



Jeb Bush  
Governor

# Department of Environmental Protection

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

Colleen M. Castille  
Secretary

May 5, 2004

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

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

Dear Mr. Barrett:

Re: Liquid Fertilizer Manufacture

The Department reviewed your consultant's letter received on April 6, 2004 requesting written concurrence that no permit is required for installation of a 35 tons per hour liquid fertilizer unit at the Suwannee River Complex in White Springs. PCS's permitting exemption request is based on Rule 62-210.300(3)(b)1, F.A.C. which covers generic and temporary exemptions.

The letter states that virtually no fluorides will be emitted from the reaction of super-phosphoric acid and ammonia. If operated as a stationary source on a full-time basis, this unit could produce as much as 306,600 tons of 11-37-0 per year.

The drawing included with the request does not provide any details of the process, showing the plant as an empty box. However, the Department is familiar with the typical 11-37-0 process. These units usually consist of a water-jacketed pipe reactor fitted with an air-cooled packed tower unit that emits the flash-off from the hot recirculated material coming from the pipe reactor. Fluoride emissions are in the form of ammonium fluoride and are generally low as a result of the use of superphosphoric acid. However, we will need more information on the process along with an estimate of the fluoride emissions before we can provide written concurrence.

Processing of this request will continue upon receipt of the additional information needed. If there are any questions, please call John Reynolds at 850/921-9530.

Sincerely,

James K. Pennington, P.E.  
Administrator  
North Permitting Section

cc: C. Kirts, NED  
P. Raval, Koogler & Assoc.

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