



Florida Department of Environmental Protection

Bob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

July 27, 2009

Mr. W. K. Thornton, General Manager
White Springs Agricultural Chemicals, Inc.
P.O. Box 300
White Springs, Florida 32096

Re: Revised Draft Permit No. 0470002-055-AC
Suwannee River/Swift Creek Complex
BART Project

Dear Mr. Thornton:

On February 1, 2007, you submitted an application to satisfy the requirements of Best Available Retrofit Technology (BART) in Rule 62-296.340, Florida Administrative Code for the eligible units at the existing Suwannee River/Swift Creek Complex.

On November 13, 2007, the Department issued the Written Notice of Intent to Issue Air Permit and the draft permit package. The permittee did not publish the Public Notice but submitted comments. The comments were substantial such that the Department rescinds the originally issued draft permit package and issues the revised draft permit package, which includes the following revised documents: Revised Written Notice of Intent to Issue Air Permit, Revised Public Notice of Intent to Issue Air Permit, Revised Technical Evaluation and Preliminary Determination and Revised Draft Permit and Appendices.

The Department issued the Revised Written Notice of Intent to Issue Air Permit, Revised Public Notice of Intent to Issue Air Permit, Revised Technical Evaluation and Preliminary Determination and the Revised Draft Permit and Appendices on July 23, 2009. Subsequently, some changes were made and enclosed are the following documents which should replace the ones issued previously:

- Revised Written Notice of Intent to Issue Air Permit;
- Revised Public Notice of Intent to Issue Air Permit;
- Revised Technical Evaluation and Preliminary Determination; and
- Revised Draft Permit and Appendices.

The Revised Public Notice of Intent to Issue Air Permit is the actual notice that you must have published in the legal advertisement section of a newspaper of general circulation in the area affected by this project. Comments will be accepted for these revised documents during the 30-day public notice comment period. If you have any questions, please contact the Project Engineer, Syed Arif, at 850/921-9528.

Sincerely,

Trina Vielhauer, Chief
Bureau of Air Regulation

Enclosures

REVISED WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

*In the Matter of an
Application for Air Permit by:*

White Springs Agricultural Chemicals, Inc.
P.O. Box 300
White Springs, FL 32096

Revised Draft Permit No. 0470002-055-AC
Facility ID No. 0470002
Suwannee River/Swift Creek Complex
BART Project
Hamilton County, Florida

Authorized Representative:
W. K. Thornton, General Manager

Facility Location: The applicant, White Springs Agricultural Chemicals, Inc., operates the existing Suwannee River/Swift Creek Complex, which is located in Hamilton County at 15843 SE 78th Street, White Springs, Florida.

Project: On February 1, 2007, White Springs Agricultural Chemicals, Inc. submitted an application to satisfy the requirements of Best Available Retrofit Technology (BART) in Rule 62-296.340, Florida Administrative Code (F.A.C.) for the eligible units at the facility identified above. Details of the project are provided in the application and the enclosed Revised Technical Evaluation and Preliminary Determination.

Permitting Authority: Applications for air construction permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters F.A.C. 62-4, 62-210 and 62-212. The proposed project is not exempt from air permitting requirements and an air permit is required to perform the proposed work. The Bureau of Air Regulation is the Permitting Authority responsible for making a permit determination for this project. The Permitting Authority's physical address is: 111 South Magnolia Drive, Suite #4, Tallahassee, Florida. The Permitting Authority's mailing address is: 2600 Blair Stone Road, MS #5505, Tallahassee, Florida 32399-2400. The Permitting Authority's telephone number is 850/488-0114.

Project File: A complete project file is available for public inspection during the normal business hours of 8:00 a.m. to 5:00 p.m., Monday through Friday (except legal holidays), at address indicated above for the Permitting Authority. The complete project file includes the Revised Draft Permit, the Revised Technical Evaluation and Preliminary Determination, the application, and the information submitted by the applicant, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Permitting Authority's project review engineer for additional information at the address or phone number listed above. In addition, electronic copies of these documents are available on the following web site: <http://www.dep.state.fl.us/air/eproducts/apds/default.asp>.

Notice of Intent to Issue Permit: The Permitting Authority gives notice of its intent to issue an air permit to the applicant for the project described above. The applicant has provided reasonable assurance that operation of the proposed equipment will not adversely impact air quality and that the project will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297, F.A.C. The Permitting Authority will issue a Final Permit in accordance with the conditions of the proposed Revised Draft Permit unless a timely petition for an administrative hearing is filed under Sections 120.569 and 120.57, F.S. or unless public comment received in accordance with this notice results in a different decision or a significant change of terms or conditions.

Public Notice: Pursuant to Section 403.815, F.S. and Rules 62-110.106 and 62-210.350, F.A.C., you (the applicant) are required to publish at your own expense the enclosed Revised Public Notice of Intent to Issue Air Permit (Public Notice). The Revised Public Notice shall be published one time only as soon as possible in the legal advertisement section of a newspaper of general circulation in the area affected by this project. The newspaper used must meet the requirements of Sections 50.011 and 50.031, F.S. in the county where the activity is to take place. If you are uncertain that a newspaper meets these requirements, please contact the Permitting Authority at above address or phone number. Pursuant to Rule 62-110.106(5) and (9), F.A.C., the applicant shall provide proof of publication to the Permitting Authority at the above address within 7 days of publication. Failure to publish the notice and provide proof of publication may result in the denial of the permit pursuant to Rule 62-110.106(11), F.A.C.

Comments: The Permitting Authority will accept written comments concerning the proposed Revised Draft Permit for a period of 30 days from the date of publication of the Revised Public Notice. Written comments must be postmarked

REVISED WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Revised Notice of Intent to Issue Air Permit package (including the Revised Written Notice of Intent to Issue Air Permit, Revised Public Notice of Intent to Issue Air Permit, the Revised Technical Evaluation and Preliminary Determination, and the Revised Draft Permit) was sent by electronic mail (or a link to these documents made available electronically on a publicly accessible server) with received receipt requested before the close of business on _____ to the persons listed below.

W.K. Thornton, White Springs Agricultural Chemicals, Inc. (wkthornton@pcsphosphate.com)

B. Ellis, White Springs Agricultural Chemicals, Inc. (wjellis@pcsphosphate.com)

M. Lee, PhD., P.E., Koogler & Associates, Inc. (mlee@kooglerassociates.com)

R. Ryan, Holland & Knight LLP (rory.ryan@hkllaw.com)

R. Moore, DEP-OGC (ronni.moore@dep.state.fl.us)

C. Kirts, DEP-NED (christopher.kirts@dep.state.fl.us)

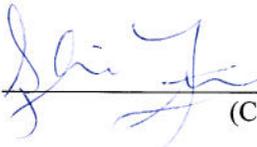
Kathleen Forney, EPA Region 4 (forney.kathleen@epa.gov)

Catherine Collins, Fish and Wildlife Service (catherine_collins@fws.gov)

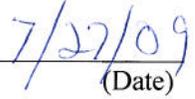
Vickie Gibson, DEP-BAR (victoria.gibson@dep.state.fl.us) (for read file)

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated agency clerk, receipt of which is hereby acknowledged.



(Clerk)



(Date)

REVISED PUBLIC NOTICE OF INTENT TO ISSUE AIR PERMIT

Florida Department of Environmental Protection
Division of Air Resource Management, Bureau of Air Regulation
Revised Draft Air Construction Permit No. 0470002-055-AC
White Springs Agricultural Chemicals, Inc., Suwannee River/Swift Creek Chemical Complex
Hamilton County, Florida

Applicant: The applicant for this project is White Springs Agricultural Chemicals, Inc. The applicant's authorized representative and mailing address is: W. K. Thornton, General Manager, White Springs Agricultural Chemicals, Inc., P.O. Box 300, White Springs, Florida 32096.

Facility and Location: The applicant, White Springs Agricultural Chemicals, Inc., operates the existing Suwannee River/Swift Creek Complex, which is located in Hamilton County at 15843 SE 78th Street in White Springs, Florida. The applicant operates an existing phosphate complex, which processes phosphate rock to produce several products at the Suwannee River/Swift Creek Complex (two plants).

Project: On February 1, 2007, White Springs Agricultural Chemicals, Inc. submitted an application to satisfy the requirements of Best Available Retrofit Technology (BART) in Rule 62-296.340, Florida Administrative Code (F.A.C.) for the existing Suwannee River/Swift Creek Complex. The purpose of the BART regulation is to improve visibility in the Class I areas, which include six national parks and federal wildlife areas in and around Florida. The BART provisions apply to Emissions Units (EU) built between 1962 and 1977 at one of the 26 specified industrial categories that have the potential to emit more than 250 tons a year of visibility-impairing pollutants, which are defined as nitrogen oxides (NO_x), particulate matter (PM₁₀/PM_{2.5}), and sulfur dioxide (SO₂).

The BART regulation requires a control technology review to establish a BART standard, which is an emission limitation based on the degree of reduction achievable through the application of the best system of continuous emission reduction for each pollutant which is emitted by a BART-eligible source. The emission limitation must be established, on a case-by case basis, taking into consideration the technology available, the costs of compliance, the energy and non-air quality environmental impacts of compliance, any pollution control equipment in use or in existence at the source, the remaining useful life of the source, and the degree of improvement in visibility which may reasonably be anticipated to result from the use of such technology.

The BART-eligible units at this facility include: EU001 - #2 Phosphate Rock Grinder, EU003 - 'A' Defluorinated Phosphate (DFP) Plant, EU004 - 'X' Train (Dical Process), EU008 - 'Y' Train - #1 Monoammonium Phosphate (MAP)/Diammonium Phosphate (DAP) Plant, EU010 - #1 MAP/DAP Storage Building, EU015 - MAP/DAP Shipping and Screening Facility, EU021 - 'C' Sulfuric Acid Plant (SAP), EU022 - 'D' SAP, EU032 - 'Z' Train (#2 MAP/DAP), EU038 - 'B' DFP Plant, EU042 - DFP Feed Prep, EU044 - 'A' and 'B' DFP Coolers, EU054 - Molten Sulfur System, EU062 - DFP Silos, EU064 - Swift Creek Mine Rock Dryer, EU065 - Swift Creek Mine Silos. The Department of Environmental Protection (Department) reviewed the application and makes a preliminary determination regarding the BART controls and emissions standards in the revised draft air construction permit. The Department has determined that the existing controls and techniques constitute BART for the eligible BART units at this facility. The revised draft air construction permit establishes the new BART emissions standards based on installed controls and tested emissions rates.

On November 13, 2007, the Department issued the Written Notice of Intent to Issue Air Permit and the draft permit package. The permittee did not publish the Public Notice but submitted comments. The comments were substantial such that the Department revised certain conditions of the draft permit package. The Department is now rescinding the original draft permit package and issuing a revised draft permit package for which comments are being accepted.

Permitting Authority: Applications for air construction permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and F.A.C. Chapters 62-4, 62-210 and 62-212. The proposed project is not exempt from air permitting requirements and an air permit is required to perform the proposed work. The Bureau of Air Regulation is the Permitting Authority responsible for making a permit determination for this project. The Permitting Authority's physical address is: 111 South Magnolia Drive, Suite #4, Tallahassee, Florida. The Permitting Authority's mailing address is: 2600 Blair Stone Road, MS #5505, Tallahassee, Florida 32399-2400. The Permitting Authority's telephone number is 850/488-0114.

(Public Notice to be Published in the Newspaper)

REVISED PUBLIC NOTICE OF INTENT TO ISSUE AIR PERMIT

Permitting Authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation: Mediation is not available for this proceeding.

(Public Notice to be Published in the Newspaper)