

Jeb Bush
Governor

Department of Environmental Protection

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

David B. Struhs
Secretary

September 18, 2000

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Vernon J. Lloyd
Vice President - Production
White Springs Agricultural Chemicals, Inc.
Post Office Box 300
White Springs, Florida 32096

Re: DRAFT Permit No. 0470002-039-AC (PSD-FL-297)
White Springs Facility, Agricultural Chemicals Complex


Dear Mr. Lloyd:

Enclosed is one copy of the Draft Air Construction Permit for the White Springs Facility, Agricultural Chemicals Complex located at east of State Road 137, north of White Springs, Hamilton County. The Technical Evaluation and Preliminary Determination, Best Available Control Technology, the Department's Intent to Issue Air Construction Permit and the "PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT" are also included.

The "PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT" must be published. Proof of publication, i.e., newspaper affidavit, must be provided to the Department's Bureau of Air Regulation office within 7 (seven) days of publication. Failure to publish the notice and provide proof of publication may result in the denial of the permit.

Please submit any written comments you wish to have considered concerning the Department's proposed action to A. A. Linero, P.E., Administrator, New Source Review Section at the above letterhead address. If you have any other questions, please contact Syed Arif, P.E., at 850/921-9528.

Sincerely,


C. H. Fancy, P.E., Chief,
Bureau of Air Regulation

CHF/sa

Enclosures

"More Protection, Less Process"

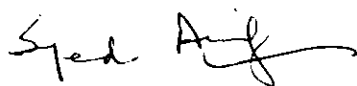
Printed on recycled paper.

Florida Department of
Environmental Protection

Memorandum

TO: Clair Fancy

THRU: Al Linero

FROM: Syed Arif 

DATE: September 13, 2000

SUBJECT: White Springs Agricultural Chemicals, Inc.
0470002-039-AC (PSD-FL-297)

Attached is the Public Notice package for increasing the production rate at the above referenced facility.

The A and C Phosphoric Acid Plants will be shut down; the B Phosphoric Acid Plant will be converted to a hemi-hydrate process and the process rate will be increased from 83 to 100 tons per hour P_2O_5 input; the D Phosphoric Acid Plant process rate will be increased from 95 to 110 tons per hour P_2O_5 input; the Acid Clarification process rate will be increased from 100 to 110 tons per hour P_2O_5 input; the C & D Superphosphoric Acid Plant process rate will be increased from 95 to 110 tons per hour P_2O_5 input; and, the X Train (Dical) production rate will be increased from 45 to 55 tons per hour product. An air quality impact analysis was not required.

The only pollutant that underwent PSD review was Fluorides. 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 limit for X-Train, B & D Phosphoric acid plants were reduced to 0.02 lb/ton product for the X-Train and 0.012 lb/ton P_2O_5 input for the B & D Phosphoric acid plants. The new limits were based on the past actuals as demonstrated during the compliance test results for 1995-1999.

September 13 is Day 29 for the project.

I recommend your approval and signature.

AAL/sa

Attachments

In the Matter of an
Application for Permit by:

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

DEP File No. 0470002-039-AC
Draft Permit No. PSD-FL-297
Agricultural Chemicals Complex
Hamilton County

INTENT TO ISSUE AIR CONSTRUCTION PERMIT

The Department of Environmental Protection (Department) gives notice of its intent to issue an air construction permit (copy of DRAFT Permit attached) for the proposed project, detailed in the application specified above and the attached Technical Evaluation and Preliminary Determination, for the reasons stated below.

The applicant, White Springs Agricultural Chemicals, Inc., submitted a complete application on August 11, 2000 to the Department for an air construction permit to reallocate the phosphoric acid production capability within the complex and to increase the processing rates of the Acid Clarification Plant, C & D Superphosphoric Acid Plant and the X Train (Dical) at its White Springs facility located east of State Road 137, north of White Springs, Hamilton County.

The Department has permitting jurisdiction under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, and 62-212. The above actions are not exempt from permitting procedures. The Department has determined that a review for the Prevention of Significant Deterioration (PSD), a determination of Best Available Control Technology (BACT) and an air construction permit are required for the proposed work.

The Department intends to issue this Air Construction Permit based on the belief that reasonable assurances have been provided to indicate that operation of these emission units will not adversely impact air quality, and the emission units will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297, F.A.C.

Pursuant to Section 403.815, F.S., and Rule 62-110.106(7)(a)1., F.A.C., you (the applicant) are required to publish at your own expense the enclosed "PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT." The notice shall be published one time only in the legal advertisement section of a newspaper of general circulation in the area affected. Rule 62-110.106(7)(b), F.A.C., requires that the applicant cause the notice to be published as soon as possible after notification by the Department of its intended action. For the purpose of these rules, "publication in a newspaper of general circulation in the area affected" means publication in a newspaper meeting the requirements of Sections 50.011 and 50.031, F.S., in the county where the activity is to take place. If you are uncertain that a newspaper meets these requirements, please contact the Department at the address or telephone number listed below. The applicant shall provide proof of publication to the Department's Bureau of Air Regulation, at 2600 Blair Stone Road, Mail Station #5505, Tallahassee, Florida 32399-2400 (Telephone: 850/488-0114; Fax 850/ 922-6979). You must provide proof of publication within seven days of publication, pursuant to Rule 62-110.106(5), F.A.C. No permitting action for which published notice is required shall be granted until proof of publication of notice is made by furnishing a uniform affidavit in substantially the form prescribed in section 50.051, F.S. to the office of the Department issuing the permit. Failure to publish the notice and provide proof of publication may result in the denial of the permit pursuant to Rules 62-110.106(9) & (11), F.A.C.

The Department will issue the Draft Air Construction Permit and subsequent Final Air Construction Permit in accordance with the conditions of the attached Draft Air Construction permit unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The Department will accept written comments concerning the proposed permit issuance action for a period of 30 (thirty) days from the date of publication of PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT. Written comments should be provided to the Department's Bureau of Air Regulation at 2600 Blair Stone Road, Mail Station #5505, Tallahassee, FL 32399-2400. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in the Draft Air Construction Permit, the permitting authority shall issue a Revised Draft Air Construction Permit and require, if applicable, another Public Notice.

The Department will issue the permit with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to sections 120.569 and 120.57 F.S., before the deadline for filing a petition. The procedures for petitioning for a hearing are set forth below.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under sections 120.569 and 120.57 of the Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida, 32399-3000. Petitions filed by the permit applicant or any of the parties listed below must be filed within fourteen days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under section 120.60(3) of the Florida Statutes must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of this notice of intent, whichever occurs first. Under section 120.60(3), however, any person who asked the Department for notice of agency action may file a petition within fourteen days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under sections 120.569 and 120.57 F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205 of the Florida Administrative Code.

A petition that disputes the material facts on which the Department's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner, the name, address, and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of how and when petitioner received notice of the agency action or proposed action; (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and (g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the agency to take with respect to the agency's proposed action.

A petition that does not dispute the material facts upon which the Department's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Department's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any such final decision of the Department on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above. Mediation is not available in this proceeding.

In addition to the above, a person subject to regulation has a right to apply for a variance from or waiver of the requirements of particular rules, on certain conditions, under Section 120.542 F.S. The relief provided by this state statute applies only to state rules, not statutes, and not to any federal regulatory requirements. Applying for a variance or waiver does not substitute or extend the time for filing a petition for an administrative hearing or exercising any other right that a person may have in relation to the action proposed in this notice of intent.


The application for a variance or waiver is made by filing a petition with the Office of General Counsel of the Department, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. The petition must specify the following information: (a) The name, address, and telephone number of the petitioner; (b) The name, address, and telephone number of the attorney or qualified representative of the petitioner, if any; (c) Each rule or portion of a rule from which a variance or waiver is requested; (d) The citation to the statute underlying

(implemented by) the rule identified in (c) above; (e) The type of action requested; (f) The specific facts that would justify a variance or waiver for the petitioner; (g) The reason why the variance or waiver would serve the purposes of the underlying statute (implemented by the rule); and (h) A statement whether the variance or waiver is permanent or temporary and, if temporary, a statement of the dates showing the duration of the variance or waiver requested.

The Department will grant a variance or waiver when the petition demonstrates both that the application of the rule would create a substantial hardship or violate principles of fairness, as each of those terms is defined in Section 120.542(2) F.S., and that the purpose of the underlying statute will be or has been achieved by other means by the petitioner.

Persons subject to regulation pursuant to any federally delegated or approved air program should be aware that Florida is specifically not authorized to issue variances or waivers from any requirements of any such federally delegated or approved program. The requirements of the program remain fully enforceable by the Administrator of the EPA and by any person under the Clean Air Act unless and until the Administrator separately approves any variance or waiver in accordance with the procedures of the federal program.

Executed in Tallahassee, Florida.


C. H. Fancy, P.E., Chief
Bureau of Air Regulation


CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this INTENT TO ISSUE AIR CONSTRUCTION PERMIT (including the PUBLIC NOTICE, Technical Evaluation and Preliminary Determination, Draft BACT Determination, and the DRAFT permit) was sent by certified mail (*) and copies were mailed by U.S. Mail before the close of business on 9/21/00 to the person(s) listed:

Vernon J. Lloyd, WSAC*
Gregg Worley , EPA
John Bunyak, NPS
Chris Kirts, DEP
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.

 9/21/00
(Clerk) (Date)

**NOTICE TO BE PUBLISHED
IN THE NEWSPAPER**

PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
DEP File No. 0470002-039-AC (PSD-FL-297)
Agricultural Chemical Complex
White Springs Agricultural Chemicals, Inc.
Hamilton County

The Department of Environmental Protection (Department) gives notice of its intent to issue an air construction permit to White Springs Agricultural Chemicals, Inc. to reallocate the phosphoric acid production capability within the complex and to increase the processing rates of the Acid Clarification Plant, C & D Superphosphoric Acid Plant and the X Train (Dical) at its White Springs facility. The plant is located east of State Road 137, north of White Springs, Hamilton County.

A Best Available Control Technology (BACT) determination was required for fluorides pursuant to Rule 62-212.400, F.A.C. The applicant's name and address are: White Springs Agricultural Chemicals, Inc., P.O. Box 300, White Springs, Florida 32096.

The A and C Phosphoric Acid Plants will be shut down; the B Phosphoric Acid Plant will be converted to a hemi-hydrate process and the process rate will be increased from 83 to 100 tons per hour P_2O_5 input; the D Phosphoric Acid Plant process rate will be increased from 95 to 110 tons per hour P_2O_5 input; the Acid Clarification process rate will be increased from 100 to 110 tons per hour P_2O_5 input; the C & D Superphosphoric Acid Plant process rate will be increased from 95 to 110 tons per hour P_2O_5 input; and, the X Train (Dical) production rate will be increased from 45 to 55 tons per hour product. Controls for fluoride emissions consist of scrubbers using process pond water. An air quality impact analysis was not required.

The Department will issue the Draft Air Construction Permit and subsequent Final Air Construction Permit in accordance with the conditions of the Draft Air Construction Permit unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions. The permitting authority has determined that an Air Construction Permit is required.

The Department will accept written comments concerning the proposed permit issuance action for a period of 30 (thirty) days from the date of publication of "PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT." Written comments should be provided to the Department's Bureau of Air Regulation at 2600 Blair Stone Road, Mail Station #5505, Tallahassee, FL 32399-2400. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in the proposed agency action, the Department shall revise the proposed permit and require, if applicable, another Public Notice.

The Department will issue the permit with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to sections 120.569 and 120.57 F.S., before the deadline for filing a petition. The procedures for petitioning for a hearing are set forth below. Mediation is not available in this proceeding.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under sections 120.569 and 120.57 of the Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida, 32399-3000. Petitions filed by the permit applicant or any of the parties listed below must be filed within fourteen days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to

**NOTICE TO BE PUBLISHED
IN THE NEWSPAPER**

written notice under section 120.60(3) of the Florida Statutes must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of this notice of intent, whichever occurs first. Under section 120.60(3), however, any person who asked the Department for notice of agency action may file a petition within fourteen days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under sections 120.569 and 120.57 F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205 of the Florida Administrative Code.

A petition that disputes the material facts on which the Department's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner, the name, address, and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of how and when petitioner received notice of the agency action or proposed action; (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and (g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the agency to take with respect to the agency's proposed action.

A petition that does not dispute the material facts upon which the Department's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Department's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any such final decision of the Department on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

A complete project file is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

Dept. of Environmental Protection
Bureau of Air Regulation
111 S. Magnolia Drive, Suite 4
Tallahassee, Florida 32301
Telephone: 850/488-0114
Fax: 850/922-6979

Dept. of Environmental Protection
Northeast District
7825 Baymeadows Way, Suite B-200
Jacksonville, Florida 32256-7590
Telephone: 904/448-4310
Fax: 904/448-4363

The complete project file includes the application, technical evaluations, Draft Permit, and the information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Administrator, New Resource Review Section at 111 South Magnolia Drive, Suite 4, Tallahassee, Florida 32301, or call 850/488-0114, for additional information.

TECHNICAL EVALUATION
AND
PRELIMINARY DETERMINATION

WHITE SPRINGS AGRICULTURAL CHEMICALS, INC.

Agricultural Chemicals Complex
White Springs, Hamilton County

DEP File No. 0470002-039-AC
PSD-FL-297

Department of Environmental Protection
Division of Air Resources Management
Bureau of Air Regulation

September 13, 2000

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

1. APPLICATION INFORMATION

1.1 Applicant Name and Address

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

Authorized Representative: Mr. Vernon J. Lloyd, V.P. - Production

1.2 Reviewing and Process Schedule

07-20-2000: Date of Receipt of Application
08-09-2000: DEP Completeness Request
08-11-2000: Applicant's response to DEP's Completeness Request
09-xx-2000: Issue Intent

2. FACILITY INFORMATION

2.1 Facility Location

The agricultural chemicals manufacturing facility is located east of State Road 137, north of White Springs, Hamilton County. This site is approximately 25 kilometers from the Okefenokee National Wilderness Area, a Class I Area. The UTM coordinates of this facility are Zone 17; 328.3 km E; 3368.8 km N.

2.2 Standard Industrial Classification Codes (SIC)

| | | |
|--------------------|------|-------------------------------|
| Major Group No. | 28 | Chemicals and Allied Products |
| Industry Group No. | 2874 | Phosphate Fertilizers |

2.3 Facility Category

This agricultural chemicals facility makes sulfuric acid, phosphoric acid, superphosphoric acid, monoammonium phosphate (MAP), diammonium phosphate (DAP) and animal feed ingredients.

The sulfuric acid is produced on-site by burning elemental sulfur, converting the resulting sulfur dioxide to sulfur trioxide, and absorbing it into a recirculating sulfuric acid solution. Phosphoric acid is made by acidulation of phosphate rock with sulfuric acid. Waste gypsum is produced and stacked. The phosphoric acid is reacted with ammonia to make MAP and DAP. The phosphoric acid is reacted with limestone and other raw materials to make animal feed ingredients. The facility is classified as a major or Title V source of air pollution because emissions of at least one regulated air pollutant, such as particulate matter (PM/PM₁₀), sulfur dioxide (SO₂), nitrogen oxides (NO_x), carbon monoxide (CO), or volatile organic compounds (VOC) exceed 100 TPY.

This industry is included in the list of the 28 Major Facility Categories per Table 62-212.400-1, F.A.C. Because emissions are greater than 100 TPY for at least one criteria pollutant, the facility is also a major facility with respect to Rule 62-212.400, Prevention of Significant Deterioration (PSD). Per Table 62-212.400-2, modifications at the facility resulting in emissions increases greater than 3 TPY of fluorides, require review per the PSD rules and a determination of Best Available Control Technology (BACT) per Rule 62-212, F.A.C.

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

3. PROCESS DESCRIPTION

Phosphoric acid is made by reacting wet phosphate rock with sulfuric acid in reaction tanks, filtering the acid, concentrating the acid, and pumping the acid to various processes and/or storage, as necessary. Waste gypsum from the process is pumped and stacked. Air emissions of fluorides are controlled by scrubbers using pond water.

The acid clarification process uses additives to remove certain impurities from the phosphoric acid. Purified acid is pumped into storage tanks. Air emissions of fluorides are controlled by scrubbers using pond water.

Superphosphoric acid is made by concentrating phosphoric acid, using high vacuum and high pressure steam, to a strength of about 70 percent P_2O_5 . Air emissions of fluorides are controlled by scrubbers using pond water.

The X Train (dical) process reacts limestone with phosphoric acid in a pugmill. The resulting slurry is then dried in a fossil fuel fired direct contact rotary dryer. The dried solids are then screened to remove on size product. The product size material is conveyed to storage. The over-sized and under-sized materials are crushed and recirculated to the pugmill. Air emissions of fluorides and particulate matter are controlled by the add-on wet scrubbers and baghouses, as appropriate.

4. PROJECT DESCRIPTION

This permit addresses the following emissions units:

| EMISSION UNIT NO. | SYSTEM | EMISSION UNIT DESCRIPTION |
|-------------------|---------|----------------------------------|
| 004 | Product | X-Train (Dical) |
| 020 | Process | B Phosphoric Acid Plant |
| 069 | Process | D Phosphoric Acid Plant |
| 070 | Process | C & D Superphosphoric Acid Plant |
| 071 | Process | Acid Clarification |

The proposed project includes the conversion of the B Phosphoric Acid Plant from prayon to a hemi-hydrate process and an increase in the processing rate from 83 to 100 tons per hour P_2O_5 input; an increase in the processing rate of D Phosphoric Acid Plant from 95 to 110 tons per hour P_2O_5 input; an increase in the processing rate of Acid Clarification from 100 to 110 tons per hour P_2O_5 input; an increase in the processing rate of C & D Superphosphoric Acid Plant from 95 to 110 tons per hour P_2O_5 input; and an increase in the production rate of the X Train (Dical) from 45 to 55 tons per hour product.

Some equipment changes and upgrades will be necessary to increase the production rates of the emission units. The proposed project will result in actual increases in fluorides (F1) and particulate

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

matter (PM/PM₁₀). There will also be minimal emissions increases of sulfur dioxide (SO₂), nitrogen oxides (NO_x), carbon monoxide (CO) and volatile organic compounds (VOC). Emissions increases of PM/PM₁₀, SO₂, NO_x, CO and VOC are below their respective significant emission levels per Table 62-212.400-2, F.A.C., and do not require PSD or non-attainment new source review. However, PSD review is required for fluorides since emissions, per the application, will increase by more than PSD significant levels.

5. RULE APPLICABILITY

The project is subject to the federal new source performance standards (NSPS) for wet-process phosphoric acid plants (40 CFR 60, Subpart T) and for superphosphoric acid plants (40 CFR 60, Subpart U), incorporated by reference in Rule 62-204.800, F.A.C.

The proposed project is also subject to permitting, preconstruction review, emissions limits and compliance requirements under the provisions of Chapter 403, Florida Statutes, and Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297 of the Florida Administrative Code (F.A.C.).

This facility is located in Hamilton County, an area designated as attainment for all criteria pollutants in accordance with Rule 62-204.360, F.A.C. The proposed project is subject to review under Rule 62-212.400, F.A.C., Prevention of Significant Deterioration (PSD), because the potential emission increases for fluorides exceed the significant emission rates given in Chapter 62-212, Table 62-212.400-2, F.A.C. PSD review requires an assessment of air quality impacts and a determination of Best Available Control Technology (BACT).

The emission units affected by this permit modification shall comply with all applicable provisions of the Florida Administrative Code (including applicable portions of the Code of Federal Regulations incorporated therein) and, specifically, the following Chapters and Rules:

| | |
|-----------------|--|
| Chapter 62-4 | Permits. |
| Rule 62-204.220 | Ambient Air Quality Protection |
| Rule 62-204.240 | Ambient Air Quality Standards |
| Rule 62-204.260 | Prevention of Significant Deterioration Increments |
| Rule 62-204.360 | Designation of Prevention of Significant Deterioration Areas |
| Rule 62-204.800 | Federal Regulations Adopted by Reference |
| Rule 62-210.300 | Permits Required |
| Rule 62-210.350 | Public Notice and Comments |
| Rule 62-210.370 | Reports |
| Rule 62-210.550 | Stack Height Policy |
| Rule 62-210.650 | Circumvention |
| Rule 62-210.700 | Excess Emissions |
| Rule 62-210.900 | Forms and Instructions |
| Rule 62-212.300 | General Preconstruction Review Requirements |
| Rule 62-212.400 | Prevention of Significant Deterioration |
| Rule 62-213 | Operation Permits for Major Sources of Air Pollution |
| Rule 62-296.320 | General Pollutant Emission Limiting Standards |
| Rule 62-297.310 | General Test Requirements |

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

Rule 62-297.401

Compliance Test Methods

Rule 62-297.520

EPA Continuous Monitor Performance Specifications

6. SOURCE IMPACT ANALYSIS

6.1 Air Quality Analysis

As stated in the application, the proposed project will increase emissions of fluorides in excess of PSD significant amounts. F is a non-criteria pollutant and has no AAQS or PSD increments defined for it; therefore, no air quality impact analysis was required for F. Instead, the BACT requirements will establish the F emission limit for this project. The PSD regulations require an analysis of impacts on soils, vegetation, visibility, growth-related air quality impacts and impacts on the air quality related values.

Based on the required analyses, the Department has reasonable assurance that the proposed project, as described in this report and subject to the conditions of approval proposed herein, will not cause or significantly contribute to a violation of any AAQS or PSD increment. However, the following EPA-directed stack height language is included: "In approving this permit, the Department has determined that the application complies with the applicable provisions of the stack height regulations as revised by EPA on July 8, 1985 (50 FR 27892). Portions of the regulations have been remanded by a panel of the U.S. Court of Appeals for the D.C. Circuit in NRDC v. Thomas, 838 F. 2d 1224 (D.C. Cir. 1988). Consequently, this permit may be subject to modification if and when EPA revises the regulation in response to the court decision. This may result in revised emission limitations or may affect other actions taken by the source owners or operators."

7. CONCLUSION

Based on the foregoing technical evaluation of the application and additional information submitted by the applicant, the Department has made a preliminary determination that the proposed project will comply with all applicable state and federal air pollution regulations, provided the Department's BACT determination is implemented.

Syed Arif, P.E.

PERMITTEE:

White Springs Agricultural Chemicals, Inc.
Post Office Box 300
White Springs, Florida 32096

| | |
|-------------------|-----------------------------------|
| File No. | 0470002-039-AC |
| Permit No. | PSD-FL-297 |
| SIC No. | 2874 |
| Project: | Agricultural Chemicals Complex |
| Expires: | October 1, 2003 |

Authorized Representative:

Vernon J. Lloyd
Vice President, Production

PROJECT AND LOCATION:

Permit for the construction /modification of the Agricultural Chemicals Complex to increase production rates of B and D Phosphoric Acid Plants, Acid Clarification, C & D Superphosphoric Acid Plant and the X Train (Dical) at the White Springs facility, east of State Road 137, north of White Springs, Hamilton County. UTM coordinates are Zone 17; 328.3 km E; 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 the Florida Administrative Code (F.A.C.) Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297. The above named permittee is authorized to modify 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 ARE MADE A PART OF THIS PERMIT:

Appendix BD BACT Determination
Appendix GC Construction Permit General Conditions

Howard L. Rhodes, Director
Division of Air Resources
Management

SECTION I. FACILITY INFORMATION

FACILITY DESCRIPTION

The Agricultural Chemicals Complex at White Springs is an agricultural chemicals manufacturing facility. Phosphate rock is reacted with sulfuric acid (purchased or produced on-site) to make phosphoric acid. The phosphoric acid is further processed into various products, including superphosphoric acid, monoammonium phosphate (MAP), diammonium phosphate (DAP) and animal feed ingredients.

This permit allows conversion of the B Phosphoric Acid Plant to a hemi-hydrate process and an increase in the processing rate from 83 to 100 tons per hour P_2O_5 input; an increase in the processing rate of D Phosphoric Acid Plant from 95 to 110 tons per hour P_2O_5 input; an increase in the processing rate of Acid Clarification from 100 to 110 tons per hour P_2O_5 input; an increase in the processing rate of C & D Superphosphoric Acid Plant from 95 to 110 tons per hour P_2O_5 input; and an increase in the production rate of the X Train (Dical) from 45 to 55 tons per hour product.

REGULATORY CLASSIFICATION

The Agricultural Chemicals Complex is classified as a major source of air pollution or Title V source because it has the potential to emit at least 100 tons per year of particulate matter, nitrogen oxides and sulfur dioxide.

PERMIT SCHEDULE:

- 07-20-2000: Date of Receipt of Application
- 08-11-2000: Application deemed complete
- 09-xx-2000: Intent issued

RELEVANT DOCUMENTS:

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

- Application received 07-20-2000
- Department's incompleteness letter dated 08-9-2000
- Applicant's letter dated 08-11-2000
- Fish and Wildlife Service letter dated 08-04-2000
- Technical Evaluation and Preliminary Determination dated 09-xx-2000
- Best Available Control Technology determination (issued concurrently with permit)

SECTION II. EMISSION UNIT(S) ADMINISTRATIVE REQUIREMENTS

1. Regulating Agencies: All documents related to applications for permits to operate, reports, tests, minor modifications and notifications shall be submitted to the Department of Environmental Protection, Northeast District Office located at 7825 Baymeadows Way, Suite B-200, Jacksonville, Florida 32256-7590, and phone number (904) 448-4310. All applications for permits to construct or modify an emission unit(s) *subject to the Prevention of Significant Deterioration (PSD)* should be submitted to the Bureau of Air Regulation (BAR), Florida Department of Environmental Protection (FDEP) located at 2600 Blairstone Road, Tallahassee, Florida 32399-2400 and phone number (850)488-0114.
2. 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.]**
3. Terminology: The terms used in this permit have specific meanings as defined in the corresponding chapters of the Florida Administrative Code.
4. Forms and Application Procedures: 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. **[Rule 62-210.900, F.A.C.]**
5. Expiration: This air construction permit shall expire on **October 1, 2003**. **[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 permitting authority 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]**
6. Applicable Regulations: The facility is subject to the following regulations: Florida Administrative Code Chapters 62-4; 62-103; 62-204; 62-210; 62-212, 62-296, and 62-297. Issuance of this permit does not relieve the facility owner or operator from compliance with any applicable federal, state, or local permitting requirements or regulations. **[Rule 62-210.300, F.A.C.]**

AIR CONSTRUCTION PERMIT 0470002-039-AC AND PSD-FL-297
SECTION III. EMISSION UNIT(S) SPECIFIC CONDITIONS

COMMON CONDITIONS: 40 CFR 60 - NEW SOURCE PERFORMANCE STANDARDS

This permit addresses the following emission units.

| EMISSION UNIT NO. | EMISSION UNIT DESCRIPTION |
|-------------------|----------------------------------|
| 020 | B Phosphoric Acid Plant |
| 069 | D Phosphoric Acid Plant |
| 070 | C & D Superphosphoric Acid Plant |

These emission units shall comply with all applicable requirements of 40 CFR 60, General provisions, Subpart A, adopted by reference in Rule 62-204.800(7), F.A.C.

- 40 CFR 60.7, Notification and record keeping
- 40 CFR 60.8, Performance tests
- 40 CFR 60.11, Compliance with standards and maintenance requirements
- 40 CFR 60.12, Circumvention
- 40 CFR 60.13, Monitoring requirements
- 40 CFR 60.19, General notification and reporting requirements

The B and D Phosphoric Acid Plants are subject to the applicable requirements of the New Source Performance Standards (NSPS) adopted by reference in Rules 62-204.800, F.A.C., including:

- 40 CFR 60 Subpart T, Standards of Performance for Wet-Process Phosphoric Acid Plants

The C & D Superphosphoric Acid Plant is subject to the applicable requirements of the New Source Performance Standards (NSPS) adopted by reference in Rules 62-204.800, F.A.C., including:

- 40 CFR 60 Subpart U, Standards of Performance for Superphosphoric Acid Plants

SPECIFIC CONDITIONS :

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

| EMISSION UNIT NO. | EMISSION UNIT DESCRIPTION |
|-------------------|----------------------------------|
| 004 | X-Train (Dical) |
| 020 | B Phosphoric Acid Plant |
| 069 | D Phosphoric Acid Plant |
| 070 | C & D Superphosphoric Acid Plant |
| 071 | Acid Clarification |

1. Unless otherwise indicated, the construction and operation of the subject Agricultural Chemicals production facilities shall be in accordance with the capacities and specifications stated in the application. [Rule 62-210.300, F.A.C.]

AIR CONSTRUCTION PERMIT 0470002-039-AC AND PSD-FL-297
SECTION III. EMISSION UNIT(S) SPECIFIC CONDITIONS

2. The subject emissions units shall comply with all applicable provisions of the 40 CFR 60 New Source Performance Standards for Wet-Process Phosphoric Acid Plants, Subpart T and Superphosphoric Acid Plants, Subpart U. **[Rule 62-204.800 F.A.C.]**
3. The maximum daily (24-hour) average and annual operation rates shall not exceed:
 - a. X-Train (Dical) – 55 tons per hour (tph) product, 400,000 tons per year (tpy) product;
 - b. B Phosphoric Acid Plant - 100 tph P₂O₅ input, 600,000 tpy P₂O₅ input;
 - c. D Phosphoric Acid Plant - 110 tph P₂O₅ input, 800,000 tpy P₂O₅ input;
 - d. C & D Superphosphoric Acid Plant - 110 tph P₂O₅ input, 876,000 tpy P₂O₅ input; and,
 - e. Acid Clarification - 110 tph P₂O₅ input, 876,000 tpy P₂O₅ input.**[Rule 62-210.200, F.A.C. (Definitions - Potential Emissions)]**
4. The subject emission units are allowed to operate continuously (8760 hours/year).
[Rule 62-210.200, F.A.C. (Definitions - Potential Emissions)]
5. Total fluoride emissions shall not exceed the following:
 - a. X-Train (Dical) – 1.1 lb/hr and 4.0 tpy, based on 0.02 lb/ton product;
 - b. B Phosphoric Acid Plant – 1.2 lb/hr and 3.6 tpy, based on 0.012 lb/ton P₂O₅ input;
 - c. D Phosphoric Acid Plant - 1.32 lb/hr and 4.8 tpy, based on 0.012 lb/ton P₂O₅ input;
 - d. C & D Superphos. Acid Plant – 0.96 lb/hr and 3.8 tpy, based on 0.0087 lb/ton P₂O₅ input;
 - e. Acid Clarification – 3.3 lb/hr and 13.1 tpy, based on 0.03 lb/ton P₂O₅ input.**[Rule 62-212.400, F.A.C.]**
6. Particulate matter emissions shall not exceed the following:
 - a. X Train – 9.9 lb/hr and 36.0 TPY;
 - b. Dedust Baghouse – 3.2 lb/hr and 11.6 TPY;
 - c. Shipping Baghouse – 2.3 lb/hr and 8.4 TPY;
 - d. Limestone Bin Baghouse – 0.77 lb/hr and 2.8 TPY;
 - e. Reclaim Bin Baghouse – 0.77 lb/hr and 2.8 TPY; and,
 - f. Fugitive Dust Collection Baghouse – 5.1 lb/hr and 18.0 TPY.**[Rule 62-210.200, F.A.C.]**
7. Visible emissions from all scrubber stacks shall not exceed 20% opacity.
[Rule 62-212.400, F.A.C.]
8. The X-Train natural gas firing rate shall not exceed 564 MMCF per year. The permittee shall maintain records of the fuel use. **[Rule 62-210.200, F.A.C.]**

AIR CONSTRUCTION PERMIT 0470002-039-AC AND PSD-FL-297
SECTION III. EMISSION UNIT(S) SPECIFIC CONDITIONS

9. Visible emissions from all baghouse stacks shall not exceed 20% opacity.
[Rule 62-296.320, F.A.C.]
10. The permittee shall install, calibrate, operate and maintain monitoring devices that continuously measure and record the total pressure drop across each scrubbing system. Accuracy of the monitoring devices shall be $\pm 5\%$ over the operating range. [Rules 62-297.310, 62-204.800, F.A.C.; 40 CFR 60.203; 40 CFR 60. 213]
11. Before this construction permit expires, the subject emission units shall be tested for compliance with the above emission limits. For the duration of all tests the emission unit 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.]
12. The Department's Northeast District office in Jacksonville shall be notified in writing at least 15 days prior to the compliance tests. 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.]
13. The compliance test procedures shall be in accordance with EPA Reference Methods 1, 2, 3, 4, 5, 9 and 13A or 13B, as appropriate, as published in 40 CFR 60, Appendix A. 60, Appendix A. Testing using EPA Reference Method 5 shall be waived for all baghouses when a visible emission limit of 5 percent opacity is met. [Rules 62-204.800 and 62-297.310(7)(c), F.A.C.]
14. All measurements, records, and other data required to be maintained by this facility shall be retained for at least five (5) years following the data on which such measurements, records, or data are recorded. These data shall be made available to the Department upon request. [Rule 62-4.070(3), F.A.C.]
15. The permittee shall install, calibrate, maintain, and operate monitoring devices which can be used to determine the mass flow of phosphorus-bearing feed material to the phosphoric and superphosphoric acid processes. The monitoring devices shall have an accuracy of ± 5 percent over the operating range. The permittee shall maintain a daily record of equivalent P_2O_5 feed by first determining the total mass rate in metric ton/hour of phosphorus bearing feed using the flow monitoring device meeting the requirements of 40 CFR 60.203(a), or 40 CFR 60.213(a), and then by proceeding according to 40 CFR 60.204(b)(3) or 40 CFR 60.214(b)(3), as applicable. [Rule 62-204.800, F.A.C.; 40 CFR 60.203(b); 40 CFR 60.213(b)]
16. No person shall cause, suffer, allow, or permit the discharge of air pollutants which cause or contribute to an objectionable odor. [Rule 62-296.320, F.A.C.]

AIR CONSTRUCTION PERMIT 0470002-039-AC AND PSD-FL-297
SECTION III. EMISSION UNIT(S) SPECIFIC CONDITIONS

17. No person shall circumvent any air pollution control device, or allow the emission of air pollutants without the applicable air pollution control device operating properly. **[Rule 62-210.650, F.A.C.]**
18. The subject emissions units shall be subject to the following:
- Excess emissions resulting from startup, shutdown or malfunction of any source shall be permitted providing (1) best operational practices to minimize emissions are adhered to and (2) the duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration. **[Rule 62-210.700, F.A.C.]**
 - Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during startup, shutdown, or malfunction shall be prohibited. **[Rule 62-210.700, F.A.C.]**
 - Considering operational variations in types of industrial equipment operations affected by this rule, the Department may adjust maximum and minimum factors to provide reasonable and practical regulatory controls consistent with the public interest. **[Rule 62-210.700, F.A.C.]**
 - In case of excess emissions resulting from malfunctions, each source shall notify the Department or the appropriate Local Program in accordance with Rule 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the Department. **[Rule 62-210.700, F.A.C.]**
19. The permittee shall submit an Annual Operating Report using DEP Form 62-210.900(4) to the Department's Northeast District office by March 1 of the following year for the previous year's operation. **[Rule 62-210.370, F.A.C.]**
20. The permittee shall permanently shut down A and C Phosphoric Acid Plants upon commencing commercial operation of the B and D Phosphoric Acid Plants. **[Rule 62-210.200, F.A.C. (Definitions - Potential Emissions)]**

APPENDIX BD
BEST AVAILABLE CONTROL TECHNOLOGY DETERMINATION (BACT)

Agricultural Chemicals Complex
White Springs Agricultural Chemicals, Inc.
PSD-FL-297 / 0470002-039-AC
White Springs, Hamilton County

The project proposed by White Springs Agricultural Chemicals, Inc. includes the conversion of the B Phosphoric Acid Plant to a hemi-hydrate process and an increase in the processing rate from 83 to 100 tons per hour P₂O₅ input; an increase in the processing rate of D Phosphoric Acid Plant from 95 to 110 tons per hour P₂O₅ input; an increase in the processing rate of Acid Clarification from 100 to 110 tons per hour P₂O₅ input; an increase in the processing rate of C & D Superphosphoric Acid Plant from 95 to 110 tons per hour P₂O₅ input; and an increase in the production rate of the X Train (Dical) from 45 to 55 tons per hour product.

The proposed modification will result in a significant increase in emissions of fluorides (F). The project is, therefore, subject to Prevention of Significant Deterioration (PSD) review in accordance with Rule 62-212.400, Florida Administrative Code (F.A.C.). A Best Available Control Technology (BACT) determination is part of the review required by Rules 62-212.400 and 62-296, F.A.C.

DATE OF RECEIPT OF COMPLETE BACT APPLICATION:

August 11, 2000

BACT DETERMINATION PROCEDURE:

In accordance with Chapter 62-212, F.A.C., this BACT determination is based on the maximum degree of reduction of each pollutant emitted which the Department of Environmental Protection (Department), on a case by case basis, taking into account energy, environmental and economic impacts, and other costs, determines is achievable through application of production processes and available methods, systems, and techniques. In addition, the regulations state that, in making the BACT determination, the Department shall give consideration to:

- Any Environmental Protection Agency determination of BACT pursuant to Section 169, and any emission limitation contained in 40 CFR Part 60 - Standards of Performance for New Stationary Sources or 40 CFR Part 61 - National Emission Standards for Hazardous Air Pollutants.
- All scientific, engineering, and technical material and other information available to the Department.
- The emission limiting standards or BACT determination of any other state.

APPENDIX BD
BEST AVAILABLE CONTROL TECHNOLOGY DETERMINATION (BACT)

- The emission limiting standards or BACT determination of any other state.
- The social and economic impact of the application of such technology.

The EPA currently stresses that BACT should be determined using the "top-down" approach. The first step in this approach is to determine, for the emission unit in question, the most stringent control available for a similar or identical emission unit or emission unit category. If it is shown that this level of control is technically or economically unfeasible for the emission unit in question, then the next most stringent level of control is determined and similarly evaluated. This process continues until the BACT level under consideration cannot be eliminated by any substantial or unique technical, environmental, or economic objections.

The air pollutant emissions from this facility can be grouped into categories based upon the control equipment and techniques that are available to control emissions from these emission units. Using this approach, the emissions can be classified as indicated below:

- *Fluorides* (HF, SiF₄). Controlled generally by scrubbing with pond water.
- *Particulate Matter* (PM, PM₁₀). Controlled generally by wet scrubbing or filtration.
- *Combustion Products* (SO₂, NO_x, PM). Controlled generally by good combustion of clean fuels.
- *Products of Incomplete Combustion* (CO, VOC). Controlled generally by proper combustion.

Grouping the pollutants in this manner facilitates the BACT analysis because it enables the equipment available to control the type or group of pollutants emitted and the corresponding energy, economic, and environmental impacts to be examined on a common basis.

Although all of the pollutants addressed in the BACT analysis may be subject to a specific emission limiting standard as a result of PSD review, the control of "non-regulated" air pollutants is considered in imposing a more stringent BACT limit on a "regulated" pollutant (i.e., PM, SO₂, H₂SO₄, fluorides, etc.), if a reduction in "non-regulated" air pollutants can be directly attributed to the control device selected as BACT for the abatement of the "regulated" pollutants.

APPENDIX BD
BEST AVAILABLE CONTROL TECHNOLOGY DETERMINATION (BACT)

BACT LIMITS PROPOSED BY APPLICANT:

| POLLUTANT | EMISSION LIMIT | LIMIT BASIS | CONTROL TECHNOLOGY |
|-----------------------|-----------------------|---|--------------------------------|
| F (X Train) | 1.65 lb/hr | 0.03 lb/ton product | Wet scrubbers using pond water |
| F (B Phos.Acids) | 1.35 lb/hr | 0.0135 lb/ton P ₂ O ₅ input | Wet scrubbers using pond water |
| F (D Phos.Acids) | 1.49 lb/hr | 0.0135 lb/ton P ₂ O ₅ input | Wet scrubbers using pond water |
| F (C&D Superphos.) | 0.96 lb/hr | 0.0087 lb/ton P ₂ O ₅ input | Wet scrubbers using pond water |
| F(Acid Clarification) | 3.3 lb/hr | 0.03 lb/ton P ₂ O ₅ input | Wet scrubbers using pond water |

BACT POLLUTANT ANALYSIS

Fluoride-containing gases, including hydrogen fluoride (HF), are evolved during the chemical reactions from the processes associated with the above emission units. Scrubbing the gas stream with pond water removes most of the fluoride evolved from the process. The applicant has proposed that the existing emission control equipment be considered as BACT.

BACT DETERMINATION BY THE DEPARTMENT:

Based on the information provided by the applicant and other information available to the Department, the following emission limits are established employing the top-down BACT approach.

| POLLUTANT | EMISSION LIMIT | LIMIT BASIS | CONTROL TECHNOLOGY |
|-----------------------|-----------------------|---|--------------------------------|
| F (X Train) | 1.1 lb/hr | 0.02 lb/ton product | Wet scrubbers using pond water |
| F (B Phos.Acids) | 1.2 lb/hr | 0.012 lb/ton P ₂ O ₅ input | Wet scrubbers using pond water |
| F (D Phos.Acids) | 1.32 lb/hr | 0.012 lb/ton P ₂ O ₅ input | Wet scrubbers using pond water |
| F (C&D Superphos.) | 0.96 lb/hr | 0.0087 lb/ton P ₂ O ₅ input | Wet scrubbers using pond water |
| F(Acid Clarification) | 3.3 lb/hr | 0.03 lb/ton P ₂ O ₅ input | Wet scrubbers using pond water |

The top-down BACT determination for fluorides identified the control technologies listed below starting with the most stringent:

1. Packed scrubber using once-through fresh water.
2. Packed scrubber using neutralized water from a dedicated pond (fresh water makeup).
3. Existing scrubber, using packing, and process cooling pond water.

Use of once-through fresh water would achieve the highest level of fluoride removal but this option is not practical for operations where water conservation is required and plant water balance problems would be created.

APPENDIX BD
BEST AVAILABLE CONTROL TECHNOLOGY DETERMINATION (BACT)

Option 2 is possible, the main considerations being the cost of installing the pond and equipment and the cost of operating a lime treatment unit. Costs for Option 2, based on data for a similar project amounted to almost \$40,000 per ton of fluorides removed. FDEP considers this figure sufficiently high to rule out Option 2. However, it should be noted that the low magnitude of fluoride emissions relative to their potential environmental impact justifies the consideration of higher fluoride cost effectiveness figures relative to the high tonnage pollutants such as sulfur dioxide and nitrogen oxides.

For the proposed project, Option 3 is determined by the top-down approach as the basis for the fluoride BACT emission limit.

The BACT limits tabulated above for the emission units evaluated are based on the recent compliance test results for the units between 1995 - 1999. These limits have been demonstrated to be achievable based on the historical test data for the emission units.

COMPLIANCE

Compliance with the fluoride limit shall be demonstrated using EPA Reference Method 13A or 13B as contained in 40 CFR 60, Appendix A.

DETAILS OF THE ANALYSIS MAY BE OBTAINED BY CONTACTING:

Syed Arif, P.E., Permit Engineer, New Source Review Section
Department of Environmental Protection
Bureau of Air Regulation
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Recommended By:

Approved By:

C. H. Fancy, P.E., Chief
Bureau of Air Regulation

Howard L. Rhodes, Director
Division of Air Resources Management

Date:

Date:

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 Statute. 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.

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

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 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 (*X*)
 - (b) Determination of Prevention of Significant Deterioration (*X*); and
 - (c) Compliance with New Source Performance Standards (*X*).
- 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.

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. Vernon J. Lloyd
 Vice President - Production
 White Springs Agricultural
 Chemicals, Inc.
 P. O. Box 300
 White Springs, FL 32096

COMPLETE THIS SECTION ON DELIVERY

A. Received by (Please Print Clearly) _____ B. Date of Delivery 9-25-00

C. Signature [Signature] Agent Addressee

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

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

4. Restricted Delivery? (Extra Fee) Yes

2. Article Number (Copy from service label)

7099 3400 0000 1453 2429

PS Form 3811, July 1999

Domestic Return Receipt

102595-99-M-1789

**U.S. Postal Service
 CERTIFIED MAIL RECEIPT**

(Domestic Mail Only; No Insurance Coverage Provided)

Article Sent To:

Vernon Lloyd

Postage \$ _____

Certified Fee _____

Return Receipt Fee (Endorsement Required) _____

Restricted Delivery Fee (Endorsement Required) _____

Total Postage & Fees \$ _____

Na Mr. Vernon J. Lloyd
 St: Vice President - Production
 Ci: White Springs Agricultural
 PO Box 300
 PS White Springs, FL 32096

Postmark
 Here

or Instructions

7099 3400 0000 1453 2429