

Jeb Bush  
Governor

# Department of Environmental Protection

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

David B. Struhs  
Secretary

August 9, 2000

## CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Vernon J. Lloyd, VP-Production  
White Springs Agricultural Chemicals, Inc.  
P.O. Box 300  
White Springs, Florida 32096

Re: DEP File No. 0470002-039-AC, PSD-FL-297  
Phosphoric Acid Production Reallocation

Dear Mr. Lloyd:

The Department has received the application on July 26, 2000 for the reallocation of phosphoric acid production capability amongst the existing plants at Suwannee River and Swift Creek Chemical Complex. The proposed project also includes an increase in the processing rates of the acid clarification system, superphosphoric acid plant and a dicalcium phosphate plant. 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 contains only a summary of fluoride stack test data. Please submit the detailed test reports for the 1998 and 1999 annual fluoride stack tests containing data on production rates, stack flows, scrubber conditions, etc. for each test run. Please redo Appendix A of the application by showing actual emissions in terms of lb F/ton  $P_2O_5$ . Also, include additional three years of stack test data summary, if available, for fluoride emissions.
2. Emission calculations in Appendix A for Fluorides indicate restriction in annual hours of operation for the Phosphoric Acid Plants, Acid Clarification Plant, Superphosphoric Acid Plant. The calculations restricts the 'B' and 'D' phos acid plants to 6,000 and 7,273 hrs/yr respectively, the acid clarification plant to 7,964 hrs/yr and the C & D superphosphoric acid plant to 7,964 hrs/yr. Please indicate if the intent of the application is to restrict the operation of these plants, otherwise redo the calculations based on 8,760 hrs/yr operation.
3. Emission calculations in Appendix A for Fluorides and Particulate Matter indicate restriction in annual hours of operation for the X-Train (Dical). The calculations restrict the X-Train to 7,273 hrs/yr. Please indicate if the intent of the application is to restrict the operation of this plant, otherwise redo the calculations for all the affected pollutants including F, PM/PM<sub>10</sub>, SO<sub>2</sub>, NO<sub>x</sub>, CO and VOC based on 8,760 hrs/yr operation.

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4. Please provide the references for the emission factors used in calculating proposed emissions for PM/PM<sub>10</sub> (0.18 lb/ton), SO<sub>2</sub> (0.6 lb/MMCF), NO<sub>x</sub> (100 lb/MMCF), CO (84 lb/MMCF) and VOC (2.8 lb/MMCF) for the X-Train. Also, provide the justification in using 0.015 gr/cf PM/PM<sub>10</sub> grain loading for the baghouses at the Dical Plant.
5. Please provide the RBLC data on BACT limits established for fluorides for superphosphoric acid plants, acid clarification plants and dical plants.
6. Enclosed are preliminary comments submitted by the US Fish & Wildlife Service. Please respond to their concerns. We are still awaiting comments from EPA, which 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 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.

We will be happy to meet and discuss the details with you and your staff. Mr. Syed Arif, P.E. is responsible for the technical review of the application. He may be contacted at 850/921-9528.

Sincerely,



A. A. Linero, P.E., Administrator  
Bureau of Air Regulation

Enclosure  
AAL/sa

cc: John B. Koogler, P.E., K & A  
Chris Kirts, DEP NED  
Gregg Worley, EPA Region IV  
John Bunyak, NPS



## U.S. FISH & WILDLIFE SERVICE AIR QUALITY BRANCH

P.O. BOX 25287, Denver, CO 80225-0287

Date: August 4, 2000

Telephone: (303) 969-2617

Fax: (303) 969-2822

To: Al Linero  
Syed Arif

From: Ellen Porter  
Kirsten King

Subject: White Springs Agricultural Chemicals, Inc.

White Springs Agricultural Chemicals, Inc. (WSAC) is proposing to reallocate phosphoric acid production among the existing A, B, C, and D Plants at their Suwannee River and Swift Creek Chemical Complex in Hamilton County, Florida. The WSAC facility is located 40 km southwest of Okefenokee Wilderness, a Class I air quality area administered by the U.S. Fish and Wildlife Service. WSAC proposes to shut down phosphoric acid production at plants A and C. WSAC will convert plant B to hemi-hydrate process and increase capacity from 83 to 100 tons per hour P<sub>2</sub>O<sub>5</sub> input and increase the capacity of Plant D from 95 to 110 tons per hour P<sub>2</sub>O<sub>5</sub> input. These changes will result in a 24 ton per year increase in fluoride emissions.

### **Best Available Control Technology (BACT) Analysis**

WSAC proposes fluoride emission limits of:

0.03 lb/ton product from the X-Train;

0.0135 lb/ton P<sub>2</sub>O<sub>5</sub> input from the phosphoric acid plants;

0.03 lb/ton P<sub>2</sub>O<sub>5</sub> input from the acid clarification process; and

0.0087 lb/ton P<sub>2</sub>O<sub>5</sub> input from C& D Superphosphoric Acid Plant (SPA).

The proposed limits do conform to BACT limits, however, we would like WSAC to explain why a decrease in production with BACT level limits causes a 24 ton per year increase in fluoride emissions. Based on the information provided in the tables of the application it appears that WSAC's previous emissions were significantly below the levels being proposed. We would like to understand why WSAC needs the higher emission limits.

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<ul style="list-style-type: none"> <li>Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.</li> <li>Print your name and address on the reverse so that we can return the card to you.</li> <li>Attach this card to the back of the mailpiece, or on the front if space permits.</li> </ul>		A. Received by (Please Print Clearly)	B. Date of Delivery 8-11-00
1. Article Addressed to:  Mr. Vernon J. Lloyd VP-Production White Springs Agricultural Chemicals, Inc. PO Box 300 White Springs, FL 32096		C. Signature X <i>[Signature]</i>	<input checked="" type="checkbox"/> Agent <input type="checkbox"/> Addressee
		D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No	
2. Article Number (Copy from service label) 7099 3400 0000 1453 2849		3. Service Type <input type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.	
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PS Form 3811, July 1999

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 Agricultural  
 Chemicals

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Name (Please Print Clearly) (to be completed by mailer)  
 Vernon J. Lloyd  
 Street, Apt. No., or PO Box No.  
 PO Box 300  
 City, State, ZIP+4  
 White Springs, FL 32096

PS Form 3800, July 1999      See Reverse for Instructions