

FINAL DETERMINATION

White Springs Agricultural Chemicals, Inc.
Permit No. 0470002-050-AC
Y Train Pipe Reactor

An Intent to Issue an air construction permit to White Springs Agricultural Chemicals, Inc., to install two phosphoric acid storage tanks at the Suwannee River complex in Hamilton County was distributed on June 18, 2004. The Notice of Intent was published in the Jasper News on September 2, 2004. Copies of the draft construction permit were available for public inspection at the Department offices in Jacksonville and Tallahassee.

The applicant requested that a condition be added stating that the monitoring requirements will be superseded by any Alternate Monitoring Plan subsequently issued by the Department. No other comments were received following publication of the Notice.

The final action of the Department is to issue the permit with the requested change.

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
NOTICE OF FINAL PERMIT

In the Matter of an
Application for Permit

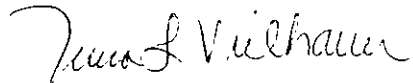
Mr. Paul H. Barrett
White Springs Agricultural Chemicals, Inc.
Post Office Box 300
White Springs, Florida 32096

DEP File No. 0470002-050-AC

Enclosed is the FINAL Permit Number 0470002-050-AC for installing a Pipe Reactor at the existing Y Train Fertilizer Plant at the Suwannee River Complex in Hamilton County. This permit is issued pursuant to Chapter 403, Florida Statutes and in accordance with Rule 62-296.403, F.A.C.

Any party to this order (permit) has the right to seek judicial review of the permit pursuant to Section 120.68, F.S., by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the Department in the Legal Office; 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 of Appeal must be filed within 30 (thirty) days from the date this Notice is filed with the Clerk of the Department.

Executed in Tallahassee, Florida.



Trina L. Vielhauer, Chief
Bureau of Air Regulation

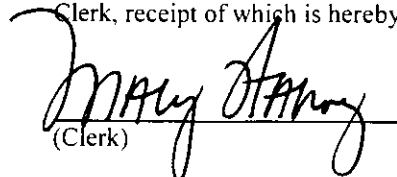
CERTIFICATE OF SERVICE

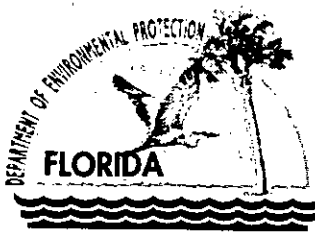
The undersigned duly designated deputy agency clerk hereby certifies that this NOTICE OF FINAL PERMIT (including the FINAL permit) was sent by certified mail (*) and copies were mailed by U.S. Mail before the close of business on 10/13/04 to the person(s) listed:

Paul H. Barrett, WSAC *
Chris Kirts, DEP-NED
John Koogler, P.E., K & A

Clerk Stamp

FILING AND ACKNOWLEDGMENT
FILED, on this date, pursuant to §120.52,
Florida Statutes, with the designated Department
Clerk, receipt of which is hereby acknowledged.


(Clerk) 10/13/04
(Date)



Jeb Bush
Governor

Department of Environmental Protection

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Colleen M. Castille
Secretary

PERMITTEE:

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

Authorized Representative:

Paul H. Barrett
General Manager

DEP Permit No.:	0470002-050-AC
Project:	Install Two Y-Train Pipe Reactors for MAP Production, (Mode 6)
SIC No.:	2874
Expiration:	December 31, 2005

PROJECT AND LOCATION:

Permit to modify the existing Y-Train Fertilizer Plant to produce MAP with a pipe reactor.
The facility is located E of SR 137, E of US 41, N of White Springs in Hamilton County, Florida.
The UTM coordinates are: Zone 17; 328.3 km E and 3368.8 km N.

STATEMENT OF BASIS:

This 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 above named permittee is authorized to construct the facility in accordance with the conditions of this permit and as described in the application, approved drawings, plans, and other documents on file with the Department of Environmental Protection (Department).

ATTACHED APPENDICES MADE A PART OF THIS PERMIT:

Appendix GC General Conditions

Michael G. Cooke, Director
Division of Air Resource
Management

AIR CONSTRUCTION PERMIT 0470002-050-AC
SECTION II. GENERAL REQUIREMENTS

FACILITY DESCRIPTION

White Springs Agricultural Chemicals, Inc. (WSAC) operates a phosphate fertilizer manufacturing facility near White Springs, Hamilton County, Florida, producing sulfuric acid, wet-process phosphoric acid, ammoniated phosphate fertilizers and related products. WSAC is applying for a non-PSD permit to produce granular Monoammonium Phosphate (MAP) at their Y-Train #1 MAP/DAP Fertilizer Plant using two pipe reactors instead of the existing tank reactor. This project will only require that two pipes be installed for mixing the phosphoric acid and ammonia currently added to the process in the tank reactor. The only other physical changes required will be the rerouting of raw material streams to the pipe reactors.

REGULATORY CLASSIFICATION

Phosphate rock processing plants are listed as a Major Facility Category in Table 62-212.400-1, F.A.C., "Major Facility Categories." Therefore, stack and fugitive emissions of over 100 TPY of a regulated pollutant are sufficient to classify the installation as a "Major Facility" per the definitions in Rule 62-210.200, F.A.C., subject to the Significant Emission Rates given in Table 62-212.400-2, F.A.C. and the requirements of Rule 62-212.400, F.A.C., Prevention of Significant Deterioration (PSD) and Best Available Control Technology (BACT) if applicable.

This facility is classified as a "Major or Title V Source" per Rule 62-210.200, F.A.C., because it has the potential to emit at least 100 tons per year of particulate matter. This facility in its entirety is also a major source of hazardous air pollutants (HAPs).

Standards of Performance for the Phosphate Fertilizer Industry: Diammonium Phosphate Plants (40 CFR 60, Subpart V) apply only to production of Diammonium Phosphate (DAP) in the Y-Train Fertilizer Plant.

The maximum achievable control technology (MACT) standards promulgated by EPA for Phosphate Fertilizers Production Plants (40 CFR 63, Subpart BB) apply for the production of DAP and MAP in the Y-Train Fertilizer Plant.

The terms and conditions of this permit apply only to the construction/operation of the Y Train for Mode 6.

PERMIT SCHEDULE:

- 04-06-04: Date of Receipt of Application
- 04-06-04: Application Complete
- 06-18-04: Issued Intent to Issue Permit
- 09-02-04: Notice of Intent published

RELEVANT DOCUMENTS:

The documents listed below are specifically related to this permitting action and form the basis of the permit. They are on file with the Department:

- Application received April 6, 2004

AIR CONSTRUCTION PERMIT 0470002-050-AC
SECTION II. GENERAL REQUIREMENTS

Regulating Agencies: All documents related to applications for permits to operate, reports, tests, minor modifications and notifications shall be submitted to the Department's Northeast District Office, 7825 Baymeadows Way, Suite 200B, Jacksonville, Florida 32256-7590. All applications for permits to construct or modify an emissions unit(s) *subject to the Prevention of Significant Deterioration or Nonattainment (NA) review requirements* should be submitted to the Bureau of Air Regulation (BAR), Florida Department of Environmental Protection (FDEP), 2600 Blair Stone Road, MS 5505, Tallahassee, Florida 32399-2400 (phone number 850/488-0114).

General Conditions: The owner and operator is subject to and shall operate under the attached General Permit Conditions G.1 through G.15 listed in Appendix GC of this permit. General Permit Conditions are binding and enforceable pursuant to Chapter 403 of the Florida Statutes. [Rule 62-4.160, F.A.C.]

Terminology: The terms used in this permit have specific meanings as defined in the corresponding chapters of the Florida Administrative Code.

Applicable Regulations, Forms and Application Procedures: Unless otherwise indicated in this permit, the construction and operation of the subject emissions unit 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 Florida Administrative Code Chapters 62-4, 62-110, 62-204, 62-212, 62-213, 62-296, 62-297 and the Code of Federal Regulations Title 40, Part 60, adopted by reference in the Florida Administrative Code (F.A.C.) regulations. The facility is subject to all applicable provisions of the Code of Federal Regulations Title 40, Part 63, Subpart BB. The permittee shall use the applicable forms listed in Rule 62-210.900, F.A.C. and follow the application procedures in Chapter 62-4, F.A.C. Issuance of this permit does not relieve the facility owner or operator from compliance with any applicable federal, state, or local permitting or regulations. [Rules 62-204.800, 62-210.300 and 62-210.900, F.A.C.]

Expiration: This air construction permit shall expire on **December 31, 2005** [Rule 62-210.300(1), F.A.C.]. The permittee may, for good cause, request that this construction permit be extended. Such a request shall be submitted to the Bureau of Air Regulation prior to 60 days before the expiration of the permit. However, the permittee shall promptly notify the Department's Northeast District Office of any delays in completion of the project, which would affect the startup day by more than 90 days. [Rule 62-4.090, F.A.C.]

Application for Title V Permit: An application for a Title V operating permit, pursuant to Chapter 62-213, F.A.C., must be submitted to the Department's Northeast District Office by October 1, 2004. [Chapter 62-213, F.A.C.]

Permit Approval: Approval to construct shall become invalid if construction is not commenced within 18 months after receipt of such approval, or if construction is discontinued for a period of 18 months or more, or if construction is not completed within a reasonable time. The Department may extend the 18-month period upon a satisfactory showing that an extension is justified. [40 CFR 52.21(r)(2)].

Annual Reports: Pursuant to Rule 62-210.370(2), F.A.C., Annual Operation Reports, the permittee is required to submit annual reports on the actual operating rates and emissions from this facility. Annual operating reports using DEP Form 62-210.900(4) shall be sent to the DEP's Northeast District office by March 1st of each year.

Stack Testing Facilities: Stack sampling facilities shall be installed in accordance with Rule 62-297.310(6), F.A.C.

Quarterly Reports: Quarterly excess emission reports, in accordance with 40 CFR 60.7 (a)(7) (c) (1997 version), shall be submitted to the DEP's Northeast District office.

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.]

AIR CONSTRUCTION PERMIT 0470002-050-AC
SECTION III. EMISSION UNIT(S) SPECIFIC REQUIREMENTS

SUBSECTION A. Y Train DAP/MAP Fertilizer Plant

The Specific Conditions listed in this section apply to the following emission units:

EMISSION UNIT NO.	EMISSION UNIT DESCRIPTION
008	Y Train DAP/MAP Fertilizer Plant

The Y Train DAP/MAP Plant is permitted to produce up to 60 tons per hour of product on a monthly rolling average or 66 tons per hour on a one-hour daily rolling average. The plant was previously capable of producing fertilizer by five different modes (Mode 1: DAP by Split Flows of 30% & 50% P₂O₅ phosphoric acid; Mode 2: DAP by 40% P₂O₅ acid; Mode 3: Triplesuperphosphate (TSP); Mode 4: MAP by Split Flows of 30% & 50% P₂O₅ acid; Mode 5: MAP by 40% P₂O₅ acid). **This permit adds Modes 6: MAP by reacting ammonia and acid in two pipe reactors.** The plant will consist of the two separate pipe reactors, a tank reactor for the other modes, two pug mills, granulator, dryer, cooler, screens, mills, and other associated process equipment. Emissions from the pipe reactors are vented to the reactor scrubber for ammonia removal and then to a pond water scrubber for fluoride control.

CONSTRUCTION

1. Addition of Mode 6:

The permittee is authorized to modify the Y Train Fertilizer Plant so that it can also produce MAP in two pipe reactors by mixing phosphoric acid and ammonia.

[Application dated April 6, 2004]

EMISSION AND PERFORMANCE REQUIREMENTS

2. Production:

a. The production rate for Mode 6 shall not exceed 60 tons of product per hour based on a 12-month rolling average or 66 tons of product per hour based on a one-hour daily rolling average. Only one of the six operating modes shall be in operation at one time.

b. The annual production rate for Mode 6 shall not exceed 525,600 tons of product per year.

[Application dated April 6, 2004; Rules 62-212.300, 62-296.403(2), 62-210.200(PTE), F.A.C., Permit 0470002-033-AV]

3. Hours of Operation:

Operation in Mode 6 shall be permitted for up to 8760 hours/year.

[Application dated April 6, 2004; Rules 62-212.300, 62-296.403(2), and 62-210.200(PTE), F.A.C., Permit 0470002-033-AV]

4. Emissions:

a. During operation in Mode 6, PM/PM₁₀ emissions shall not exceed 45.15 lbs/hr and 197.74 TPY.

b. During operation in Mode 6, Total Fluoride emissions shall not exceed 2.18 lb/hr; 0.060 lb/ton of equivalent P₂O₅ feed; and 9.54 TPY.

c. Visible Emissions shall not be equal to or greater than 20% opacity.

[Application dated April 6, 2004; 40 CFR 63.622(a); Rule 62-296.403(2), 63.626(a)(1), 63.630(a), and 62-296.320(4)(b), F.A.C., Permit 0470002-033-AV]

AIR CONSTRUCTION PERMIT 0470002-050-AC
SECTION II. GENERAL REQUIREMENTS

TEST METHODS AND PROCEDURES

5. The compliance test procedures for PM/PM₁₀ shall be in accordance with EPA Method 5 as published in 40 CFR 60, Appendix A.
[Rule 62-297.410(5), F.A.C.]
6. The compliance test procedures for Fluorides shall be in accordance with EPA Methods 13A or 13B as published in 40 CFR 60, Appendix A.
[Rule 62-297.410(13), F.A.C.]
7. The compliance test procedures for Visible Emissions shall be in accordance with EPA Method 9 as published in 40 CFR 60, Appendix A.
[Rule 62-297.410(9), F.A.C.]
8. Before this construction permit expires, and annually, the subject emissions units shall be tested for compliance with the applicable emission limits. For the duration of all tests the emission units shall be operating at permitted capacity. Permitted capacity is defined as 90-100 percent of the maximum operating rate allowed by the permit. If it is impracticable to test at permitted capacity, then the emission unit may be tested at less than permitted capacity (i.e., 90% of the maximum operating rate allowed by the permit); in this case, subsequent emission unit operation is limited to 110 percent of the test load until a new test is conducted. Once the emission unit is so limited, then operation at higher capacities is allowed for no more than 15 consecutive days for the purposes of additional compliance testing to regain the permitted capacity in the permit.
[Rule 62-297.310, F.A.C.]
9. The Department's Northeast District office shall be notified in writing at least 15 days prior to compliance testing. Written reports of the test results shall be submitted to that office within 45 days of test completion.
[Rule 62-297.310, F.A.C.]

MONITORING REQUIREMENTS

10. Each owner or operator of a new or existing diammonium and/or monoammonium phosphate process line or granular triple superphosphate process line subject to the provisions of this subpart shall install, calibrate, maintain, and operate a monitoring system which can be used to determine and permanently record the mass flow of phosphorus-bearing feed material to the process. The monitoring system shall have an accuracy of ± 5 percent over its operating range.
[40 CFR 63.625(a)]
11. Each owner or operator of a new or existing diammonium and/or monoammonium phosphate process line, granular triple superphosphate process line, or granular triple superphosphate storage building using a wet scrubbing emission control system shall install, calibrate, maintain, and operate the following monitoring systems:
 - (1) A monitoring system which continuously measures and permanently records the pressure drop across each scrubber in the process scrubbing system in 15-minute block averages. The monitoring system shall be certified by the manufacturer to have an accuracy of ± 5 percent over its operating range.
 - (2) A monitoring system which continuously measures and permanently records the flow rate of the scrubbing liquid to each scrubber in the process scrubbing system in 15-minute block averages. The

AIR CONSTRUCTION PERMIT 0470002-050-AC
SECTION II. GENERAL REQUIREMENTS

monitoring system shall be certified by the manufacturer to have an accuracy of ± 5 percent over its operating range.

(3) The terms of any Alternate Sampling Procedure issued by the Department that apply to this emissions unit will supersede the monitoring provisions herein.

[40 CFR 63.625(c)]

12. Following the date on which the performance test required in § 63.626 is completed, the owner or operator of a new or existing affected source using a wet scrubbing emission control system and subject to emissions limitations for total fluorides or particulate matter contained in this subpart must establish allowable ranges for operating parameters using the methodology of either paragraph (1) or (2) of this section:
- (1) The allowable range for the daily averages of the pressure drop across each scrubber and of the flow rate of the scrubbing liquid to each scrubber in the process scrubbing system is ± 20 percent of the baseline average value determined as a requirement of § 63.626(c)(4) or (d)(4). The Administrator retains the right to reduce the ± 20 percent adjustment to the baseline average values of operating ranges in those instances where performance test results indicate that a source's level of emissions is near the value of an applicable emissions standard, but, in no instance shall the adjustment be reduced to less than ± 10 percent. The owner or operator must notify the Administrator of the baseline average value and must notify the Administrator each time that the baseline value is changed as a result of the most recent performance test. The baseline average values used for compliance shall be based on the values determined during the most recent performance test. The new baseline average value shall be effective on the date following the performance test.
 - (2) The owner or operator of any new or existing affected source shall establish, and provide to the Administrator for approval, allowable ranges of baseline average values for the pressure drop across and of the flow rate of the scrubbing liquid to each scrubber in the process scrubbing system for the purpose of assuring compliance with this subpart. Allowable ranges may be based upon baseline average values recorded during previous performance tests using the test methods required in this subpart and established in the manner required in § 63.626(c)(4) or (d)(4). As an alternative, the owner or operator can establish the allowable ranges of baseline average values using the results of performance tests conducted specifically for the purposes of this paragraph using the test methods required in this subpart and established in the manner required in § 63.626(c)(4) or (d)(4). The source shall certify that the control devices and processes have not been modified subsequent to the testing upon which the data used to establish the allowable ranges were obtained. The allowable ranges of baseline average values developed pursuant to the provisions of this paragraph must be submitted to the Administrator for approval. The owner or operator must request and obtain approval of the Administrator for changes to the allowable ranges of baseline average values. When a source using the methodology of this paragraph is retested, the owner operator shall determine new allowable ranges of baseline average values unless the retest indicates no change in the operating parameters from previous tests. Any new allowable ranges of baseline average values resulting from the most recent performance test shall be effective on the date following the retest. Until changes to allowable ranges of baseline average values are approved by the Administrator, the allowable ranges for use in § 63.624 shall be based upon the range of baseline average values proposed for approval.

[Rule 40 CFR 63.625(f)]

APPENDIX GC
GENERAL PERMIT CONDITIONS [F.A.C. 62-4.160]

- G.1 The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.
- G.2 This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings or exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.
- G.3 As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey and vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit is not a waiver or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.
- G.4 This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.
- G.5 This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.
- G.6 The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.
- G.7 The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:
- a) Have access to and copy and records that must be kept under the conditions of the permit;
 - b) Inspect the facility, equipment, practices, or operations regulated or required under this permit, and,
 - c) Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.
- Reasonable time may depend on the nature of the concern being investigated.
- G.8 If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:
- a) A description of and cause of non-compliance; and
 - b) The period of noncompliance, including dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.
- The permittee shall be responsible for any and all damages, which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.
- G.9 In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by Sections 403.73 and 403.111, Florida

APPENDIX GC
GENERAL PERMIT CONDITIONS [F.A.C. 62-4.160]

Statutes. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

- G.10 The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.
- G.11 This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 62-4.120 and 62-730.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.
- G.12 This permit or a copy thereof shall be kept at the work site of the permitted activity.
- G.13 This permit also constitutes:
- a) Determination of Best Available Control Technology ()
 - b) Determination of Prevention of Significant Deterioration ()
 - c) Compliance with New Source Performance Standards ()
 - d) Compliance with National Emission Standards for Hazardous Air Pollutants (X). Subpart BB requirements
- G.14 The permittee shall comply with the following:
- a) Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
 - b) The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application or this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.
 - c) Records of monitoring information shall include:
 - 1. The date, exact place, and time of sampling or measurements;
 - 2. The person responsible for performing the sampling or measurements;
 - 3. The dates analyses were performed;
 - 4. The person responsible for performing the analyses;
 - 5. The analytical techniques or methods used; and
 - 6. The results of such analyses.
- G.15 When requested by the Department, the permittee shall within a reasonable time furnish any information required by law, which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

Memorandum

Florida Department of Environmental Protection

TO: Michael Cooke
THRU: Trina Vielhauer *TV*
THRU: Jim Pennington *JKP*
FROM: Syed Arif *SA 10/12*
DATE: October 12, 2004
SUBJECT: White Springs Agricultural Chemicals, Inc.
DEP File No. 0470002-050-AC

Attached for your review and approval is the final construction permit for modifying the existing Y Train Fertilizer Plant so that it can alternatively produce Monoammonium Phosphate (MAP) in a pipe reactor at the Suwannee River Complex located near White Springs, Hamilton County, Florida. This permit merely adds another mode of operation for MAP production. There will be no increase in actual emissions or potential emissions resulting from this modification. The only physical change will be the installation of the pipe reactor and the routing of materials to the reactor.

No comments were received during the public comment period. I recommend your approval and signature.

The permit clock is currently on Day 88.

Attachments

*Mike,
This is one of
John's remaining
projects. No
comments
received.
Trin*

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:
Mr. Paul H. Barrett
White Springs Agricultural
Chemicals, Inc.
Post Office Box 300
White Springs, Florida 32096

2. Article Number **7000 1670 0013 3109 8666**
(Transfer from service label)

COMPLETE THIS SECTION ON DELIVERY

A. Signature Agent Addressee
X *[Signature]*

B. Received by (Printed Name) **J.P. Reynolds** C. Date of Delivery **10/15/04**

D. Is delivery address different from item 1? Yes
 If YES, enter delivery address below: No

3. Service Type
 Certified Mail Express Mail
 Registered Return Receipt for Merchandise
 Insured Mail C.O.D.

4. Restricted Delivery? (Extra Fee) Yes

U.S. Postal Service
CERTIFIED MAIL RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)

9999 80TE E100 029T 0002

Postage	\$
Certified Fee	
Return Receipt Fee <small>(Endorsement Required)</small>	
Restricted Delivery Fee <small>(Endorsement Required)</small>	
Total Postage & Fees	\$

Postmark
Here

Sent to **Mr. Paul H. Barrett**
White Springs Agricultural Chemicals, Inc
Street, Apt. No., or PO Box No
Post Office Box 300
White Springs, Florida 32096