Florida Department of Environmental Protection

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Secretary

Sent by Electronic Mail – Received Receipt Requested

PERMITTEE

White Springs Agricultural Chemicals, Inc.
Suwannee River/Swift Creek Complex
PO Box 300
White Springs, Florida 32096

Authorized Representative:
Mr. W. K. Thornton, General Manager

Air Permit No. 0470002-069-AC
Permit Expires: **DRAFT**

Plant Name: Suwannee River/Swift Creek Complex
Minor Source Air Construction Permit
Project Name: Filter Replacement

This is the final air construction permit, which authorizes the replacement of "J" Rotary Drum filter with an equivalent belt filter at the Acid Clarification Plant (EU071). The proposed work will be conducted at the Suwannee River/Swift Creek Complex, which is a Phosphate Rock Plant (Standard Industrial Classification No. 2874). The facility is located in Hamilton County at 15843 SE 78th Street, White Springs in Hamilton, Florida. The UTM coordinates are Zone 17, 328.3km East, and 3368.8 km North. As noted in the Final Determination provided with this final permit, only minor changes and clarifications were made to the draft permit.
This final permit is organized by the following sections.

Section 1. General Information

Section 2. Administrative Requirements

Section 3. Emissions Unit Specific Conditions

Section 4. Appendices

Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of Section 4 of this permit.

This air pollution construction permit is issued under the provisions of: Chapter 403 of the Florida Statutes (F.S.) and Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297 of the Florida Administrative Code (F.A.C.). The permittee is authorized to conduct the proposed work in accordance with the conditions of this permit. This project is subject to the general preconstruction review requirements in Rule 62-212.300, F.A.C. and is not subject to the preconstruction review requirements for major stationary sources in Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

Upon issuance of this final permit, any party to this order has the right to seek judicial review of it under Section 120.68 of the Florida Statutes by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel (Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000) and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The notice must be filed within 30 days after this order is filed with the clerk of the Department.

Executed in Jacksonville, Florida

(DRAFT)

_____ _____

Christopher L. Kirts, P.E. Date
Air Program Administrator

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Final Air Permit package (including the Final Determination and Final 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 November 18, 2009 to the persons listed below.

Mr. W. K. Thornton, White Springs Agricultural Chemicals, Inc. (wkthornton@pcsphosphate.com)
Mr. Bill Ellis, White Springs Agricultural Chemicals, Inc. (wjellis@pcsphosphate.com)
Pradeep Raval, Koogler and Associates, Inc. (praval@kooglerassociates.com)
John Koogler, Ph.D., P.E., Koogler and Associates, Inc. (jkoogler@kooglerassociates.com)

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.

Monique Jordan

11/18/2009

_____ _____

(Clerk) (Date)

FACILITY AND PROJECT DESCRIPTION

Existing Facility

Currently the Acid Clarification Plant utilizes a series of 6 rotary drum filters 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.

Proposed Project

Project 069 authorizes the replacement of "J" Rotary Drum filter with an equivalent belt filter at the Acid Clarification Plant (EU071).

Facility ID No. 0470002	
ID No.	**Emission Unit Description**
071	Acid clarification Plant

FACILITY REGULATORY CLASSIFICATION

- The facility is a major source of hazardous air pollutants (HAP).
- The facility has no units subject to the acid rain provisions of the Clean Air Act (CAA).
- The facility is a Title V major source of air pollution in accordance with Chapter 213, F.A.C.
- The facility is not a major stationary source in accordance with Rule 62-212.400(PSD), F.A.C.

SECTION 2. ADMINISTRATIVE REQUIREMENTS (DRAFT)

1. Permitting Authority: The permitting authority for this project is the Northeast District Office, Florida Department of Environmental Protection (Department). The mailing address is 7825 Baymeadows Way, Suite B-200, Jacksonville, Florida 32256-7590. All documents related to applications for permits to operate an emissions unit shall be submitted to this District office.

2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the District Office. The mailing address and phone number of the District Office is: 7825 Baymeadows Way, Suite B-200, Jacksonville, Florida 32256-7590.

3. Appendices: The following Appendices are attached as part of this permit:

   a. Appendix A. Citation Formats and Glossary of Common Terms;

   b. Appendix B. General Conditions;

   c. Appendix C. Common Conditions; and

   d. Appendix D. Common Testing Requirements.

4. Applicable Regulations, Forms and Application Procedures: Unless otherwise specified in this permit, the construction and operation of the subject emissions units shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of: Chapter 403, F.S.; and Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296 and 62-297, F.A.C. Issuance of this permit does not relieve the permittee from compliance with any applicable federal, state, or local permitting or regulations.

5. New or Additional Conditions: For good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time. [Rule 62-4.080, F.A.C.]

6. Modifications: The permittee shall notify the Compliance Authority upon commencement of construction. No new emissions unit shall be constructed and no existing emissions unit shall be modified without obtaining an air construction permit from the Department. Such permit shall be obtained prior to beginning construction or modification. [Rules 62-210.300(1) and 62-212.300(1)(a), F.A.C.]

7. Source Obligation:

   (a) At such time that a particular source or modification becomes a major stationary source or major modification (as these terms were defined at the time the source obtained the enforceable limitation) solely by virtue of a relaxation in any enforceable limitation which was established after August 7, 1980, on the capacity of the source or modification otherwise to emit a pollutant, such as a restriction on hours of operation, then the requirements of subsections 62-212.400(4) through (12), F.A.C., shall apply to the source or modification as though construction had not yet commenced on the source or modification.

   (b) At such time that a particular source or modification becomes a major stationary source or major modification (as these terms were defined at the time the source obtained the enforceable limitation) solely by exceeding its projected actual emissions, then the requirements of subsections 62-212.400(4) through (12), F.A.C., shall apply to the source or modification as though construction had not yet commenced on the source or modification.

   [Rule 62-212.400(12), F.A.C.]

8. Application for Title V Permit: This permit authorizes construction of the permitted emissions units and initial operation to determine compliance with Department rules. A Title V air operation permit is required for regular operation of the permitted emissions unit. The permittee shall apply for a Title V air operation permit at least 90 days prior to expiration of this permit, but no later than 180 days after commencing operation. To apply for a Title V operation permit, the applicant shall submit the appropriate application form, compliance test results, and such additional information as the Department may by law require. The application shall be submitted to the appropriate Permitting Authority with copies to the Compliance Authority. [Rules 62-4.030, 62-4.050, 62-4.220 and Chapter 62-213, F.A.C.]

9. Actual Emissions Reporting: This permit is based on an analysis that compared baseline actual emissions with projected actual emissions and avoided the requirements of subsection 62-212.400(4) through (12), F.A.C. for several pollutants. Therefore, pursuant to Rule 62-212.300(1)(e), F.A.C., the permittee is subject to the following monitoring, reporting and recordkeeping provisions.

   a. The permittee shall monitor the emissions of any PSD pollutant that the Department identifies could increase as a result of the construction or modification and that is emitted by any emissions unit that could be affected; and, using the most reliable information available, calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of 5 years following resumption of regular operations after the change. Emissions shall be computed in accordance with the provisions in Rule 62-210.370, F.A.C., which are provided in Appendix C of this permit.

   b. The permittee shall report to the Department within 60 days after the end of each calendar year during the 5-year period setting out the unit's annual emissions during the calendar year that preceded submission of the report. The report shall contain the following:

      1) The name, address and telephone number of the owner or operator of the major stationary source;

      2) The annual emissions as calculated pursuant to the provisions of 62-210.370, F.A.C., which are provided in Appendix C of this permit;

      3) If the emissions differ from the preconstruction projection, an explanation as to why there is a difference; and

      4) Any other information that the owner or operator wishes to include in the report.

   c. The information required to be documented and maintained pursuant to subparagraphs 62-212.300(1)(e)1 and 2, F.A.C., shall be submitted to the Department, which shall make it available for review to the general public.

   For this project, the Department requires the annual reporting of actual Fluoride emissions for the following units: Emissions Unit 071.

   [Application 0470002-069-AC; and Rules 62-212.300(1)(e) and 62-210.370, F.A.C.]

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS (DRAFT)

EU 071 Acid clarification Plant

This section of the permit addresses the following emissions unit.

ID No.	Emission Unit Description
071	Acid clarification Plant

This emissions unit is regulated under Best Available Control Technology (BACT) Determination from AC24-2722, dated February 28, 1978.

1. **Relation to Other Permits.** The conditions of this permit will supplement and comply with conditions of all existing, valid, Department permits.

[Rules 62-4.210, 62-4.030, and 62-210.300(1)(b), F.A.C.]

EQUIPMENT

2. **Equipment Name**. Belt Filter: The permittee is authorized to install a 352 sq. ft. filter area belt filter to replace the existing 450 sq. ft filter area "J" Rotary Drum Filter. Although the new filter will have less filter area, it **shall not** perform in a manner that exceeds any permitted limits or permit condition(s).

[Air Application No. 0470002-069-AC]

PERFORMANCE RESTRICTIONS

3. **Permitted Capacity.** This permit does not change any or establish any new capacities for the Acid clarification Plant. The rate shall not exceed Maximum Daily 1-Hour Average Rate = 110 tons 100% P_2O_5 input. The operating rate shall not exceed 876,000 tons during any 12 consecutive months of 100% P_2O_5 input.

[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.; permit 0470002-034-AC, and PSD-FL-297]

4. **Restricted Operation.** The hours of operation of are not limited (8760 hours per year).

[Rules 62-4.070(3) and 62-210.200(PTE), F.A.C.]

EMISSIONS STANDARDS

5. **Fluoride Emissions Standards.** This permit does not change any or establish any new capacities for the Acid Clarification Plant. 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]

TESTING REQUIREMENTS

6. **Initial Compliance Tests.** The emissions unit shall be tested to demonstrate initial compliance with the emissions standards for **Fluoride**. 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.]

7. Fluoride emissions stack test method shall be EPA Method 13A or 13B incorporated and adopted by reference in Chapter 62-297, F.A.C. and be performed annually with a frequency base date of 06/17.

[Rule 62-297.401, F.A.C.]

NOTIFICATION, RECORDKEEPING, REPORTING REQUIREMENTS

8. This emissions unit is subject to the recordkeeping requirements of **Section 2- Administrative Requirements Condition No. 9** of this permit.

9. **Belt Filter Information Submittal.** Within 15 days of installation of the Belt Filter and prior to its startup, the permittee shall submit the specific belt filter vendor information to the Department in a written format.

[Rule 62-4.070(3), F.A.C.]

10. **Commencement of Construction/Startup Notification.** The Permittee shall provide a written notification to the Department of the following:

1. The date construction is commenced. The notification shall be postmarked no later than 30 days after such date.

2. The actual date of initial startup of the emissions unit. The notification shall be postmarked within 15 days after such date.

[Rule 62-4.070(3), F.A.C.]

11. **Application for Title V Permit**. This emissions unit is subject to the requirements of **Section 2- Administrative Requirements Condition No. 8** of this permit.