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KA 102-03-05

June 23, 2005

Mr. Bobby Bull
Florida Department of
Environmental Protection
MS 5505
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Subject: Comments on Draft Title V Permit
White Springs Agricultural Chemicals, Inc
DEP File No. 0470002-048-AV

Dear Mr. Bull:

The following comments and concerns are submitted in response to FDEP's above referenced draft Title V permit:

General Comment

Regarding annual testing, it should be clarified that testing and the associated reporting may be conducted during the federal fiscal year and any specific dates are for planning purposes only. This condition may be added in Subsection HH.

Page 3, Section I, Condition 5

Please include Appendix U-1, List of Unregulated Emissions Units and Appendix I-1, List of Insignificant Activities in the permit.

Page 5, Section I, Condition 9

It should be clarified that, as in the previous permit, for the purposes of the recording and reporting requirements, monthly reflects the beginning of each month and quarterly reflects the beginning of each calendar quarter.

Page 28, Specific Condition J6 and Page 30, Specific Condition K6

Please add EPA Method 6C as an acceptable method for testing for sulfur dioxide emissions.

Page 50, Specific Condition T8

The appropriate test method should reflect EPA Method 9.

Page 56, Specific Condition W10

As this condition is redundant, it can be deleted.

Page 63, Specific Condition Z6 and Page 65, Specific Condition AA6

Please add EPA Method 6C as an acceptable method for testing for sulfur dioxide emissions.

Page 78 Item (2), Operating Rate During Testing

The permit should reflect 30 days of operation, to allow for the 15-day notice and the required testing at higher rates.

CAM Averaging Period

It is requested that the required data collection and excursion determinations be revised to reflect "An excursion is defined as any 24-hour average excluding those events defined...". FDEP can approve the 24-hr averaging period in accordance with 40 CFR 64.3(b)(4). The justification is to ensure that the more general CAM plan requirements are consistent with the more specific HF MACT requirements for consistency of interpretation, ease of operation and recordkeeping, and enforcement, given that MACT requirements are intended, by definition, to be the maximum achievable control technology and more stringent than CAM.

CAM Plan

Based on clarifications received from FDEP staff, the applicability of the CAM plan has been re-evaluated for the affected emission units. The revised CAM applicability is presented below.

EU 003, DFP A Plant

The CAM applicability for F and SO2 emissions from this process is revised since the pre-controlled emissions are expected to be below the CAM applicability threshold.

The pre-controlled fluoride emissions from the process can be estimated based on the actual emissions (0.42 lb/hr) and the assumed scrubber efficiency of 95 percent, as follows:

F pre-control = 0.42 lb/hr / (1-0.95) x 8760 hrs/yr x ton/2000 lbs = 37 tpy

The pre-controlled sulfur dioxide emissions from the process can be estimated based on the actual emissions (0.48 lb/hr) and the assumed scrubber efficiency of 95 percent, as follows:

SO2 pre-control = 0.48 lb/hr / (1-0.95) x 8760 hrs/yr x ton/2000 lbs = 42 tpy

As the expected pre-controlled emissions are less than 100 tpy, CAM does not apply to fluorides and sulfur dioxide. The CAM applicability for PM is unchanged at this time. It should be noted, however, that based on the emissions data previously submitted to FDEP, the PM emissions from this process are less than 100 tpy.

EU 004, X-Train

The CAM applicability for PM is unchanged at this time, as there are no pre-control emissions data. It should be noted, however, that based on the emissions data previously submitted to FDEP, the PM emissions from this process are less than 100 tpy.

EU 008, Y-Train

The CAM applicability for PM emissions from this process is revised based on the fact that the initial process recovery scrubbers are not considered control devices for CAM purposes. The ammonia recovery scrubber design inherently reduces the particulate matter and fluoride loading to the final gas scrubbers. The final gas scrubber is designed to control fluoride emissions to comply with the fluoride emissions standard. It is not utilized for control of particulate matter.

In any case, the pre-control emissions can be estimated based on the actual emissions (3.9 lb/hr) and an assumed scrubber efficiency of 80 percent:

PM pre-control = 3.9 lb/hr / (1-0.8) x 8760 hrs/yr x ton/2000 lbs = 85 tpy

As there is no dedicated/designated PM control device and since the expected pre-controlled emissions are less than 100 tpy, CAM does not apply.

EU 010, No. 1 Storage and Shipping Building

The CAM applicability for PM emissions from this process is revised since the pre-controlled emissions are expected to be below the CAM applicability threshold.

The pre-controlled PM emissions from the process can be estimated based on the actual emissions (<1 lb/hr) and the assumed scrubber efficiency of 80 percent, as follows:

PM pre-control = 1 lb/hr / (1-0.8) x 8760 hrs/yr x ton/2000 lbs = 22 tpy

As the expected pre-controlled emissions are less than 100 tpy, CAM does not apply.

EU 015, Screening and Shipping Building

The CAM applicability for PM emissions from this process is revised since the pre-controlled emissions are expected to be below the CAM applicability threshold.

The pre-controlled PM emissions from the process can be estimated based on the actual emissions (<1 lb/hr) and the assumed scrubber efficiency of 80 percent, as follows:

PM pre-control = 1 lb/hr / (1-0.8) x 8760 hrs/yr x ton/2000 lbs = 22 tpy

As the expected pre-controlled emissions are less than 100 tpy, CAM does not apply.

EU 032, Z-Train

The CAM applicability for PM emissions from this process is revised based on the fact that the initial process recovery scrubbers are not considered control devices for CAM purposes. The ammonia recovery scrubber design inherently reduces the particulate matter and fluoride loading to the tail gas scrubbers. The tail gas scrubber is designed to control fluoride emissions to comply with the fluoride emissions standard. It is not utilized for control of particulate matter.

In any case, the pre-control emissions can be estimated based on the actual emissions (3.5 lb/hr) and an assumed scrubber efficiency of 80 percent:

PM pre-control = 3.5 lb/hr / (1-0.8) x 8760 hrs/yr x ton/2000 lbs = 77 tpy

As there is no dedicated/designated PM control device and since the expected pre-controlled emissions are less than 100 tpy, CAM does not apply.

EU 038, DFP B Plant

The CAM applicability for F and SO2 emissions from this process is revised since the pre-controlled emissions are expected to be below the CAM applicability threshold.

The pre-controlled fluoride emissions from the process can be estimated based on the actual emissions (0.49 lb/hr) and the assumed scrubber efficiency of 95 percent, as follows:

F pre-control = 0.49 lb/hr / (1-0.95) x 8760 hrs/yr x ton/2000 lbs = 43 tpy

The pre-controlled sulfur dioxide emissions from the process can be estimated based on the actual emissions (0.47 lb/hr) and the assumed scrubber efficiency of 95 percent, as follows:

SO2 pre-control = 0.47 lb/hr / (1-0.95) x 8760 hrs/yr x ton/2000 lbs = 41 tpy

As the expected pre-controlled emissions are less than 100 tpy, CAM does not apply to fluorides and sulfur dioxide. The CAM applicability for PM is unchanged at this time. It should be noted, however, that based on the emissions data previously submitted to FDEP, the PM emissions from this process are less than 100 tpy.

EU 042, DFP Feed Prep

The CAM applicability for PM emissions from this process is revised since the pre-controlled emissions are expected to be below the CAM applicability threshold.

The pre-controlled PM emissions from the process can be estimated based on the actual emissions (<1 lb/hr) and the assumed scrubber efficiency of 80 percent, as follows:

PM pre-control = 1 lb/hr / (1-0.8) x 8760 hrs/yr x ton/2000 lbs = 22 tpy

As the expected pre-controlled emissions are less than 100 tpy, CAM does not apply.

EU 044, A and B DFP Coolers

The CAM applicability for PM emissions from this process is revised since the pre-controlled emissions are expected to be below the CAM applicability threshold.

In the case of each cooler, a dry cyclone is used for material recovery, to capture the bulk of the particulate matter, followed by a wet cyclonic scrubber for emission control.

The pre-controlled PM emissions from the process can be estimated based on the actual emissions of each cooler (8.8 lb/hr) and a scrubber efficiency of 50 percent (wet cyclonic), as follows:

PM pre-control = 8.8 lb/hr / (1-0.5) x 8760 hrs/yr x ton/2000 lbs = 77 tpy

As the expected pre-controlled emissions are less than 100 tpy, CAM does not apply.

EU 065, SCM Rock Silos

The CAM applicability for PM emissions from this process is revised since the pre-controlled emissions are expected to be below the CAM applicability threshold.

The pre-controlled PM emissions from the process can be estimated based on the actual emissions (4.7 lb/hr) and the assumed scrubber efficiency of 70 percent (water spray scrubber design), as follows:

PM pre-control = 4.7 lb/hr / (1-0.7) x 8760 hrs/yr x ton/2000 lbs = 69 tpy

As the expected pre-controlled emissions are less than 100 tpy, CAM does not apply.

MACT Issues

Please include the applicable provisions of the MACT requirements in the draft Title V permit so that we may submit our comments on those issues, as appropriate.

Construction Permit Issues

Please extend PSD-FL 297 until December 31, 2007, to allow completion of the D-Phosphoric Acid Plant project. The B-Phosphoric Acid Plant project is expected to be completed by March 2006.

The other projects included in PSD-FL-297 have been completed, with the exception of EU 004, X-Train. The X-Train modification has been completed except for the replacement of the pug mills. There are no plans to replace the pug mills in the near future and, therefore, there will be no production rate increase from this emissions unit.

It is our understanding that project numbers 045-AC (DFP Silos), and 050-AC (Y-Train) will be rolled into the TV permit as these projects are completed. Also, it is expected that project 053-AC (deletion of inactive units), will be rolled into the TV permit, and with the correction previously submitted to FDEP, that EU 006 should be deleted and not EU 008.

If you have any additional questions, please call me.

Very truly yours,

KOOGLER & ASSOCIATES

John B. Koogler, Ph.D., P.E.

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