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JUN 28 2007

BUREAU OF AIR REGULATION

Syed Arif, FDEP

Division of Air Resource Management  
2600 Blair Stone Road MS 5500  
Tallahassee, Florida 32399-2400

June 25, 2007

**SUBJECT: Response to RAI Letter dated February 13, 2007  
DEP File No. 0470002-055-AC  
Best Achievable Retrofit Technology**

Dear Syed,

Please find the enclosed the response to your RAI letter to W.K.Thornton at White Springs Agricultural Chemicals, Inc. (PCS) dated February 13, 2007. The responses are provided below as answers in the format of the questions within your letter. A modeling report is attached for the BART analysis.

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1. For each emissions unit subject to BART, you are required by Rule 62-296.340, F.A.C., to conduct an analysis of emissions control alternatives. This step includes the identification of available , technically feasible retrofit technologies, and for each technology identified an analysis of the cost of compliance, the energy and non-air quality environmental impacts, and the degree of visibility improvement in affected Class I areas, resulting from the use of the control technology . Please provide this information to the Department for each emissions unit.

**ANSWER:**

This facility is one of the 26 subject categories. The applicable units listed below began startup between the applicable dates 8/7/1962 and 8/7/1977 and potential emissions of pollutants of SO<sub>2</sub> or PM from the subject units exceed 250 tons per year. Of the 32 emission units, 16 are subject to BART for PM and SO<sub>2</sub>. The other units do not meet the applicability criteria of BART.

App. Y of Part 51 V.I.C.1.