

STATEMENT OF BASIS

White Springs Agricultural Chemicals, Inc.

Facility ID No.: 0470002
Hamilton County

Title V Air Operation Permit Revision
PROPOSED Title V Air Operation Permit Revision No.: 0470002-041-AV

The initial Title V Air Operation Permit, No. 0470002-033-AV, was issued/effective on May 14, 1999. This Title V Air Operation Permit Revision is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210 and 62-213. The above named permittee is hereby authorized to operate the facility shown on the application and approved drawing(s), plans, and other documents, attached hereto or on file with the permitting authority, in accordance with the terms and conditions of this permit.

The subject of this permit revision is to 1) modify the current, permitted compliance testing requirement for Emission Unit Nos. 003 and 038 (Pollyphos® Reactors A & B) from an annual basis to a 5-year basis instead, 2) to modify the current permitted materials processed, stored, and shipped at Emission unit No. 015 (Screening and Shipping Facility) to include Monocal, Dical, and Pollyphos®, 3) to modify the current, permitted materials processed, stored, and shipped at Emission unit No. 010 (No. 1 Storage Building) to include Monocal, Dical, and Pollyphos®, and 4) to incorporate the provisions of 40 CFR 63 Subparts AA and BB, National Emissions Standards for Hazardous Air Pollutants Phosphoric Acid Manufacturing and Phosphate Fertilizers Production.

Several Specific Condition(s) established in Title V Air Operation Permit, No. 0470002-033-AV, and based on an AC permitting action, Nos. 0470002-040-AC, 0470002-042-AC, and 0470002-043-AC are changed as follows:

A. Section II. Facility-wide Condition No. 10

The following condition has been added:

10. This facility shall comply with all the applicable requirements of 40 CFR Part 63, Subparts AA and BB, National Emissions Standards for Hazardous Air Pollutants Phosphoric Acid Manufacturing and Phosphate Fertilizers Production no later than the compliance deadline, i.e. June 12, 2002. This facility shall also comply with the General Provisions of 40 CFR 63 Subpart A, as applicable.

B. Section III, Subsection C, Condition No. C.10.

FROM:

C.10. Sulfur Dioxide Emissions stack test method shall be EPA Method 6 incorporated and adopted by reference in Chapter 62-297, F.A.C. and be performed annually with a frequency base date of 10/15.

[Rule 62-297.401(6), F.A.C.]

TO:

C.10. Sulfur Dioxide Emissions stack test method shall be EPA Method 6/6C incorporated and adopted by reference in Chapter 62-297, F.A.C. and be performed on a 5-year cycle with a frequency base date of 10/15.

[Rule 62-297.401(6), F.A.C., Air Construction Permit No. 0470002-040-AC, Admin. Correction No. 0470002-035-AV]

The 5-year testing frequency is justified by the low emission rate documented in previous emissions tests. The applicant has consistently presented test results that are more than 97% below the applicable standards. Furthermore, in accordance with Rule 62-297.310(7)(a)4.b., F.A.C., an annual Sulfur Dioxide compliance test is required if there is an applicable standard and if the emissions unit has a potential to emit of 100 tons per year or greater. The permitted Sulfur Dioxide limit for Emissions Unit Number 003 is 8.00 pounds per hour and 35.04 tons per year.

C. Section III, Subsection H, Description

FROM:

E.U. ID

No.
010

Brief Description

SR #1 Storage & Shipping which operates as follows:

- Mode 1. When ship DAP (Diammonium Phosphate) or MAP (Monoammonium Phosphate), particulate matter emissions are controlled by a Buffalo wet scrubber.
- Mode 2. When ship GTSP (Granular Triple Superphosphate), particulate matter and fluoride emissions are controlled by a Buffalo wet scrubber.
- Mode 3. When store GTSP, particulate matter and fluoride emissions are controlled by a Zurn wet scrubber.

TO:

E.U. ID

<u>No.</u>	<u>Brief Description</u>
010	SR #1 Storage & Shipping which operates as follows: Mode 1. When ship Monocal or Dical or Pollyphos® or DAP (Diammonium Phosphate) or MAP (Monoammonium Phosphate), particulate matter emissions are controlled by a Buffalo wet scrubber. Mode 2. When ship GTSP (Granular Triple Superphosphate), particulate matter and fluoride emissions are controlled by a Buffalo wet scrubber. Mode 3. When store GTSP, particulate matter and fluoride emissions are controlled by a Zurn wet scrubber.

D. Section III, Subsection J, Description

FROM:

E.U. ID

<u>No.</u>	<u>Brief Description</u>
015	MAP (Monoammonium Phosphate) or DAP (Diammonium Phosphate) Screening & Shipping Facility with particulate matter emissions controlled by a single cyclone in series with a Venturi wet scrubber.

TO:

E.U. ID

<u>No.</u>	<u>Brief Description</u>
015	MAP (Monoammonium Phosphate) or DAP (Diammonium Phosphate) or Monocal or Dical or Pollyphos® (DFP) Screening & Shipping Facility with particulate matter emissions controlled by a single cyclone in series with a Venturi wet scrubber.

E. Section III, Subsection U, Condition U.10.

FROM:

U.10. Sulfur Dioxide Emissions testing shall comply with the applicable in requirements Rule 62-297.401(6), F.A.C. and be performed annually with frequency base date of 01/19.

TO:

U.10. Sulfur Dioxide Emissions testing shall comply with the applicable in requirements Rule 62-297.401(6), F.A.C. and be performed on a 5-year cycle with frequency base date of 01/19.
[Air Construction Permit No. 0470002-042-AC]

The 5-year testing frequency is justified by the low emission rate documented in previous emissions tests. The applicant has consistently presented test results that are more than 97% below the applicable standards. Furthermore, in accordance with Rule 62-297.310(7)(a)4.b., F.A.C., an annual Sulfur Dioxide compliance test is required if there is an applicable standard and if the emissions unit has a potential to emit of 100 tons per year or greater. The permitted Sulfur Dioxide limit for Emissions Unit Number 038 is 8.00 pounds per hour and 35.04 tons per year.

F. Section III, Subsection AA, Condition AA.4.

FROM:

AA.4. Visible Emissions test method shall be EPA Method 9 incorporated and adopted by reference in Chapter 62-297, F.A.C. and be performed annually with a frequency base date of 08/15.
[Rule 62-296.411(1)(j), F.A.C.; Rule 62-297.401; F.A.C.]

TO:

AA.4. Visible Emissions test method shall be EPA Method 9 incorporated and adopted by reference in Chapter 62-297, F.A.C. and be performed on a 5-year cycle with a frequency base date of 08/15.
[Rule 62-296.411(1)(j), F.A.C.; Rule 62-297.401; F.A.C., Air Construction Permit No. AC24-171596; DRAFT Title V Permit Revision No. 0470002-041-AV]

The pre-Title V permits (Nos. AC24-171596 and AO24-187726) for the Molten Sulfur System at Suwannee River required visible emission testing on a five-year cycle. When the FINAL Title V Permit No. 0470002-033-AV was issued, it was inadvertently made an annual requirement. This Title V Permit Revision is to reflect the 5-year testing frequency that was in the previously construction permit. Furthermore, a file review indicates that on August 15, 1990, the Department made the decision to reduce the testing frequency to every 5 years due to the very low actual emissions.

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Several changes are being made due to updates from time of issuance of Final Title V Permit No. 1090022-004-AV:

G. Cover Page.

FROM:

Permitting Authority:
Florida Department of Environmental Protection
Northeast District
7825 Baymeadows Way, Suite B200
Jacksonville, Florida 32056-7590
Telephone: 904-448-4310
Fax: 904-448-4363

TO:

Permitting Authority:
State of Florida
Department of Environmental Protection
Division of Air Resources Management
Bureau of Air Regulation
Mail Station #5505
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Telephone: 850/488-0144
Fax: 850/922-6979

Compliance Authority:
Florida Department of Environmental Protection
Northeast District
7825 Baymeadows Way, Suite B-200
Jacksonville, Florida 32056-7590
Telephone: 904-807-3300
Fax: 904-448-4363

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H. Placard Page

FROM:

Referenced attachments made a part of this permit:
Appendix U-1, List of Unregulated Emissions Units and/or Activities
APPENDIX TV-1, TITLE V CONDITIONS (version dated 12/02/97)

TO:

Referenced attachments made a part of this permit:
Appendix U-1, List of Unregulated Emissions Units and/or Activities
APPENDIX TV-4, TITLE V CONDITIONS (version dated 02/12/02)
Appendix CP-1, Compliance Plan dated 7/15/04
Appendix AA, General Provisions for 40 CFR Part 63, Subpart A
Appendix BB, General Provisions for 40 CFR Part 63, Subpart A
40 CFR Part 63, Subpart AA
40 CFR Part 63, Subpart BB

I. Placard Page - Subsection D

Subsection D. Miscellaneous.

The use of 'Permitting Notes' throughout this permit are for informational purposes only and are not permit conditions.

J. Section II. Facility-wide Condition No. 1

FROM:

1. APPENDIX TV-1, TITLE V CONDITIONS is a part of this permit.
APPENDIX TV-1, TITLE V CONDITIONS, is distributed to the permittee only. Other persons requesting copies of these conditions shall be provided one copy when requested or otherwise appropriate.

TO:

1. APPENDIX TV-4, TITLE V CONDITIONS, is a part of this permit.
{Permitting note: APPENDIX TV-4, TITLE V CONDITIONS, is distributed to the permittee only. Other persons requesting copies of these conditions shall be provided a copy when requested or otherwise appropriate.}

K. Section II. Facility-wide Condition No. 4

FROM:

4. Prevention of Accidental Releases (Section 112(r) of CAA). If required by 40 CFR 68, the permittee shall submit to the implementing agency:
a. a risk management plan (RMP) when, and if, such requirement becomes applicable; and
b. certification forms and/or RMPs according to the promulgated rule schedule.
[40 CFR 68]

TO:

4. Prevention of Accidental Releases (Section 112(r) of CAA).

a. The permittee shall submit its Risk Management Plan (RMP) to the Chemical Emergency Preparedness and Prevention Office (CEPPO) RMP Reporting Center when, and if, such requirement becomes applicable. Any Risk Management Plans, original submittals, revisions or updates to submittals, should be sent to:

RMP Reporting Center
P.O. Box 1515
Lanham-Seabrook, Maryland 20703-1515
Telephone: 301/429-5018

b. The permittee shall submit to the permitting authority Title V certification forms or a compliance schedule in accordance with Rule 62-213.440(2), F.A.C.
[40 CFR 68]

L. Section II. Facility-wide Condition No. 8

The following Note was added prior to the condition.

{Note: This condition implements the requirements of Rules 62-296.320(4)(c)1., 3., & 4. F.A.C. (condition 58. of APPENDIX TV-4, TITLE V CONDITIONS.)”

M. Section II. Facility-wide Condition Nos. 11 and 12

Have been added:

11. Statement of Compliance. The annual statement of compliance pursuant to Rule 62-213.440(3)(a)2., F.A.C., shall be submitted within 60 (sixty) days after the end of the calendar year using DEP Form No. 62-213.900(7), F.A.C.
[Rules 62-213.440(3) and 62-213.900, F.A.C.]

{Permitting Note: This condition implements the requirements of Rules 62-213.440(3)(a)2. & 3., F.A.C. (see Condition 51. of APPENDIX TV-4, TITLE V CONDITIONS.)”

12. Certification by Responsible Official (RO). In addition to the professional engineering certification required for applications by Rule 62-4.050(3), F.A.C., any application form, report, compliance statement, compliance plan and compliance schedule submitted pursuant to Chapter 62-213, F.A.C., shall contain a certification signed by a responsible official that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. Any responsible official who fails to submit any required information or who has submitted incorrect information shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary information or correct information.

N. Section II. Facility-wide Condition No. 13

The Telephone information has been updated for the Northeast District Office

11. All reports, tests, notifications or other submittals required by this permit shall be submitted to the Department's Northeast District, Air Section:

Florida Department of Environmental Protection
Northeast District Office, Air Program
7825 Baymeadows Way, Suite B-200
Jacksonville, Florida 32256-7590

Telephone: 904/807-3300
Fax: 904/448-4363

O. Section II. Facility-wide Condition No. 14

Has been corrected to reflect the current address and phone numbers from:

12. Any reports, data, notifications, certification, and requests required to be sent to the United States environmental protection Agency, Region 4, should be sent to the following address:

United States Environmental Protection Agency
Region 4
Air, Pesticides & Toxics Management Division
Operating Permits Section
61 Forsyth Street
Atlanta, Georgia 30303

Telephone: 404/562-9099
Fax: 404/562-9095

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TO:

Any reports, data, notifications, certifications, and requests required to be sent to the United States Environmental Protection Agency, Region 4, should be sent to:

United States Environmental Protection Agency
Region 4

Air, Pesticides & Toxics Management Division
Air and EPCRA Enforcement Branch

Air Enforcement Section

61 Forsyth Street

Atlanta, Georgia 30303

Telephone: 404/562-9155, Fax: 404/562-9163

P. Section III. Emission Limitations and Standards sections

The following permitting note has been added to each Emission Limitations and Standards Section under each Subsection:

{Permitting note. The averaging time for this condition is based on the run time of the specified test method.}

Q. Compliance Plan

The Compliance Plan has been added to comply with Settlement dated 7/15/04 between the permittee and the Department regarding OGC case 02-0862.

R. Section II has been changed by adding **Condition 6:**

6. Compliance Plan. PCS shall comply with the Compliance Plan attached at Appendix CP-1.

[Rule 62-213.440(2), F.A.C., OGC Case 02-0862]

S. Memorandum of Understanding for Sulfuric Acid Plants has been added to PROPOSED Permit 0470002-041-AV.