

Holland+Knight

Tel 407 425 8500
Fax 407 244 5288

Holland & Knight LLP
200 South Orange Avenue, Suite 2600
Orlando, FL 32801-3461
www.hklaw.com

RECEIVED

JAN 22 2009

Rory C. Ryan
407 244 5110
rory.ryan@hklaw.com

January 20, 2009

BUREAU OF AIR REGULATION

VIA EMAIL & US MAIL

Trina Vielhauer
Chief, Bureau of Air Regulation
Division of Air Resource Management
2600 Blair Stone Road, MS #5505
Tallahassee, FL 32399-2400

Ronda L. Moore
Assistant General Counsel
Florida Department of Environmental Protection
3900 Commonwealth Blvd., MS 35
Tallahassee, FL 32399-3000

RE: Response to Request for Information from Syed Arif dated 12/23/08

Dear Trina and Ronni:

As you know this law firm represents White Springs Agricultural Chemicals, Inc ("PCS"). This letter responds to Syed Arif's email to Charlie Pults of December 23, 2008, concerning facility ID# 0470002. In that email Syed requested that I confirm PCS's position to resolve three outstanding items, and, if satisfied, the DEP would then issue the revised BART permit.

Concerning item 1, the following is our explanation as to why certain EU are not subject to CAM. This summary represents the culmination of voluminous materials and discussions between PCS and the Department as it relates to CAM applicability, including the submittal of information related to pre-control emissions evaluations, emission testing conducted specifically for CAM applicability, a site visit by FDEP staff specifically for CAM determination, and addressing units subject to MACT.

EU 004, X-Train

CAM requirements do not apply to this emissions unit because the X-train scrubber is considered process equipment for CAM purposes.

EU 008, Y-Train

CAM requirements do not apply to this emissions unit because the initial process recovery scrubbers are considered process equipment for CAM purposes.

EU 010, No. 1 Storage and Shipping Building

CAM requirements do not apply to this emissions unit because the scrubber is considered process equipment for CAM purposes.

EU 015, Screening and Shipping Building

CAM requirements do not apply to this emissions unit because the cyclone and scrubber are considered process equipment for CAM purposes.

EU 032, Z-Train

CAM requirements do not apply to this emissions unit because the initial process recovery scrubbers are considered process equipment for CAM purposes.

EU 044, A and B DFP Coolers

CAM requirements do not apply to this emissions unit because the dry and wet cyclones are considered process equipment for CAM purposes.

EU 065, SCM Silos

CAM requirements do not apply to this emissions unit because the scrubber is considered process equipment for CAM purposes.

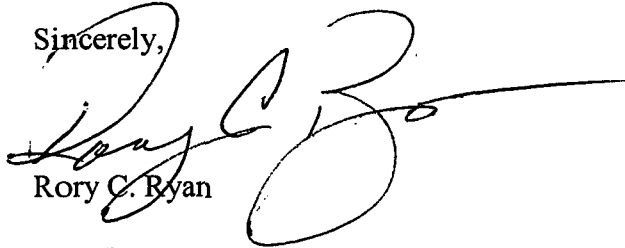
Concerning item 2, the reference to "...retaining the current limit of 4 lb/ton based on a 3-hour average..." was an oversight in our earlier response. To the extent the DEP needs us to formally withdraw this statement, please consider it withdrawn.

Concerning item 3, PCS is agreeable to the DEP modifying the permit to recognize the compliance requirement with Performance Specification 3 in combination with Performance Specification 2.

Ronda L. Moore
Trina Vielhauer
January 10, 2009
Page 3

In conclusion, please confirm the DEP is now able to issue the revised BART draft permit.

Sincerely,

A handwritten signature in black ink, appearing to read "Rory C. Ryan", with a long horizontal flourish extending to the right.

Rory C. Ryan

RCR/kw

cc: Karin S. Torain, Esq.
Charlie Pults, P.E.
Max Lee, PhD., P.E.
Koogler & Assoc.

5985863_v1