PERMITTEE:

White Springs Agricultural Chemicals, Inc.
Post Office Box 300
White Springs, Florida 32096

File No.	0470002-039-AC
Permit No.	PSD-FL-297
SIC No.	2874
Project:	Agricultural Chemicals Complex
Expires:	October 1, 2003

Authorized Representative:

Vernon J. Lloyd
Vice President, Production

PROJECT AND LOCATION:

Permit for the construction /modification of the Agricultural Chemicals Complex to increase production rates of B and D Phosphoric Acid Plants, Acid Clarification, C & D Superphosphoric Acid Plant and the X Train (Dical) at the White Springs facility, east of State Road 137, north of White Springs, Hamilton County. UTM coordinates are Zone 17; 328.3 km E; 3368.8 km N.

STATEMENT OF BASIS:

This construction permit is issued under the provisions of Chapter 403 of the Florida Statutes (F.S.), and the Florida Administrative Code (F.A.C.) Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297. The above named permittee is authorized to modify the facility in accordance with the conditions of this permit and as described in the application, approved drawings, plans, and other documents on file with the Department of Environmental Protection (Department).

ATTACHED APPENDICES ARE MADE A PART OF THIS PERMIT:

Appendix BD	BACT Determination
Appendix GC	Construction Permit General Conditions

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Howard L. Rhodes, Director
Division of Air Resources
Management

SECTION I. FACILITY INFORMATION

FACILITY DESCRIPTION

The Agricultural Chemicals Complex at White Springs is an agricultural chemicals manufacturing facility. Phosphate rock is reacted with sulfuric acid (purchased or produced on-site) to make phosphoric acid. The phosphoric acid is further processed into various products, including superphosphoric acid, monoammonium phosphate (MAP), diammonium phosphate (DAP) and animal feed ingredients.

This permit allows conversion of the B Phosphoric Acid Plant to a hemi-hydrate process and an increase in the processing rate from 83 to 100 tons per hour P_2O_5 input; an increase in the processing rate of D Phosphoric Acid Plant from 95 to 110 tons per hour P_2O_5 input; an increase in the processing rate of Acid Clarification from 100 to 110 tons per hour P_2O_5 input; an increase in the processing rate of C & D Superphosphoric Acid Plant from 95 to 110 tons per hour P_2O_5 input; and an increase in the production rate of the X Train (Dical) from 45 to 55 tons per hour product.

REGULATORY CLASSIFICATION

The Agricultural Chemicals Complex is classified as a major source of air pollution or Title V source because it has the potential to emit at least 100 tons per year of particulate matter, nitrogen oxides and sulfur dioxide.

PERMIT SCHEDULE:

- 07-26-2000: Date of Receipt of Application
- 08-11-2000: Application deemed complete
- 09-21-2000: Intent issued

RELEVANT DOCUMENTS:

The documents listed form the basis of the permit. They are specifically related to this permitting action. These documents are on file with the Department.

- Application received 07-26-2000
- Department's incompleteness letter dated 08-09-2000
- Applicant’s letter dated 08-11-2000
- Fish and Wildlife Service letter dated 08-04-2000
- Technical Evaluation and Preliminary Determination dated 09-21-2000
- EPA letter dated October 30, 2000
- Best Available Control Technology determination (issued concurrently with permit)

SECTION II. EMISSION UNIT(S) ADMINISTRATIVE REQUIREMENTS

1. Regulating Agencies: All documents related to applications for permits to operate, reports, tests, minor modifications and notifications shall be submitted to the Department of Environmental Protection, Northeast District Office located at 7825 Baymeadows Way, Suite B-200, Jacksonville, Florida 32256-7590, and phone number (904) 448-4310. All applications for permits to construct or modify an emission unit(s) *subject to the Prevention of Significant Deterioration (PSD)* should be submitted to the Bureau of Air Regulation (BAR), Florida Department of Environmental Protection (FDEP) located at 2600 Blairstone Road, Tallahassee, Florida 32399-2400 and phone number (850)488-0114.
2. General Conditions: The owner and operator is subject to and shall operate under the attached General Permit Conditions G.1 through G.15 listed in *Appendix GC* of this permit. General Permit Conditions are binding and enforceable pursuant to Chapter 403 of the Florida Statutes. **[Rule 62-4.160, F.A.C**.]
3. Terminology: The terms used in this permit have specific meanings as defined in the corresponding chapters of the Florida Administrative Code.
4. Forms and Application Procedures: The permittee shall use the applicable forms listed in Rule 62-210.900, F.A.C. and follow the application procedures in Chapter 62-4, F.A.C. **[Rule 62-210.900, F.A.C.]**
5. Expiration: This air construction permit shall expire on **October 1, 2003. [Rule 62-210.300(1), F.A.C.].** The permittee may, for good cause, request that this construction permit be extended. Such a request shall be submitted to the Bureau of Air Regulation prior to 60 days before the expiration of the permit. However, the permittee shall promptly notify the permitting authority office of any delays in completion of the project which would affect the startup day by more than 90 days. **[Rule 62-4.090, F.A.C]**
6. Applicable Regulations: The facility is subject to the following regulations: Florida Administrative Code Chapters 62-4; 62-103; 62-204; 62-210; 62-212, 62-296, and 62-297. Issuance of this permit does not relieve the facility owner or operator from compliance with any applicable federal, state, or local permitting requirements or regulations. **[Rule 62-210.300, F.A.C.]**

COMMON CONDITIONS: 40 CFR 60 - NEW SOURCE PERFORMANCE STANDARDS

This permit addresses the following emission units.

EMISSION UNIT NO.	EMISSION UNIT DESCRIPTION
020	B Phosphoric Acid Plant
069	D Phosphoric Acid Plant
070	C & D Superphosphoric Acid Plant

These emission units shall comply with all applicable requirements of 40 CFR 60, General provisions, Subpart A, adopted by reference in Rule 62-204.800(7), F.A.C.

- 40 CFR 60.7, Notification and record keeping
- 40 CFR 60.8, Performance tests
- 40 CFR 60.11, Compliance with standards and maintenance requirements
- 40 CFR 60.12, Circumvention
- 40 CFR 60.13, Monitoring requirements
- 40 CFR 60.19, General notification and reporting requirements

The B and D Phosphoric Acid Plants are subject to the applicable requirements of the New Source Performance Standards (NSPS) adopted by reference in Rules 62-204.800, F.A.C., including:

- 40 CFR 60 Subpart T, Standards of Performance for Wet-Process Phosphoric Acid Plants

The C & D Superphosphoric Acid Plant is subject to the applicable requirements of the New Source Performance Standards (NSPS) adopted by reference in Rules 62-204.800, F.A.C., including:

- 40 CFR 60 Subpart U, Standards of Performance for Superphosphoric Acid Plants

SPECIFIC CONDITIONS :

The Specific Conditions listed in this subsection apply to the following emission units:

EMISSION UNIT NO.	EMISSION UNIT DESCRIPTION
004	X-Train (Dical)
020	B Phosphoric Acid Plant
069	D Phosphoric Acid Plant
070	C & D Superphosphoric Acid Plant
071	Acid Clarification

1. Unless otherwise indicated, the construction and operation of the subject Agricultural Chemicals production facilities shall be in accordance with the capacities and specifications stated in the application. **[Rule 62-210.300, F.A.C.]**

2. The subject emissions units shall comply with all applicable provisions of the 40 CFR 60 New Source Performance Standards for Wet-Process Phosphoric Acid Plants, Subpart T and Superphosphoric Acid Plants, Subpart U. **[Rule 62-204.800 F.A.C.]**
3. The maximum daily (24-hour) average and annual operation rates shall not exceed:
   a. X-Train (Dical) – 55 tons per hour (tph) product, 400,000 tons per year (tpy) product;
   b. B Phosphoric Acid Plant - 100 tph P_2O_5 input, 600,000 tpy P_2O_5 input;
   c. D Phosphoric Acid Plant - 110 tph P_2O_5 input, 800,000 tpy P_2O_5 input;
   d. C & D Superphosphoric Acid Plant - 110 tph P_2O_5 input, 876,000 tpy P_2O_5 input; and,
   e. Acid Clarification - 110 tph P_2O_5 input, 876,000 tpy P_2O_5 input.

   [Rule 62-210.200, F.A.C. (Definitions - Potential Emissions)]
4. The subject emission units are allowed to operate continuously (8760 hours/year).

   [Rule 62-210.200, F.A.C. (Definitions - Potential Emissions)]
5. Total fluoride emissions shall not exceed the following:
   a. X-Train (Dical) – 1.1 lb/hr and 4.0 tpy, based on 0.02 lb/ton product;
   b. B Phosphoric Acid Plant – 1.2 lb/hr and 3.6 tpy, based on 0.012 lb/ton P_2O_5 input;
   c. D Phosphoric Acid Plant - 1.32 lb/hr and 4.8 tpy, based on 0.012 lb/ton P_2O_5 input;
   d. C & D Superphos. Acid Plant – 0.96 lb/hr and 3.8 tpy, based on 0.0087 lb/ton P_2O_5 input;
   e. Acid Clarification – 3.3 lb/hr and 13.1 tpy, based on 0.03 lb/ton P_2O_5 input.

   [Rule 62-212.400, F.A.C.]
6. Particulate matter emissions shall not exceed the following:
   a. X Train – 9.9 lb/hr and 36.0 TPY;
   b. Dedust Baghouse – 3.2 lb/hr and 11.6 TPY;
   c. Shipping Baghouse – 2.3 lb/hr and 8.4 TPY;
   d. Limestone Bin Baghouse – 0.77 lb/hr and 2.8 TPY;
   e. Reclaim Bin Baghouse – 0.77 lb/hr and 2.8 TPY; and,
   f. Fugitive Dust Collection Baghouse – 5.1 lb/hr and 18.0 TPY.

   [Rule 62-210.200, F.A.C.]
7. Visible emissions from all scrubber stacks shall not exceed 20% opacity.

   [Rule 62-212.400, F.A.C.]
8. The X-Train natural gas firing rate shall not exceed 564 MMCF per year. The permittee shall maintain records of the fuel use. **[Rule 62-210.200, F.A.C.]**

9. Visible emissions from all baghouse stacks shall not exceed 20% opacity. **[Rule 62-296.320, F.A.C.]**

10. The permittee shall install, calibrate, operate and maintain monitoring devices that continuously measure and record the total pressure drop across each scrubbing system. Accuracy of the monitoring devices shall be ± 5% over the operating range. **[Rules 62-297.310, 62-204.800, F.A.C.; 40 CFR 60.203; 40 CFR 60. 213]**

11. Before this construction permit expires, the subject emission units shall be tested for compliance with the above emission limits. For the duration of all tests the emission unit shall be operating at permitted capacity. Permitted capacity is defined as 90-100 percent of the maximum operating rate allowed by the permit. If it is impracticable to test at permitted capacity, then the emission unit may be tested at less than permitted capacity (i.e., 90% of the maximum operating rate allowed by the permit); in this case, subsequent emission unit operation is limited to 110 percent of the test load until a new test is conducted. Once the emission unit is so limited, then operation at higher capacities is allowed for no more than 15 consecutive days for the purposes of additional compliance testing to regain the permitted capacity in the permit. **[Rule 62-297.310, F.A.C.]**

12. The Department's Northeast District office in Jacksonville shall be notified in writing at least 15 days prior to the compliance tests. Written reports of the test results shall be submitted to that office within 45 days of test completion. **[Rule 62-297.310, F.A.C.]**

13. The compliance test procedures shall be in accordance with EPA Reference Methods 1, 2, 3, 4, 5, 9 and 13A or 13B, as appropriate, as published in 40 CFR 60, Appendix A. 60, Appendix A. Testing using EPA Reference Method 5 shall be waived for all baghouses when a visible emission limit of 5 percent opacity is met. **[Rules 62-204.800 and 62-297.310(7)(c), F.A.C.]**

14. All measurements, records, and other data required to be maintained by this facility shall be retained for at least five (5) years following the data on which such measurements, records, or data are recorded. These data shall be made available to the Department upon request. **[Rule 62-4.070(3), F.A.C.]**

15. The permittee shall install, calibrate, maintain, and operate monitoring devices which can be used to determine the mass flow of phosphorus-bearing feed material to the phosphoric and superphosphoric acid processes. The monitoring devices shall have an accuracy of ±5 percent over the operating range. The permittee shall maintain a daily record of equivalent P_2O_5 feed by first determining the total mass rate in metric ton/hour of phosphorus bearing feed using the flow monitoring device meeting the requirements of 40 CFR 60.203(a), or 40 CFR 60.213(a), and then by proceeding according to 40 CFR 60.204(b)(3) or 40 CFR 60.214(b)(3), as applicable. **[Rule 62-204.800, F.A.C.; 40 CFR 60.203(b); 40 CFR 60.213(b)]**

16. No person shall cause, suffer, allow, or permit the discharge of air pollutants which cause or contribute to an objectionable odor. **[Rule 62-296.320, F.A.C.]**

17. No person shall circumvent any air pollution control device, or allow the emission of air pollutants without the applicable air pollution control device operating properly. **[Rule 62-210.650, F.A.C.]**

18. The subject emissions units shall be subject to the following:

- Excess emissions resulting from startup, shutdown or malfunction of any source shall be permitted providing (1) best operational practices to minimize emissions are adhered to and (2) the duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration. **[Rule 62-210.700, F.A.C.]**
- Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during startup, shutdown, or malfunction shall be prohibited. **[Rule 62-210.700, F.A.C.]**
- Considering operational variations in types of industrial equipment operations affected by this rule, the Department may adjust maximum and minimum factors to provide reasonable and practical regulatory controls consistent with the public interest. **[Rule 62-210.700, F.A.C.]**
- In case of excess emissions resulting from malfunctions, each source shall notify the Department or the appropriate Local Program in accordance with Rule 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the Department. **[Rule 62-210.700, F.A.C.]**

19. The permittee shall submit an Annual Operating Report using DEP Form 62-210.900(4) to the Department's Northeast District office by March 1 of the following year for the previous year's operation. **[Rule 62-210.370, F.A.C.]**

20. The permittee shall permanently shut down A and C Phosphoric Acid Plants upon commencing commercial operation of the B and D Phosphoric Acid Plants. **[Rule 62-210.200, F.A.C. (Definitions - Potential Emissions)]**

21. By February 1, 2001 the permittee shall submit predictions of fluoride concentrations caused by this project for comparison to the fluoride de minimus ambient impact level. Modeling shall be performed using Department and EPA modeling techniques. **[Rule 62-212.400(5)(f), F.A.C.]**