Florida Department of Environmental Protection

Northeast District
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Jacksonville, Florida 32256

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Governor

Carlos Lopez-Cantera
Lt. Governor

Jonathan P. Steverson
Secretary

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. 0470002-099-AC
Permit Expires: December 31, 2016
Suwannee River and Swift Creek
Complex

Revision to Permit No. 0470002-090-AC
Replace heat exchangers in the existing
"C" and "D" SPA Plant (EU070)

PROJECT

This is the final air construction permit, which revises Permit No. 0470002-090-AC for the following item: to replace two existing heat exchangers (as needed) in the existing "C" and "D" SPA Plant (EU070), 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 78th 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 into the following sections: Section 1 (General Information) and Section 2 (Permit Revisions). As noted in the Final Determination provided with this final permit, only minor changes and clarifications were made to the draft permit.

STATEMENT OF BASIS

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.). 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. A copy of this permit modification shall be filed with the referenced permit and shall become part of the permit.

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
Air Permitting

FILING AND ACKNOWLEDGEMENT & CERTIFICATE OF SERVICE

Filed on this date pursuant to § 120.52, Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged. The undersigned hereby certifies that this permit and all copies were sent before the close of business on December 11, 2015 to the listed persons.

Leslie Maybin
Clerk

December 11, 2015
Date

William L. Donohue, General Manager- PCS Phosphate, White Springs (bdonohue@pcsphosphate.com)
Pradeep Raval, Koogler and Associates (praval@kooglerassociates.com)
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David Still - PCS Phosphate, White Springs (DAStill@potashcorp.com)

FACILITY DESCRIPTION

The existing facility is a phosphate mining and chemical production facility, which consists of the following emissions units and activities: 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.

FACILITY REGULATORY CLASSIFICATION

- The facility **is** a major source of hazardous air pollutants (HAP).
- The facility **does not operate** 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 62-213, F.A.C.
- The facility **is** a major stationary source in accordance with Rule 62-212.400(PSD), F.A.C.

PROPOSED PROJECT

Revision to Permit No. 0470002-090-AC. This application is submitted for a construction permit revision to allow the scope of the construction project previously permitted by FDEP and to also include the replacement of two existing heat exchangers (as needed) in the existing “C” and “D” SPA Plant (EU 070) at the Swift Creek Chemical (SCC) site.

The following permit conditions are revised as indicated. ~~Strikethrough~~ is used to denote the deletion of text. Double-underlines are used to denote the addition of text. All changes are emphasized with yellow highlight.

Permit Being Modified: Permit No. 0470002-090-AC.

Affected Emissions Unit: EU070.

1. Page 1 and Proposed Project Description. This condition is revised as follows:

   This is the final air construction permit, which authorizes the relocation of (only) the evaporator of EU036 "B" Superphosphoric Acid (SPA) Plant (Vacuum Evaporation Process, from the Suwannee River Chemical site to the existing EU070 "C" & "D" Superphosphoric Acid (SPA) Plants (Vacuum Evaporation Process) at the Swift Creek Chemical site; to replace two existing heat exchangers (as needed) in the existing "C" and "D" SPA Plant (EU070) at Swift Creek Chemical site within the same existing Title V facility. This project will also add a 54% Acid Clarifier Tank. The EU036 "B" Superphosphoric Acid (SPA) Plant (Vacuum Evaporation Process) and the 54% Acid Clarifier Tank will be vented to the existing EU070 scrubber. As part of the proposed project, EU036 will be removed from service.

PROPOSED CONSTRUCTION WORK

2. **BB.2.** The permittee is authorized to relocate the evaporator from EU036 "B" Superphosphoric Acid (SPA) Plant (Vacuum Evaporation Process) moved from Suwannee River Chemical site to the Swift Creek Chemical site, to replace two existing heat exchangers (as needed) in the existing "C" and "D" SPA Plant (EU070) at Swift Creek Chemical site, and to add a new 54% Acid Clarifier Tank, both of which will be vent to the existing EU070 scrubber.

[Air Construction Permit Application No. 0470002-090-AC, and Air Construction Permit Application No. 0470002-099-AC]

3. **BB.3.** The permittee is authorized to install at the facility as a part of this project:

   - New foundations,
   - Support steel,
   - Pumps,
   - Piping,
   - Valves
   - Wiring and controls.
   - Modification of existing structure/piping.

   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.

   [Air Construction Permit Application No. 0470002-090-AC, and Air Construction Permit Application No. 0470002-099-AC]

TESTING REQUIREMENTS

4. **BB.7. Initial Total Fluorides Compliance Tests**. After the evaporator from EU036, and each of the Heat Exchangers has been vented to the existing EU070 scrubber; and the unit is 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 compliance testing date the facility can demonstrate initial compliance at that time.

   {Permitting Note: If for any reason the heat exchanger(s) or evaporator is constructed and vented to the existing EU070 scrubber at a later time, that portion of the construction will have to conduct a separate test within 60 days after achieving permitted capacity, but not later than 180 days after initial operation of the unit.}

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

5. **BB.9. Commencement of Construction and Operation.** After the evaporator new tank, and the replacement of each of the two existing heat exchangers at **EU070** are installed, the permittee shall submit to the Air Compliance Authority of this Office written notification of the date of commencement of construction and operation of **EU070**. 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 thirty (30) business day following commencement of construction and operation.

   {Permitting Note: If for any reason the heat exchanger(s) or evaporator is constructed and vented to the existing EU070 scrubber at a later time, that portion of the construction and operation must submit a notification.}

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

6. **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.]