



Jeb Bush
Governor

Department of Environmental Protection

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

Colleen M. Castille
Secretary

October 18, 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

Re: DEP File No. 0470002-052-AC
Pipe Reactor on 'Z' Train (MAP/DAP Plant)
Suwannee River Complex

Dear Mr. Barrett:

The Department has received the above referenced application on September 23, 2004, for the Suwannee River Complex in Hamilton County. Based on our initial review of the proposed project, we have determined that additional information is needed in order to continue processing this application package. Please submit the information requested below to the Department's Bureau of Air Regulation:

1. The application does not contain any emissions data to determine PSD applicability for this project. Normally, this is done by comparing the past actual emissions with future potential emissions due to this modification. Please provide the Department with necessary calculations to show that this modification will be a minor modification. Also, include the current production rate for the emission unit and the associated emission limits for Fluorides (Fl) and Particulate Matter (PM).
2. Please provide the Department with a detailed technical evaluation for this project in Attachment 1.
3. The application states that the pipe reactor will be the fifth alternate method of operation for the MAP/DAP plant. Please describe the other four methods of operation and the actual Fl and PM emissions associated with them.

Any additional comments from the Northeast District Office will be forwarded to you after we receive them.

The Department will resume processing this application after receipt of the requested information. Rule 62-4.050(3), F.A.C. requires that all applications for a Department permit must be certified by a professional engineer registered in the State of Florida. This requirement also applies to responses to Department requests for additional information of an engineering nature. A

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new certification statement by the authorized representative or responsible official must accompany any material changes to the application. Rule 62-4.055(1), F.A.C. now requires applicants to respond to requests for information within 90 days.

Please note that in accordance with Rule 62-4.055(1), "The applicant shall have **ninety days** after the Department mails a timely request for additional information to submit that information to the Department..... Failure of an applicant to provide the timely requested information by the applicable date **shall** result in denial of the application."

We will be happy to meet and discuss the details with you and your staff. I may be contacted at 850/921-9528.

Sincerely,



Syed Arif, P.E.
Permitting North Section
Bureau of Air Regulation

cc: C. B. Pults, WSAC, Inc.
C. Kirts, DEP-NED
J. Koogler, Ph.D., P.E., Koogler & Associates