



4014 NW THIRTEENTH STREET
GAINESVILLE, FLORIDA 32609
352/377-5822 • FAX/377-7158

KA 102-04-02

November 10, 2004

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BUREAU OF AIR REGULATION

Mr. Syed Arif, P.E.
Florida Department of
Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Subject: Additional Information
White Springs Agricultural Chemicals, Inc.
File No. 0470002-052-AC

Dear Mr. Arif:

This is in response to your letter dated October 18, 2004, requesting additional information on the above referenced project for adding an alternate method of operation for the Z-Train. The responses are in the order of the issues raised.

1. It is anticipated that the construction permit will address only the alternate method of operation, using the pipe reactors, and will not affect the other currently permitted methods of operation. The requested emissions increase evaluation is not necessary for this review as the proposed project is expected to result in a decrease in air emissions, based on discussions with the technical staff at WSA familiar with the process and confirmed by Mr. John Reynolds, of FDEP, based on his own technical literature review.
2. The proposed project will involve installing two pipe reactors in parallel as an alternate method of operation to the existing tank reactor. The tank reactor will continue to be used to make product using the existing methods of operation. It should be noted that the tank reactor would not be operating when the pipe reactors are operating. The raw material streams will feed either the tank reactor or the pipe reactors at a given time. The product and air streams from the pipe/tank reactor will be routed to the same existing process equipment.
3. The existing methods of operation, identified in the current permit, are as follows:

Mode 1: DAP produced by split (30% and 50% P₂O₅ input) phosphoric acid.
Mode 2: MAP produced by split (30% and 50% P₂O₅ input) phosphoric acid.
Mode 3: DAP produced by 40% P₂O₅ input phosphoric acid.
Mode 4: MAP produced by 40% P₂O₅ input phosphoric acid.

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The existing permit limits the fluoride emissions from Modes 1 – 4 to 0.06 lbF/ton P2O5 input; 2.18 lb/hr; 9.5 tpy. Similarly, the particulate matter emissions from Modes 1 – 4 are limited to 47.37 lb/hr; 206.90 tpy. As the limits are identical for all methods of operation, mode-specific testing is not conducted.

The requested R.O. and P.E. certifications are attached.

If you have any questions, please call me.

Very truly yours,
KOOGLER & ASSOCIATES



Pradeep Raval

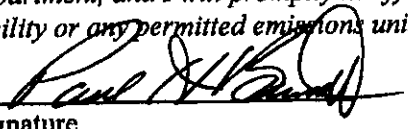
Par
Encl.

C: C. Pults, WSA
R. Felton-Smith, FDEP -Jacksonville

APPLICATION INFORMATION

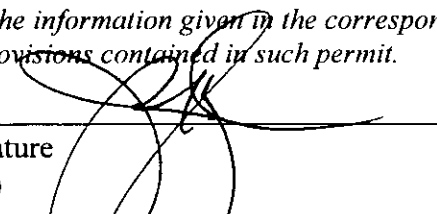
Owner/Authorized Representative Statement

Complete if applying for an air construction permit or an initial FESOP.

1. Owner/Authorized Representative Name : Paul H. Barrett, General Manager
2. Owner/Authorized Representative Mailing Address... Organization/Firm: White Springs Agricultural Chemicals, Inc. Street Address: P.O. Box 300 City: White Springs State: FL Zip Code: 32096
3. Owner/Authorized Representative Telephone Numbers... Telephone: (386) 397-8101 Fax: (386) 397-1026
4. Owner/Authorized Representative Email Address: pbarrett@pcsphosphate.com
5. Owner/Authorized Representative Statement: <i>I, the undersigned, am the owner or authorized representative of the facility addressed in this air permit application. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof and all other requirements identified in this application to which the facility is subject. I understand that a permit, if granted by the department, cannot be transferred without authorization from the department, and I will promptly notify the department upon sale or legal transfer of the facility or any permitted emissions unit.</i>  Signature <u>11-9-04</u> Date

APPLICATION INFORMATION

Professional Engineer Certification

1. Professional Engineer Name: John B. Koogler, Ph.D., P.E. Registration Number: 12925
2. Professional Engineer Mailing Address... Organization/Firm: Koogler and Associates, Inc. Street Address: 4014 N.W. 13th Street City: Gainesville State: FL Zip Code: 32609
3. Professional Engineer Telephone Numbers... Telephone: (352) 377-5822 Fax: (352) 377-7158
4. Professional Engineer Email Address: jkoogler@kooglerassociates.com
5. Professional Engineer Statement: <i>I, the undersigned, hereby certify, except as particularly noted herein*, that:</i> <i>(1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this application for air permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; and</i> <i>(2) To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application.</i> <i>(3) If the purpose of this application is to obtain a Title V air operation permit (check here <input type="checkbox"/>, if so), I further certify that each emissions unit described in this application for air permit, when properly operated and maintained, will comply with the applicable requirements identified in this application to which the unit is subject, except those emissions units for which a compliance plan and schedule is submitted with this application.</i> <i>(4) If the purpose of this application is to obtain an air construction permit (check here <input checked="" type="checkbox"/>, if so) or concurrently process and obtain an air construction permit and a Title V air operation permit revision or renewal for one or more proposed new or modified emissions units (check here <input type="checkbox"/>, if so), I further certify that the engineering features of each such emissions unit described in this application have been designed or examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application.</i> <i>(5) If the purpose of this application is to obtain an initial air operation permit or operation permit revision or renewal for one or more newly constructed or modified emissions units (check here <input type="checkbox"/>, if so), I further certify that, with the exception of any changes detailed as part of this application, each such emissions unit has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with all provisions contained in such permit.</i> Signature (seal)  Date <u>11/10/04</u>

* Attach any exception to certification statement.