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BUREAU OF AIR REGULATION

October 24, 2008

VIA EMAIL & US MAIL

Trina Vielhauer  
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Florida Department of Environmental Protection  
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RE: White Springs Agricultural Chemicals, Inc. (PCS) Facility (ID# 0470002)

Dear Trina and Ronni:

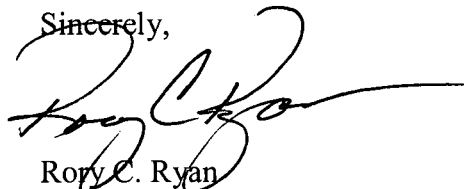
As you know, this law firm represents White Springs Agricultural Chemicals, Inc. ("PCS"), and this letter follows-up on the telephone conference between Trina and Syed with Charlie Pults and PCS's consultants from Koogler & Associates, Inc. on September 18, 2008. Following the September 18, 2008 telephone conference, on behalf of PCS, Koogler & Associates, Inc. submitted two letters: one responding to proposed Continuous Monitoring Requirements and the other concerning Particulate Matter Limits, with both responses submitted on September 24, 2008. The purpose of this correspondence is to notify the Department of PCS's willingness to accept a permit condition to the White Springs facility draft permit requiring 40 CFR 60, Appendix F quality assurance procedures (RATA and CGAs) for the sulfur dioxide Continuous Emission Monitoring Systems for emissions units 021 and 022, the C and D sulfuric acid plants, respectively. This concession is in addition to the other compromises by PCS, including the acceptance of the SO<sub>2</sub> emissions limitation of 3.5 lb/ton on a 3-hour average basis, which compromises are all made in a good faith effort toward resolution of the BART draft permit issues. While PCS is willing to accept the Department's request to add this RATA/CGA requirement for emissions units 021 and 022, PCS respectfully renews its request to the Department to reconsider and ultimately agree to PCS's revised emissions limits for units 015, 044, 065, 003, 038 and 008.

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In consideration for PCS's concession regarding the RATA requirement, PCS respectfully renews its requests for emissions units 015, 044, 065, 003, and 038 that PCS receive a ten percent increase to the Department's proposed Particulate Matter BART limits. Additionally, for emissions unit 008, due to the similarity of operations of Y-Train and Z-Train, PCS requests that Y-Train have a similar limit of 9.2 lbs per hour. The reasons for this renewed request were discussed during the September 18<sup>th</sup> telephone conference and readdressed in the September 24, 2008 correspondence. My client's overriding concern is the inherent variability of the testing process and the significantly reduced tolerances allowed by the Department's proposed emissions rates likely place PCS in the position of suffering future stack test failures.

More specifically, PCS requested this ten percent increase be added to account for the inherent variability of stack testing by EPA Method 5. Collaborative studies by EPA(1) show that with competent test teams, the within-team Relative Standard Deviation (RSD) of a Method 5 test was 10.4% and the between-team RSD was a 12.1%. More recently, ASTM(2) reported that when the stack gas PM concentration was less than 150 mg/dscm (approx. 0.065 gr/dscf), the RSD of a Method 5 test will be below 10% (it was not specified whether this was the within-team or between-team RSD). ASTM further reported that the accuracy of Method 5 test (the departure of the average of three test runs from the true stack gas particulate matter concentration) is 14.7%. In sum, given that the precision and accuracy of one standard deviation of the Method 5 test are both in the range of approximately 10-15% of the emission rate being measured, PCS respectfully requests a ten percent increase be added to the proposed Department limits. Additionally, PCS requests that emission unit 008 (Y-Train) have an emission limit similar to that of Z-Train of 9.2lb/hr due to similarity of operations and emission.

In conclusion, PCS is willing to accept the Department's proposed RATA/CGA requirement for emissions units 021 and 022, but correspondingly requests the Department recognize PCS's position concerning the Department's proposed Particulate Matter limits and agree to PCS's request for ten percent increase to the proposed Department limits. Resolution of these two remaining issues related to the pending draft permit would allow for the necessary revisions to the draft permit to be completed, the pending petition for formal administrative hearing be dismissed, and assist the Department in the completion of its SIP within the required timeline. Please advise if this compromise is acceptable to the Department.

Sincerely,  
  
Rory C. Ryan

RCR/kw  
Enclosure

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

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Koogler & Assoc.

References

- (1) USEPA, *Quality Assurance Handbook for Air Pollutant Measurement Systems: Volume III. Stationary Sources Specific Methods*, Section 3.4, Revision No. 0, EPA/600/4-77/027b, January 15, 1980.
- (2) ASTM, *Reference Method Accuracy and Precision (ReMAP): Phase 1 – Precision of Manual Stack Emission Measurements*, Lanier, W. S. and Hendrix, C. D., February 2001.

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