

**Appendix Best Available Control Technology (BACT) Determination
Rental, Emergency Use Steam Generating Unit**

**White Springs Agricultural Chemicals, Inc.
Hamilton County**

The applicant has submitted a construction permit application for construction permit to for the use of a rental steam generating boiler with a design capacity of up to 155 MMBtu per hour maximum. The boiler will be fired by either Natural Gas (NG) or Low sulfur No 2 fuel oil/diesel with a maximum sulfur content of 0.05 percent by weight. The rental unit will be brought onsite and operated during periods of emergency, unplanned loss in steam production from any of the existing steam generating boilers, EU Nos. 039, 040, and 068 (C Auxiliary Boiler, D Auxiliary Boiler, and E Auxiliary Boiler respectively). The emergency unit will be located onsite and used for no more than 180 consecutive days in a given year.

This BACT determination is required for the source as set forth in Rule 62-296.406, F.A.C., - Fossil Fuel Steam Generators with less than 250 Million Btu per hour Heat Input, New and Existing Sources.

BACT Determination Requested by Applicant:

The amount of particulate matter and sulfur dioxide emissions from the rental boiler will be controlled by firing of natural gas or low sulfur No. 2 fuel oil (with a maximum sulfur content of no more than 0.05 %, by weight).

Date of Receipt of BACT Application: December 11, 2012

BACT Determination by (DEP Northeast District):

The amount of particulate matter and sulfur dioxide emissions from the rental boiler shall be limited by the firing of natural gas and low sulfur content No. 2 fuel oil. The sulfur content of the No.2 fuel oil shall not exceed 0.05 %, by weight.

BACT Determination Rationale:

Sulfur in fuel is a primary air pollution concern since most of the fuel sulfur becomes sulfur dioxide. Also, particulate matter emissions from fuel burning are related to the sulfur content. The BACT for the rental boiler is:

When firing No.2 fuel oil, the particulate matter and sulfur dioxide emissions are to be controlled by limiting the sulfur content of the fuel to no more than 0.05 %, by weight.

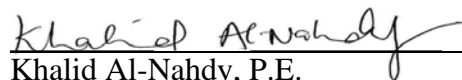
Natural gas is also an authorized fuel.

This determination is consistent with other BACT determinations for small steam generating units (i.e. less than 250 MMBTU per hour heat input) and is more stringent than both 40 CFR 60 Subpart Db - Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units and 40 CFR 60, Subpart Dc - Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units for very low sulfur oil (i.e. less than 0.5% sulfur content by weight).

Details of the Analysis May be Obtained by Contacting:

Rita Felton-Smith
Florida Department of Environmental Protection
8800 Baymeadows Way West, Suite 100
Jacksonville, Florida 32256

Approved by:

 February 1, 2013
Khalid Al-Nahdy, P.E.
District Air Program Administrator