



4014 NW 13th STREET  
GAINESVILLE, FL 32609-1923  
352/377-5822 ▪ FAX/377-7158

KA 102-04-00  
August 14, 2007

**RECEIVED**

AUG 16 2007

**BUREAU OF AIR REGULATION**

Mr. Syed Arif, P.E.  
Florida Department of  
Environmental Protection  
Division of Air Resource Management  
2600 Blair Stone Road MS 5500  
Tallahassee, Florida 32399-2400

**SUBJECT:** Response to RAI Letter dated July 26, 2007  
DEP File No. 0470002-055-AC  
Best Achievable Retrofit Technology  
White Springs Agricultural Chemicals, Inc.

Dear Syed,

Please find the enclosed the response to your RAI letter to W.K.Thornton at White Springs Agricultural Chemicals, Inc. (PCS) dated July 26, 2007. The responses are provided below as answers in the format of the questions within your letter. A CD is attached for response to item No. 2.

- 
1. The Department noted a discrepancy in the emission units that were classified as BART sources in the survey form of April 18, 2003, compared to the BART sources in Table 1 of the application. For each emissions unit that are now claimed not to be BART sources, please provide documentations to show that those emissions unit did not commence construction prior to August 7, 1977. The documentation could be in the form of the original construction permit, purchase order for the equipment, or some other form of documentation.

Answer: Attachment A is divided into sections for each emission unit claimed not subject to BART. Documentation for each unit is within each section.

2. Please provide the active worksheets to include calculations and formulas for Table 7 and 8 of the modeling section.

Answer: The attached CD (Attachment B) includes an electronic copy of the requested active worksheet files in Excel format.

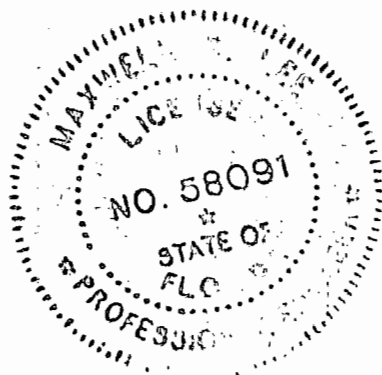
If you have any questions regarding this information or any related matter, please contact me (352) 377-5822.

Sincerely,



Max Lee, Ph.D., P.E.

8/3/07  
Date



Enc:

Cc: Charles Pults, PCS

# ATTACHMENT A

BART exemption documentation

# DETERMINATION OF BART-SUBJECT SOURCES, WHITE SPRINGS AGRICULTURAL CHEMICALS (ARMS ID:0470002)

| Stack ID | Units                            | Initial Air Constr. Permit    | Permit Issuance date | Permit notes  | subject to BART? |
|----------|----------------------------------|-------------------------------|----------------------|---|------------------|
| 1        | #2 Rock Grinder                  |                               |                      | AO In June 1974   | YES              |
|          | A Phos Acid (no longer operates) |                               |                      |   |                  |
| 3        | A DFP                            |                               |                      | AC not known but, operation permit in 1975                      | YES              |
| 4        | X Train                          |                               |                      | AC not known but, operation permit in 1975                      | YES              |
| 8        | Y Train                          |                               |                      | AC not known but, operation permit in 1975                      | YES              |
| 10       | #1 Storage                       |                               |                      | AC not known but, operation permit in 1975                      | YES              |
| 15       | MAP/DAP Shipping                 |                               |                      | AC not known but, operation permit in 1975                      | YES              |
|          | C Phos Acid (now part of EU 20)  | no reactor                    |                      | AC not known but, operation permit in 1975                      | YES              |
| 20       | B Phos Acid                      |                               |                      | AC not known but, operation permit in 1975                      | YES              |
| 21       | C Sulfuric                       |                               |                      | AC not known but, operation permit in 1975                      | YES              |
| 22       | D Sulfuric                       |                               |                      | AC not known but, operation permit in 1975                      | YES              |
| 32       | Z Train                          | July 1978 had an AO FL-083    |                      | AC not known but, operation permit in 1975                      | YES              |
| 34       | S Acid Clarification             | AC-24-2698                    | 7/6/1979             |   | NO               |
| 35       | N Acid Clarification             | AC-24-2699                    | 7/6/1979             |   | NO               |
| 36       | A & B SPA                        | AC-24-2700                    | 7/6/1977             | construction began after 8/7/1977                               | NO               |
| 38       | B DFP                            |                               |                      | operation permit in 1975  | YES              |
| 39       | C Aux Boiler                     | AC-24-2700                    | 7/6/1977             | Unit ordered October 1977                                       | NO               |
| 40       | D Aux Boiler                     | AC-24-2701                    | 7/6/1977             | Unit ordered October 1977                                       | NO               |
| 42       | DFP Feed Prep                    |                               |                      | AC not known but, operation permit in 1975                      | YES              |
| 44       | A & B DFP Coolers                |                               |                      | AC not known but, operation permit in 1975                      | YES              |
| 54       | SR Molten Sulfur System C & D    | AC-24-171596                  | 2/7/1990             |   | NO               |
| 62       | DFP Silos                        |                               |                      | op. permit in 1975 assumed due to EU 38 and 3 in same operation | YES              |
| 64       | SCM Rock Dryer                   |                               |                      | op. permit in 1976 assumed due to EU 65 in operation            | YES              |
| 65       | SCM Silos                        |                               |                      | operation permit in 1976  | YES              |
| 66       | E Sulfuric Acid                  | AC-24-2715                    | 2/28/1978            |   | NO               |
| 67       | F Sulfuric Acid                  | AC-24-2716                    | 2/28/1978            |   | NO               |
| 68       | E Aux Boiler                     | AC-24-????                    | 2/28/1978            |   | NO               |
| 69       | D Phos Acid                      | AC-24-2718                    | 2/28/1978            |   | NO               |
| 70       | C & D SPA                        | AC-24-2720, AC-24-2719        | 2/28/1978            | C&D separate AC permits   | NO               |
| 71       | SC Acid Clarification            | AC-24-2722-east, AC-24-2721-w | 2/28/1978            | east and west separate AC permits                               | NO               |
| 72       | SC Molten Sulfur System E & F    | AC-24-171595                  | 2/7/1990             |   | NO               |

## Unit 34: S Acid Clarification

BEST AVAILABLE COPY



NOV 5 1979  
SUB. DISTRICT - JAAX

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION  
APPLICATION TO OPERATE/~~CONSTRUCT~~  
AIR POLLUTION SOURCES

SOURCE TYPE: Phosphoric Acid Clarification  New  Existing

APPLICATION TYPE:  Construction  Operation  Modification

COMPANY NAME: Occidental Chemical Company COUNTY: Hamilton

Identify the specific emission point source(s) addressed in this application (i.e. Lime Kiln No. 4 with Venturi Scrubber; Peeking Unit No. 2, Gas Fired) Acid Clarification - South

SOURCE LOCATION: Street S.R. 137 City White Springs

UTM: East 328,320 E North 3,368,810 N

Latitude 0 ' 00 " N Longitude 0 ' 00 " W

APPLICANT NAME AND TITLE: Occidental Chemical Company

APPLICANT ADDRESS: Post Office Box 300, White Springs, Florida 32096

SECTION I: STATEMENTS BY APPLICANT AND ENGINEER

A. APPLICANT

I am the undersigned owner or authorized representative\* of Occidental Chemical Company

I certify that the statements made in this application for a non operating permit are true, correct and complete to the best of my knowledge and belief. Further, I agree to maintain and operate the pollution control source and pollution control facilities in such a manner as to comply with the provision of Chapter 403, Florida Statutes, and all the rules and regulations of the department and revisions thereof. I also understand that a permit, if granted by the department, will be non-transferable and I will promptly notify the department upon sale or legal transfer of the permitted establishment.

\*Attach letter of authorization

Signed: M. P. McArthur  
M. P. McArthur, V.P. & General Manager  
Name and Title (Please Type)

Date: 11/2/79 Telephone No. (904) 397-8101

B. PROFESSIONAL ENGINEER REGISTERED IN FLORIDA (where required by Chapter 471, F.S.)

This is to certify that the engineering features of this pollution control project have been designed/examined by me and found to be in conformity with modern engineering principles applicable to the treatment and disposal of pollutants characterized in the permit application. There is reasonable assurance, in my professional judgment, that the pollution control facilities, when properly maintained and operated, will discharge an effluent that complies with all applicable statutes of the State of Florida and the rules and regulations of the department. It is also agreed that the undersigned will furnish, if authorized by the owner, the applicant a set of instructions for the proper maintenance and operation of the pollution control facilities and, if applicable, pollution sources.

Signed: John B. Koogler  
John B. Koogler, P.E.  
Name (Please Type)

(Affix Seal)

SHOLTES & KOOGLER ENVIRONMENTAL CONSULTANTS  
Company Name (Please Type)  
1213 NW 6th Street, Gainesville, FL 32601  
Mailing Address (Please Type)

Florida Registration No. 12925

Date: \_\_\_\_\_ Telephone No. (904) 377-5822

\* These instructions will be furnished by the vendors supplying the pollution control equipment. Said instructions and vendor guarantees will be reviewed for satisfactory operation and recommendations made where required.

SECTION II: GENERAL PROJECT INFORMATION

A. Describe the nature and extent of the project. Refer to pollution control equipment, and expected improvements in source performance as a result of installation. State whether the project will result in full compliance. Attach additional sheet if necessary.

This facility was constructed to filter 48% phosphoric acid prior to evaporation to superphosphoric acid. The plant will consist of four (4) 12' long x 12' diameter rotary drum filters. Diatomaceous earth will be used as filter aid. A filter media will be stored and fed similar to the filter aid and emissions controlled with baghouses discharging back to storage. Each filter drum will be hooded and vented. (Continued on Page 2a)

B. Schedule of project covered in this application (Construction Permit Application Only)

Start of Construction \_\_\_\_\_ Completion of Construction \_\_\_\_\_

C. Costs of pollution control system(s): (Note: Show breakdown of estimated costs only for individual components/units of the project serving pollution control purposes. Information on actual costs shall be furnished with the application for operation permit.)

\$60,000 for counter-current packed scrubber

\$10,000 for baghouses to support filter media storage and lime rock storage

D. Indicate any previous DER permits, orders and notices associated with the emission point, including permit issuance and expiration dates.

This unit was constructed under FDER Permit No. AC24-2698 issued July 6 and expiring December 31, 1979.

E. Is this application associated with or part of a Development of Regional Impact (DRI) pursuant to Chapter 380, Florida Statutes, and Chapter 22F-2, Florida Administrative Code? Yes \_\_\_ No

F. Normal equipment operating time: hrs/day 24 ; days/wk 7 ; wks/yr 52 ; if power plant, hrs/yr \_\_\_\_\_ ; if seasonal, describe: \_\_\_\_\_

G. If this is a new source or major modification, answer the following questions. (Yes or No)

(Not Applicable, for Air Construction Permit only)

1. Is this source in a non-attainment area for a particular pollutant?

a. If yes, has "offset" been applied?

b. If yes, has "Lowest Achievable Emission Rate" been applied?

c. If yes, list non-attainment pollutants.

2. Does best available control technology (BACT) apply to this source? If yes, see Section VI.

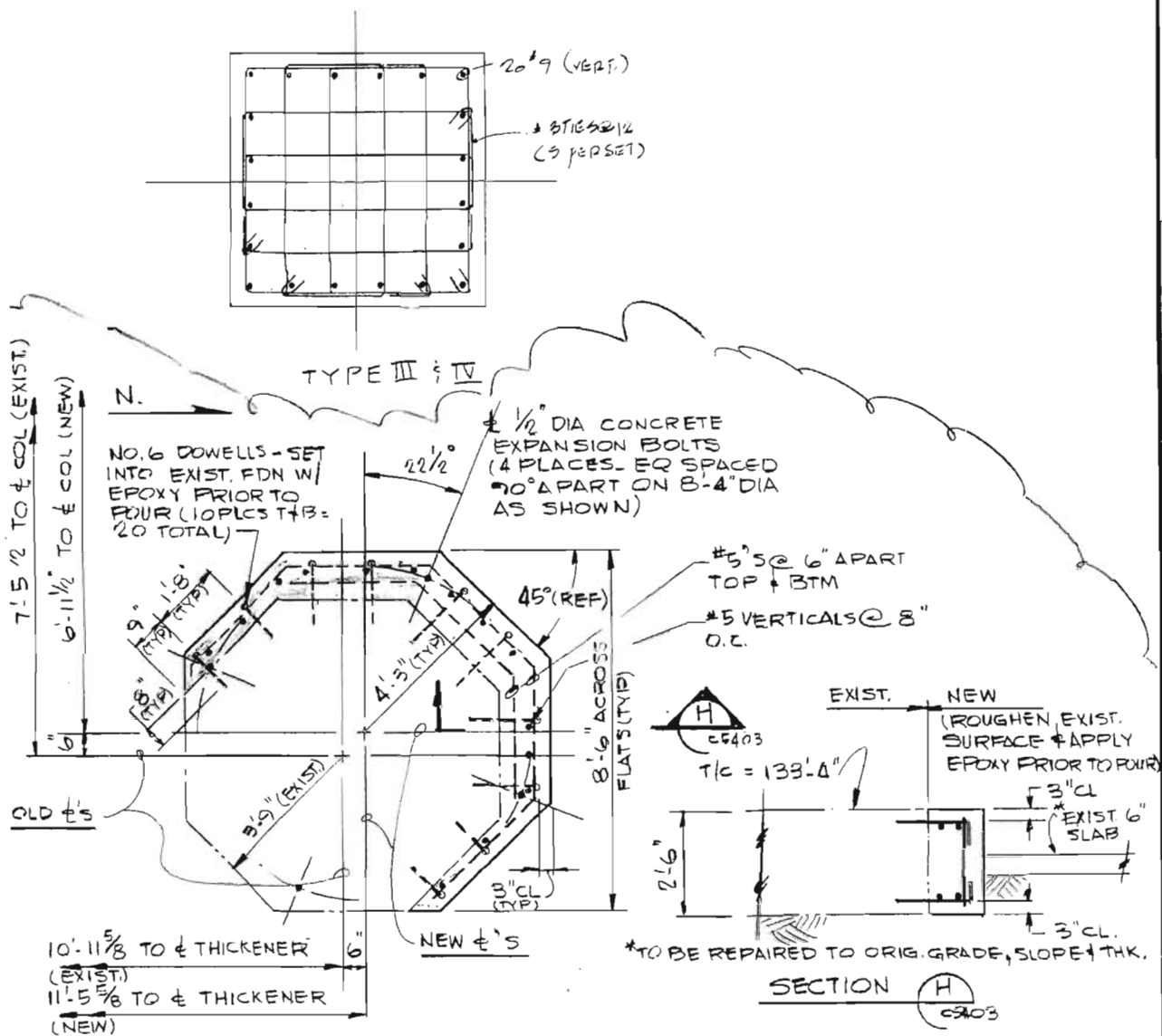
3. Does the State "Prevention of Significant Deterioration" (PSD) requirements apply to this source? If yes, see Sections VI and VII.

4. Do "Standards of Performance for New Stationary Sources" (NSPS) apply to this source?

5. Do "National Emission Standards for Hazardous Air Pollutants" (NESHAP) apply to this source?

Attach all supportive information related to any answer of "Yes". Attach any justification for any answer of "No" that might be considered questionable.

NOTE: THIS FOUNDATION DRAWING INDICATES THAT THE N&S ACID CLARIFICATION PLANTS WERE NOT IN EXISTENCE IN OCTOBER 1977.



**PLAN VIEW - SYNSPAR O'FLOW TK FOUNDATION**

NEW IS SHADED - FORM NEW FDN AROUND EXIST. FDN - CUT EXIST. ANCHOR BOLTS OFF 1/2" BELOW TIC EL.  
SCALE: 3/8" = 1'-0"

|  |          |   |          |
|--|----------|---|----------|
| <b>Davy Powergas Inc.</b><br>LAKELAND, FLORIDA |          | <b>OCCIDENTAL CHEMICAL COMPANY</b><br>SUWANNEE RIVER PHOSPHATE DIVISION |          |
| PN 4256  |          | AREA SA   |          |
| BY   | DATE     | SCALE: 3/8" = 1'-0" (U.S.)  | DATE     |
| J.W.M.   | 12/20/73 | DRAWN BY AL CAMACHO   | 9-15-77  |
|  |          | CHECKED BY RJF/MAR  | 10-10-77 |
|  |          | APPROVED BY <i>[Signature]</i>  | 10-10-77 |
|  |          | APPROVED BY <i>[Signature]</i>  | 10-14-77 |
|  |          | APPROVED BY <i>[Signature]</i>  | 10-17-77 |
| TITLE  |          | PLANT   |          |
| OXY/SPA PROJECT - PHASE I                      |          |   |          |
| WHITE SPRING, FLA.                             |          | JOB NO.   |          |
| AGING & PURIFICATION AREA                      |          | CHARGE NO.  |          |
| FILTER BLDG.                                   |          | REVISION NO.  |          |
| SECTIONS                                       |          | DWG. NO. SA-C5403   |          |

**WORK SAFELY**

|   |   |   |   |
|---|---|---|---|
| X | X | X | X |
| E | I | M | P |
| S | V | L | R |



## Unit 35: N Acid Clarification

PERMITTED

BY

LOWER ST. JOHNS RIVER SUB DISTRICT

DEPARTMENT OF ENVIRONMENTAL REGULATION

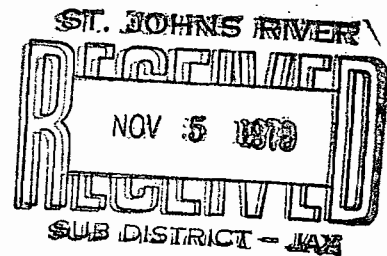
PERMIT NO. AD24-21062

DATE 2/4/80



STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION



APPLICATION TO OPERATE/~~CONSTRUCT~~  
AIR POLLUTION SOURCES

SOURCE TYPE: Phosphoric Acid Clarification  New  Existing

APPLICATION TYPE:  Construction  Operation  Modification

COMPANY NAME: Occidental Chemical Company COUNTY: Hamilton

Identify the specific emission point source(s) addressed in this application (i.e. Lime Kiln No. 4 with Venturi Scrubber; Peeking Unit No. 2, Gas Fired) Acid Clarification - North

SOURCE LOCATION: Street S.R. 137 City White Springs

UTM: East 328,320 E North 3,368,810 N

Latitude ° ' " Longitude ° ' "

APPLICANT NAME AND TITLE: Occidental Chemical Company

APPLICANT ADDRESS: Post Office Box 300, White Springs, Florida 32096

SECTION I: STATEMENTS BY APPLICANT AND ENGINEER

A. APPLICANT

I am the undersigned owner or authorized representative\* of Occidental Chemical Company

I certify that the statements made in this application for a n operating permit are true, correct and complete to the best of my knowledge and belief. Further, I agree to maintain and operate the pollution control source and pollution control facilities in such a manner as to comply with the provision of Chapter 403, Florida Statutes, and all the rules and regulations of the department and revisions thereof. I also understand that a permit, if granted by the department, will be non-transferable and I will promptly notify the department upon sale or legal transfer of the permitted establishment.

\*Attach letter of authorization

Signed: [Signature]  
M. P. McArthur, V.P. & General Manager  
Name and Title (Please Type)

Date: 11/2/79 Telephone No. (904) 397-8101

B. PROFESSIONAL ENGINEER REGISTERED IN FLORIDA (where required by Chapter 471; F.S.)

This is to certify that the engineering features of this pollution control project have been designed/examined by me and found to be in conformity with modern engineering principles applicable to the treatment and disposal of pollutants characterized in the permit application. There is reasonable assurance, in my professional judgment, that the pollution control facilities, when properly maintained and operated, will discharge an effluent that complies with all applicable statutes of the State of Florida and the rules and regulations of the department. ~~It is also agreed that the undersigned will furnish, if authorized by the owner, the applicant a set of instructions for the proper maintenance and operation of the pollution control facilities and, if applicable, pollution sources.~~

Signed: [Signature]  
John B. Koogler, P.E.  
Name (Please Type)

(Affix Seal)

SHOLTES & KOOGLER ENVIRONMENTAL CONSULTANTS  
Company Name (Please Type)  
1213 NW 6th Street, Gainesville, FL 32601  
Mailing Address (Please Type)

Florida Registration No. 12925

Date: \_\_\_\_\_ Telephone No. (904) 377-5822

\* These instructions will be furnished by the vendors supplying the pollution control equipment. Said instructions and vendor guarantees will be reviewed for satisfactory operation and recommendations made where required.

**SECTION II: GENERAL PROJECT INFORMATION**

A. Describe the nature and extent of the project. Refer to pollution control equipment, and expected improvements in source performance as a result of installation. State whether the project will result in full compliance. Attach additional sheet if necessary.

This facility was constructed to filter 48% phosphoric acid prior to evaporation to superphosphoric acid. The plant will consist of six(6) 12' long x 12' diameter rotary drum filters. Each filter drum will be hooded and vented. Vent gases from the filters are passed through the packed counter-current scrubber and stack to the atmosphere. Acid Clarification, North was previously identified as "#2".

B. Schedule of project covered in this application (Construction Permit Application Only)

Start of Construction \_\_\_\_\_ Completion of Construction \_\_\_\_\_

C. Costs of pollution control system(s): (Note: Show breakdown of estimated costs only for individual components/units of the project serving pollution control purposes. Information on actual costs shall be furnished with the application for operation permit.)

\$60,000 for counter-current packed scrubber

D. Indicate any previous DER permits, orders and notices associated with the emission point, including permit issuance and expiration dates.

This unit was constructed under FDER permit No. AC24-2699 issued on July 6 and expiring December 31, 1979

E. Is this application associated with or part of a Development of Regional Impact (DRI) pursuant to Chapter 380, Florida Statutes, and Chapter 22F-2, Florida Administrative Code? Yes  No

F. Normal equipment operating time: hrs/day 24 ; days/wk 7 ; wks/yr 52 ; if power plant, hrs/yr \_\_\_\_\_ ; if seasonal, describe: \_\_\_\_\_

G. If this is a new source or major modification, answer the following questions. (Yes or No)

(Not Applicable, for Air Construction Permit only)

1. Is this source in a non-attainment area for a particular pollutant?

a. If yes, has "offset" been applied? \_\_\_\_\_

b. If yes, has "Lowest Achievable Emission Rate" been applied? \_\_\_\_\_

c. If yes, list non-attainment pollutants. \_\_\_\_\_

2. Does best available control technology (BACT) apply to this source? If yes, see Section VI. \_\_\_\_\_

3. Does the State "Prevention of Significant Deterioration" (PSD) requirements apply to this source? If yes, see Sections VI and VII. \_\_\_\_\_

4. Do "Standards of Performance for New Stationary Sources" (NSPS) apply to this source? \_\_\_\_\_

5. Do "National Emission Standards for Hazardous Air Pollutants" (NESHAP) apply to this source? \_\_\_\_\_

Attach all supportive information related to any answer of "Yes". Attach any justification for any answer of "No" that might be considered questionable.

Unit 36: A & B SPA

BEST AVAILABLE COPY



STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION  
APPLICATION TO OPERATE/~~CONSTRUCT~~  
AIR POLLUTION SOURCES

SOURCE TYPE: Superphosphoric Acid Plants  New<sup>1</sup>  Existing<sup>1</sup>  
APPLICATION TYPE:  Construction  Operation  Modification  
COMPANY NAME: Occidental Chemical Company COUNTY: Hamilton  
Identify the specific emission point source(s) addressed in this application (i.e. Lime Kiln No. 4 with Venturi Scrubber; Peeking Unit No. 2, Gas Fired) Superphosphoric Acid Plants "A" and "B"  
SOURCE LOCATION: Street S.R. 137 City White Springs  
UTM: East 328,320 E North 3,368,810 N  
Latitude 0 "N Longitude 0 "W  
APPLICANT NAME AND TITLE: Occidental Chemical Company  
APPLICANT ADDRESS: Post Office Box 300, White Springs, Florida 32096

SECTION I: STATEMENTS BY APPLICANT AND ENGINEER

A. APPLICANT

I am the undersigned owner or authorized representative\* of Occidental Chemical Company

I certify that the statements made in this application for a n. operating permit are true, correct and complete to the best of my knowledge and belief. Further, I agree to maintain and operate the pollution control source and pollution control facilities in such a manner as to comply with the provision of Chapter 403, Florida Statutes, and all the rules and regulations of the department and revisions thereof. I also understand that a permit, if granted by the department, will be non-transferable and I will promptly notify the department upon sale or legal transfer of the permitted establishment.

\*Attach letter of authorization

Signed: [Signature]  
M. P. McArthur, V.P. & General Manager  
Name and Title (Please Type)  
Date: \_\_\_\_\_ Telephone No. (904) 397-8101

B. PROFESSIONAL ENGINEER REGISTERED IN FLORIDA (where required by Chapter 471, F.S.)

This is to certify that the engineering features of this pollution control project have been designed/examined by me and found to be in conformity with modern engineering principles applicable to the treatment and disposal of pollutants characterized in the permit application. There is reasonable assurance, in my professional judgment, that the pollution control facilities, when properly maintained and operated, will discharge an effluent that complies with all applicable statutes of the State of Florida and the rules and regulations of the department. ~~It is also agreed that the undersigned will furnish, if authorized by the owner, the applicant a set of instructions for the proper maintenance and operation of the pollution control facilities and, if applicable, pollution sources.~~

Signed: \_\_\_\_\_  
John B. Koogler, P.E.  
Name (Please Type)

(Affix Seal)

SHOLTES & KOOGLER ENVIRONMENTAL CONSULTANTS  
Company Name (Please Type)  
1213 NW 6th Street, Gainesville, FL 32601  
Mailing Address (Please Type)  
Date: \_\_\_\_\_ Telephone No. (904) 377-5822

Florida Registration No. 12925

\* These instructions will be furnished by the vendors supplying the pollution control equipment. Said instructions and vendor guarantees will be reviewed for satisfactory operation and recommendations made where required.

**SECTION II: GENERAL PROJECT INFORMATION**

A. Describe the nature and extent of the project. Refer to pollution control equipment, and expected improvements in source performance as a result of installation. State whether the project will result in full compliance. Attach additional sheet if necessary.

These sources are two superphosphoric acid vacuum evaporators designed to evaporate 54% P<sub>2</sub>O<sub>5</sub> phosphoric acid to 70% P<sub>2</sub>O<sub>5</sub> phosphoric acid at the rate of 1,000 TPD of 100% P<sub>2</sub>O<sub>5</sub> each. Off-gases from the evaporators will be condensed with recirculated pond water in barometric condensers. Emissions from the plant will consist of gaseous fluorides in the vent gases from the SPA seal tanks and condenser seal tanks. These emissions will meet the allowable NSPS rate of 0.01 lbs/F/ton P<sub>2</sub>O<sub>5</sub> input with no control.

B. Schedule of project covered in this application (Construction Permit Application Only) \_\_\_\_\_ input with no control.  
 Start of Construction N/A Completion of Construction N/A. (See attached page)

C. Costs of pollution control system(s): (Note: Show breakdown of estimated costs only for individual components/units of the project serving pollution control purposes. Information on actual costs shall be furnished with the application for operation permit.)

\$10,000 for duct work

D. Indicate any previous DER permits, orders and notices associated with the emission point, including permit issuance and expiration dates.

This unit was constructed under FDER construction permit No. **AC24-2700** issued on **July 6, 1977**; expires December 31, 1979.

E. Is this application associated with or part of a Development of Regional Impact (DRI) pursuant to Chapter 380, Florida Statutes, and Chapter 22F-2, Florida Administrative Code?  Yes  No

F. Normal equipment operating time: hrs/day 24; days/wk 7; wks/yr 52; if power plant, hrs/yr \_\_\_\_\_; if seasonal, describe: \_\_\_\_\_

G. If this is a new source or major modification, answer the following questions. (Yes or No)

Not Applicable, for Air Construction Permit Only.

1. Is this source in a non-attainment area for a particular pollutant?

- a. If yes, has "offset" been applied? \_\_\_\_\_
- b. If yes, has "Lowest Achievable Emission Rate" been applied? \_\_\_\_\_
- c. If yes, list non-attainment pollutants. \_\_\_\_\_

2. Does best available control technology (BACT) apply to this source? If yes, see Section VI. \_\_\_\_\_

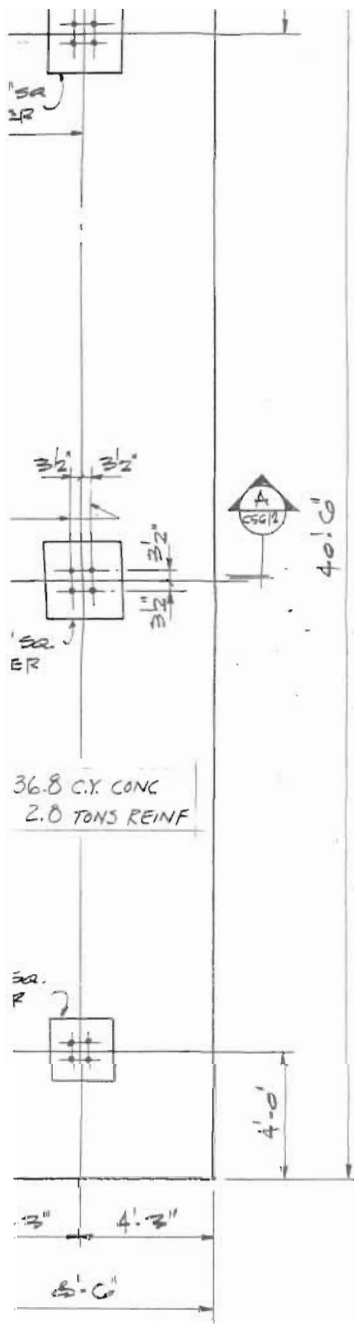
3. Does the State "Prevention of Significant Deterioration" (PSD) requirements apply to this source? If yes, see Sections VI and VII. \_\_\_\_\_

4. Do "Standards of Performance for New Stationary Sources" (NSPS) apply to this source? \_\_\_\_\_

5. Do "National Emission Standards for Hazardous Air Pollutants" (NESHAP) apply to this source? \_\_\_\_\_

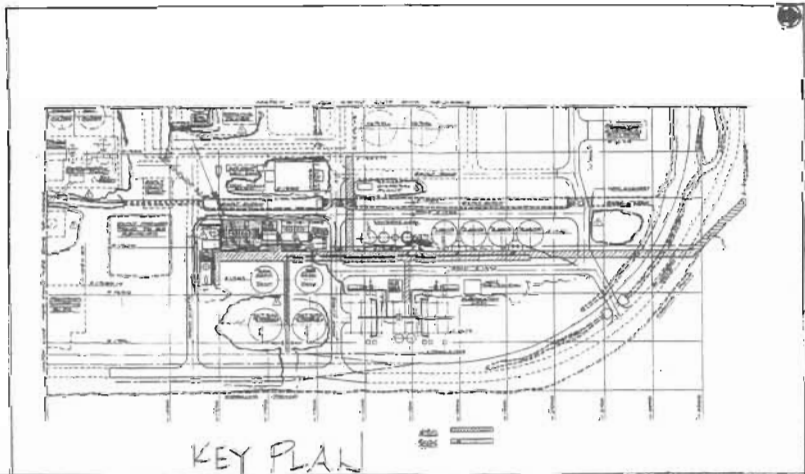
Attach all supportive information related to any answer of "Yes". Attach any justification for any answer of "No" that might be considered questionable.

NOTE: THIS FOUNDATION DRAWING INDICATES THAT THE A&B SPA PLANTS WERE NOT IN EXISTENCE IN OCTOBER 1977.



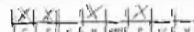
NOTES:

1. FOR GEN. CONC. NOTES SEE DWG. 54-C5433.
2. WORK THIS DWG. WITH DWG. C5503.
3. ALL INFO. MARKED 'TYPICAL' APPLIES TO THAT FIG TYPE ONLY.



|   |                         |                                   |                           |                                    |  |
|---|-------------------------|-----------------------------------|---------------------------|------------------------------------|--|
| <b>CHEMICAL</b>                         |                         | <b>OXY</b>                        |                           | <b>OCcidental CHEMICAL COMPANY</b> |  |
| Davy Powergas Inc.<br>LAKELAND, FLORIDA |                         | SUWANNEE RIVER PHOSPHATE DIVISION |                           |                                    |  |
| PN 4256                                 | AREA 50                 |                                   |                           |                                    |  |
| DATE                                    | SCALE: 1/4" = 1'-0"     | DATE                              | TITLE                     | PLANT                              |  |
|   | DRAWN BY A.L. CAMACHO   | 9-23-77                           | OXY/EPA PROJECT - PHASE I | JOB NO.                            |  |
|   | CHECKED BY DB/SAB       | 10/10/77                          | WHITE SPRINGS, FLORIDA    | CHARGE NO.                         |  |
|   | APPROVED BY R. Brown    | 10/17/77                          | SPA EVAPORATION AREA      | REVISION NO. 2                     |  |
| 11-28-77                                | APPROVED BY [Signature] | 10/17/77                          | FOUNDATION PLAN           | DWS. NO. 56-C5611                  |  |
| 10-24-77                                | APPROVED BY [Signature] | 10/14/77                          |                           |                                    |  |
| G                                       | H                       |                                   | I                         |                                    |  |

**WORK SAFELY**



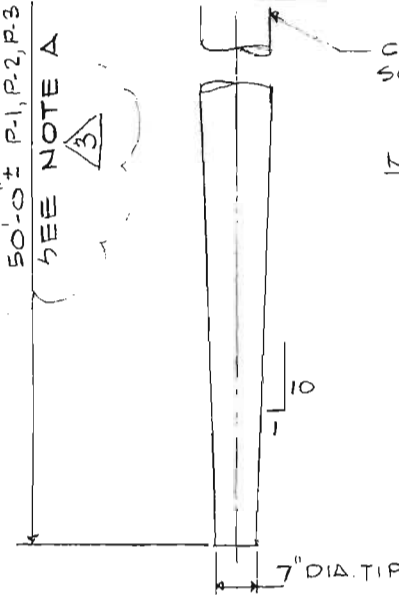
Unit 39: C Aux Boiler



NOTE: THESE FOUNDATION DRAWINGS FOR C&D BOILERS, INDICATES THEY WERE NOT IN EXISTENCE IN MAY 1979.



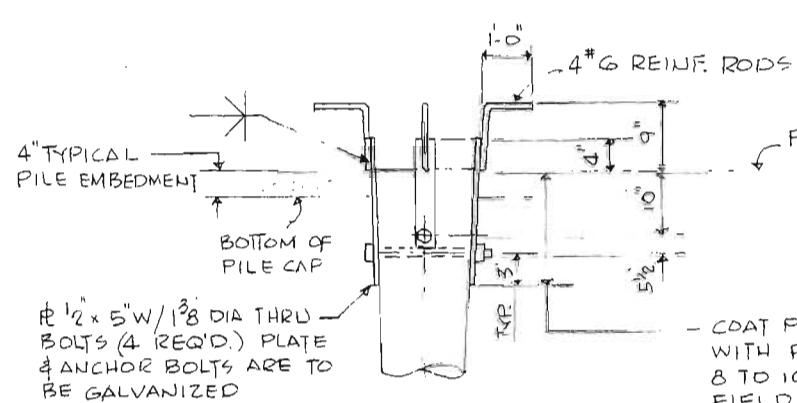
50'-0" ± P-1, P-2, P-3  
SEE NOTE A



CLASS "B" TREATED SOUTHERN PINE PILE

NOTE: PILES TO BE DRIVEN TO EXIST'G. GRADE EL. 129'-6" ± PILE CUT-OFF ELEVATION PER SCHEDULE.  
PILE CUT OFF & ANCHOR TO BE BY CONCRETE FOUNDATION CONTRACTOR.

TYPICAL PILE DETAIL  
N.T.S.



P-5 CUT-OFF ELEV. SEE SCHEDULE IN TYP. PILE DETAIL.

COAT PILE, PLATES & BOLTS WITH PRUF COAT "TAREP" - 8 TO 10 DRY MILS THK IN FIELD AFTER INSTALLATION

ANCHOR DETAIL FOR P-5 ONLY

NOTE: INSTALL ANCHORS SO THAT HORIZ. LEG OF REINF HAS 2" MIN COVER TO EDGE OF PILE CAP & BOLTS TO BE AT RIGHT ANGLES TO EACH OTHER.

capacity was obtained during the lengths than originally

lengths ranged from 15 ft. to 19 ft. of the piles 19 ft.



IF PILES 96  
16

Drawn by *Ddu* 5-29-79  
Checked by *Vol* 5/14/79  
Approved by *EGD* 5/29/79

859-325-L1112

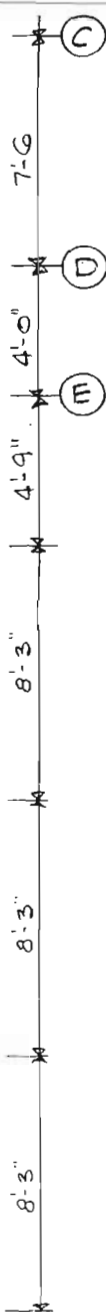
**OCCIDENTAL CHEMICAL COMPANY**  
SUWANNEE RIVER PHOSPHATE DIVISION

| BY         | DATE    | SCALE: 1/4" = 1'-0"    | DATE    | TITLE                 | PLANT            |
|------------|---------|------------------------|---------|-----------------------|------------------|
|            |         | DRAWN BY DIDOMENICO    | 5-11-79 | 1979 BOILER ADDITION  | 40C-20           |
|            |         | CHECKED BY VOLK        | 5-15-79 | WHITE SPRINGS FLORIDA | CHARGE NO.       |
| <i>Vol</i> | 7/3/79  | APPROVED BY <i>Vol</i> | 5-29-79 | PILE PLAN & DETAILS   | REVISION NO. 3   |
| <i>Vol</i> | 5/21/79 | APPROVED BY <i>EGD</i> | 5-29-79 | C&D Boilers etc       | DWG. NO. 40C-209 |
| <i>Vol</i> | 5/11/79 | APPROVED BY            |         |                       |                  |

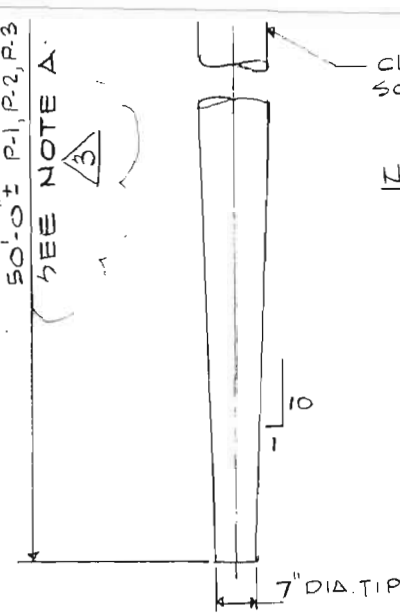
**WORK SAFELY**

## Unit 40: D Aux Boiler

NOTE: THESE FOUNDATION DRAWINGS FOR C&D BOILERS, INDICATES THEY WERE NOT IN EXISTENCE IN MAY 1979.



50'-0"± P-1, P-2, P-3  
SEE NOTE A.



CLASS "B" TREATED SOUTHERN PINE PILE

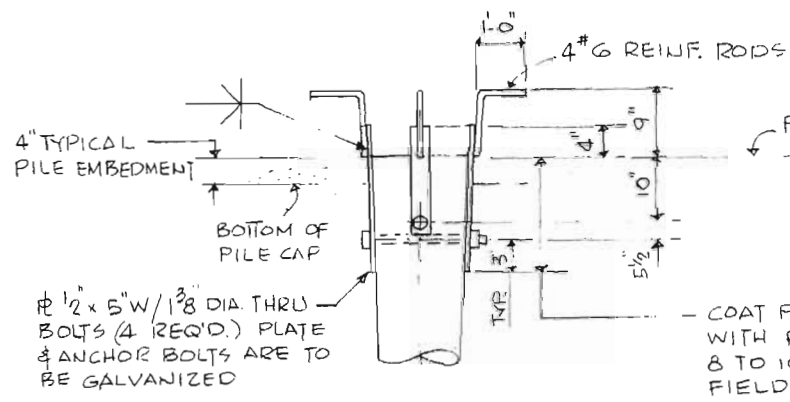
NOTE: PILES TO BE DRIVEN TO EXIST'S. GRADE EL. 129'-6"± PILE CUT-OFF ELEVATION PER SCHEDULE.

PILE CUT OFF & ANCHOR TO BE BY CONCRETE FOUNDATION CONTRACTOR.

BEST AVAILABLE COPY

TYPICAL PILE DETAIL

N.T.S.



ANCHOR DETAIL FOR P-5 ONLY

NOTE: INSTALL ANCHORS SO THAT HORIZ. LEG OF REINF HAS 2" MIN COVER TO EDGE OF PILE CAP. & BOLTS TO BE AT RIGHT ANGLES TO EACH OTHER

capacity was obtained during pile lengths than originally

lengths ranged from 15 ft. to 19 ft. of the piles 19 ft.

3

IF PILES 96

1G

Drawn by *Dw* 5-29-79  
Checked by *Vol* 5-15-79  
Approved by *Vol* 5-29-79  
Approved by *ESD* 5-29-79  
Approved by *ESD* 5-11-79

859-325-L1112

**OCCIDENTAL CHEMICAL COMPANY**  
SUNANNEE RIVER PHOSPHATE DIVISION

| BY         | DATE    | SCALE: 1/4"=1'-0" | DATE    | TITLE                 | PLANT            |
|------------|---------|-------------------|---------|-----------------------|------------------|
|            |         |                   | 5-11-79 | 1979 BOILER ADDITION  | 40C-20           |
|            |         |                   | 5-15-79 | WHITE SPRINGS FLORIDA | CHARGE NO.       |
| <i>Vol</i> | 7/3/79  |                   | 5-29-79 | PILE PLAN & DETAILS   | REVISION NO. 3   |
| <i>Vol</i> | 5/11/79 |                   | 5-29-79 | C&D Boilers SRC       | DWG. NO. 40C-209 |

WORK SAFELY

Unit 54: SR Molten Sulfur Molten System C & D



102-88-04

# Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION  
NOTICE OF PERMIT

Mr. H. C. Smith  
Occidental Chemical Corp.  
P. O. Box 300  
White Springs, Florida 32096

February 7, 1990

Enclosed is construction permit No. AC 24-171596 to Occidental for the existing molten sulfur system at the Suwannee River Chemical Complex in White Springs, Hamilton County, Florida. This permit is issued pursuant to Section 403, Florida Statutes.

Any party to this permit has the right to seek judicial review of the permit pursuant to Section 120.68, Florida Statutes, by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the Department in the Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400; and by filing a copy of the Notice of Appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The Notice of Appeal must be filed within 30 days from the date this permit is filed with the Clerk of the Department.

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL REGULATION

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

Copy furnished to:

A. Kutyna, NE District  
R. Tedder, P.E.

## Unit 66: E Sulfuric Acid

# STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL REGULATION CONSTRUCTION PERMIT

FOR Occidental Chemical Company  
P. O. Box 300  
White Springs, FL 32096

PERMIT NO. AC24-2715 DATE OF ISSUE February 28, 1978

PURSUANT TO THE PROVISIONS OF SECTIONS 403.061 (16) AND 403.707 OF CHAPTER 403 FLORIDA STATUTES AND CHAPTERS 17-4 AND 17-7 FLORIDA ADMINISTRATIVE CODE, THIS PERMIT IS ISSUED TO:  
A. A. Guffey, General Manager

FOR THE CONSTRUCTION OF THE FOLLOWING:  
Sulfuric Acid Plant "E", 2000 TPD; Double Absorption; New Contact Type  
with a Brink Mist Eliminator, subject to provisos 1 through 11.

LOCATED AT E. of U.S. 41, NW of White Springs, Hamilton County, Florida  
UTM: E-321,110 N-3,369,800

IN ACCORDANCE WITH THE APPLICATION DATED February 3, 1978

ANY CONDITIONS OR PROVISOS WHICH ARE ATTACHED HERETO ARE INCORPORATED INTO AND MADE A PART OF THIS PERMIT AS THOUGH FULLY SET FORTH HEREIN, FAILURE TO COMPLY WITH SAID CONDITIONS OR PROVISOS SHALL CONSTITUTE A VIOLATION OF THIS PERMIT AND SHALL SUBJECT THE APPLICANT TO SUCH CIVIL AND CRIMINAL PENALTIES AS PROVIDED BY LAW.

THIS PERMIT SHALL BE EFFECTIVE FROM THE DATE OF ISSUE UNTIL September 30, 1980  
OR UNLESS REVOKED OR SURRENDERED AND SHALL BE SUBJECT TO ALL LAWS OF THE STATE AND THE RULES AND REGULATIONS OF THE DEPARTMENT.

Frank Watkins, Jr.  
Frank Watkins, Jr.  
Subdistrict Engineer

Joseph W. Landers, Jr.  
JOSEPH W. LANDERS, JR.  
SECRETARY  
G. Doug Dutton  
Subdistrict Manager  
G. Doug Dutton

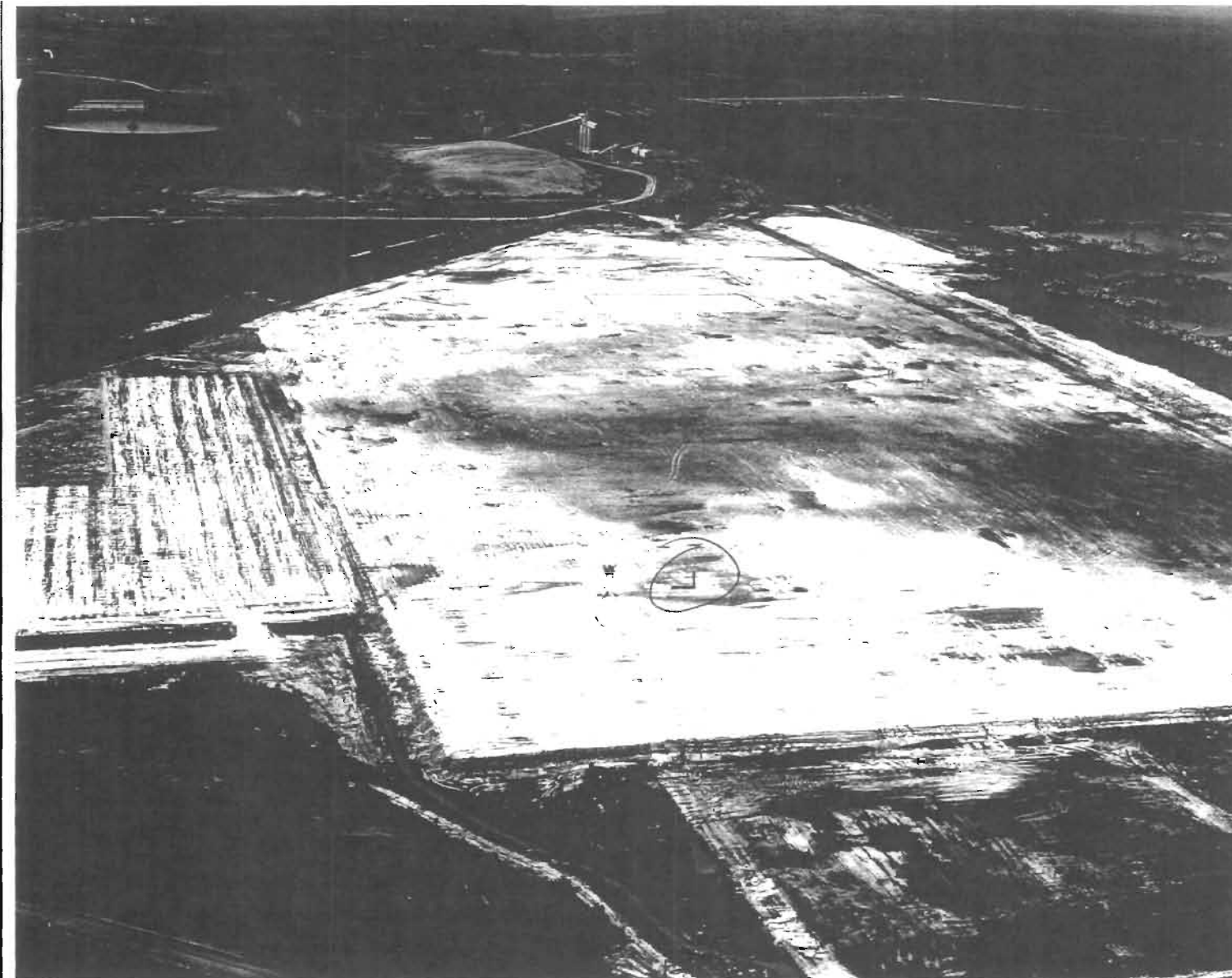
Unit 67: F Sulfuric Acid - SEE PHOTOGRAPH OF SCCC.



BEST AVAILABLE COPY

PHOTOGRAPH TAKEN IN SEPTEMBER 1978  
SWIFT CREEK CHEMICAL COMPLEX

NOTE: THIS PHOTOGRAPH INDICATES THAT THERE WERE NO AIR EMISSION SOURCES IN EXISTENCE AT SCCC IN SEPTEMBER 1978.



PAUL ROY STUDIO  
1483 S. ALACHUA ST.  
LAKE CITY, FLA. 32055  
Neg. # 6  
Date SEP 15 1978

Sept. 1978 - The black arrow marks the location

SCCC

Unit 68: E Aux Boiler - SEE PHOTOGRAPH OF SCC



SECTION II: GENERAL PROJECT INFORMATION

A. Describe the nature and extent of the project. Refer to pollution control equipment, and expected improvements in source performance as a result of installation. State whether the project will result in full compliance. Attach additional sheet if necessary.

Wet process phosphoric acid plant reacting sulfuric acid with phosphate rock is  
vented to a wet packed scrubber.

B. Schedule of project covered in this application (Construction Permit Application Only)

Start of Construction N/A Completion of Construction N/A

C. Costs of pollution control system(s): (Note: Show breakdown of estimated costs only for individual components/units of the project serving pollution control purposes. Information on actual costs shall be furnished with the application for operation permit.)

Approximately \$750,000

D. Indicate any previous DER permits, orders and notices associated with the emission point, including permit issuance and expiration dates.

Unit was constructed under FDER No. AC-24-2718; issued February 28, 1978,  
expiring December 31, 1980.

E. Is this application associated with or part of a Development of Regional Impact (DRI) pursuant to Chapter 380, Florida Statutes, and Chapter 22F-2, Florida Administrative Code?  Yes  No

F. Normal equipment operating time: hrs/day 24 ; days/wk 7 ; wks/yr 52 ; if power plant, hrs/yr \_\_\_\_\_ ;  
if seasonal, describe: \_\_\_\_\_

G. If this is a new source or major modification, answer the following questions. (Yes or No) **NOT APPLICABLE (For Air Construction Permit Only)**

1. Is this source in a non-attainment area for a particular pollutant?
  - a. If yes, has "offset" been applied? \_\_\_\_\_
  - b. If yes, has "Lowest Achievable Emission Rate" been applied? \_\_\_\_\_
  - c. If yes, list non-attainment pollutants. \_\_\_\_\_
2. Does best available control technology (BACT) apply to this source? If yes, see Section VI. \_\_\_\_\_
3. Does the State "Prevention of Significant Deterioration" (PSD) requirements apply to this source? If yes, see Sections VI and VII. \_\_\_\_\_
4. Do "Standards of Performance for New Stationary Sources" (NSPS) apply to this source? \_\_\_\_\_
5. Do "National Emission Standards for Hazardous Air Pollutants" (NESHAP) apply to this source? \_\_\_\_\_

Attach all supportive information related to any answer of "Yes". Attach any justification for any answer of "No" that might be considered questionable.

Unit 70: C & D SPA



STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION  
APPLICATION TO OPERATE/CONSTRUCT  
AIR POLLUTION SOURCES

SOURCE TYPE: Superphosphoric Acid Plants  New<sup>1</sup>  Existing<sup>1</sup>  
APPLICATION TYPE:  Construction  Operation  Modification  
COMPANY NAME: Occidental Chemical Company COUNTY: Hamilton

Identify the specific emission point source(s) addressed in this application (i.e. Lime Kiln No. 4 with Venturi Scrubber; Peeking Unit No. 2, Gas Fired) Superphosphoric Acid Plants "C" and "D"

SOURCE LOCATION: Street U. S. 41 City White Springs  
UTM: East 7,321,110 North 3,369,800  
Latitude      °      '      "N Longitude      °      '      "W

APPLICANT NAME AND TITLE: Occidental Chemical Company  
APPLICANT ADDRESS: P. O. Box 300, White Springs, Florida 32096

SECTION I: STATEMENTS BY APPLICANT AND ENGINEER

A. APPLICANT

I am the undersigned owner or authorized representative\* of Occidental Chemical Company  
I certify that the statements made in this application for a n operating  
permit are true, correct and complete to the best of my knowledge and belief. Further, I agree to maintain and operate the pollution control source and pollution control facilities in such a manner as to comply with the provision of Chapter 403, Florida Statutes, and all the rules and regulations of the department and revisions thereof. I also understand that a permit, if granted by the department, will be non-transferable and I will promptly notify the department upon sale or legal transfer of the permitted establishment.

\*Attach letter of authorization

Signed: \_\_\_\_\_  
M. P. McArthur, V.P. & General Manager  
Name and Title (Please Type)  
Date: \_\_\_\_\_ Telephone No. (904) 397-8101

B. PROFESSIONAL ENGINEER REGISTERED IN FLORIDA (where required by Chapter 471, F.S.)

This is to certify that the engineering features of this pollution control project have been designed/examined by me and found to be in conformity with modern engineering principles applicable to the treatment and disposal of pollutants characterized in the permit application. There is reasonable assurance, in my professional judgment, that the pollution control facilities, when properly maintained and operated, will discharge an effluent that complies with all applicable statutes of the State of Florida and the rules and regulations of the department. It is also agreed that the undersigned will furnish, if authorized by the owner, the applicant a set of instructions for the proper maintenance and operation of the pollution control facilities and, if applicable, pollution sources.

Signed: \_\_\_\_\_  
John B. Koogler, P. E.  
Name (Please Type)

(Affix Seal)

SHOLTES & KOOGLER ENVIRONMENTAL CONSULTANTS  
Company Name (Please Type)  
1213 N. W. 6th Street, Gainesville, FL 32607  
Mailing Address (Please Type)

Florida Registration No. 12925 Date: \_\_\_\_\_ Telephone No. (904) 377-5822

<sup>1</sup>See Section 17-2.02(15) and (22), Florida Administrative Code, (F.A.C.)

SECTION II: GENERAL PROJECT INFORMATION

A. Describe the nature and extent of the project. Refer to pollution control equipment, and expected improvements in source performance as a result of installation. State whether the project will result in full compliance. Attach additional sheet if necessary.  
 These sources are two superphosphoric acid vacuum evaporators designed to evaporate 54% P<sub>2</sub>O<sub>5</sub> phosphoric acid to 70% P<sub>2</sub>O<sub>5</sub> phosphoric acid at the rate of 1,000 TPD of 100% P<sub>2</sub>O<sub>5</sub> each. Off-gases from the evaporators will be condensed with recirculated pond water in barometric condensers. Emissions from the plant will consist of gaseous fluorides in the vent gases from the SPA seal tanks and condenser seal tanks. These emissions will meet the allowable NSPS rate of 0.01 lbs/F/ton P<sub>2</sub>O<sub>5</sub> input with no control. (See attached page)

B. Schedule of project covered in this application (Construction Permit Application Only)  
 Start of Construction N/A Completion of Construction N/A

C. Costs of pollution control system(s): (Note: Show breakdown of estimated costs only for individual components/units of the project serving pollution control purposes. Information on actual costs shall be furnished with the application for operation permit.)  
 \$10,000 for duct work

D. Indicate any previous DER permits, orders and notices associated with the emission point, including permit issuance and expiration dates.  
 These units were constructed under FDER construction permits No. AC24-2720 & 2719 issued on February 28, 1978 expiring December 31, 1980.

E. Is this application associated with or part of a Development of Regional Impact (DRI) pursuant to Chapter 380, Florida Statute and Chapter 22F-2, Florida Administrative Code?  Yes  No

F. Normal equipment operating time: hrs/day 24; days/wk 7; wks/yr 52; if power plant, hrs/yr \_\_\_\_\_; if seasonal, describe: \_\_\_\_\_

G. If this is a new source or major modification, answer the following questions. (Yes or No)

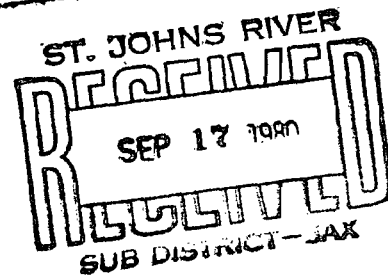
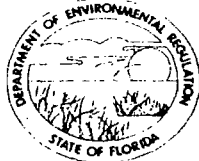
NOT APPLICABLE  
 FOR AIR CONSTRUCTION PERM  
 ONLY

1. Is this source in a non-attainment area for a particular pollutant?
  - a. If yes, has "offset" been applied? \_\_\_\_\_
  - b. If yes, has "Lowest Achievable Emission Rate" been applied? \_\_\_\_\_
  - c. If yes, list non-attainment pollutants. \_\_\_\_\_
2. Does best available control technology (BACT) apply to this source? If yes, see Section VI. \_\_\_\_\_
3. Does the State "Prevention of Significant Deterioration" (PSD) requirements apply to this source? If yes, see Sections VI and VII. \_\_\_\_\_
4. Do "Standards of Performance for New Stationary Sources" (NSPS) apply to this source? \_\_\_\_\_
5. Do "National Emission Standards for Hazardous Air Pollutants" (NESHAP) apply to this source? \_\_\_\_\_

Attach all supportive information related to any answer of "Yes". Attach any justification for any answer of "No" that might be considered questionable.

## Unit 71: SC Acid Clarification





MITTED BY  
LOWER ST. JOHNS RIVER SUB DISTRICT  
DEPARTMENT OF ENVIRONMENTAL REGULATION

PERMIT NO. AD 34-3485  
DATE 12/18/80

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION  
APPLICATION TO OPERATE/  
AIR POLLUTION SOURCES

SOURCE TYPE: Phosphoric Acid Clarification  New<sup>1</sup>  Existing<sup>1</sup>  
APPLICATION TYPE:  Construction  Operation  Modification  
COMPANY NAME: Occidental Chemical Company COUNTY: Hamilton

Identify the specific emission point source(s) addressed in this application (i.e. Lime Kiln No. 4 with Venturi Scrubber; Peeking Unit No. 2, Gas Fired) Acid Clarification - East

SOURCE LOCATION: Street U. S. 41 City White Springs  
UTM: East 7,321,050 North 3,369,970  
Latitude      °      '      "N Longitude      °      '      "W

APPLICANT NAME AND TITLE: Occidental Chemical Company  
APPLICANT ADDRESS: P. O. Box 300, White Springs, FL 32096

SECTION I: STATEMENTS BY APPLICANT AND ENGINEER

A. APPLICANT

I am the undersigned owner or authorized representative\* of Occidental Chemical Company

I certify that the statements made in this application for an operating permit are true, correct and complete to the best of my knowledge and belief. Further, I agree to maintain and operate the pollution control source and pollution control facilities in such a manner as to comply with the provision of Chapter 403, Florida Statutes, and all the rules and regulations of the department and revisions thereof. I also understand that a permit, if granted by the department, will be non-transferable and I will promptly notify the department upon sale or legal transfer of the permitted establishment.

\*Attach letter of authorization

Signed: [Signature]  
M. P. McArthur, V.P. & General Manager  
Name and Title (Please Type)  
Date: 9/17/80 Telephone No. (904) 397-8101

B. PROFESSIONAL ENGINEER REGISTERED IN FLORIDA (where required by Chapter 471, F.S.)

This is to certify that the engineering features of this pollution control project have been designed/examined by me and found to be in conformity with modern engineering principles applicable to the treatment and disposal of pollutants characterized in the permit application. There is reasonable assurance, in my professional judgment, that the pollution control facilities, when properly maintained and operated, will discharge an effluent that complies with all applicable statutes of the State of Florida and the rules and regulations of the department. It is also agreed that the undersigned will furnish, if authorized by the owner, the applicant a set of instructions for the proper maintenance and operation of the pollution control facilities and, if applicable, pollution sources.

Signed: [Signature]  
John B. Koogler, P. E.  
Name (Please Type)  
SHOLTES & KOOGLER ENVIRONMENTAL CONSULTANTS  
Company Name (Please Type)

(Affix Seal)

1213 N. W. 6th Street, Gainesville, FL 32601  
Mailing Address (Please Type)  
Date: 9/16/80 Telephone No. (904) 377-5822

Florida Registration No. 12925

<sup>1</sup>See Section 17-2.02(15) and (22), Florida Administrative Code, (F.A.C.)  
DER FORM 17-1.122(16) Page 1 of 10

SECTION II: GENERAL PROJECT INFORMATION

A. Describe the nature and extent of the project. Refer to pollution control equipment, and expected improvements in source performance as a result of installation. State whether the project will result in full compliance. Attach additional sheet if necessary.  
This facility was constructed to filter 48% phosphoric acid prior to evaporation to superphosphoric acid. The plant will consist of six (6) 12' long x 12' diameter rotary drum filters. Each filter drum will be hooded and vented. Vent gases from the filters are passed through the packed counter-current scrubber and stack to the atmosphere. Acid Clarification, East was previously identified as "#4".

B. Schedule of project covered in this application (Construction Permit Application Only)  
Start of Construction N/A Completion of Construction N/A

C. Costs of pollution control system(s): (Note: Show breakdown of estimated costs only for individual components/units of the project serving pollution control purposes. Information on actual costs shall be furnished with the application for operation permit.)  
\$60,000 for counter-current packed scrubber

D. Indicate any previous DER permits, orders and notices associated with the emission point, including permit issuance and expiration dates.  
This unit was constructed under FDER permit No. AC24-2722 issued on February 28, 1978 and expiring December 31, 1980.

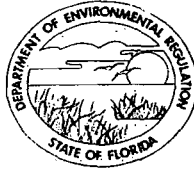
E. Is this application associated with or part of a Development of Regional Impact (DRI) pursuant to Chapter 380, Florida Statutes, and Chapter 22F-2, Florida Administrative Code?  Yes  No

F. Normal equipment operating time: hrs/day 24 ; days/wk 7 ; wks/yr 52 ; if power plant, hrs/yr \_\_\_\_\_ ; if seasonal, describe: \_\_\_\_\_

G. If this is a new source or major modification, answer the following questions. (Yes or No) **NOT APPLICABLE FOR AIR CONSTRUCTION PERMIT ONLY**

1. Is this source in a non-attainment area for a particular pollutant?
  - a. If yes, has "offset" been applied? \_\_\_\_\_
  - b. If yes, has "Lowest Achievable Emission Rate" been applied? \_\_\_\_\_
  - c. If yes, list non-attainment pollutants. \_\_\_\_\_
2. Does best available control technology (BACT) apply to this source? If yes, see Section VI. \_\_\_\_\_
3. Does the State "Prevention of Significant Deterioration" (PSD) requirements apply to this source? If yes, see Sections VI and VII. \_\_\_\_\_
4. Do "Standards of Performance for New Stationary Sources" (NSPS) apply to this source? \_\_\_\_\_
5. Do "National Emission Standards for Hazardous Air Pollutants" (NESHAP) apply to this source? \_\_\_\_\_

Attach all supportive information related to any answer of "Yes". Attach any justification for any answer of "No" that might be considered questionable.



STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION  
APPLICATION TO OPERATE/CONSTRUCT  
AIR POLLUTION SOURCES

SOURCE TYPE: Phosphoric Acid Clarification [ ] New<sup>1</sup> [X] Existing<sup>1</sup>

APPLICATION TYPE: [ ] Construction [X] Operation [ ] Modification

COMPANY NAME: Occidental Chemical Company COUNTY: Hamilton

Identify the specific emission point source(s) addressed in this application (i.e. Lime Kiln No. 4 with Venturi Scrubber; Peeking Unit No. 2, Gas Fired) Acid Clarification - West

SOURCE LOCATION: Street U.S. 41 City White Springs

UTM: East 7,321,050 North 3,369,970

Latitude      °      '      "N Longitude      °      '      "W

APPLICANT NAME AND TITLE: Occidental Chemical Company

APPLICANT ADDRESS: P. O. Box 300, White Springs, FL 32096

**SECTION I: STATEMENTS BY APPLICANT AND ENGINEER**

**A. APPLICANT**

I am the undersigned owner or authorized representative\* of Occidental Chemical Company

I certify that the statements made in this application for a n operating permit are true, correct and complete to the best of my knowledge and belief. Further, I agree to maintain and operate the pollution control source and pollution control facilities in such a manner as to comply with the provision of Chapter 403, Florida Statutes, and all the rules and regulations of the department and revisions thereof. I also understand that a permit, if granted by the department, will be non-transferable and I will promptly notify the department upon sale or legal transfer of the permitted establishment.

\*Attach letter of authorization

Signed: \_\_\_\_\_

M. P. McArthur, V.P. & General Manager  
Name and Title (Please Type)

Date: \_\_\_\_\_ Telephone No. (904) 397-8101

**B. PROFESSIONAL ENGINEER REGISTERED IN FLORIDA (where required by Chapter 471, F.S.)**

This is to certify that the engineering features of this pollution control project have been designed/examined by me and found to be in conformity with modern engineering principles applicable to the treatment and disposal of pollutants characterized in the permit application. There is reasonable assurance, in my professional judgment, that the pollution control facilities, when properly maintained and operated, will discharge an effluent that complies with all applicable statutes of the State of Florida and the rules and regulations of the department. It is also agreed that the undersigned will furnish, if authorized by the owner, the applicant a set of instructions for the proper maintenance and operation of the pollution control facilities and, if applicable, pollution sources.

Signed: \_\_\_\_\_

John B. Koogler, P. E.  
Name (Please Type)

SHOLTES & KOOGLER ENVIRONMENTAL CONSULTANTS

1213 N. W. 6th Street Gainesville, FL 32601  
Company Name (Please Type)

Mailing Address (Please Type)

Florida Registration No. 12925 Date: \_\_\_\_\_ Telephone No. (904) 377-5822

(Affix Seal)

<sup>1</sup>See Section 17-2.02(15) and (22), Florida Administrative Code, (F.A.C.)

**SECTION II: GENERAL PROJECT INFORMATION**

A. Describe the nature and extent of the project. Refer to pollution control equipment, and expected improvements in source performance as a result of installation. State whether the project will result in full compliance. Attach additional sheet if necessary.

~~This facility was constructed to filter 48% phosphoric acid prior to evaporation to superphosphoric acid. The plant will consist of four (4) 12' long x 12' diameter rotary drum filters. Diatomaceous earth will be used as filter aid. A filter media will be stored and fed similar to the filter aid and emissions controlled with baghouses discharging back to storage. Each filter drum will be hooded and vented.~~  
 (Continued on Page 2a).

B. Schedule of project covered in this application (Construction Permit Application Only)

Start of Construction           N/A           Completion of Construction           N/A          

C. Costs of pollution control system(s): (Note: Show breakdown of estimated costs only for individual components/units of the project serving pollution control purposes. Information on actual costs shall be furnished with the application for operation permit.)

\$60,000 for counter-current packed scrubber  
\$10,000 for baghouses to support filter media storage and lime rock storage.

D. Indicate any previous DER permits, orders and notices associated with the emission point, including permit issuance and expiration dates.

This unit was constructed under FDER Permit No. AC24-2721 issued February 28, 1978  
expiring December 31, 1980.

E. Is this application associated with or part of a Development of Regional Impact (DRI) pursuant to Chapter 380, Florida Statutes, and Chapter 22F-2, Florida Administrative Code?  Yes  No

F. Normal equipment operating time: hrs/day 24 ; days/wk 7 ; wks/yr 52 ; if power plant, hrs/yr \_\_\_\_\_ ;  
 if seasonal, describe: \_\_\_\_\_

G. If this is a new source or major modification, answer the following questions. (Yes or No) **NOT APPLICABLE FOR AIR CONSTRUCTION PERMIT ONLY**

1. Is this source in a non-attainment area for a particular pollutant?  
 a. If yes, has "offset" been applied? \_\_\_\_\_  
 b. If yes, has "Lowest Achievable Emission Rate" been applied? \_\_\_\_\_  
 c. If yes, list non-attainment pollutants. \_\_\_\_\_

2. Does best available control technology (BACT) apply to this source? If yes, see Section VI. \_\_\_\_\_

3. Does the State "Prevention of Significant Deterioration" (PSD) requirements apply to this source? If yes, see Sections VI and VII. \_\_\_\_\_

4. Do "Standards of Performance for New Stationary Sources" (NSPS) apply to this source? \_\_\_\_\_

5. Do "National Emission Standards for Hazardous Air Pollutants" (NESHAP) apply to this source? \_\_\_\_\_

Attach all supportive information related to any answer of "Yes". Attach any justification for any answer of "No" that might be considered questionable.

Unit 72: SC Molten Sulfur System E & F



102-88-04

# Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Bob Martinez, Governor

Dale Twachmann, Secretary

John Shearer, Assistant Secretary

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION  
NOTICE OF PERMIT

Mr. H. C. Smith  
Occidental Chemical Corp.  
P. O. Box 300  
White Springs, Florida 32096

February 7, 1990

Enclosed is construction permit No. AC 24-171595 to Occidental for the existing molten sulfur system at the Swift Creek Chemical Complex in White Springs, Hamilton County, Florida. This permit is issued pursuant to Section 403, Florida Statutes.

Any party to this permit has the right to seek judicial review of the permit pursuant to Section 120.68, Florida Statutes, by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the Department in the Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400; and by filing a copy of the Notice of Appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The Notice of Appeal must be filed within 30 days from the date this permit is filed with the Clerk of the Department.

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL REGULATION

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

Copy furnished to:

A. Kutyna, NE District  
R. Tedder, P.E.

## ATTACHMENT B

CD of Tables 7 and 8 in Excel format





BEST AVAILABLE COPY

09/06/07 THU 15:10 FAX 386 3978390

PCS WHITE SPGS ENV AFFAI

002

SECTION III. GENERAL PROJECT INFORMATION

A. Describe the nature and extent of the project. Refer to pollution control equipment, and expected improvements in source performance as a result of installation. State whether the project will result in full compliance. Attach additional sheet if necessary. Existing gas fired auxiliary steam boiler with stand-by oil firing capability is used to augment steam produced from the sulfuric acid plants to provide operating flexibility in the phosphoric acid production and evaporation process.

Boiler will be modified to accept a mix of ground coal and oil with same sulfur content but increased ash. A dust collector will be installed to mitigate particulate emissions.

B. Schedule of project covered in this application (Construction Permit Application Only) Start of Construction May, 1981 Completion of Construction August, 1981

C. Costs of pollution control system(s): (Note: Show breakdown of estimated costs only for individual components/units of the project serving pollution control purposes. Information on actual costs shall be furnished with the application for operation permit.)

\$1,200,000 Baghouse
340,000 Enclosed Ash Removal System

D. Indicate any previous DER permits, orders and notices associated with the emission point, including permit issuance and expiration dates. Unit was constructed under FDER Construction Permit No. AC-24-2700 and 2701 issued on July 6, 1977 and expiring on December 31, 1979. Unit currently operating on Permit No. A0-24-21059 issued March 6, 1980 and expiring January 31, 1985 covering two identical boilers "C" and "D".

E. Is this application associated with or part of a Development of Regional Impact (DRI) pursuant to Chapter 380, Florida Statutes, and Chapter 22F-2, Florida Administrative Code? Yes X No

F. Normal equipment operating time: hrs/day 24 ; days/wk 7 ; wks/yr 52 ; if power plant, hrs/yr ; if seasonal, describe:

G. If this is a new source or major modification, answer the following questions. (Yes or No) NOT APPLICABLE

- 1. Is this source in a non-attainment area for a particular pollutant?
a. If yes, has "offset" been applied?
b. If yes, has "Lowest Achievable Emission Rate" been applied?
c. If yes, list non-attainment pollutants.
2. Does best available control technology (BACT) apply to this source? If yes, see Section VI.
3. Does the State "Prevention of Significant Deterioration" (PSD) requirements apply to this source? If yes, see Sections VI and VII.
4. Do "Standards of Performance for New Stationary Sources" (NSPS) apply to this source?
5. Do "National Emission Standards for Hazardous Air Pollutants" (NESHAP) apply to this source?

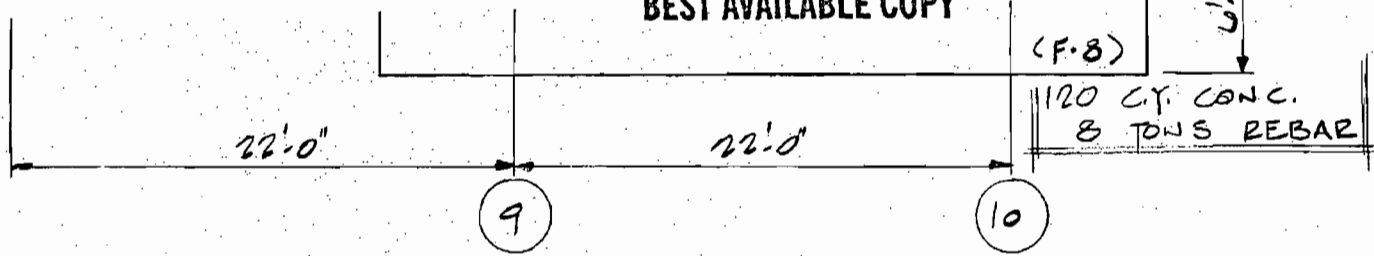
Attach all supportive information related to any answer of "Yes". Attach any justification for any answer of "No" that might be considered questionable.

003

PCS WHITE SPGS ENV AFFAI

09/06/07 THU 15:11 FAX 386 3978390

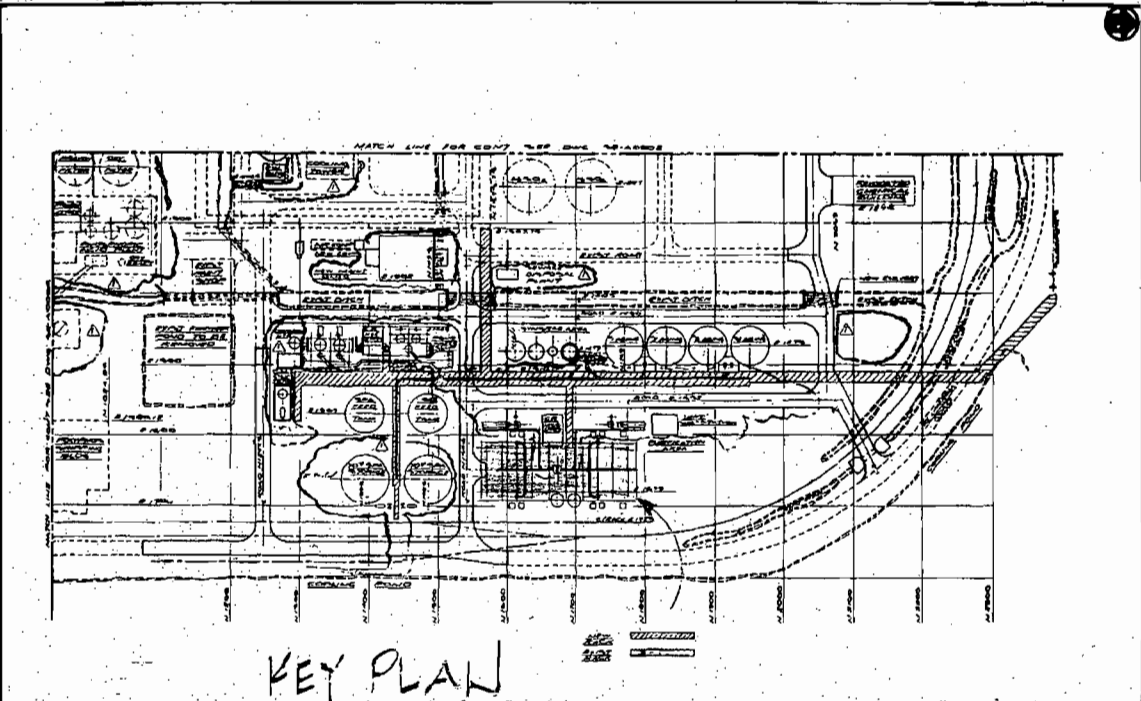
BEST AVAILABLE COPY



9

10

SEE DWG. C5433.  
1. C5403.  
9. C5403.



**Davy Powergas Inc.**  
LAKELAND, FLORIDA



**OCCIDENTAL CHEMICAL COMPANY**

SUWANNEE RIVER PHOSPHATE DIVISION

PN 4256

AREA 54

| BY  | DATE    | SCALE: 1/8" = 1'-0" (O.D.) | DATE     |
|-----|---------|----------------------------|----------|
|     |         | DRAWN BY AL CAMACHO        | 9-15-77  |
|     |         | CHECKED BY RJF / MAR       | 10-10-77 |
|     |         | APPROVED BY [Signature]    | 10-14-77 |
| MAR | 9-14-78 | APPROVED BY [Signature]    | 10-14-77 |
| AC  | 3-27-78 | APPROVED BY [Signature]    | 10-11-77 |

| TITLE                     |
|---------------------------|
| OXY/SPA PROJECT - PHASE I |
| WHITE SPRINGS, FLA.       |
| AGING & PURIFICATION AREA |
| FILTER BUILDING           |
| FOUNDATION PLAN           |

|                   |
|-------------------|
| PLANT             |
| JOB NO.           |
| CHARGE NO.        |
| REVISION NO. 2    |
| DWG. NO. 54-C5402 |

G

H

I

**WORK SAFELY**



# Florida Department of Environmental Protection

Bob Martinez Center  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Charlie Crist  
Governor

Jeff Kottkamp  
Lt. Governor

Michael W. Sole  
Secretary

July 26, 2007

ELECTRONIC MAIL - RECEIVED RECEIPT REQUESTED  
[wkthornton@pcsphosphate.com](mailto:wkthornton@pcsphosphate.com)

Mr. W. K. Thornton,  
General Manager  
White Springs Agricultural Chemicals, Inc.  
Post Office Box 300  
White Springs, Florida 32096

Re: DEP File No. 0470002-055-AC  
Best Achievable Retrofit Technology (BART) Application  
White Springs Agricultural Chemicals, Inc.

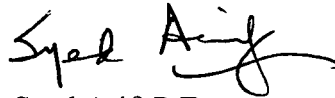
Dear Mr. Thornton:

The Department received the BART analysis on June 28, 2007, for the White Springs Agricultural Chemicals, Inc. facility in Hamilton County. Based on our review of the submittal, 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 by August 31, 2007. The Department is requiring the information to be submitted by that date as the processing of this application is under time constraints. The Division of Air Resource Management has a goal to finalize all BART determinations by October 1, 2007. The Department must submit a state implementation plan (SIP) to EPA by December 17, 2007 identifying all BART determinations.

1. The Department noted a discrepancy in the emission units that were classified as BART sources in the survey form of April 18, 2003, compared to the BART sources in Table 1 of the application. For each emissions unit that are now claimed not to be BART sources, please provide documentations to show that those emissions unit did not commence construction prior to August 7, 1977. The documentation could be in the form of the original construction permit, purchase order for the equipment, or some other form of documentation.
2. Please provide the active worksheets to include calculations and formulas for Tables 7 and 8 of the BART modeling section.

We will be happy to meet and discuss the details with you and your staff. I may be contacted at 850/921-9528. You may discuss the modeling requirements with Mr. Cleve Holladay at 850/921-8986.

Sincerely,



Syed Arif, P.E.  
North Permitting Section

/sa

cc: J. Little, EPA ([little.james@epamail.epa.gov](mailto:little.james@epamail.epa.gov))  
D. Morse, NPS ([dee\\_morse@nps.gov](mailto:dee_morse@nps.gov))  
C. Pults, White Springs Agricultural Chemicals, Inc. ([cpults@pcsposphate.com](mailto:cpults@pcsposphate.com))  
C. Kirts, DEP-NED ([christopher.kirts@dep.state.fl.us](mailto:christopher.kirts@dep.state.fl.us))  
R. Felton-Smith, DEP-NED ([rita.felton-smith@dep.state.fl.us](mailto:rita.felton-smith@dep.state.fl.us))  
M. Lee, P.E., Koogler & Associates, Inc. ([mlee@kooglerassociates.com](mailto:mlee@kooglerassociates.com))

## Harvey, Mary

---

**From:** Little.James@epamail.epa.gov  
**Sent:** Thursday, July 26, 2007 4:03 PM  
**To:** Harvey, Mary  
**Subject:** Re: White Springs Agricultural Chemicals, Inc. - 0470002-055-AC

"Harvey, Mary"  
<Mary.Harvey@dep.state.fl.us>

07/26/2007 04:02 PM

To  
James Little/R4/USEPA/US@EPA,  
"Dee Morse, NPS"  
<dee\_morse@nps.gov>,  
<cpulits@pcsphosphate.com>,  
"Kirts, Christopher"  
<Christopher.Kirts@dep.state.fl.us>,  
"Felton-Smith, Rita"  
<Rita.Felton-Smith@dep.state.fl.us>,  
<mlee@kooglerassociates.com>,  
<wkthornton@pcsphosphate.com>  
cc  
"Gibson, Victoria"  
<Victoria.Gibson@dep.state.fl.us>  
, "Arif, Syed"  
<Syed.Arif@dep.state.fl.us>,  
"Adams, Patty"  
<Patty.Adams@dep.state.fl.us>  
Subject  
White Springs Agricultural  
Chemicals, Inc. - 0470002-055-AC

Dear Sir/Madam:

Please send a "reply" message verifying receipt of the attached document(s); this may be done by selecting "Reply" on the menu bar of your e-mail software and then selecting "Send". We must receive verification of receipt and your reply will preclude subsequent e-mail transmissions to verify receipt of the document(s).

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<http://www.adobe.com/products/acrobat/readstep.html>.

The Bureau of Air Regulation is issuing electronic documents for permits, notices and other correspondence in lieu of hard copies through the United States Postal System, to

## Harvey, Mary

---

**From:** Dee\_Morse@nps.gov  
**Sent:** Monday, July 30, 2007 4:58 PM  
**To:** Harvey, Mary  
**Subject:** White Springs Agricultural Chemicals, Inc. - 0470002-055-AC

### Return Receipt

Your document: White Springs Agricultural Chemicals, Inc. - 0470002-055-AC

was received by: Dee Morse/DENVER/NPS

at: 07/30/2007 02:57:37 PM

**Harvey, Mary**

**From:** wkthornton@pcsp phosphate.com  
**Sent:** Thursday, July 26, 2007 4:52 PM  
**To:** Harvey, Mary  
**Cc:** sPosey@pcsp phosphate.com; cPults@pcsp phosphate.com  
**Subject:** Re: White Springs Agricultural Chemicals, Inc. - 0470002-055-AC  
**Attachments:** Letter - DEP File #0470002-055-AC.pdf

I am in receipt of your e-mail  
 Keith Thornton

"Harvey, Mary" <Mary.Harvey@dep.state.fl.us>

07/26/07 04:02 PM

To "Jim Little, EPA" <little.james@epa.gov>, "Dee Morse, NPS" <dee\_morse@nps.gov>, <cpults@pcsp phosphate.com>, "Kirts, Christopher" <Christopher.Kirts@dep.state.fl.us>, "Felton-Smith, Rita" <Rita.Felton-Smith@dep.state.fl.us>, <mlee@kooglerassociates.com>, <wkthornton@pcsp phosphate.com>

cc "Gibson, Victoria" <Victoria.Gibson@dep.state.fl.us>, "Arif, Syed" <Syed.Arif@dep.state.fl.us>, "Adams, Patty" <Patty.Adams@dep.state.fl.us>

Subject White Springs Agricultural Chemicals, Inc. - 0470002-055-AC

Dear Sir/Madam:

Please send a "reply" message verifying receipt of the attached document(s); this may be done by selecting "Reply" on the menu bar of your e-mail software and then selecting "Send". We must receive verification of receipt and your reply will preclude subsequent e-mail transmissions to verify receipt of the document(s).

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<http://www.adobe.com/products/acrobat/readstep.html>.

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Thank you,  
 DEP, Bureau of Air Regulation

7/27/2007

## Harvey, Mary

---

**From:** Felton-Smith, Rita  
**To:** Harvey, Mary  
**Sent:** Friday, July 27, 2007 8:05 AM  
**Subject:** Read: White Springs Agricultural Chemicals, Inc. - 0470002-055-AC

Your message

**To:** 'Jim Little, EPA'; 'Dee Morse, NPS'; 'cpults@pcsphosphate.com'; Kirts, Christopher; Felton-Smith, Rita; 'mlee@kooglerassociates.com'; 'wkthornton@pcsphosphate.com'  
**Cc:** Gibson, Victoria; Arif, Syed; Adams, Patty  
**Subject:** White Springs Agricultural Chemicals, Inc. - 0470002-055-AC  
**Sent:** 7/26/2007 4:02 PM

was read on 7/27/2007 8:05 AM.



## Harvey, Mary

---

**From:** Gibson, Victoria  
**To:** Harvey, Mary  
**Sent:** Thursday, July 26, 2007 4:05 PM  
**Subject:** Read: White Springs Agricultural Chemicals, Inc. - 0470002-055-AC

Your message

**To:** 'Jim Little, EPA'; 'Dee Morse, NPS'; 'cpults@pcsphosphate.com'; Kirts, Christopher; Felton-Smith, Rita; 'mlee@kooglerassociates.com'; 'wkthornton@pcsphosphate.com'  
**Cc:** Gibson, Victoria; Arif, Syed; Adams, Patty  
**Subject:** White Springs Agricultural Chemicals, Inc. - 0470002-055-AC  
**Sent:** 7/26/2007 4:02 PM

was read on 7/26/2007 4:05 PM.

## Harvey, Mary

---

**From:** Arif, Syed  
**To:** Harvey, Mary  
**Sent:** Thursday, July 26, 2007 4:07 PM  
**Subject:** Read: White Springs Agricultural Chemicals, Inc. - 0470002-055-AC

Your message

**To:** 'Jim Little, EPA'; 'Dee Morse, NPS'; 'cpults@pcsphosphate.com'; Kirts, Christopher; Felton-Smith, Rita; 'mlee@kooglerassociates.com'; 'wkthornton@pcsphosphate.com'  
**Cc:** Gibson, Victoria; Arif, Syed; Adams, Patty  
**Subject:** White Springs Agricultural Chemicals, Inc. - 0470002-055-AC  
**Sent:** 7/26/2007 4:02 PM

was read on 7/26/2007 4:07 PM.

**Harvey, Mary**

**From:** Harvey, Mary  
**Sent:** Thursday, July 26, 2007 4:02 PM  
**To:** 'Jim Little, EPA'; 'Dee Morse, NPS'; 'cpults@pcsphosphate.com'; Kirts, Christopher; Felton-Smith, Rita; 'mlee@kooglerassociates.com'; 'wkthornton@pcsphosphate.com'  
**Cc:** Gibson, Victoria; Arif, Syed; Adams, Patty  
**Subject:** White Springs Agricultural Chemicals, Inc. - 0470002-055-AC  
**Attachments:** Letter - DEP File #0470002-055-AC.pdf

| Tracking: | Recipient                                | Delivery                     | Read                    |
|-----------|--|------------------------------|-------------------------|
|           | <del>'Jim Little, EPA'</del>             |                              |                         |
|           | <del>'Dee Morse, NPS'</del>              |                              |                         |
|           | <del>'cpults@pcsphosphate.com'</del>     |                              |                         |
|           | Kirts, Christopher                       | Delivered: 7/26/2007 4:02 PM |                         |
|           | <del>Felton-Smith, Rita</del>            | Delivered: 7/26/2007 4:02 PM | Read: 7/27/2007 8:05 AM |
|           | <del>'mlee@kooglerassociates.com'</del>  |                              |                         |
|           | <del>'wkthornton@pcsphosphate.com'</del> |                              |                         |
|           | <del>Gibson, Victoria</del>              | Delivered: 7/26/2007 4:02 PM | Read: 7/26/2007 4:05 PM |
|           | <del>Arif, Syed</del>                    | Delivered: 7/26/2007 4:02 PM | Read: 7/26/2007 4:07 PM |
|           | <del>Adams, Patty</del>                  | Delivered: 7/26/2007 4:02 PM | Read: 7/26/2007 4:17 PM |

Dear Sir/Madam:

Please send a "reply" message verifying receipt of the attached document(s); this may be done by selecting "Reply" on the menu bar of your e-mail software and then selecting "Send". We must receive verification of receipt and your reply will preclude subsequent e-mail transmissions to verify receipt of the document(s).

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<http://www.adobe.com/products/acrobat/readstep.html>.

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Thank you,

DEP, Bureau of Air Regulation

7/31/2007

## Harvey, Mary

---

**From:** Max Lee [mlee@kooglerassociates.com]  
**Sent:** Tuesday, July 31, 2007 3:37 PM  
**To:** Harvey, Mary  
**Cc:** 'Pradeep Raval'; cpults@pcsphosphate.com  
**Subject:** RE: White Springs Agricultural Chemicals, Inc. - 0470002-055-AC

Hi Mary,

I received it and am working on the data request. Can you please add [praval@kooglerassociates.com](mailto:praval@kooglerassociates.com) to the list of recipients?

Thank you,  
Max

---

**From:** Harvey, Mary [mailto:Mary.Harvey@dep.state.fl.us]  
**Sent:** Tuesday, July 31, 2007 3:34 PM  
**To:** cpults@pcsphosphate.com; Kirts, Christopher; mlee@kooglerassociates.com  
**Subject:** FW: White Springs Agricultural Chemicals, Inc. - 0470002-055-AC

Good Afternoon:

This email was sent to you on 7/26. Please email me back if you have received this letter. We need the read receipt to complete the files.

Thank you very kindly.  
Mary

---

**From:** Harvey, Mary  
**Sent:** Thursday, July 26, 2007 4:02 PM  
**To:** 'Jim Little, EPA'; 'Dee Morse, NPS'; 'cpults@pcsphosphate.com'; Kirts, Christopher; Felton-Smith, Rita; 'mlee@kooglerassociates.com'; 'wkthornton@pcsphosphate.com'  
**Cc:** Gibson, Victoria; Arif, Syed; Adams, Patty  
**Subject:** White Springs Agricultural Chemicals, Inc. - 0470002-055-AC

Dear Sir/Madam:

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The document is in Adobe Portable Document Format (pdf). Adobe Acrobat Reader can be

7/31/2007

## Harvey, Mary

---

**From:** cPults@pcsphosphate.com  
**Sent:** Tuesday, July 31, 2007 3:35 PM  
**To:** Harvey, Mary  
**Subject:** Re: FW: White Springs Agricultural Chemicals, Inc. - 0470002-055-AC

Got it.

I was out of town last week.

Charlie

**Friday, Barbara**

---

**From:** Harvey, Mary  
**Sent:** Tuesday, May 08, 2007 11:17 AM  
**To:** 'Mr. Gregg Worley, EPA Region 4'; 'Mr. Dee Morse, National Park Service'; 'cpults@pcsphosphate.com'; Kirts, Christopher; 'mlee@kooglerassociates.com'  
**Cc:** Arif, Syed; Adams, Patty; Gibson, Victoria  
**Subject:** DEP File #0470002-055-AC - White Springs Agricultural Chemicals, Inc.  
**Attachments:** Ltr.Thornton-WSAC Inc. - Facility #0470002-055-AC.pdf

Dear Sir/Madam:

Please send a "reply" message verifying receipt of the attached document(s); this may be done by selecting "Reply" on the menu bar of your e-mail software and then selecting "Send". We must receive verification of receipt and your reply will preclude subsequent e-mail transmissions to verify receipt of the document(s).

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Thank you,

DEP, Bureau of Air Regulation

7/13/2007

**Friday, Barbara**

---

**From:** Harvey, Mary  
**Sent:** Tuesday, May 08, 2007 2:06 PM  
**To:** 'wkthornton@pcsphosphate.com'  
**Cc:** Adams, Patty; Arif, Syed  
**Subject:** FW: DEP File #0470002-055-AC - White Springs Agricultural Chemicals, Inc.  
**Attachments:** Ltr.Thornton-WSAC Inc. - Facility #0470002-055-AC.pdf

---

**From:** Harvey, Mary  
**Sent:** Tuesday, May 08, 2007 11:17 AM  
**To:** 'Mr. Gregg Worley, EPA Region 4'; 'Mr. Dee Morse, National Park Service'; 'cpults@pcsphosphate.com'; Kirts, Christopher; 'mlee@kooglerassociates.com'  
**Cc:** Arif, Syed; Adams, Patty; Gibson, Victoria  
**Subject:** DEP File #0470002-055-AC - White Springs Agricultural Chemicals, Inc.

Dear Sir/Madam:

Please send a "reply" message verifying receipt of the attached document(s); this may be done by selecting "Reply" on the menu bar of your e-mail software and then selecting "Send". We must receive verification of receipt and your reply will preclude subsequent e-mail transmissions to verify receipt of the document(s).

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Thank you,

DEP, Bureau of Air Regulation

**Friday, Barbara**

---

**From:** Harvey, Mary

**Sent:** Wednesday, May 09, 2007 9:00 AM

**To:** Adams, Patty

**Subject:** FW: FW: DEP File #0470002-055-AC - White Springs Agricultural Chemicals, Inc.

---

**From:** wkthornton@pcsphosphate.com [mailto:wkthornton@pcsphosphate.com]

**Sent:** Tuesday, May 08, 2007 5:24 PM

**To:** Harvey, Mary

**Subject:** Re: FW: DEP File #0470002-055-AC - White Springs Agricultural Chemicals, Inc.

6/28/2007



## Friday, Barbara

---

**From:** Harvey, Mary  
**Sent:** Wednesday, May 09, 2007 9:02 AM  
**To:** Adams, Patty  
**Subject:** FW: DEP File #0470002-055-AC - White Springs Agricultural Chemicals, Inc.

-----Original Message-----

From: Dee\_Morse@nps.gov [mailto:Dee\_Morse@nps.gov]  
Sent: Tuesday, May 08, 2007 4:10 PM  
To: Harvey, Mary  
Subject: DEP File #0470002-055-AC - White Springs Agricultural Chemicals, Inc.

Return Receipt

Your DEP File #0470002-055-AC - White Springs Agricultural  
document: Chemicals, Inc.

was Dee Morse/DENVER/NPS  
received  
by:

at: 05/08/2007 02:09:37 PM

Friday, Barbara

---

**From:** Harvey, Mary  
**Sent:** Tuesday, May 08, 2007 11:24 AM  
**To:** Adams, Patty; Arif, Syed  
**Subject:** FW: DEP File #0470002-055-AC - White Springs Agricultural Chemicals, Inc.

**Attachments:** Ltr.Thornton-WSAC Inc. - Facility #0470002-055-AC.pdf



Ltr.Thornton-WSAC  
Inc. - Facil...

-----Original Message-----

**From:** cPults@pcsphosphate.com [mailto:cPults@pcsphosphate.com]  
**Sent:** Tuesday, May 08, 2007 11:19 AM  
**To:** Harvey, Mary  
**Subject:** Re: DEP File #0470002-055-AC - White Springs Agricultural Chemicals, Inc.

"Harvey, Mary"  
<Mary.Harvey@dep.  
state.fl.us>

05/08/07 11:16 AM

To  
"Mr. Gregg Worley, EPA Region 4"  
<worley.gregg@epa.gov>, "Mr. Dee  
Morse, National Park Service"  
<dee\_morse@nps.gov>,  
<cPults@pcsphosphate.com>, "Kirts,  
Christopher"  
<Christopher.Kirts@dep.state.fl.us>  
, <mlee@kooglerassociates.com>

cc

"Arif, Syed"  
<Syed.Arif@dep.state.fl.us>,  
"Adams, Patty"  
<Patty.Adams@dep.state.fl.us>,  
"Gibson, Victoria"  
<Victoria.Gibson@dep.state.fl.us>  
Subject  
DEP File #0470002-055-AC - White  
Springs Agricultural Chemicals,  
Inc.

Dear Sir/Madam:

Please send a "reply" message verifying receipt of the attached document(s); this may be

done by selecting "Reply" on the menu bar of your e-mail software and then selecting "Send". We must receive verification of receipt and your reply will preclude subsequent e-mail transmissions to verify receipt of the document(s).

The document(s) may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible.

The document is in Adobe Portable Document Format (pdf). Adobe Acrobat Reader can be downloaded for free at the following internet site:  
<http://www.adobe.com/products/acrobat/readstep.html>.

The Bureau of Air Regulation is issuing electronic documents for permits, notices and other correspondence in lieu of hard copies through the United States Postal System, to provide greater service to the applicant and the engineering community. Please advise this office of any changes to your e-mail address or that of the Engineer-of-Record.

Thank you,  
DEP, Bureau of Air Regulation

(See attached file: Ltr.Thornton-WSAC Inc. - Facility #0470002-055-AC.pdf)

## Harvey, Mary

---

**From:** Kirts, Christopher  
**To:** Harvey, Mary  
**Sent:** Monday, August 06, 2007 3:36 PM  
**Subject:** Read: FW: White Springs Agricultural Chemicals, Inc. - 0470002-055-AC

Your message

**To:** 'cpults@pcsphosphate.com'; Kirts, Christopher; 'mlee@kooglerassociates.com'  
**Subject:** FW: White Springs Agricultural Chemicals, Inc. - 0470002-055-AC  
**Sent:** 7/31/2007 3:34 PM

was read on 8/6/2007 3:36 PM.

## Harvey, Mary

---

**From:** Kirts, Christopher  
**To:** Harvey, Mary  
**Sent:** Monday, August 13, 2007 10:50 AM  
**Subject:** Read: White Springs Agricultural Chemicals, Inc. - 0470002-055-AC

Your message

**To:** 'Jim Little, EPA'; 'Dee Morse, NPS'; 'cpults@pcsphosphate.com'; Kirts, Christopher; Felton-Smith, Rita; 'mlee@kooglerassociates.com'; 'wkthornton@pcsphosphate.com'  
**Cc:** Gibson, Victoria; Arif, Syed; Adams, Patty  
**Subject:** White Springs Agricultural Chemicals, Inc. - 0470002-055-AC  
**Sent:** 7/26/2007 4:02 PM

was read on 8/13/2007 10:50 AM.



# Florida Department of Environmental Protection

Bob Martinez Center  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Charlie Crist  
Governor

Jeff Kottkamp  
Lt. Governor

Michael W. Sole  
Secretary

May 8, 2007

ELECTRONIC MAIL - RECEIVED RECEIPT REQUESTED  
[wkthornton@pcsphosphate.com](mailto:wkthornton@pcsphosphate.com)

Mr. W. K. Thornton,  
General Manager  
White Springs Agricultural Chemicals, Inc.  
Post Office Box 300  
White Springs, Florida 32096

Re: DEP File No. 0470002-055-AC  
Best Achievable Retrofit Technology (BART) Application  
White Springs Agricultural Chemicals, Inc.

Dear Mr. Thornton:

The Department has received a letter dated May 1, 2007 from Koogler & Associates submitted on your behalf requesting additional time to submit BART information requested in our letter of February 13, 2007. The extension of time requested is 60 days. Based on Rule 62-4.055, F.A.C., the applicant shall have ninety days after the Department mails a timely request for additional information to submit that information to the Department. If an applicant requires more than ninety days in which to respond to a request for additional information, the applicant may notify the Department in writing of the circumstances, at which time the application shall be held in active status for one additional period of up to ninety days.

The initial ninety days to respond to our request for additional information is May 14, 2007. Because of the timing of the rule and submittal of the applications, you are being granted an additional thirty days from that date to submit the requested additional information. The information should be submitted to the Department by June 13, 2007. If the Department does not receive the additional information requested in our February 13, 2007 letter by June 13, 2007, your application will be processed based on other information available to the Department. If you have any questions regarding this matter, please call me at 850/921-9528.

Sincerely,

Syed Arif, P.E.  
North Permitting Section

/sa

cc: G. Worley, EPA ([worley.gregg@epa.gov](mailto:worley.gregg@epa.gov))  
D. Morse, NPS ([dee\\_morse@nps.gov](mailto:dee_morse@nps.gov))  
C. Pults, White Springs Agricultural Chemicals, Inc. ([cpults@pcsphosphate.com](mailto:cpults@pcsphosphate.com))  
C. Kirts, DEP-NED ([christopher.kirts@dep.state.fl.us](mailto:christopher.kirts@dep.state.fl.us))  
M. Lee, P.E., Koogler & Associates, Inc. ([mlee@kooglerassociates.com](mailto:mlee@kooglerassociates.com))



# Florida Department of Environmental Protection

Bob Martinez Center  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Charlie Crist  
Governor

Jeff Kottkamp  
Lt. Governor

Michael W. Sole  
Secretary

February 13, 2007

ELECTRONIC MAIL - RECEIVED RECEIPT REQUESTED

Mr. W. K. Thornton,  
General Manager  
White Springs Agricultural Chemicals, Inc.  
Post Office Box 300  
White Springs, Florida 32096

Re: DEP File No. 0470002-055-AC  
Best Achievable Retrofit Technology (BART) Application  
White Springs Agricultural Chemicals, Inc.

Dear Mr. Thornton:

The Department has received the above referenced application on January 31, 2007, for the White Springs Agricultural Chemicals, Inc. facility in Hamilton County. 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. 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 affected BART emissions unit.
2. If a determination is made after doing the above analysis that the BART emissions unit has emissions control already in place which is the most stringent controls available, then please provide the Department with emissions data (at least for the previous two years) information for that particular BART emissions unit. The emissions data information can be in the form of continuous emissions monitoring data or stack tests.
3. If a determination is made after doing the above analysis that the BART eligible sulfuric acid plants (SAPs) has controls already in place which is the most stringent controls available, then please provide emissions data for SO<sub>2</sub> in lb/ton of 100% H<sub>2</sub>SO<sub>4</sub> for the last year (3-hour CEM averages) of operation for the BART eligible SAPs. In providing this data, please present it in a graphical representation against time. On the same graph, indicate the production rate for the plants (3-hour averages) and indicate the turn-around date, if any, for the SAPs on the time axis.
4. Please provide electronic copies of all modeling files for this project.

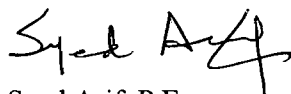
Any additional comments from EPA, Northeast District Office and the U.S. Fish and Wildlife Service will be forwarded to you after we receive them.

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.

Please note that in accordance with Rule 62-4.055(1), "The applicant shall have **ninety days** after the Department mails a timely request for additional information to submit that information to the Department ... Failure of an applicant to provide the timely requested information by the applicable date **shall** result in denial of the application."

We will be happy to meet and discuss the details with you and your staff. I may be contacted at 850/921-9528. You may discuss the modeling requirements with Mr. Cleve Holladay at 850/921-8986.

Sincerely,



Syed Arif, P.E.  
North Permitting Section

/sa

cc: G. Worley, EPA ([worley.gregg@epa.gov](mailto:worley.gregg@epa.gov))  
D. Morse, NPS ([dee\\_morse@nps.gov](mailto:dee_morse@nps.gov))  
C. Pults, White Springs Agricultural Chemicals, Inc. ([cpults@pcsphosphate.com](mailto:cpults@pcsphosphate.com))  
C. Kirts, DEP-NED ([christopher.kirts@dep.state.fl.us](mailto:christopher.kirts@dep.state.fl.us))  
M. Lee, P.E., Koogler & Associates, Inc. ([mlee@kooglerassociates.com](mailto:mlee@kooglerassociates.com))



|  |  |  |  |                    |
|--|--|--|--|--------------------|
|    |  | <b>GND</b>                                   |  | Pieces: <b>1/1</b> |
| <b>FM: DEP AIR RESOURCE MGMT</b><br>P. Adams<br>DIRECTOR OFFICE STE 23<br>111 S MAGNOLIADR<br>TALLAHASSEE, FL 32301<br>UNITED STATES Phone: 850-921-9505       |  | TLH<br>Sender's ref:<br>37550201000 A7 AP255 |  | ORIGIN:            |
| <b>To: DEP NORTHEAST DISTRICT OFFICE</b><br>MS. RITA FELTON-SMITH<br>7825 BAYMEADOWS WAY<br>AIR SECTION, SUITE 200B<br>JACKSONVILLE, FL 32256<br>UNITED STATES |  | POST CODE:<br><b>32256</b>                   |  | TEL: 904-807-3235  |
| Description: PSD-FL-380 3/15 left, BART app. Smurfit Stone&PCS<br>Weight: 3lbs for 1 pcs<br>Date: 2007-04-25   |  | DHL standard terms and conditions apply.     |  | Day<br><b>26TH</b> |
| (ZL)US32256  |  | <b>ASHX 7D</b><br><b>FSC</b>                 |  |                    |
| (Non-Negotiable)   |  | WAYBILL: 21249376153                         |  |                    |



Please fold or cut in half  
**DO NOT PHOTOCOPY**

Using a photocopy could delay the delivery of your package and will result in additional shipping charge

|   |  |   |
|---|--|---|
| <b>SENDER'S RECEIPT</b><br>Waybill #: 21249376153   |  | Rate Estimate: 3.06<br>Protection: Not Required<br>Description: PSD-FL-380 3/15 left, BART app. Smurfit Stone&PCS |
| To(Company):<br>DEP Northeast District Office<br>Air Section, Suite 200B<br>7825 Baymeadows Wway<br>Jacksonville, FL 32256<br>UNITED STATES |  | Weight (lbs.): 3<br>Dimensions: 0 x 0 x 0   |
| Attention To: Ms. Rita Felton-Smith<br>Phone#: 904-807-3235   |  | Ship Ref: 37550201000 A7 AP255<br>Service Level: Ground (Est. delivery in 1 business day(s))                      |
| Sent By: P. Adams<br>Phone#: 850-921-9505   |  | Special Svc:<br>Date Printed: 4/25/2007<br>Bill Shipment To: Sender<br>Bill To Acct: 778941286                    |

DHL Signature (optional) \_\_\_\_\_ Route \_\_\_\_\_ Date \_\_\_\_\_ Time \_\_\_\_\_

For Tracking, please go to [www.dhl-usa.com](http://www.dhl-usa.com) or call 1-800-225-5345  
 Thank you for shipping with DHL



**Friday, Barbara**

---

**To:** worley.gregg@epa.gov; dee\_morse@nps.gov; cPults@pcsphosphate.com; Kirts, Christopher; mlee@kooglerassociates.com  
**Cc:** Arif, Syed  
**Subject:** Best Achievable Retrofit Technology (BART) Application - White Springs Agricultural Chemicals, Inc.  
**Attachments:** 0470002-055-AC - White Springs Agricultural Chemicals, Inc.pdf

Dear Sir/Madam:

Please send a "reply" message verifying receipt of the attached document(s); this may be done by selecting "Reply" on the menu bar of your e-mail software and then selecting "Send". We must receive verification of receipt and your reply will preclude subsequent e-mail transmissions to verify receipt of the document(s).

The document(s) may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible.

The document is in Adobe Portable Document Format (pdf). Adobe Acrobat Reader can be downloaded for free at the following internet site: <http://www.adobe.com/products/acrobat/readstep.html>.

The Bureau of Air Regulation is issuing electronic documents for permits, notices and other correspondence in lieu of hard copies through the United States Postal System, to provide greater service to the applicant and the engineering community. Please advise this office of any changes to your e-mail address or that of the Engineer-of-Record.

Thank you,

DEP, Bureau of Air Regulation

2/13/2007

## Friday, Barbara

---

**From:** Exchange Administrator  
**Sent:** Tuesday, February 13, 2007 10:22 AM  
**To:** Friday, Barbara  
**Subject:** Delivery Status Notification (Relay)

**Attachments:** ATT282199.txt; Best Achievable Retrofit Technology (BART) Application - White Springs Agricultural Chemicals, Inc.



ATT282199.txt  
(290 B)



Best Achievable  
Retrofit Techn...

This is an automatically generated Delivery Status Notification.

Your message has been successfully relayed to the following recipients, but the requested delivery status notifications may not be generated by the destination.

cPulsts@pcsphosphate.com

## Friday, Barbara

---

**From:** Exchange Administrator  
**Sent:** Tuesday, February 13, 2007 10:22 AM  
**To:** Friday, Barbara  
**Subject:** Delivery Status Notification (Relay)

**Attachments:** ATT282200.txt; Best Achievable Retrofit Technology (BART) Application - White Springs Agricultural Chemicals, Inc.



ATT282200.txt  
(284 B)



Best Achievable  
Retrofit Techn...

This is an automatically generated Delivery Status Notification.

Your message has been successfully relayed to the following recipients, but the requested delivery status notifications may not be generated by the destination.

dee\_morse@nps.gov

## Friday, Barbara

---

**From:** System Administrator  
**To:** Kirts, Christopher  
**Sent:** Tuesday, February 13, 2007 10:22 AM  
**Subject:** Delivered:Best Achievable Retrofit Technology (BART) Application - White Springs Agricultural Chemicals, Inc.

Your message

**To:** 'worley.gregg@epa.gov'; 'dee\_morse@nps.gov'; 'cPults@pcsphosphate.com'; Kirts, Christopher; 'mlee@kooglerassociates.com'  
**Cc:** Arif, Syed  
**Subject:** Best Achievable Retrofit Technology (BART) Application - White Springs Agricultural Chemicals, Inc.  
**Sent:** 2/13/2007 10:22 AM

was delivered to the following recipient(s):

Kirts, Christopher on 2/13/2007 10:22 AM

## Friday, Barbara

---

**From:** EPA Postmaster automated message [postmaster@epamail.epa.gov]  
**Sent:** Tuesday, February 13, 2007 10:23 AM  
**To:** Friday, Barbara  
**Subject:** Delivery Notification: Message successfully forwarded

**Attachments:** ATT282227.txt; ATT282227.txt



ATT282227.txt (626 B)    ATT282227.txt (2 KB)

This report relates to a message you sent with the following header fields:

Message-id: <5280B20498F24C46A51A87E86A0C8F97263952@tlhexsmb5.floridadep.net>  
Date: Tue, 13 Feb 2007 10:22:01 -0500  
From: "Friday, Barbara" <Barbara.Friday@dep.state.fl.us>  
To: worley.gregg@epamail.epa.gov, dee\_morse@nps.gov, cPults@pcsposphate.com, "Kirts, Christopher" <Christopher.Kirts@dep.state.fl.us>, mlee@kooglerassociates.com  
Subject: Best Achievable Retrofit Technology (BART) Application - White Springs Agricultural Chemicals, Inc.

Your message has been successfully relayed to the recipients

Recipient address: worley.gregg@mseive.epa.gov  
Original address: worley.gregg@epa.gov  
Reason: Message successfully relayed to a system that does not support receipts  
Diagnostic code: dns;mseive02.rtp.epa.gov (TCP|134.67.208.33|4389|134.67.221.150|25) (mseive02.rtp.epa.gov ESMTP Postfix) smtp;250 Ok  
Remote system: dns;mseive02.rtp.epa.gov (TCP|134.67.208.33|4389|134.67.221.150|25) (mseive02.rtp.epa.gov ESMTP Postfix)

on a remote system that does not support the generation of successful delivery receipts. This does NOT mean that your message has actually been placed in the recipients' mailboxes; merely that it has passed through a part of the message transport infrastructure. In the event of a nondelivery you should expect to receive a nondelivery notification; in the event of successful delivery, however, you are unlikely to receive a positive confirmation of delivery.

## Friday, Barbara

---

**From:** System Administrator  
**To:** mlee@kooglerassociates.com  
**Sent:** Tuesday, February 13, 2007 10:25 AM  
**Subject:** Delivered:Mail System Delivery Report

### Your message

**To:** worley.gregg@epa.gov; dee\_morse@nps.gov; cPults@pcsphosphate.com; Kirts, Christopher; mlee@kooglerassociates.com  
**Cc:** Arif, Syed  
**Subject:** Best Achievable Retrofit Technology (BART) Application - White Springs Agricultural Chemicals, Inc.  
**Sent:** 2/13/2007 10:22 AM

was delivered to the following recipient(s):

mlee@kooglerassociates.com on 2/13/2007 10:25 AM

## Friday, Barbara

---

**From:** cPults@pcsphosphate.com  
**Sent:** Tuesday, February 13, 2007 11:05 AM  
**To:** Friday, Barbara  
**Subject:** Re: Best Achievable Retrofit Technology (BART) Application - White Springs Agricultural Chemicals, Inc.

Got it  
Charlie



## Friday, Barbara

---

**From:** Dee\_Morse@nps.gov  
**Sent:** Tuesday, February 13, 2007 11:08 AM  
**To:** Friday, Barbara  
**Subject:** Best Achievable Retrofit Technology (BART) Application - White Springs Agricultural Chemicals, Inc.

### Return Receipt

Your Best Achievable Retrofit Technology (BART) Application -  
document: White Springs Agricultural Chemicals, Inc.

was Dee Morse/DENVER/NPS  
received  
by:

at: 02/13/2007 09:07:51 AM

**Friday, Barbara**

---

**From:** Max Lee [mlee@kooglerassociates.com]  
**Sent:** Tuesday, February 13, 2007 12:36 PM  
**To:** Friday, Barbara  
**Subject:** RE: Best Achievable Retrofit Technology (BART) Application - White Springs Agricultural Chemicals, Inc.

---

**From:** Friday, Barbara [mailto:Barbara.Friday@dep.state.fl.us]  
**Sent:** Tuesday, February 13, 2007 10:22 AM  
**To:** worley.gregg@epa.gov; dee\_morse@nps.gov; cPults@pcsphosphate.com; Kirts, Christopher; mlee@kooglerassociates.com  
**Cc:** Arif, Syed  
**Subject:** Best Achievable Retrofit Technology (BART) Application - White Springs Agricultural Chemicals, Inc.

Dear Sir/Madam:

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The document(s) may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible.

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Thank you,

DEP, Bureau of Air Regulation

--  
No virus found in this incoming message.  
Checked by AVG Free Edition.  
Version: 7.1.411 / Virus Database: 268.17.37/682 - Release Date: 2/12/2007

--  
No virus found in this outgoing message.  
Checked by AVG Free Edition.  
Version: 7.1.411 / Virus Database: 268.17.37/682 - Release Date: 2/12/2007

2/13/2007

RECEIVED

FEB 02 2007

MEMO

BUREAU OF AIR REGULATION

TO: Syed Arif, FDEP   
FROM: Charles Pults, White Springs Agricultural Chemical, Inc.  
DATE: January 31, 2007

SUBJECT: RO Signature Page for BART Application

Please find the enclosed Responsible Official signature page for the facility ID: 0470002 air construction permit application for incorporation of Best Achievable Retrofit Technology (BART). A faxed copy of this signature page was enclosed with the hardcopy application submission submitted January 31, 2007. As well, an electronic version was attached to the emailed application submitted to your attention on January 31, 2007. As mentioned in the emailed application text, the EPSAP application was not submitted by internet due to technical problems with EPSAP.

If you have any questions regarding this information or any related matter, please contact me or Max Lee of Koogler & Associates, Inc. (352) 377-5822.

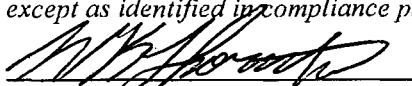
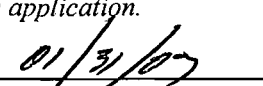
Enc:

Cc: Max Lee, Koogler & Associates, Inc.

## APPLICATION INFORMATION

### Application Responsible Official Certification

Complete if applying for an initial/revised/renewal Title V permit or concurrent processing of an air construction permit and a revised/renewal Title V permit. If there are multiple responsible officials, the "application responsible official" need not be the "primary responsible official."

|  |
|--|
| 1. Application Responsible Official Name: <b>W. K. Thornton, General Manager</b>   |
| 2. Application Responsible Official Qualification (Check one or more of the following options, as applicable):<br><input checked="" type="checkbox"/> For a corporation, the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit under Chapter 62-213, F.A.C.<br><input type="checkbox"/> For a partnership or sole proprietorship, a general partner or the proprietor, respectively.<br><input type="checkbox"/> For a municipality, county, state, federal, or other public agency, either a principal executive officer or ranking elected official.<br><input type="checkbox"/> The designated representative at an Acid Rain source.   |
| 3. Application Responsible Official Mailing Address...<br>Organization/Firm: <b>White Springs Agricultural Chemicals, Inc.</b><br>Street Address: <b>P.O. Box 300</b><br>City: <b>White Springs</b> State: <b>FL</b> Zip Code: <b>32096</b>  |
| 4. Application Responsible Official Telephone Numbers...<br>Telephone: <b>(386) 397-8101</b> Fax: <b>(386) 397-1026</b>  |
| 5. Application Responsible Official Email Address: <b>wkthornton@pcsphosphate.com</b>  |
| 6. Application Responsible Official Certification:<br><i>I, the undersigned, am a responsible official of the Title V source addressed in this air permit application. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof and all other applicable requirements identified in this application to which the Title V source is subject. I understand that a permit, if granted by the department, cannot be transferred without authorization from the department, and I will promptly notify the department upon sale or legal transfer of the facility or any permitted emissions unit. Finally, I certify that the facility and each emissions unit are in compliance with all applicable requirements to which they are subject, except as identified in compliance plan(s) submitted with this application.</i><br><br>Signature<br><br>Date |