

Florida Department of
Environmental Protection

Memorandum

TO: Howard L. Rhodes
THRU: Clair Fancy *CAF*
THRU: Al Linero *alinero*
FROM: Syed Arif *for*
DATE: November 20, 2000
SUBJECT: White Springs Agricultural Chemicals, Inc.
DEP File No. 0470002-039-AC; PSD-FL-297

Attached for your approval and signature is the final construction permit to ~~increase~~^{reallocate} production at the PCS (formerly Oxychem) facility in White Springs.

The A and C Phosphoric Acid Plants will be shut down, while process modifications and production increases at other phosphoric and superphoric acid plants will occur. The production of Dical (animal feed) will increase too.

Controls for fluoride emissions consist of scrubbers using process pond water. The BACT determination concluded that the existing control equipment meets BACT requirements. The fluoride BACT limits for the Dical and phosphoric acid plants were decreased from 0.02 to 0.012 lb/ton. The new limits were based on recent compliance tests conducted during 1995-1999. The lower value is equal to the lowest fluoride limit issued to-date for a phosphoric acid plant.

There was a comment from EPA during the public notice period. They want modeling of fluoride to determine whether predicted impacts from the proposed increase in fluoride emissions would be greater than the preconstruction monitoring de minimus impact level. They also want at least a qualitative assessment of the fluoride emissions on soils, vegetation, wildlife, and visibility.

We recognize the requirement to perform this modeling and the qualitative assessment. However, even if the de minimus level is exceeded there are no state or EPA-specified monitoring methods for fluoride.

The company has agreed to perform the modeling, but requests the permit at this time. We will require all future applicants to submit this information during the completeness review period and to provide a qualitative assessment of impacts.

I recommend your approval and signature.

AAL/sa