendix CP-5. This facility is subject to the attached Appendix CP-5.

Change No. 2- BART: Particulate-Only Emissions Units Controlled by Baghouses

Subsection A-EU001 #2 Phosphate Rock Grinder

Subsection C-EU004 X-Train (Dical Process)

Subsection Q-EU042 DFP Feed Prep

Subsection U-EU062 DFP Silos

Change No. 3- BART: Particulate-Only Emissions Units Controlled by Wet Scrubbers

Subsection E-EU010 #1 MAP/DAP – Storage Building

Subsection F-EU015 MAP/DAP Shipping and Screening Facility

Subsection R-EU044 ‘A’ and ‘B’ DFP Coolers

Subsection W-EU065 Swift Creek Mine Silos

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Change No. 4- BART: Emissions Units with Combustion

Subsection B-EU003 'A' DFP Plant

Subsection C-EU004 X-Train (Dical Process)

Subsection D-EU008 'Y' Train - #1 DAP Plant

Subsection H-EU021 'C' SAP

Subsection I-EU022 "~~D~~" 'D' SAP

Subsection J-EU032 'Z' Train - #2 DAP Plant

Subsection N-EU038 'B' DFP Plant

Subsection Q-EU042 DFP Feed Prep

Subsection V-EU064 Swift Creek Mine Rock Dryer

Change No. 5- BART: Molten Sulfur System for 'C' and 'D' Sulfuric Acid ~~Plant~~Plants

CONCLUSION

This project revises Title V air operation permit No. 0470002-085-AV, which was issued on September 25, 2013. This Title V air operation permit revision is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Chapters 62-4, 62-210 and 62-213, F.A.C.