



**FLORIDA DEPARTMENT OF  
ENVIRONMENTAL PROTECTION**

NORTHEAST DISTRICT  
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JACKSONVILLE, FLORIDA 32256

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GOVERNOR

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LT. GOVERNOR

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SECRETARY

*Sent by Electronic Mail – Received Receipt Requested*

**PERMITTEE**

White Springs Agricultural Chemicals, Inc.-dba  
PCS Phosphate, White Springs  
P. O. Box 300  
White Springs, Florida 32096

Authorized Representative:  
William L. Donohue, General Manager

Air Permit No. 0470002-088-AC  
Permit Expires: February 21, 2015

Suwannee River and Swift Creek  
Complex  
Air Construction Permit  
Relocate EU061 Green SPA

This is the final air construction permit, which authorizes the relocation of Emissions Unit No. 061, Green Superphosphoric Acid Plant (SPA), from Suwannee River Chemical site to the Swift Creek Chemical site within the same existing Title V facility. The proposed work will be conducted at the Suwannee River/Swift Creek Complex, which is a phosphate mining and chemical production facility (Standard Industrial Classification No. 2874). The facility is located in Hamilton County at 15843 SE 78<sup>th</sup> Street, White Springs, Florida. The UTM coordinates are Zone 17, 328.3 km East and 3368.8 km North; and, Latitude: 30° 26' 27" North and Longitude: 82° 47' 16" West.

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.

## AIR CONSTRUCTION PERMIT

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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



Richard S. Rachal III, P.G.

Program Administrator

Waste and Air Resource Management

### 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 February 21, 2014 to the persons listed below.

William L. Donohue, General Manager- PCS Phosphate, White Springs ([bdonohue@pcsphosphate.com](mailto:bdonohue@pcsphosphate.com))

Pradeep Raval, Koogler and Associates ([praval@kooglerassociates.com](mailto:praval@kooglerassociates.com))

John Koogler, Ph.D., P.E. -Koogler and Associates ([jkoogler@kooglerassociates.com](mailto:jkoogler@kooglerassociates.com))

Bill Ellis, White Springs Agricultural Chemicals, Inc. ([wjellis@pcsphosphate.com](mailto:wjellis@pcsphosphate.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.

  
(Clerk)

February 21, 2014  
(Date)

## SECTION 1. GENERAL INFORMATION

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### FACILITY AND PROJECT DESCRIPTION

#### Existing Facility

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.

#### Proposed Project

This project is for an air construction permit, which authorizes the relocation of Emissions Unit No. 061, Green Superphosphoric Acid Plant (SPA), from Suwannee River Chemical site to the Swift Creek Chemical site within the same existing Title V facility. This project will modify the following emissions units.

**EU061 Green Superphosphoric Acid Plant (SPA) new coordinates are Latitude: 30° 26' 57" North and Longitude: 82° 51' 55" West.**

Facility ID No. 0470002	
ID No.	Emission Unit Description
061	Green Superphosphoric Acid Plant (SPA)

### 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** a major stationary source in accordance with Rule 62-212.400(PSD), F.A.C.

## SECTION 2. ADMINISTRATIVE REQUIREMENTS

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1. Permitting Authority: The permitting authority for this project is the Northeast District Office, Waste and Air Resource Management, Florida Department of Environmental Protection (Department). The Northeast District Office's mailing address is 8800 Baymeadows Way West, Suite 100, Jacksonville, Florida 32256, (904) 256-1700. All documents related to applications for permits to operate an emissions unit shall be submitted to the Northeast District Office.
2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Northeast District Office, Compliance Assurance. The mailing address and phone number of the Northeast District Office is: 8800 Baymeadows Way West, Suite 100, Jacksonville, Florida 32256, (904) 256-1700.
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.]

## SECTION 2. ADMINISTRATIVE REQUIREMENTS

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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.]

### SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

#### A. EU061, Green Superphosphoric Acid Plant (SPA)

This section of the permit addresses the following emissions unit.

ID No.	Emission Unit Description
061	Green Superphosphoric Acid Plant (SPA)

Green Superphosphoric Acid (SPA) Plant emits fluoride emissions which are controlled by a cross-flow packed wet scrubber. This process changes the color of hot SPA from black to green using an oxidant. CAM does not apply for fluoride for this emissions unit.

{Permitting note: This emissions unit is regulated under Rule 62-296.320, F.A.C., General Pollutant Emission Limiting Standards.}

#### PROPOSED CONSTRUCTION WORK

**1.a.** The permittee is authorized to relocate Emissions Unit No. 061, Green Superphosphoric Acid Plant (SPA), from Suwannee River Chemical site to the Swift Creek Chemical site.

**1.b. Green Superphosphoric Acid Plant (SPA).** The permittee is authorized to install at the facility as a part of this project:

- New foundations, support steel, piping,
- Relocate the existing scrubber,
- New condensate receiver and transfer pump, relocate the pressure filter,
- Relocate four existing tanks (Ammonium Nitrate Tank (State No. 51000), Primary Oxidation Tank, Secondary Oxidation Tank and Reduction Tank), add new pumps for the sludge tank,
- Adding 2 new tanks (Lomag Feed Tank and Filter Feed Tank), new agitator drive for existing agitator,
- New pre-coat mix tank with an agitator and pump, new sluice tank and pumps, piping,
- Existing Diatomaceous Earth (DE) silo re-commissioned to serve the pre-coat tank, dust collector (new or relocated),
- New deck-top on the silo, new bin vent filter, filter relocation, new screw feeder,
- New filtered acid stand pipe and pump, new filter line,
- product shipping tank (the former South BSPA storage tank (State No. 23970)),
- Relocate the Lomag Heater, an existing tank will be used as the sludge tank,
- Relocate the Primary Green Acid Cooler and the Secondary Green Acid Cooler,
- Two new load-out lines, valve branch connecting pipes,
- Two new gangways, two new loading arms, and other equipment as necessary to complete the relocation project.

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## SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

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### A. EU061, Green Superphosphoric Acid Plant (SPA)

#### 1.b. Continued:

The construction shall be in accordance with the application and associated documents provided to the Permitting Authority for the issuance of this permit. Any changes to the project that are contrary to these documents and permit shall be reported in writing to the Permitting Authority by the P.E. of Record.

[Application No. 0470002-088-AC]

2. **Relation to Other Permits.** The conditions of this permit supplements all other previously issued air construction and operation permits for these emissions units. These conditions are in addition to all other applicable permit conditions and regulatory requirements. The Permittee shall continue to comply with the conditions of those permits, which include restrictions and standards regarding capacities, production, operation, fuels, emissions, monitoring, recordkeeping, reporting, and the like.

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

#### PERFORMANCE RESTRICTIONS

3. **Permitted Capacity.** This permit does not modify or add any new permitted capacities. The rate shall not exceed the Maximum 12-MRA Hourly Rate = 40 tons of 100% P<sub>2</sub>O<sub>5</sub> input or Maximum Daily 1-Hour Average Rate = 44.0 tons of 100% P<sub>2</sub>O<sub>5</sub> input. 12-MRA (MRA - Monthly Rolling Average) Hourly Rate Maximum shall not be exceeded by the 12-MRA hourly rate calculated by averaging each monthly hourly average with the previous 11 monthly hourly averages.

[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.; permit 0470002-034-AC, (Applicant requested on July 10, 2006 and August 7, 2006) Air Construction Permit No. 0470002-054-AC]

4. **Hours of Operation.** This permit does not modify the existing hours of operation. The hours of operation for this emissions unit shall be allowed to operate continuously 8760 hours/year (8784 in any Leap Year).

[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.]

#### EMISSIONS STANDARDS

5. **Emissions Standards.** This permit does not modify or add any new emission standards. At sample port, fluoride emissions shall not exceed 0.5 lb/hr and 2.2 TPY.

[Requested by applicant; Permit #AC24-205170; and Air Construction Application for Permit No. 0470002-054-AC Application]

### SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

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#### A. EU061, Green Superphosphoric Acid Plant (SPA)

#### TESTING REQUIREMENTS

6. **Initial Compliance Tests.** After EU061 Green Superphosphoric Acid Plant (SPA) has been relocated and operational, 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. However, if this date is close to the next scheduled annual compliance testing date as required below in **Specific Condition No. 7**, the facility can demonstrate initial compliance at that time.

[Rules 62-4.070(3) and 62-297.310(7)(a)1, F.A.C.]

7. **Annual Compliance Tests.** 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 during each federal fiscal year (October 1<sup>st</sup> to September 30<sup>th</sup>).

[Rule 62-297.401, F.A.C. and 62-297.310(7)(a)1, F.A.C.]

8. **Commencement of Construction and Operation.** The permittee shall submit to the Air Compliance Authority of this Office written notification of the date of commencement of construction and operation of **EU061**. This notification shall be submitted or postmarked within as many days prior to the date of construction and operation commencement as practical, but no later than one (1) business day following commencement of construction and operation.

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

9. This Facility is subject to SECTION 2. Administrative Requirements of this permit and also, the attached Combined Appendices.