

Jeb Bush  
Governor

# Department of Environmental Protection

Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

David B. Struhs  
Secretary

December 18, 2003

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Vernon J. Lloyd  
Vice President - Production  
White Springs Agricultural Chemicals, Inc.  
Post Office Box 300  
White Springs, Florida 32096

Dear Mr. Lloyd:

Re: Extension Request/DEP File No. 0470002-047-AC (PSD-FL-297A)  
White Springs Agricultural Chemicals, Inc.

The Department has reviewed your consultant's letter of July 17, 2003 and subsequent submittal received October 24, 2003 requesting an extension of the expiration date of the above referenced permit. The purpose of the extension is to allow more time to complete construction. This request is acceptable and the expiration date is hereby extended from October 1, 2003 to October 1, 2004. The extension is conditioned upon the following amendments to the original permit:

## SECTION I. FACILITY INFORMATION

### Regulatory Classification

The Agricultural Chemicals Complex is classified as a major source of air pollution or Title V source because it has the potential to emit at least 100 tons per year of particulate matter, nitrogen oxides and sulfur dioxide.

(Add the following Condition)

The White Springs Agricultural Chemicals Facility is also classified as a "Major Source" per 40 CFR 63.2, Definitions [adopted and incorporated by reference by the Department at Paragraph 62-204.800(11)(d)] because it consists of a group of stationary sources located within a contiguous area and under common control that emit or have the potential to emit considering controls, in the aggregate, 10 tons per year or more of any hazardous air pollutant or 25 tons per year or more of any combination of hazardous air pollutants.

## SECTION III. EMISSION UNIT(S) SPECIFIC CONDITIONS

(Add the following Conditions)

COMMON CONDITIONS: 40 CFR 63 - NEW SOURCE PERFORMANCE STANDARDS - NATIONAL STANDARDS FOR HAZARDOUS AIR POLLUTANTS FOR SOURCE CATEGORIES

"More Protection, Less Process"

Printed on recycled paper.

This permit addresses the following emission units.

<u>EMISSION UNIT NO.</u>	<u>EMISSION UNIT DESCRIPTION</u>
<u>020</u>	<u>B Phosphoric Acid Plant</u>
<u>069</u>	<u>D Phosphoric Acid Plant</u>
<u>070</u>	<u>C &amp; D Superphosphoric Acid Plant</u>

These emission units shall comply with all applicable requirements of:

- 40 CFR 63, General Provisions, Subpart A – General Provisions adopted by reference in Rule 62-204.800(11)(d), F.A.C.
- 40 CFR 63, Subpart AA – National Emissions Standards for Hazardous Air Pollutants from Phosphoric Acid Manufacturing Plants, adopted by reference in Rule 62-204.800(11)(b), F.A.C.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under Sections 120.569 and 120.57 of the Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida, 32399-3000. Petitions filed by the permit applicant or any of the parties listed below must be filed within fourteen days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3) of the Florida Statutes must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of this notice of intent, whichever occurs first. Under Section 120.60(3), however, any person who asked the Department for notice of agency action may file a petition within fourteen days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57 F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205 of the Florida Administrative Code.

A petition that disputes the material facts on which the Department's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner, the name, address, and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of how and when petitioner received notice of the agency action or proposed action; (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate; (e) A concise statement of the ultimate facts alleged, as well as the Rules and statutes which entitle the petitioner to relief; and (f) A demand for relief.

A petition that does not dispute the material facts upon which the Department's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Department's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any such final decision of the Department on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above. Mediation is not available in this proceeding.

In addition to the above, a person subject to regulation has a right to apply for a variance from or waiver of the requirements of particular rules, on certain conditions, under Section 120.542 F.S. The relief provided by this state statute applies only to state rules, not statutes, and not to any federal regulatory requirements. Applying for a variance or waiver does not substitute or extend the time for filing a petition for an administrative hearing or exercising any other right that a person may have in relation to the action proposed in this notice of intent.

The application for a variance or waiver is made by filing a petition with the Office of General Counsel of the Department, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. The petition must specify the following information: (a) The name, address, and telephone number of the petitioner; (b) The name, address, and telephone number of the attorney or qualified representative of the petitioner, if any; (c) Each rule or portion of a rule from which a variance or waiver is requested; (d) The citation to the statute underlying (implemented by) the rule identified in (c) above; (e) The type of action requested; (f) The specific facts that would justify a variance or waiver for the petitioner; (g) The reason why the variance or waiver would serve the purposes of the underlying statute (implemented by the rule); and (h) A statement whether the variance or waiver is permanent or temporary and, if temporary, a statement of the dates showing the duration of the variance or waiver requested.

The Department will grant a variance or waiver when the petition demonstrates both that the application of the rule would create a substantial hardship or violate principles of fairness, as each of those terms is defined in Section 120.542(2) F.S., and that the purpose of the underlying statute will be or has been achieved by other means by the petitioner.

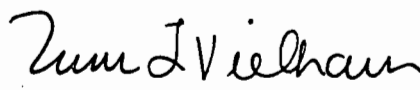
Persons subject to regulation pursuant to any federally delegated or approved air program should be aware that Florida is specifically not authorized to issue variances or waivers from any requirements of any such federally delegated or approved program. The requirements of the program remain fully enforceable by the Administrator of the EPA and by any person under the Clean Air Act unless and until the Administrator separately approves any variance or waiver in accordance with the procedures of the federal program.

This permitting decision is final and effective on the date filed with the clerk of the Department unless a petition is filed in accordance with the above paragraphs or unless a request for extension of time in which to file a petition is filed within the time specified for filing a petition pursuant to Rule 62-110.106, F.A.C., and the petition conforms to the content requirements of Rules 28-106.201 and 28-106.301, F.A.C. Upon timely filing of a petition or a request for extension of time, this order will not be effective until further order of the Department.

Any party to this permitting decision (order) has the right to seek judicial review of it under section 120.68 of the Florida Statutes, by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel, Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000, 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 must be filed within thirty days after this order is filed with the clerk of the Department.

A copy of this letter shall be filed with the referenced permit and shall become part of the permit.

Sincerely,



Trina L. Vielhauer, Chief

**CERTIFICATE OF SERVICE**

The undersigned duly designated deputy agency clerk hereby certifies that this AMENDMENT was sent by certified mail (\*) and copies were mailed by U.S. Mail before the close of business on 12/18/03 to the person(s) listed:

Vernon J. Lloyd, WSAC\*  
Gregg Worley, EPA  
John Bunyak, NPS  
Chris Kirts, DEP  
John Koogler, P.E., K & A  
Charlie Pults, WSAC

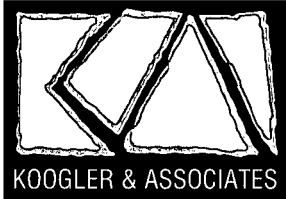
Clerk Stamp

**FILING AND ACKNOWLEDGMENT FILED,**  
on this date, pursuant to §120.52, Florida Statutes,  
with the designated Department Clerk, receipt of  
which is hereby acknowledged.

Victoria Gibson 12/18/03  
(Clerk) (Date)

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<ul style="list-style-type: none"> <li>Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.</li> <li>Print your name and address on the reverse so that we can return the card to you.</li> <li>Attach this card to the back of the mailpiece, or on the front if space permits.</li> </ul>	A. Received by (Please Print Clearly) _____ B. Date of Delivery <u>12-22-03</u>
1. Article Addressed to:  Mr. Vernon J. Lloyd Vice President - Production White Springs Agricultural Chemicals, Inc. Post Office Box 300 White Springs, FL 32096	C. Signature <u>[Signature]</u> <input checked="" type="checkbox"/> Agent <input type="checkbox"/> Addressee D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No
2. Article Number (Copy from service label) <u>7000 2870 0000 7028 3659</u>	3. Service Type <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D. 4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes

U.S. Postal Service <b>CERTIFIED MAIL RECEIPT</b> (Domestic Mail Only; No Insurance Coverage Provided)																								
7000 2870 0000 7028 3659	<table border="1"> <tr> <td>Postage</td> <td>\$</td> <td rowspan="5" style="text-align: center; vertical-align: middle;">Postmark Here</td> </tr> <tr> <td>Certified Fee</td> <td></td> </tr> <tr> <td>Return Receipt Fee (Endorsement Required)</td> <td></td> </tr> <tr> <td>Restricted Delivery Fee (Endorsement Required)</td> <td></td> </tr> <tr> <td><b>Total Postage &amp; Fees</b></td> <td><b>\$</b></td> </tr> </table> <table border="1"> <tr> <td colspan="2"><b>Sent To</b></td> </tr> <tr> <td colspan="2">Vernon J. Lloyd</td> </tr> <tr> <td colspan="2">Street, Apt. No., or PO Box No.</td> </tr> <tr> <td colspan="2">Po Box 300</td> </tr> <tr> <td colspan="2">City, State, ZIP+ 4</td> </tr> <tr> <td colspan="2">White Springs, FL 32096</td> </tr> </table>	Postage	\$	Postmark Here	Certified Fee		Return Receipt Fee (Endorsement Required)		Restricted Delivery Fee (Endorsement Required)		<b>Total Postage &amp; Fees</b>	<b>\$</b>	<b>Sent To</b>		Vernon J. Lloyd		Street, Apt. No., or PO Box No.		Po Box 300		City, State, ZIP+ 4		White Springs, FL 32096	
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White Springs, FL 32096																								
PS Form 3800, May 2000 See Reverse for Instructions																								



**KOOGLER & ASSOCIATES**  
**ENVIRONMENTAL SERVICES**

4014 NW THIRTEENTH STREET  
GAINESVILLE, FLORIDA 32609  
352/377-5822 ■ FAX/377-7158

KA 102-00-03

October 23, 2003

**RECEIVED**

**OCT 24 2003**

**BUREAU OF AIR REGULATION**

Mr. Syed Arif, P.E.  
Florida Department of  
Environmental Protection  
Twin Towers Office Building  
2600 Blair Stone Rd  
Tallahassee, FL 32399-2400

Subject: Permit Extension Request  
White Springs Agricultural Products, Inc  
File No. 0470002-39-AC, PSD-FL-297

Dear Mr. Arif:

This is in response to your letter dated July 29, 2003, for additional information on the request for an extension of the above referenced permit to October 1, 2005.

As previously indicated, construction work started soon after the permit was issued and has been continuing. The construction work is expected to continue for some time into the future and so a conservative future permit expiration date is proposed. The BACT determination will not need to be revisited, as there have been no delays in commencing construction or any break in the construction work approaching the 18-month provision of the rule.

Specifically, the following had been commenced within 18 months of permit issuance and have been completed without a break in construction activity of 18 months:

- Removal of old pugmills
- Installation of new pugmill
- Burner replacement
- New baghouse on limestone bin
- New baghouse on fines return
- New baghouse on material handling units
- Pump and piping changes in phosphoric acid, superphosphoric and clarification areas.

October 23, 2003

The following are currently ongoing without a break in construction activity of 18 months:

- Purchasing of pumps, piping, ducting, seals, etc. for the project
- Purchasing of other components under approved capital funding
- Installation engineering design drawings for the project
- Removal of equipment to be replaced
- Addition of new screens in product shipping
- Addition of mills in material handling area

The following will be undertaken in 2004 through 2005 without a break in construction activity of 18 months:

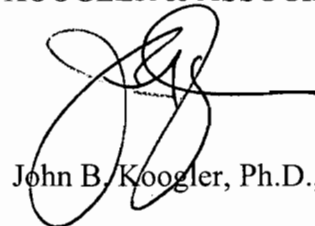
- Complete all screen replacement
- Complete all mills replacement
- Complete all pump, piping, ducting, instrumentation, controls, etc.
- Removal of existing deduster
- Addition of fines holding bin
- Replace dryer fan
- Complete the conversion of Phosphoric acid plant
- Replacement of acid filter
- Replacement of reaction vessels
- Complete all emissions testing
- Complete the Title V permit revision application upon completion of construction

Regarding the issue of applicability of 40CFR63, Subparts AA and BB, the permittee is engaged in ongoing discussions with the Department in an effort to resolve the matter in an amicable manner.

If you have any questions, please do not hesitate to call Pradeep Raval or me.

Very truly yours,

KOOGLER & ASSOCIATES



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

JBK:par

C: Charlie Pults, WSAC  
Rita Felton-Smith, FDEP



Jeb Bush  
Governor

# Department of Environmental Protection

Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

David B. Struhs  
Secretary

July 29, 2003

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. John B. Koogler, Ph.D., P.E.  
Koogler & Associates Environmental Services  
4014 N.W. 13<sup>th</sup> Street  
Gainesville, FL 32609

Re: Extension Request/DEP File No. 0470002-039-AC (PSD-FL-297A)  
White Springs Agricultural Chemicals, Inc.

Dear Mr. Koogler:

The Department reviewed your request of July 17, 2003 to extend the expiration date of the construction permit from October 1, 2003 to October 1, 2005.

Per Rule 62-4.080(3), F.A.C., an extension for a construction permit shall be granted if the applicant can demonstrate reasonable assurances that upon completion, the extended permit will comply with the standards and conditions required by applicable regulation.

We already have fairly extensive information about the facility and the control equipment. To complete the reasonable assurance requirement allowing extension of the permit, please submit the following information:

1. List any additional tasks to be performed to achieve "normal operating conditions" and the approximate dates for completing those tasks.
2. Please provide documentation to show that there was not a delay of more than 18 months in either commencing construction or any break in construction activities.
3. Identify additional production and emission testing that needs to be conducted and provide estimated dates for completion of those tasks.
4. Provide a statement (and basis for believing) that the facility will comply with all applicable regulations including 40 CFR 63 Subpart AA.

According to Rule 62-4-080(3), the permit will remain in effect until the Department takes final action. Permit applicants are advised that Rule 62-4.055(1), F.A.C. now requires applicants to respond to requests for information within 90 days. If you have any questions regarding this matter, please call Syed Arif, P.E. at 850/921-9528.

Sincerely,

A. A. Linero, P.E. Administrator  
New Source Review Section

Cc: Rita Felton-Smith, DEP NED  
Charlie Pults, WSAC

"More Protection, Less Process"

Printed on recycled paper.



**U.S. Postal Service**  
**CERTIFIED MAIL RECEIPT**  
*(Domestic Mail Only; No Insurance Coverage Provided)*

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Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
<b>Total Postage &amp; Fees</b>	<b>\$</b>

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Sent To <b>Charlie Pults</b>	
Street, Apt. No., or PO Box No. <b>PO Box 300</b>	
City, State, ZIP+4 <b>White Springs, FL 32096</b>	



**KOOGLER & ASSOCIATES**  
**ENVIRONMENTAL SERVICES**

4014 NW THIRTEENTH STREET  
GAINESVILLE, FLORIDA 32609  
352/377-5822 ■ FAX/377-7158

KA 102-00-03

July 17, 2003

**RECEIVED**

**JUL 21 2003**

**BUREAU OF AIR REGULATION**

Mr. Syed Arif, P.E.  
Florida Department of  
Environmental Protection  
Twin Towers Office Building  
2600 Blair Stone Rd  
Tallahassee, FL 32399-2400

Subject: Permit Extension Request  
White Springs Agricultural Products, Inc  
File No. 0470002-39-AC, PSD-FL-297  
*0470002-047-AC*

Dear Mr. Arif:

This is to request an extension of the above referenced permit from October 1, 2003 to October 1, 2005.

Construction work started soon after the permit was issued and has been continuing. The construction work is expected to continue for some time into the future and so a conservative future permit expiration date is proposed. The BACT determination will not need to be revisited, as there have been no delays in commencing construction or any break in the construction work approaching the 18-month provision of the rule.

If you have any questions, please do not hesitate to call Pradeep Raval or me.

Very truly yours,

KOOGLER & ASSOCIATES

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

JBK:par

C: Charlie Pults, WSAC  
Rita Felton-Smith, FDEP

**U.S. Postal Service**  
**CERTIFIED MAIL RECEIPT**  
*(Domestic Mail Only; No Insurance Coverage Provided)*

7007 0220 0000 1000 2692 5467

**OFFICIAL USE**

Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
<b>Total Postage &amp; Fees</b>	<b>\$</b>

Postmark  
Here

Sent To  
 Charlie Pults  
 Street, Apt. No.  
 or PO Box No.  
 PO Box 300  
 City, State, ZIP+4  
 White Springs, FL 32096

**SENDER: COMPLETE THIS SECTION**

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Mr. Vernon J. Lloyd  
 Vice President - Production  
 White Springs Agricultural Chemicals, Inc.  
 Post Office Box 300  
 White Springs, FL 32096

2. Article Number (Copy from service label)

7000 2870 0000 7028 3659

**COMPLETE THIS SECTION ON DELIVERY**

A. Received by (Please Print Clearly)

B. Date of Delivery  
12-22-03

C. Signature

X

Agent

Addressee

D. Is delivery address different from item 1?  Yes

No

If YES, enter delivery address below:

3. Service Type

Certified Mail  Express Mail

Registered  Return Receipt for Merchandise

Insured Mail  C.O.D.

4. Restricted Delivery? (Extra Fee)

Yes

PS Form 3811, July 1999

Domestic Return Receipt

102595-99-M-1789

**U.S. Postal Service**  
**CERTIFIED MAIL RECEIPT**  
 (Domestic Mail Only; No Insurance Coverage Provided)

**OFFICIAL USE**

7000 2870 0000 7028 3659

Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
<b>Total Postage &amp; Fees</b>	<b>\$</b>

Postmark  
Here

Sent To

Vernon J. Lloyd

Street, Apt. No., or PO Box No.

Po Box 300

City, State, ZIP+4

White Springs, FL 32096

PS Form 3800, May 2000

See Reverse for Instructions

## **FINAL DETERMINATION**

White Springs Agricultural Chemicals, Inc.  
Permit No. 0470002-051-AC  
Liquid Fertilizer Plant

An Intent to Issue an air construction permit to White Springs Agricultural Chemicals, Inc., for construction of a 40 tons per hour liquid fertilizer unit at the Suwannee River Complex in Hamilton County was distributed on September 30, 2004. The Notice of Intent was published in the Jasper News on October 14, 2004. Copies of the draft construction permit were available for public inspection at the Department offices in Jacksonville and Tallahassee.

The Department did not receive any comments from the public or the applicant.

The final action of the Department is to issue the permit as proposed.

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
NOTICE OF FINAL PERMIT

In the Matter of an  
Application for Permit

Mr. Paul H. Barrett  
White Springs Agricultural Chemicals, Inc.  
Post Office Box 300  
White Springs, Florida 32096

DEP File No. 0470002-051-AC

Enclosed is the FINAL Permit Number 0470002-051-AC for constructing 40 tons per hour liquid fertilizer plant to produce 10-34-0 or 11-37-0 liquid fertilizer at the Suwannee River Complex in Hamilton County. This permit is issued pursuant to Chapter 403, Florida Statutes and in accordance with Rule 62-296.403, F.A.C.

Any party to this order (permit) has the right to seek judicial review of the permit pursuant to Section 120.68, F.S., 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 Legal Office; 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 (thirty) days from the date this Notice is filed with the Clerk of the Department.

Executed in Tallahassee, Florida.



Trina L. Vielhauer, Chief  
Bureau of Air Regulation

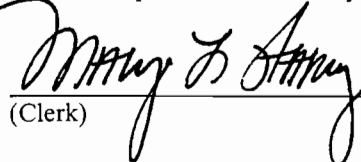
**CERTIFICATE OF SERVICE**

The undersigned duly designated deputy agency clerk hereby certifies that this NOTICE OF FINAL PERMIT (including the FINAL permit) was sent by certified mail (\*) and copies were mailed by U.S. Mail before the close of business on 11/22/04 to the person(s) listed:

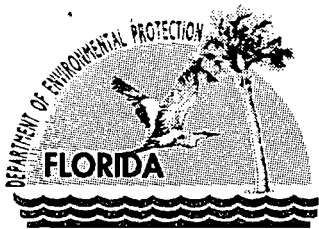
Paul H. Barrett, WSAC \*  
Chris Kirts, DEP-NED  
John Koogler, P.E., K & A

Clerk Stamp

**FILING AND ACKNOWLEDGMENT**  
**FILED**, on this date, pursuant to §120.52,  
Florida Statutes, with the designated Department  
Clerk, receipt of which is hereby acknowledged.

  
(Clerk)

11/22/04  
(Date)



# Department of Environmental Protection

Jeb Bush  
Governor

Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Colleen M. Castille  
Secretary

## PERMITTEE:

White Springs Agricultural Chemicals, Inc.  
P.O. Box 300  
White Springs, Florida 32096

### *Authorized Representative:*

Paul H. Barrett  
General Manager

DEP Permit No.:	0470002-051-AC
Project:	40 Tons Per Hour Liquid Fertilizer Production Unit
SIC No.:	2874
Expiration:	December 31, 2005

## PROJECT AND LOCATION:

Permit to install a unit for producing 40 tons per hour of either 10-34-0 or 11-37-0 liquid fertilizer.

The facility is located E of SR 137, E of US 41, N of White Springs in Hamilton County, Florida.

The UTM coordinates are: Zone 17; 328.3 km E and 3368.8 km N.

## STATEMENT OF BASIS:

This construction permit is issued under the provisions of Chapter 403 of the Florida Statutes (F.S.), and Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297 of the Florida Administrative Code (F.A.C.). The above named permittee is authorized to construct the facility in accordance with the conditions of this permit and as described in the application, approved drawings, plans, and other documents on file with the Department of Environmental Protection (Department).

## ATTACHED APPENDICES MADE A PART OF THIS PERMIT:

Appendix GC            General Conditions

Michael G. Cooke, Director  
Division of Air Resource  
Management

**AIR CONSTRUCTION PERMIT 0470002-051-AC**  
**SECTION I. FACILITY INFORMATION**

**FACILITY DESCRIPTION**

White Springs Agricultural Chemicals, Inc. (WSAC) operates a phosphate fertilizer manufacturing facility at the Suwannee River Chemical Complex near White Springs, Hamilton County, Florida, producing sulfuric acid, wet-process phosphoric acid, ammoniated phosphate fertilizers and related products. WSAC is applying for a non-PSD permit to produce 10-34-0 or 11-37-0 liquid fertilizer. This project will involve installing a pipe reactor for reacting superphosphoric acid with ammonia. Also included will be an air cooled packed tower unit that emits the flash-off from the hot recirculated material coming from the pipe reactor. The only other physical changes required will be the routing of raw material streams to the liquid fertilizer plant.

**REGULATORY CLASSIFICATION**

Phosphate rock processing plants are listed as a Major Facility Category in Table 62-212.400-1, F.A.C., "Major Facility Categories." Therefore, stack and fugitive emissions of over 100 TPY of a regulated pollutant are sufficient to classify the installation as a "Major Facility" per the definitions in Rule 62-210.200, F.A.C., subject to the Significant Emission Rates given in Table 62-212.400-2, F.A.C. and the requirements of Rule 62-212.400, F.A.C., Prevention of Significant Deterioration (PSD) and Best Available Control Technology (BACT) if applicable.

This facility is classified as a "Major or Title V Source" per Rule 62-210.200, F.A.C., because it has the potential to emit at least 100 tons per year of particulate matter. The Department has determined that this facility in its entirety is also a major source of hazardous air pollutants (HAPs) because it has the potential to emit at least 10 tons per year of hydrogen fluoride.

The Liquid Fertilizer Plant is classified as a "New Plant or Plant Section" under Rule 62-296.403(1)(i), F.A.C., requiring the use of best available control technology. The terms and conditions of this permit apply only to the construction/operation of the Liquid Fertilizer Plant.

**PERMIT SCHEDULE:**

- 08-09-04: Date of Receipt of Application
- 08-09-04: Application Complete
- 09-07-04: Issued Intent to Issue Permit
- 10-14-04: Notice of Intent published

**RELEVANT DOCUMENTS:**

The documents listed below are specifically related to this permitting action and form the basis of the permit. They are on file with the Department:

- Application received August 9, 2004



**AIR CONSTRUCTION PERMIT 0470002-051-AC**  
**SECTION II. GENERAL REQUIREMENTS**

**Regulating Agencies:** All documents related to applications for permits to operate, reports, tests, minor modifications and notifications shall be submitted to the Department's Northeast District Office, 7825 Baymeadows Way, Suite 200B, Jacksonville, Florida 32256-7590. All applications for permits to construct or modify an emissions unit(s) *subject to the Prevention of Significant Deterioration or Nonattainment (NA) review requirements* should be submitted to the Bureau of Air Regulation (BAR), Florida Department of Environmental Protection (FDEP), 2600 Blair Stone Road, MS 5505, Tallahassee, Florida 32399-2400 (phone number 850/488-0114).

**General Conditions:** The owner and/or operator is subject to and shall operate under the attached General Permit Conditions G.1 through G.15 listed in Appendix GC of this permit. General Permit Conditions are binding and enforceable pursuant to Chapter 403 of the Florida Statutes. [Rule 62-4.160, F.A.C.]

**Terminology:** The terms used in this permit have specific meanings as defined in the corresponding chapters of the Florida Administrative Code.

**Applicable Regulations, Forms and Application Procedures:** Unless otherwise indicated in this permit, the construction and operation of the subject emissions unit shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of Chapter 403, F.S. and Florida Administrative Code Chapters 62-4, 62-110, 62-204, 62-212, 62-213, 62-296, 62-297 and the Code of Federal Regulations Title 40, Part 60, adopted by reference in the Florida Administrative Code (F.A.C.) regulations. The facility is subject to all applicable provisions of the Code of Federal Regulations Title 40, Part 63, Subpart BB. The permittee shall use the applicable forms listed in Rule 62-210.900, F.A.C. and follow the application procedures in Chapter 62-4, F.A.C. Issuance of this permit does not relieve the facility owner or operator from compliance with any applicable federal, state, or local permitting or regulations. [Rules 62-204.800, 62-210.300 and 62-210.900, F.A.C.]

**Expiration:** This air construction permit shall expire on **December 31, 2005** [Rule 62-210.300(1), F.A.C.]. The permittee may, for good cause, request that this construction permit be extended. Such a request shall be submitted to the Bureau of Air Regulation prior to 60 days before the expiration of the permit. However, the permittee shall promptly notify the Department's Northeast District Office of any delays in completion of the project, which would affect the startup day by more than 90 days. [Rule 62-4.090, F.A.C.]

**Application for Title V Permit:** An application for a Title V operating permit, pursuant to Chapter 62-213, F.A.C., must be submitted to the Department's Northeast District Office at least 90 days prior to expiration of this permit, but no later than 180 days after commencing operation. [Chapter 62-213, F.A.C.]

**Permit Approval:** Approval to construct shall become invalid if construction is not commenced within 18 months after receipt of such approval, or if construction is discontinued for a period of 18 months or more, or if construction is not completed within a reasonable time. The Department may extend the 18-month period upon a satisfactory showing that an extension is justified. [40 CFR 52.21(r)(2)].

**Annual Reports:** Pursuant to Rule 62-210.370(2), F.A.C., Annual Operation Reports, the permittee is required to submit annual reports on the actual operating rates and emissions from this facility. Annual operating reports using DEP Form 62-210.900(4) shall be sent to the DEP's Northeast District office by March 1st of each year.

**Stack Testing Facilities:** Stack sampling facilities shall be installed in accordance with Rule 62-297.310(6), F.A.C.

**Quarterly Reports:** Quarterly excess emission reports, in accordance with 40 CFR 60.7 shall be submitted to the Department's Northeast District office.

**New or Additional Conditions:** For good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions and on application of the permittee, the Department may grant additional time. [Rule 62-4.080, F.A.C.]

**AIR CONSTRUCTION PERMIT 0470002-051-AC**  
**SECTION III. EMISSION UNIT SPECIFIC REQUIREMENTS**

**SUBSECTION A.      Liquid Fertilizer Plant**

The Specific Conditions listed in this section apply to the following emission unit:

EMISSION UNIT NO.	EMISSION UNIT DESCRIPTION
074	Liquid Fertilizer Plant

The Liquid Fertilizer Plant consists of a pipe reactor for reacting superphosphoric acid with ammonia and an air cooled packed tower unit that emits the flash-off from the hot recirculated material coming from the pipe reactor.

**CONSTRUCTION**

1. The permittee is authorized to construct a plant to produce liquid 10-34-0 or 11-37-0 fertilizer by reacting superphosphoric acid and ammonia according to Figure 1 submitted with the application.

[Application received August 9, 2004]

**EMISSION AND PERFORMANCE REQUIREMENTS**

2. Production:

- a. The production rate for Emissions Unit 074 shall not exceed 40 tons of product per hour.
- b. The annual production rate shall not exceed 350,400 tons of product.

[Application received August 9, 2004; Rules 62-212.300, 62-210.200(PTE), F.A.C.]

3. Hours of Operation:

Operation of Emissions Unit 074 shall be permitted for up to 8760 hours/year.

[Application received August 9, 2004; Rules 62-212.300, and 62-210.200(PTE), F.A.C.]

4. Emissions:

- a. PM/PM<sub>10</sub> emissions shall not exceed 1.0 lbs/hr and 4.4 TPY.
- b. Total Fluoride emissions shall not exceed 0.1 lb/hr and 0.5 TPY.
- c. Visible Emissions shall not be equal to or greater than 20% opacity.

[Application received August 9, 2004; Rule 62-296.403(1), F.A.C.]

**TEST METHODS AND PROCEDURES**

5. The initial compliance test procedures for PM/PM<sub>10</sub> shall be in accordance with EPA Method 5 as published in 40 CFR 60, Appendix A. The Department shall consider the results to determine the extent of additional annual testing requirements.

[Rule 62-297.410(5), F.A.C.]

6. The initial compliance test procedures for Total Fluorides shall be in accordance with EPA Methods 13A or 13B as published in 40 CFR 60, Appendix A. If the initial compliance test shows no measurable fluoride emissions, no further compliance testing for Total Fluorides shall be required. The Department shall consider the results to determine the extent of additional annual testing requirements.

[Rule 62-297.410(13), F.A.C.]

**AIR CONSTRUCTION PERMIT 0470002-051-AC**  
**SECTION III. EMISSION UNIT SPECIFIC REQUIREMENTS**

7. The compliance test procedures for Visible Emissions shall be in accordance with EPA Method 9 as published in 40 CFR 60, Appendix A.

[Rule 62-297.410(9), F.A.C.]

8. Before this construction permit expires, and annually, the subject emissions units shall be tested for compliance with the applicable emission limits. For the duration of all tests the emission units shall be operating at permitted capacity. Permitted capacity is defined as 90-100 percent of the maximum operating rate allowed by the permit. If it is impracticable to test at permitted capacity, then the emission unit may be tested at less than permitted capacity (i.e., 90% of the maximum operating rate allowed by the permit); in this case, subsequent emission unit operation is limited to 110 percent of the test load until a new test is conducted. Once the emission unit is so limited, then operation at higher capacities is allowed for no more than 15 consecutive days for the purposes of additional compliance testing to regain the permitted capacity in the permit.

[Rule 62-297.310, F.A.C.]

9. The Department's Northeast District office shall be notified in writing at least 15 days prior to compliance testing. Written reports of the test results shall be submitted to that office within 45 days of test completion.

[Rule 62-297.310, F.A.C.]

**APPENDIX GC**  
GENERAL PERMIT CONDITIONS [F.A.C. 62-4.160]

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- G.1 The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.
- G.2 This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings or exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.
- G.3 As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey and vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit is not a waiver or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.
- G.4 This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.
- G.5 This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.
- G.6 The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.
- G.7 The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:
- a) Have access to and copy and records that must be kept under the conditions of the permit;
  - b) Inspect the facility, equipment, practices, or operations regulated or required under this permit, and,
  - c) Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.
- Reasonable time may depend on the nature of the concern being investigated.
- G.8 If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:
- a) A description of and cause of non-compliance; and
  - b) The period of noncompliance, including dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.
- The permittee shall be responsible for any and all damages, which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.
- G.9 In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by Sections 403.73 and 403.111, Florida

**APPENDIX GC**  
GENERAL PERMIT CONDITIONS [F.A.C. 62-4.160]

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Statutes. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

- G.10 The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.
- G.11 This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 62-4.120 and 62-730.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.
- G.12 This permit or a copy thereof shall be kept at the work site of the permitted activity.
- G.13 This permit also constitutes:
- a) Determination of Best Available Control Technology ( )
  - b) Determination of Prevention of Significant Deterioration ( )
  - c) Compliance with New Source Performance Standards ( )
  - d) Compliance with National Emission Standards for Hazardous Air Pollutants ( )
- G.14 The permittee shall comply with the following:
- a) Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
  - b) The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application or this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.
  - c) Records of monitoring information shall include:
    1. The date, exact place, and time of sampling or measurements;
    2. The person responsible for performing the sampling or measurements;
    3. The dates analyses were performed;
    4. The person responsible for performing the analyses;
    5. The analytical techniques or methods used; and
    6. The results of such analyses.
- G.15 When requested by the Department, the permittee shall within a reasonable time furnish any information required by law, which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

Florida Department of  
Environmental Protection

Memorandum

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TO: Michael Cooke

THRU: Trina Vielhauer *TJ*

THRU: Jim Pennington *JKP*

FROM: Syed Arif *Syed Arif 11/10/04*

DATE: November 10, 2004

SUBJECT: White Springs Agricultural Chemicals, Inc.  
DEP File No. 0470002-051-AC

Attached for your review and approval is the final construction permit for constructing a 40 tons per hour liquid fertilizer production unit at the Suwannee River Chemical Complex located near White Springs in Hamilton County.

The unit will produce two grades of liquid fertilizer, 10-34-0 and 11-37-0, by reacting superphosphoric acid and ammonia in a pipe reactor. The unit has an integral packed tower section that vents the hot flash-off gases and acts as a scrubber to control emissions. There will be no significant increase in actual emissions or potential emissions resulting from this project. The only physical changes will be the installation of the pipe reactor/packed tower unit and the routing of raw materials to the reactor.

No comments were received during the public comment period. I recommend your approval and signature.

The permit clock is currently on Day 31.

Attachments

**SENDER: COMPLETE THIS SECTION**

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:  
 Mr. Paul H. Barrett  
 White Springs Agricultural  
 Chemicals, Inc.  
 Post Office Box 300  
 White Springs, Florida 32096

**COMPLETE THIS SECTION ON DELIVERY**

A. Signature *[Signature]*  Agent  
 Addressee

B. Received by (Printed Name) *J.D. Reynolds* C. Date of Delivery *11/24/00*

D. Is delivery address different from item 1?  Yes  
 If YES, enter delivery address below:  No

3. Service Type  
 Certified Mail  Express Mail  
 Registered  Return Receipt for Merchandise  
 Insured Mail  C.O.D.

4. Restricted Delivery? (Extra Fee)  Yes

2. Article Number *7000 1670 0013 3109 9205*  
 (Transfer from service label)

7000 1670 0013 3109 9205

**U.S. Postal Service  
 CERTIFIED MAIL RECEIPT  
 (Domestic Mail Only; No Insurance Coverage Provided)**

[Redacted area]

Postage	\$	Postmark Here
Certified Fee		
Return Receipt Fee (Endorsement Required)		
Restricted Delivery Fee (Endorsement Required)		
<b>Total Postage &amp; Fees</b>	<b>\$</b>	

Received by *Paul H. Barrett, White Springs  
 Agricultural Chemicals, Inc.*  
 Street, Apt. No., or PO Box No.  
 Post Office Box 300  
 White Springs, Florida 32096

October 22, 2004

Mr. Syed Arif, P.E.  
Florida Department of Environmental Protection  
Permitting North Section  
Bureau of Air Regulation  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

RECEIVED

OCT 25 2004

BUREAU OF AIR REGULATION

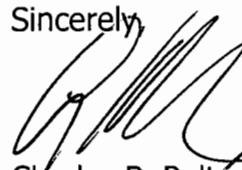
Re: Air Construction Permit No: 5700002-051-AC

Dear Mr. Arif,

Enclosed please find the newspaper affidavit for the legal advertisement that was published in The Jasper News on October 14, 2004 in accordance with the requirements of Sections 50.011 and 50.081 F.S.

If you have any questions, please contact me at (386) 397- 8442.

Sincerely,



Charles B. Pults, P.E.  
Senior Environmental Engineer

cc: C. Ranta, WED



White Springs Agricultural Chemicals, Inc.  
Hamilton County

# The Jasper News

Published Weekly

105 NE 2nd Avenue - Phone 792-2487  
Jasper, Hamilton County, Florida 32052

## STATE OF FLORIDA COUNTY OF HAMILTON:

Before the undersigned authority personally appeared

Melody Lee

who on oath says that she is

Legal Secretary

of The Jasper News, a weekly newspaper published at Jasper in  
Hamilton County, Florida; that the attached copy of advertisement,  
being a  
Public Notice of Intent to Issue Air Construction  
Permit

in the matter of

White Springs Agricultural Chemicals, Inc.

was published in said newspaper in the issues of

October 14, 2004

Affiant further says that the said The Jasper News is a newspaper  
published at Jasper in said Hamilton County, Florida, and that the  
said newspaper has heretofore been continuously published in said  
Hamilton County, Florida, each week and has been entered as second  
class mail matter at the post office in Jasper, in said Hamilton County,  
Florida, for a period of one year next preceding the first publication of  
the attached copy of advertisement; and affiant further says that he  
has neither paid nor promised any person, firm or corporation any  
discount, rebate, commission or refund for the purpose of securing this  
advertisement for publication in said newspaper.

Melody Lee

Sworn to and subscribed before me this 20th day of October A.D 2004

Beverly J Miller

My Commission DD104868

Expires May 09, 2006

(SEAL)

Beverly J Miller  
Notary Public

Personally known  or produced identification

Type of identification produced \_\_\_\_\_

The Department of Environmental Protection (Department) gives notice of its intent to issue an air construction permit to White Springs Agricultural Chemicals, Inc. for construction of a 40 tons per hour liquid fertilizer production unit at the Suwannee River Chemical Complex located E of SR 137, E of US 41, N of White Springs, Hamilton County, Florida. The applicant's name and mailing address are: White Springs Agricultural Chemicals, Inc., P.O. Box 300, White Springs, FL 32096.

This project will not result in a significant increase in actual or potential emissions. Therefore, there is no requirement for review under the Department's Prevention of Significant Deterioration (PSD) rules and a Best Available Control Technology determination is not required. The liquid fertilizer production unit will consist of a pipe reactor for mixing superphosphoric acid and ammonia and associated equipment for controlling emissions from the process.

The Department will issue the FINAL permit, in accordance with the conditions of the DRAFT permit, unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The Department will accept written comments concerning the proposed permit issuance action for a period of 14 (fourteen) days from the date of publication of this Public Notice of Intent to Issue Air Construction Permit. Written comments should be provided to the Department's Bureau of Air Regulation at 2600 Blair Stone Road, Mail Station #5505, Tallahassee, FL 32399-2400. Any written comments filed shall be made available for public inspection. If comments received result in a significant change in the proposed agency action, the Department shall revise the proposed permit and require, if applicable, another Public Notice.

The Department will issue the permit with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to sections 120.569 and 120.57 F.S., before the deadline for filing a petition. The procedures for petitioning for a hearing are set forth below. Mediation is not available in this proceeding.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under sections 120.569 and 120.57 of the Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. Petitions filed by the permit applicant or any of the parties listed below must be filed within fourteen days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under section 120.60(3) of the Florida Statutes must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of this notice of intent, whichever occurs first. Under section 120.60(3), however, any person who asked the Department for notice of agency action may file a petition within fourteen days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. The failure of any person failing to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under sections 120.569 and 120.57 F.S. or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205 of the Florida Administrative Code.



A petition that disputes the material facts on which the Department's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner, the name, address, and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of how and when petitioner received notice of the agency action or the proposed action; (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and (g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the agency to take with respect to the agency's proposed action.

A petition that does not dispute the material facts upon which the Department's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Department's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any such final decision of the Department on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

A complete project file is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

Department of Environmental Protection  
Bureau of Air Regulation  
111 S. Magnolia Drive, Suite 4  
Tallahassee, Florida 32301  
Telephone: 850/488-0114  
Fax: 850/921-9533

Department of Environmental Protection  
Northeast District Office  
7825 Baymeadows Way, Suite 200B  
Jacksonville, Florida 32256-7590  
Telephone: 904/807-3300  
Fax: 904/448-4319

The complete project file includes the application, Draft Permit, and the information submitted by the responsible official, exclusive of confidential records under section 403.111, F.S. Interested persons may contact the Administrator, North Permitting Section, at 111 South Magnolia Drive, Suite 4, Tallahassee, Florida 32301, or call 850/488-0114, for additional information.

10/14

# Memorandum

# Florida Department of Environmental Protection

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TO: Trina Vielhauer

THRU: Jim Pennington *JKP*

FROM: John Reynolds *JR*

DATE: September 28, 2004

SUBJECT: DEP File No. 0470002-051-AC  
Liquid Fertilizer Plant  
White Springs Agricultural Chemicals/  
Suwannee River Chemical Complex

Attached for your review is the Draft construction permit, Technical Evaluation and Preliminary Determination, Intent to Issue, and Public Notice for constructing a 40 tons per hour liquid fertilizer production unit at the Suwannee River Chemical Complex located near White Springs in Hamilton County. The unit will produce two grades of liquid fertilizer, 10-34-0 and 11-37-0, by reacting superphosphoric acid and ammonia in a pipe reactor. The unit has an integral packed tower section that vents the hot flash-off gases and acts as a scrubber to control emissions. There will be no significant increase in actual emissions or potential emissions resulting from this project. The only physical changes will be the installation of the pipe reactor/packed tower unit and the routing of raw materials to the reactor.

The permit clock is currently on Day 51.

Attachments

In the Matter of an  
Application for Permit by:

Paul H. Barrett, General Manager  
White Springs Agricultural Chemicals, Inc.  
P.O. Box 300  
White Springs, Florida 32096

DEP File No. 0470002-051-AC  
Liquid Fertilizer Plant  
Hamilton County

### **INTENT TO ISSUE AIR CONSTRUCTION PERMIT**

The Department of Environmental Protection (Department) gives notice of its intent to issue a permit (copy attached) for the proposed project, detailed in the application specified above.

The applicant, White Springs Agricultural Chemicals, Inc., applied on August 9, 2004 to the Department for a permit to construct a 40 tons per hour Liquid Fertilizer production unit at the Suwannee River Chemical Complex. A Best Available Control Technology (BACT) determination was not required since there will be no significant increase in air emissions as defined under the Prevention of Significant Deterioration Regulations. The facility is located in Hamilton County, Florida.

The Department has permitting jurisdiction under the provisions of Chapter 403, Florida Statutes (F.S.), Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, and 62-212. The above actions are not exempt from permitting procedures. The Department has determined that an Air Construction permit is required.

The Department intends to issue this air construction permit based on the belief that reasonable assurances have been provided to indicate that operation of this emission unit will not adversely impact air quality, and the emission units will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-296, 62-297, F.A.C.

Pursuant to Section 403.815, F.S., and Rule 62-110.106(7)(a)1., F.A.C., you (the applicant) are required to publish at your own expense the enclosed Public Notice of Intent to Issue Air Construction Permit. The notice shall be published one time only in the legal advertisement section of a newspaper of general circulation in the area affected. Rule 62-110.106(7)(b), F.A.C., requires that the applicant cause the notice to be published as soon as possible after notification by the Department of its intended action. For the purpose of these rules, "publication in a newspaper of general circulation in the area affected" means publication in a newspaper meeting the requirements of Sections 50.011 and 50.031, F.S., in the county where the activity is to take place. If you are uncertain that a newspaper meets these requirements, please contact the Department at the address or telephone number listed below. The applicant shall provide proof of publication to the Department's Bureau of Air Regulation, at 2600 Blair Stone Road, Mail Station #5505, Tallahassee, Florida 32399-2400 (Telephone: 850/488-0114; Fax 850/922-6979). You must provide proof of publication within seven days of publication, pursuant to Rule 62-110.106(5), F.A.C. No permitting action for which published notice is required shall be granted until proof of publication of notice is made by furnishing a uniform affidavit in substantially the form prescribed in section 50.051, F.S. to the office of the Department issuing the permit. Failure to publish the notice and provide proof of publication may result in the denial of the permit pursuant to Rules 62-110.106(9) & (11), F.A.C.

The Department will issue the final permit with the attached conditions unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The Department will accept written comments and requests for public meetings concerning the proposed permit issuance action for a period of 14 (fourteen) days from the date of publication of the enclosed Public Notice. Written comments should be provided to the Department's Bureau of Air Regulation at 2600 Blair Stone Road, Mail Station #5505, Tallahassee, FL 32399-2400. Any written comments filed shall be made available for public inspection. If comments received result in a

significant change in the proposed agency action, the Department shall revise the proposed permit and require, if applicable, another Public Notice.

The Department will issue the permit with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to sections 120.569 and 120.57 F.S., before the deadline for filing a petition. The procedures for petitioning for a hearing are set forth below.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under sections 120.569 and 120.57 of the Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida, 32399-3000. Petitions filed by the permit applicant or any of the parties listed below must be filed within fourteen days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under section 120.60(3) of the Florida Statutes must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of this notice of intent, whichever occurs first. Under section 120.60(3), however, any person who asked the Department for notice of agency action may file a petition within fourteen days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under sections 120.569 and 120.57 F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205 of the Florida Administrative Code.

A petition that disputes the material facts on which the Department's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner, the name, address, and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of how and when petitioner received notice of the agency action or proposed action; (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and (g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the agency to take with respect to the agency's proposed action.

A petition that does not dispute the material facts upon which the Department's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Department's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any such final decision of the Department on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above. Mediation is not available in this proceeding.

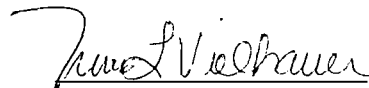
In addition to the above, a person subject to regulation has a right to apply for a variance from or waiver of the requirements of particular rules, on certain conditions, under Section 120.542 F.S. The relief provided by this state statute applies only to state rules, not statutes, and not to any federal regulatory requirements. Applying for a variance or waiver does not substitute or extend the time for filing a petition for an administrative hearing or exercising any other right that a person may have in relation to the action proposed in this notice of intent.

The application for a variance or waiver is made by filing a petition with the Office of General Counsel of the Department, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. The petition must specify the following information: (a) The name, address, and telephone number of the petitioner; (b) The name, address, and telephone number of the attorney or qualified representative of the petitioner, if any; (c) Each rule or portion of a rule from which a variance or waiver is requested; (d) The citation to the statute underlying (implemented by) the rule identified in (c) above; (e) The type of action requested; (f) The specific facts that would justify a variance or waiver for the petitioner; (g) The reason why the variance or waiver would serve the purposes of the underlying statute (implemented by the rule); and (h) A statement whether the variance or waiver is permanent or temporary and, if temporary, a statement of the dates showing the duration of the variance or waiver requested.

The Department will grant a variance or waiver when the petition demonstrates both that the application of the rule would create a substantial hardship or violate principles of fairness, as each of those terms is defined in Section 120.542(2) F.S., and that the purpose of the underlying statute will be or has been achieved by other means by the petitioner.

Persons subject to regulation pursuant to any federally delegated or approved air program should be aware that Florida is specifically not authorized to issue variances or waivers from any requirements of any such federally delegated or approved program. The requirements of the program remain fully enforceable by the Administrator of the EPA and by any person under the Clean Air Act unless and until the Administrator separately approves any variance or waiver in accordance with the procedures of the federal program.

Executed in Tallahassee, Florida.

  
Trina L. Vielhauer, Chief  
Bureau of Air Regulation

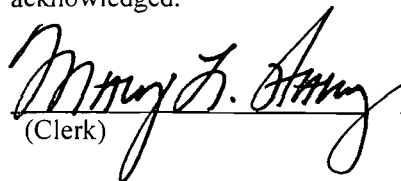
#### CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Intent to Issue Air Construction Permit (including the Public Notice and the DRAFT permit) was sent by certified mail (\*) and copies were mailed by U.S. Mail before the close of business on 9/30/04 to the person(s) listed:

Paul H. Barrett, White Springs Agricultural Chemicals, Inc.\*  
John B. Koogler, P.E., Koogler & Associates, Inc.  
Chris Kirts, DEP-NED

Clerk Stamp

**FILING AND ACKNOWLEDGMENT**  
**FILED**, on this date, pursuant to §120.52,  
Florida Statutes, with the designated  
Department Clerk, receipt of which is hereby  
acknowledged.

  
(Clerk) 9/30/04 (Date)

**PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT**

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION

DEP File No. 0470002-051-AC

White Springs Agricultural Chemicals, Inc.  
Hamilton County

The Department of Environmental Protection (Department) gives notice of its intent to issue an air construction permit to White Springs Agricultural Chemicals, Inc. for construction of a 40 tons per hour liquid fertilizer production unit at the Suwannee River Chemical Complex located E of SR 137, E of US 41, N of White Springs, Hamilton County, Florida. The applicant's name and mailing address are: White Springs Agricultural Chemicals, Inc., P. O. Box 300, White Springs, Florida 32096.

This project will not result in a significant increase in actual or potential emissions. Therefore, there is no requirement for review under the Department's Prevention of Significant Deterioration (PSD) rules and a Best Available Control Technology determination is not required. The liquid fertilizer production unit will consist of a pipe reactor for mixing superphosphoric acid and ammonia and associated equipment for controlling emissions from the process.

The Department will issue the FINAL Permit, in accordance with the conditions of the DRAFT Permit, unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The Department will accept written comments concerning the proposed permit issuance action for a period of 14 (fourteen) days from the date of publication of this Public Notice of Intent to Issue Air Construction Permit. Written comments should be provided to the Department's Bureau of Air Regulation at 2600 Blair Stone Road, Mail Station #5505, Tallahassee, FL 32399-2400. Any written comments filed shall be made available for public inspection. If comments received result in a significant change in the proposed agency action, the Department shall revise the proposed permit and require, if applicable, another Public Notice.

The Department will issue the permit with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to sections 120.569 and 120.57 F.S., before the deadline for filing a petition. The procedures for petitioning for a hearing are set forth below. Mediation is not available in this proceeding.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under sections 120.569 and 120.57 of the Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida, 32399-3000. Petitions filed by the permit applicant or any of the parties listed below must be filed within fourteen days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under section 120.60(3) of the Florida Statutes must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of this notice of intent, whichever occurs first. Under section 120.60(3), however, any person who asked the Department for notice of agency action may file a petition within fourteen days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under sections 120.569 and 120.57 F.S., or to intervene in this proceeding and

participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205 of the Florida Administrative Code.

A petition that disputes the material facts on which the Department's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner, the name, address, and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of how and when petitioner received notice of the agency action or proposed action; (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and (g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the agency to take with respect to the agency's proposed action.

A petition that does not dispute the material facts upon which the Department's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Department's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any such final decision of the Department on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

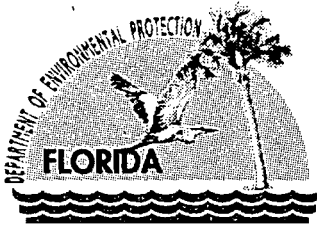
A complete project file is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

Department of Environmental Protection  
Bureau of Air Regulation  
111 S. Magnolia Drive, Suite 4  
Tallahassee, Florida 32301  
Telephone: 850/488-0114  
Fax: 850/921-9533

Department of Environmental Protection  
Northeast District Office  
7825 Baymeadows Way, Suite 200B  
Jacksonville, Florida 32256-7590  
Telephone: 904/807-3300  
Fax: 904/448-4319

The complete project file includes the application, Draft Permit, and the information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Administrator, North Permitting Section, at 111 South Magnolia Drive, Suite 4, Tallahassee, Florida 32301, or call 850/488-0114, for additional information.





Jeb Bush  
Governor

# Department of Environmental Protection

Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Colleen M. Castille  
Secretary

September 28, 2004

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Paul H. Barrett  
General Manager  
White Springs Agricultural Chemicals, Inc.  
P. O. Box 300  
White Springs, Florida 32096

Re: DEP File No. 0470002-051-AC/ 40 Tons Per Hour Liquid Fertilizer Plant

Dear Mr. Barrett:

Enclosed is one copy of the Draft air construction permit to construct a 40 Tons Per Hour Liquid Fertilizer Plant at the Suwannee River Chemical Complex located near White Springs, Hamilton County. The Department's Technical Evaluation and Preliminary Determination, Intent to Issue Air Construction Permit and the Public Notice of Intent to Issue Air Construction Permit are also included.

The Public Notice must be published one time only, as soon as possible, in the legal advertisement section of a newspaper of general circulation in the area affected, pursuant to the requirements of Chapter 50, Florida Statutes. Proof of publication, i.e., newspaper affidavit, must be provided to the Department's Bureau of Air Regulation office within seven days of publication. Failure to publish the notice and provide proof of publication may result in the denial of the permit.

Please submit any written comments you wish to have considered concerning the Department's proposed action to Jim Pennington, Administrator, North Permitting Section, at the above letterhead address. If you have any other questions, please contact Syed Arif at 850/921-9528.

Sincerely,

Trina L. Vielhauer, Chief  
Bureau of Air Regulation

TLV/JR  
Enclosures

"More Protection, Less Process"

Printed on recycled paper.



Jeb Bush  
Governor

# Department of Environmental Protection

Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Colleen M. Castille  
Secretary

## PERMITTEE:

White Springs Agricultural Chemicals, Inc.  
P.O. Box 300  
White Springs, Florida 32096

### *Authorized Representative:*

Paul H. Barrett  
General Manager

DEP Permit No.:	0470002-051-AC
Project:	40 Tons Per Hour Liquid Fertilizer Production Unit
SIC No.:	2874
Expiration:	December 31, 2005

## PROJECT AND LOCATION:

Permit to install a unit for producing 40 tons per hour of either 10-34-0 or 11-37-0 liquid fertilizer.  
The facility is located E of SR 137, E of US 41, N of White Springs in Hamilton County, Florida.  
The UTM coordinates are: Zone 17; 328.3 km E and 3368.8 km N.

## STATEMENT OF BASIS:

This construction permit is issued under the provisions of Chapter 403 of the Florida Statutes (F.S.), and Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297 of the Florida Administrative Code (F.A.C.). The above named permittee is authorized to construct the facility in accordance with the conditions of this permit and as described in the application, approved drawings, plans, and other documents on file with the Department of Environmental Protection (Department).

## ATTACHED APPENDICES MADE A PART OF THIS PERMIT:

Appendix GC            General Conditions

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Michael G. Cooke, Director  
Division of Air Resource  
Management

**AIR CONSTRUCTION PERMIT 0470002-051-AC**  
**SECTION I. FACILITY INFORMATION**

**FACILITY DESCRIPTION**

White Springs Agricultural Chemicals, Inc. (WSAC) operates a phosphate fertilizer manufacturing facility at the Suwannee River Chemical Complex near White Springs, Hamilton County, Florida, producing sulfuric acid, wet-process phosphoric acid, ammoniated phosphate fertilizers and related products. WSAC is applying for a non-PSD permit to produce 10-34-0 or 11-37-0 liquid fertilizer. This project will involve installing a pipe reactor for reacting superphosphoric acid with ammonia. Also included will be an air cooled packed tower unit that emits the flash-off from the hot recirculated material coming from the pipe reactor. The only other physical changes required will be the routing of raw material streams to the liquid fertilizer plant.

**REGULATORY CLASSIFICATION**

Phosphate rock processing plants are listed as a Major Facility Category in Table 62-212.400-1, F.A.C., "Major Facility Categories." Therefore, stack and fugitive emissions of over 100 TPY of a regulated pollutant are sufficient to classify the installation as a "Major Facility" per the definitions in Rule 62-210.200, F.A.C., subject to the Significant Emission Rates given in Table 62-212.400-2, F.A.C. and the requirements of Rule 62-212.400, F.A.C., Prevention of Significant Deterioration (PSD) and Best Available Control Technology (BACT) if applicable.

This facility is classified as a "Major or Title V Source" per Rule 62-210.200, F.A.C., because it has the potential to emit at least 100 tons per year of particulate matter. The Department has determined that this facility in its entirety is also a major source of hazardous air pollutants (HAPs) because it has the potential to emit at least 10 tons per year of hydrogen fluoride.

The Liquid Fertilizer Plant is classified as a "New Plant or Plant Section" under Rule 62-296.403(1)(i), F.A.C., requiring the use of best available control technology. The terms and conditions of this permit apply only to the construction/operation of the Liquid Fertilizer Plant.

**PERMIT SCHEDULE:**

- 08-09-04: Date of Receipt of Application
- 08-09-04: Application Complete
- 09-07-04: Issued Intent to Issue Permit
- xx-xx-04: Notice of Intent published

**RELEVANT DOCUMENTS:**

The documents listed below are specifically related to this permitting action and form the basis of the permit. They are on file with the Department:

- Application received August 9, 2004

**AIR CONSTRUCTION PERMIT 0470002-051-AC**  
**SECTION II. GENERAL REQUIREMENTS**

Regulating Agencies: All documents related to applications for permits to operate, reports, tests, minor modifications and notifications shall be submitted to the Department's Northeast District Office, 7825 Baymeadows Way, Suite 200B, Jacksonville, Florida 32256-7590. All applications for permits to construct or modify an emissions unit(s) *subject to the Prevention of Significant Deterioration or Nonattainment (NA) review requirements* should be submitted to the Bureau of Air Regulation (BAR), Florida Department of Environmental Protection (FDEP), 2600 Blair Stone Road, MS 5505, Tallahassee, Florida 32399-2400 (phone number 850/488-0114).

General Conditions: The owner and/or operator is subject to and shall operate under the attached General Permit Conditions G.1 through G.15 listed in Appendix GC of this permit. General Permit Conditions are binding and enforceable pursuant to Chapter 403 of the Florida Statutes. [Rule 62-4.160, F.A.C.]

Terminology: The terms used in this permit have specific meanings as defined in the corresponding chapters of the Florida Administrative Code.

Applicable Regulations, Forms and Application Procedures: Unless otherwise indicated in this permit, the construction and operation of the subject emissions unit shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of Chapter 403, F.S. and Florida Administrative Code Chapters 62-4, 62-110, 62-204, 62-212, 62-213, 62-296, 62-297 and the Code of Federal Regulations Title 40, Part 60, adopted by reference in the Florida Administrative Code (F.A.C.) regulations. The facility is subject to all applicable provisions of the Code of Federal Regulations Title 40, Part 63, Subpart BB. The permittee shall use the applicable forms listed in Rule 62-210.900, F.A.C. and follow the application procedures in Chapter 62-4, F.A.C. Issuance of this permit does not relieve the facility owner or operator from compliance with any applicable federal, state, or local permitting or regulations. [Rules 62-204.800, 62-210.300 and 62-210.900, F.A.C.]

Expiration: This air construction permit shall expire on **December 31, 2005** [Rule 62-210.300(1), F.A.C.]. The permittee may, for good cause, request that this construction permit be extended. Such a request shall be submitted to the Bureau of Air Regulation prior to 60 days before the expiration of the permit. However, the permittee shall promptly notify the Department's Northeast District Office of any delays in completion of the project, which would affect the startup day by more than 90 days. [Rule 62-4.090, F.A.C.]

Application for Title V Permit: An application for a Title V operating permit, pursuant to Chapter 62-213, F.A.C., must be submitted to the Department's Northeast District Office at least 90 days prior to expiration of this permit, but no later than 180 days after commencing operation. [Chapter 62-213, F.A.C.]

Permit Approval: Approval to construct shall become invalid if construction is not commenced within 18 months after receipt of such approval, or if construction is discontinued for a period of 18 months or more, or if construction is not completed within a reasonable time. The Department may extend the 18-month period upon a satisfactory showing that an extension is justified. [40 CFR 52.21(r)(2)].

Annual Reports: Pursuant to Rule 62-210.370(2), F.A.C., Annual Operation Reports, the permittee is required to submit annual reports on the actual operating rates and emissions from this facility. Annual operating reports using DEP Form 62-210.900(4) shall be sent to the DEP's Northeast District office by March 1st of each year.

Stack Testing Facilities: Stack sampling facilities shall be installed in accordance with Rule 62-297.310(6), F.A.C.

Quarterly Reports: Quarterly excess emission reports, in accordance with 40 CFR 60.7 shall be submitted to the Department's Northeast District office.

New or Additional Conditions: For good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions and on application of the permittee, the Department may grant additional time. [Rule 62-4.080, F.A.C.]

**AIR CONSTRUCTION PERMIT 0470002-051-AC**  
**SECTION III. EMISSION UNIT SPECIFIC REQUIREMENTS**

**SUBSECTION A. Liquid Fertilizer Plant**

The Specific Conditions listed in this section apply to the following emission unit:

EMISSION UNIT NO.	EMISSION UNIT DESCRIPTION
074	Liquid Fertilizer Plant

The Liquid Fertilizer Plant consists of a pipe reactor for reacting superphosphoric acid with ammonia and an air cooled packed tower unit that emits the flash-off from the hot recirculated material coming from the pipe reactor.

**CONSTRUCTION**

1. The permittee is authorized to construct a plant to produce liquid 10-34-0 or 11-37-0 fertilizer by reacting superphosphoric acid and ammonia according to Figure 1 submitted with the application.

[Application received August 9, 2004]

**EMISSION AND PERFORMANCE REQUIREMENTS**

2. Production:

- a. The production rate for Emissions Unit 074 shall not exceed 40 tons of product per hour.
- b. The annual production rate shall not exceed 350,400 tons of product.

[Application received August 9, 2004; Rules 62-212.300, 62-210.200(PTE), F.A.C.]

3. Hours of Operation:

Operation of Emissions Unit 074 shall be permitted for up to 8760 hours/year.

[Application received August 9, 2004; Rules 62-212.300, and 62-210.200(PTE), F.A.C.]

4. Emissions:

- a. PM/PM<sub>10</sub> emissions shall not exceed 1.0 lbs/hr and 4.4 TPY.
- b. Total Fluoride emissions shall not exceed 0.1 lb/hr and 0.5 TPY.
- c. Visible Emissions shall not be equal to or greater than 20% opacity.

[Application received August 9, 2004; Rule 62-296.403(1), F.A.C.]

**TEST METHODS AND PROCEDURES**

5. The initial compliance test procedures for PM/PM<sub>10</sub> shall be in accordance with EPA Method 5 as published in 40 CFR 60, Appendix A. The Department shall consider the results to determine the extent of additional annual testing requirements.

[Rule 62-297.410(5), F.A.C.]

6. The initial compliance test procedures for Total Fluorides shall be in accordance with EPA Methods 13A or 13B as published in 40 CFR 60, Appendix A. If the initial compliance test shows no measurable fluoride emissions, no further compliance testing for Total Fluorides shall be required. The Department shall consider the results to determine the extent of additional annual testing requirements.

[Rule 62-297.410(13), F.A.C.]

**AIR CONSTRUCTION PERMIT 0470002-051-AC**  
**SECTION III. EMISSION UNIT SPECIFIC REQUIREMENTS**

7. The compliance test procedures for Visible Emissions shall be in accordance with EPA Method 9 as published in 40 CFR 60, Appendix A.

**[Rule 62-297.410(9), F.A.C.]**

8. Before this construction permit expires, and annually, the subject emissions units shall be tested for compliance with the applicable emission limits. For the duration of all tests the emission units shall be operating at permitted capacity. Permitted capacity is defined as 90-100 percent of the maximum operating rate allowed by the permit. If it is impracticable to test at permitted capacity, then the emission unit may be tested at less than permitted capacity (i.e., 90% of the maximum operating rate allowed by the permit); in this case, subsequent emission unit operation is limited to 110 percent of the test load until a new test is conducted. Once the emission unit is so limited, then operation at higher capacities is allowed for no more than 15 consecutive days for the purposes of additional compliance testing to regain the permitted capacity in the permit.

**[Rule 62-297.310, F.A.C.]**

9. The Department's Northeast District office shall be notified in writing at least 15 days prior to compliance testing. Written reports of the test results shall be submitted to that office within 45 days of test completion.

**[Rule 62-297.310, F.A.C.]**

**APPENDIX GC**  
GENERAL PERMIT CONDITIONS [F.A.C. 62-4.160]

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- G.1 The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.
- G.2 This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings or exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.
- G.3 As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey and vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit is not a waiver or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.
- G.4 This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.
- G.5 This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.
- G.6 The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.
- G.7 The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:
- a) Have access to and copy and records that must be kept under the conditions of the permit;
  - b) Inspect the facility, equipment, practices, or operations regulated or required under this permit. and,
  - c) Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

- G.8 If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:
- a) A description of and cause of non-compliance; and
  - b) The period of noncompliance, including dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

The permittee shall be responsible for any and all damages, which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

- G.9 In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by Sections 403.73 and 403.111, Florida

**APPENDIX GC**  
GENERAL PERMIT CONDITIONS [F.A.C. 62-4.160]

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Statutes. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

- G.10 The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.
- G.11 This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 62-4.120 and 62-730.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.
- G.12 This permit or a copy thereof shall be kept at the work site of the permitted activity.
- G.13 This permit also constitutes:
- a) Determination of Best Available Control Technology ( )
  - b) Determination of Prevention of Significant Deterioration ( )
  - c) Compliance with New Source Performance Standards ( )
  - d) Compliance with National Emission Standards for Hazardous Air Pollutants ( )
- G.14 The permittee shall comply with the following:
- a) Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
  - b) The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application or this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.
  - c) Records of monitoring information shall include:
    - 1. The date, exact place, and time of sampling or measurements;
    - 2. The person responsible for performing the sampling or measurements;
    - 3. The dates analyses were performed;
    - 4. The person responsible for performing the analyses;
    - 5. The analytical techniques or methods used; and
    - 6. The results of such analyses.
- G.15 When requested by the Department, the permittee shall within a reasonable time furnish any information required by law, which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.



TECHNICAL EVALUATION  
AND  
PRELIMINARY DETERMINATION

WHITE SPRINGS AGRICULTURAL CHEMICALS, INC.

Liquid Fertilizer Plant  
Suwannee River Chemical Complex  
Hamilton County, Florida

DEP File Number  
0470002-051-AC

Florida Department of Environmental Protection  
Division of Air Resources Management  
Bureau of Air Regulation

September 7, 2004

# TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

---

## **I. APPLICATION INFORMATION**

### **A. Applicant**

White Springs Agricultural Chemicals, Inc.

P. O. Box 300

White Springs, Hamilton County, Florida 32096

**Authorized Representative: Mr. Paul H. Barrett, General Manager**

### **B. Facility Location**

The applicant's facility is located E of SR 137, E of US 41, N of White Springs. UTM coordinates of the site are: Zone 17, 328.3 km East and 3368.8 km North.

Facility Identification Code (SIC): Major Group No. 28, Industry Group Nos. 2874.

### **C. Reviewing and Process Schedule**

08-09-04: Date of Receipt of Application

08-09-04: Application complete

09-07-04: Intent Issued

## **II. PROJECT DESCRIPTION/EMISSIONS**

This permit allows construction of a unit for producing 40 tons per hour of liquid fertilizer (10-34-0 or 11-37-0) by reacting superphosphoric acid and ammonia in a pipe reactor. Also included will be an air cooled packed tower unit that emits the flash-off from the hot recirculated material coming from the pipe reactor and acts as a scrubber to control emissions. The only other physical changes required will be the routing of raw material streams to the liquid fertilizer plant. This will be a minor source since emissions are expected to be below the PSD significance thresholds for PM/PM<sub>10</sub> and Fluorides.

## **III. RULE APPLICABILITY**

The proposed project is subject to the applicable provisions of Chapter 403, Florida Statutes, Chapters 62-4, 62-212 and 62-296, Florida Administrative Code (F.A.C.). The facility is located in an area designated attainment or maintenance for all criteria pollutants in accordance with F.A.C. Rule 62-275.400.

## TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

---

Rule 62-296.403, F. A. C., Phosphate Processing, requires that new plants or plant units install the best available control technology. The packed tower section is designed to meet this requirement.

The maximum achievable control technology (MACT) standards promulgated by EPA for Phosphate Fertilizers Production Plants (40 CFR 63, Subpart BB) do not apply to the Liquid Fertilizer Plant.

#### **IV. AIR QUALITY ANALYSIS**

The proposed project will not result in any significant increase of any regulated pollutant. Therefore, an air quality analysis was not required.

#### **V. CONCLUSION**

Based on the information submitted by White Springs Agricultural Chemicals, Inc., the Department has determined that the proposed project will comply with all applicable state air pollution regulations.



Jeb Bush  
Governor

# Department of Environmental Protection

Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Colleen M. Castille  
Secretary

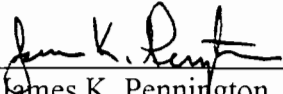
## P.E. Certification Statement

**Permittee:** White Springs Agricultural Chemicals, Inc.    **DRAFT Permit No.:** 0470002-051-AC  
**Project:** 40 Tons Per Hour Liquid Fertilizer Production Unit

This is a Permit to install a unit for producing 40 tons per hour of either 10-34-0 or 11-37-0 liquid fertilizer.

*I HEREBY CERTIFY that the engineering features described in the above referenced application and subject to the proposed permit conditions provide reasonable assurance of compliance with applicable provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 62-4 and 62-204 through 62-297. However, I have not evaluated and I do not certify aspects of the proposal outside of my area of expertise (including but not limited to the electrical, mechanical, structural, hydrological, and geological features).*

*This draft permit was prepared under my direct supervision by Mr. John Reynolds of my staff.*

    9/28/04  
James K. Pennington, P.E.    Date  
Registration Number: 34536

Permitting Authority:  
Department of Environmental Protection  
Bureau of Air Regulation  
111 South Magnolia Drive, Suite 4  
Tallahassee, Florida 32301  
Telephone: 850/488-0144  
Fax: 850/922-6979

**SENDER: COMPLETE THIS SECTION**

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Mr. Paul Barrett, General  
 Manager  
 White Springs Agricultural  
 Chemicals, Inc.  
 Post Office Box 300  
 White Springs, Florida 32096

2. Article Number (Copy from service label)

7000 1670 0013 3110 3414

**COMPLETE THIS SECTION ON DELIVERY**

A. Received by (Please Print Clearly)

J.D. Reynolds

B. Date of Delivery

10/4/04

C. Signature

X *J.D. Reynolds*

Agent

Addressee

D. Is delivery address different from item 1?

Yes

If YES, enter delivery address below:

No

3. Service Type

Certified Mail

Express Mail

Registered

Return Receipt for Merchandise

Insured Mail

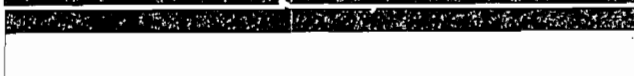
C.O.D.

4. Restricted Delivery? (Extra Fee)

Yes

7000 1670 0013 3110 3414

**U.S. Postal Service**  
**CERTIFIED MAIL RECEIPT**  
 (Domestic Mail Only; No Insurance Coverage Provided)



Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
<b>Total Postage &amp; Fees</b>	<b>\$</b>

Postmark  
 Here

Sent to: Mr. Paul H. Barrett, General Manager  
 White Springs Agricultural Chemicals, Inc.  
Street, Apt., P.O., or PO Box No.  
 Post Office Box 300  
City, State, ZIP+4  
 White Springs, Florida 32096



**KOOGLER & ASSOCIATES**  
**ENVIRONMENTAL SERVICES**

4014 NW THIRTEENTH STREET  
GAINESVILLE, FLORIDA 32609  
352/377-5822 ▪ FAX/377-7158

KA 102-04-01

August 5, 2004

**RECEIVED**

AUG 09 2004

BUREAU OF AIR REGULATION

Mr. John Reynolds  
Florida Department of  
Environmental Protection  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

Subject: Construction Permit Application for  
Liquid Fertilizer Plant  
White Springs Agricultural Chemicals, Inc.  
Facility ID: 0470002

Dear Mr. Reynolds:

Enclosed are four copies of a construction permit application for a liquid fertilizer plant, as previously discussed with you, proposed to be located at the existing Suwannee River Complex in White Springs, Florida.

If you have any questions, please call Pradeep Raval or me.

Very truly yours,

KOOGLER & ASSOCIATES

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

JBK:par  
Encl.

C: C. Pults, WSA  
R. Felton-Smith, FDEP -Jacksonville



# Department of Environmental Protection

**RECEIVED**

AUG 09 2004

## Division of Air Resource Management APPLICATION FOR AIR PERMIT - LONG FORM

BUREAU OF AIR REGULATION

### I. APPLICATION INFORMATION

**Air Construction Permit** – Use this form to apply for an air construction permit for a proposed project:

- subject to prevention of significant deterioration (PSD) review, nonattainment area (NAA) new source review, or maximum achievable control technology (MACT) review; or
- where the applicant proposes to assume a restriction on the potential emissions of one or more pollutants to escape a federal program requirement such as PSD review, NAA new source review, Title V, or MACT; or
- at an existing federally enforceable state air operation permit (FESOP) or Title V permitted facility.

**Air Operation Permit** – Use this form to apply for:

- an initial federally enforceable state air operation permit (FESOP); or
- an initial/revised/renewal Title V air operation permit.

**Air Construction Permit & Revised/Renewal Title V Air Operation Permit (Concurrent Processing Option)**  
– Use this form to apply for both an air construction permit and a revised or renewal Title V air operation permit incorporating the proposed project.

To ensure accuracy, please see form instructions.

#### Identification of Facility

1. Facility Owner/Company Name: <b>White Springs Agricultural Chemicals, Inc.</b>	
2. Site Name: <b>Suwannee River and Swift Creek Complex</b>	
3. Facility Identification Number: <b>0470002</b>	
4. Facility Location...: Street Address or Other Locator: <b>E of SR 137, E of US 41, N of White Springs</b> City: <b>White Springs</b> County: <b>Hamilton</b> Zip Code: <b>32096</b>	
5. Relocatable Facility? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	6. Existing Title V Permitted Facility? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

#### Application Contact

1. Application Contact Name: <b>Pradeep Raval, Consultant</b>
2. Application Contact Mailing Address... Organization/Firm: <b>Koogler &amp; Associates</b> Street Address: <b>4014 N.W. 13th Street</b> City: <b>Gainesville</b> State: <b>FL</b> Zip Code: <b>32609</b>
3. Application Contact Telephone Numbers... Telephone: <b>(352) 377-5822</b> Fax: <b>(352) 377-7158</b>
4. Application Contact Email Address: <b>praval@kooglerassociates.com</b>

#### Application Processing Information (DEP Use)

1. Date of Receipt of Application:	<b>8-9-04</b>
2. Project Number(s):	<b>0470002-051-A0</b>
3. PSD Number (if applicable):	
4. Siting Number (if applicable):	

## APPLICATION INFORMATION

### Purpose of Application

**This application for air permit is submitted to obtain: (Check one)**

#### **Air Construction Permit**

Air construction permit.

#### **Air Operation Permit**

Initial Title V air operation permit.

Title V air operation permit revision.

Title V air operation permit renewal.

Initial federally enforceable state air operation permit (FESOP) where professional engineer (PE) certification is required.

Initial federally enforceable state air operation permit (FESOP) where professional engineer (PE) certification is not required.

#### **Air Construction Permit and Revised/Renewal Title V Air Operation Permit (Concurrent Processing)**

Air construction permit and Title V permit revision, incorporating the proposed project.

Air construction permit and Title V permit renewal, incorporating the proposed project.

**Note: By checking one of the above two boxes, you, the applicant, are requesting concurrent processing pursuant to Rule 62-213.405, F.A.C. In such case, you must also check the following box:**

I hereby request that the department waive the processing time requirements of the air construction permit to accommodate the processing time frames of the Title V air operation permit.

### Application Comment

**This application is submitted for a minor project proposed at the existing chemical plant of White Springs Agricultural Chemicals of installing equipment to manufacture liquid fertilizer at the Suwannee River Complex.**

**As discussed with FDEP staff, only the information being changed or added to the existing facility is submitted herein.**



# APPLICATION INFORMATION

## Scope of Application

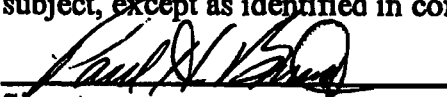
<b>Emissions Unit ID Number</b>	<b>Description of Emissions Unit</b>	<b>Air Permit Type</b>	<b>Air Permit Proc. Fee</b>
NA	Liquid Fertilizer Plant	AC1F	0

## Application Processing Fee

Check one:  Attached - Amount: \$ \_\_\_\_\_  Not Applicable

**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>Paul H. Barrett, General Manager</b>
2. Application Responsible Official Qualification (Check one or more of the following options, as applicable): <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. <input type="checkbox"/> For a partnership or sole proprietorship, a general partner or the proprietor, respectively. <input type="checkbox"/> For a municipality, county, state, federal, or other public agency, either a principal executive officer or ranking elected official. <input type="checkbox"/> The designated representative at an Acid Rain source.
3. Application Responsible Official Mailing Address... Organization/Firm: <b>White Springs Agricultural Chemicals, Inc.</b> Street Address: <b>P.O. Box 300</b> City: <b>White Springs</b> State: <b>FL</b> Zip Code: <b>32096</b>
4. Application Responsible Official Telephone Numbers... Telephone: <b>(386) 397-8308</b> ext. Fax: <b>(386) 397-8390</b>
5. Application Responsible Official Email Address: <b>pbarrett@pcsphosphate.com</b>
6. Application Responsible Official Certification: 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.   Signature  <u>7-26-04</u> Date

**APPLICATION INFORMATION**

**Professional Engineer Certification**

1. Professional Engineer Name: <b>John B. Koogler, Ph.D., P.E.</b> Registration Number: <b>12925</b>
2. Professional Engineer Mailing Address... Organization/Firm: <b>Koogler &amp; Associates</b> Street Address: <b>4014 N.W. 13th Street</b> City: <b>Gainesville</b> State: <b>FL</b> Zip Code: <b>32609</b>
3. Professional Engineer Telephone Numbers... Telephone: <b>(352) 377-5822</b> Fax: <b>(352) 377-7158</b>
4. Professional Engineer Email Address: <b>jkoogler@kooglerassociates.com</b>
5. Professional Engineer Statement: <i>I, the undersigned, hereby certify, except as particularly noted herein*, that:</i> <i>(1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this application for air permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; and</i> <i>(2) To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application.</i> <i>(3) If the purpose of this application is to obtain a Title V air operation permit (check here <input type="checkbox"/>, if so), I further certify that each emissions unit described in this application for air permit, when properly operated and maintained, will comply with the applicable requirements identified in this application to which the unit is subject, except those emissions units for which a compliance plan and schedule is submitted with this application.</i> <i>(4) If the purpose of this application is to obtain an air construction permit (check here <input checked="" type="checkbox"/>, if so) or concurrently process and obtain an air construction permit and a Title V air operation permit revision or renewal for one or more proposed new or modified emissions units (check here <input type="checkbox"/>, if so), I further certify that the engineering features of each such emissions unit described in this application have been designed or examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application.</i> <i>(5) If the purpose of this application is to obtain an initial air operation permit or operation permit revision or renewal for one or more newly constructed or modified emissions units (check here <input type="checkbox"/>, if so), I further certify that, with the exception of any changes detailed as part of this application, each such emissions unit has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with all provisions contained in such permit.</i>  Signature _____ Date <u>8/5/04</u> (seal)

\* Attach any exception to certification statement.

## II. FACILITY INFORMATION

### A. GENERAL FACILITY INFORMATION

#### Facility Location and Type

1. Facility UTM Coordinates... Zone <b>17</b> East (km) <b>328.3</b> North (km) <b>3368.8</b>	2. Facility Latitude/Longitude... Latitude (DD/MM/SS) Longitude (DD/MM/SS)		
3. Governmental Facility Code: <b>0</b>	4. Facility Status Code: <b>A</b>	5. Facility Major Group SIC Code: <b>28</b>	6. Facility SIC(s): <b>2874</b>
7. Facility Comment : <b>Title V facility</b>			

#### Facility Contact

1. Facility Contact Name: <b>Charles B. Pults, Senior Environmental Engineer</b>
2. Facility Contact Mailing Address... Organization/Firm: <b>White Springs Agricultural Chemicals, Inc.</b> Street Address: <b>P.O. Box 300</b> City: <b>White Springs</b> State: <b>FL</b> Zip Code: <b>32096</b>
3. Facility Contact Telephone Numbers: Telephone: <b>(386) 397-8442</b> Fax: <b>(386) 397-8390</b>
4. Facility Contact Email Address: <b>cpults@pcsphosphate.com</b>

#### Facility Primary Responsible Official

Complete if an "application responsible official" is identified in Section I. that is not the facility "primary responsible official."

1. Facility Primary Responsible Official Name:
2. Facility Primary Responsible Official Mailing Address... Organization/Firm: Street Address:  City:                      State:                      Zip Code:
3. Facility Primary Responsible Official Telephone Numbers... Telephone: (    ) -      ext.      Fax: (    ) -
4. Facility Primary Responsible Official Email Address:

## FACILITY INFORMATION

### Facility Regulatory Classifications

Check all that would apply *following* completion of all projects and implementation of all other changes proposed in this application for air permit. Refer to instructions to distinguish between a “major source” and a “synthetic minor source.”

1. <input type="checkbox"/> Small Business Stationary Source	<input type="checkbox"/> Unknown
2. <input type="checkbox"/> Synthetic Non-Title V Source	
3. <input checked="" type="checkbox"/> Title V Source	
4. <input checked="" type="checkbox"/> Major Source of Air Pollutants, Other than Hazardous Air Pollutants (HAPs)	
5. <input type="checkbox"/> Synthetic Minor Source of Air Pollutants, Other than HAPs	
6. <input checked="" type="checkbox"/> Major Source of Hazardous Air Pollutants (HAPs)	
7. <input type="checkbox"/> Synthetic Minor Source of HAPs	
8. <input checked="" type="checkbox"/> One or More Emissions Units Subject to NSPS (40 CFR Part 60)	
9. <input checked="" type="checkbox"/> One or More Emissions Units Subject to Emission Guidelines (40 CFR Part 60)	
10. <input checked="" type="checkbox"/> One or More Emissions Units Subject to NESHAP (40 CFR Part 61 or Part 63)	
11. <input type="checkbox"/> Title V Source Solely by EPA Designation (40 CFR 70.3(a)(5))	
12. Facility Regulatory Classifications Comment:	

**FACILITY INFORMATION**

**List of Pollutants Emitted by Facility**

1. Pollutant Emitted	2. Pollutant Classification	3. Emissions Cap [Y or N]?
PM	A	N
PM10	A	N
NOX	A	N
SO2	A	N
FL	B	N
SAM	A	N
CO	A	N
VOC	B	N

**FACILITY INFORMATION**

**B. EMISSIONS CAPS**

**Facility-Wide or Multi-Unit Emissions Caps**

1. Pollutant Subject to Emissions Cap	2. Facility Wide Cap [Y or N]? (all units)	3. Emissions Unit ID No.s Under Cap (if not all units)	4. Hourly Cap (lb/hr)	5. Annual Cap (ton/yr)	6. Basis for Emissions Cap
NA					

7. Facility-Wide or Multi-Unit Emissions Cap Comment:

## FACILITY INFORMATION

### C. FACILITY ADDITIONAL INFORMATION

#### Additional Requirements for All Applications, Except as Otherwise Stated

1. Facility Plot Plan: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Previously Submitted, Date: _____
2. Process Flow Diagram(s): (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input checked="" type="checkbox"/> Attached, Document ID: <u>Att. 1</u> <input type="checkbox"/> Previously Submitted, Date: _____
3. Precautions to Prevent Emissions of Unconfined Particulate Matter: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Previously Submitted, Date: _____

#### Additional Requirements for Air Construction Permit Applications

1. Area Map Showing Facility Location: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable (existing permitted facility)
2. Description of Proposed Construction or Modification: <input checked="" type="checkbox"/> Attached, Document ID: <u>Att. 1</u>
3. Rule Applicability Analysis: <input checked="" type="checkbox"/> Attached, Document ID: <u>Att. 1</u>
4. List of Exempt Emissions Units (Rule 62-210.300(3)(a) or (b)1., F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable
5. Fugitive Emissions Identification (Rule 62-212.400(2), F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
6. Preconstruction Air Quality Monitoring and Analysis (Rule 62-212.400(5)(f), F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
7. Ambient Impact Analysis (Rule 62-212.400(5)(d), F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
8. Air Quality Impact since 1977 (Rule 62-212.400(5)(h)5., F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
9. Additional Impact Analyses (Rules 62-212.400(5)(e)1. and 62-212.500(4)(e), F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
10. Alternative Analysis Requirement (Rule 62-212.500(4)(g), F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable



## FACILITY INFORMATION

### Additional Requirements for FESOP Applications

1. List of Exempt Emissions Units (Rule 62-210.300(3)(a) or (b)1., F.A.C.):  
 Attached, Document ID: \_\_\_\_\_  Not Applicable (no exempt units at facility)

### Additional Requirements for Title V Air Operation Permit Applications NA

1. List of Insignificant Activities (Required for initial/renewal applications only):  
 Attached, Document ID: \_\_\_\_\_  Not Applicable (revision application)

2. Identification of Applicable Requirements (Required for initial/renewal applications, and for revision applications if this information would be changed as a result of the revision being sought):

- Attached, Document ID: \_\_\_\_\_  
 Not Applicable (revision application with no change in applicable requirements)

3. Compliance Report and Plan (Required for all initial/revision/renewal applications):

- Attached, Document ID: \_\_\_\_\_

Note: A compliance plan must be submitted for each emissions unit that is not in compliance with all applicable requirements at the time of application and/or at any time during application processing. The department must be notified of any changes in compliance status during application processing.

4. List of Equipment/Activities Regulated under Title VI (If applicable, required for initial/renewal applications only):

- Attached, Document ID: \_\_\_\_\_  
 Equipment/Activities On site but Not Required to be Individually Listed  
 Not Applicable

5. Verification of Risk Management Plan Submission to EPA (If applicable, required for initial/renewal applications only) :

- Attached, Document ID: \_\_\_\_\_  Not Applicable

6. Requested Changes to Current Title V Air Operation Permit:

- Attached, Document ID: \_\_\_\_\_  Not Applicable

### Additional Requirements Comment

**The proposed project consists of installing equipment to manufacture liquid fertilizer.**

## EMISSIONS UNIT INFORMATION

Section [1] of [1]

### III. EMISSIONS UNIT INFORMATION

**Title V Air Operation Permit Application** - For Title V air operation permitting only, emissions units are classified as regulated, unregulated, or insignificant. If this is an application for Title V air operation permit, a separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each regulated and unregulated emissions unit addressed in this application for air permit. Some of the subsections comprising the Emissions Unit Information Section of the form are optional for unregulated emissions units. Each such subsection is appropriately marked. Insignificant emissions units are required to be listed at Section II, Subsection C.

**Air Construction Permit or FESOP Application** - For air construction permitting or federally enforceable state air operation permitting, emissions units are classified as either subject to air permitting or exempt from air permitting. The concept of an "unregulated emissions unit" does not apply. If this is an application for air construction permit or FESOP, a separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each emissions unit subject to air permitting addressed in this application for air permit. Emissions units exempt from air permitting are required to be listed at Section II, Subsection C.

**Air Construction Permit and Revised/Renewal Title V Air Operation Permit Application** - Where this application is used to apply for both an air construction permit and a revised/renewal Title V air operation permit, each emissions unit is classified as either subject to air permitting or exempt from air permitting for air construction permitting purposes and as regulated, unregulated, or insignificant for Title V air operation permitting purposes. **The air construction permitting classification must be used to complete the Emissions Unit Information Section of this application for air permit.** A separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each emissions unit subject to air permitting addressed in this application for air permit. Emissions units exempt from air construction permitting and insignificant emissions units are required to be listed at Section II, Subsection C.

If submitting the application form in hard copy, the number of this Emissions Unit Information Section and the total number of Emissions Unit Information Sections submitted as part of this application must be indicated in the space provided at the top of each page.

**EMISSIONS UNIT INFORMATION**

Section [1] of [1]

**A. GENERAL EMISSIONS UNIT INFORMATION**

**Title V Air Operation Permit Emissions Unit Classification**

1. Regulated or Unregulated Emissions Unit? (Check one, if applying for an initial, revised or renewal Title V air operation permit. Skip this item if applying for an air construction permit or FESOP only.)

The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit.

The emissions unit addressed in this Emissions Unit Information Section is an unregulated emissions unit.

**Emissions Unit Description and Status**

1. Type of Emissions Unit Addressed in this Section: (Check one)

This Emissions Unit Information Section addresses, as a single emissions unit, a single process or production unit, or activity, which produces one or more air pollutants and which has at least one definable emission point (stack or vent).

This Emissions Unit Information Section addresses, as a single emissions unit, a group of process or production units and activities which has at least one definable emission point (stack or vent) but may also produce fugitive emissions.

This Emissions Unit Information Section addresses, as a single emissions unit, one or more process or production units and activities which produce fugitive emissions only.

2. Description of Emissions Unit Addressed in this Section: **Liquid Fertilizer Plant**

3. Emissions Unit Identification Number: **NA**

4. Emissions Unit Status Code: **C**

5. Commence Construction Date: **NA**

6. Initial Startup Date: **NA**

7. Emissions Unit Major Group SIC Code: **28**

8. Acid Rain Unit?  
 Yes  
 No

9. Package Unit: **NA**  
Manufacturer:

Model Number:

10. Generator Nameplate Rating: **NA** MW

11. Emissions Unit Comment:

**EMISSIONS UNIT INFORMATION**

Section [1] of [1]

**Emissions Unit Control Equipment**

1. Control Equipment/Method(s) Description: **Demister**

2. Control Device or Method Code(s): **015**

**EMISSIONS UNIT INFORMATION**

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**B. EMISSIONS UNIT CAPACITY INFORMATION**

(Optional for unregulated emissions units.)

**Emissions Unit Operating Capacity and Schedule**

1. Maximum Process or Throughput Rate:		
2. Maximum Production Rate: <b>40 tph</b>		
3. Maximum Heat Input Rate:	million Btu/hr	
4. Maximum Incineration Rate:	pounds/hr tons/day	
5. Requested Maximum Operating Schedule:	<b>24 hours/day</b> <b>52 weeks/year</b>	<b>7 days/week</b> <b>8760 hours/year</b>
6. Operating Capacity/Schedule Comment:		

**EMISSIONS UNIT INFORMATION**

Section [1] of [1]

**C. EMISSION POINT (STACK/VENT) INFORMATION**  
**(Optional for unregulated emissions units.)**

**Emission Point Description and Type**

1. Identification of Point on Plot Plan or Flow Diagram: <b>liquid fertilizer</b>		2. Emission Point Type Code: <b>1</b>	
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking:			
4. ID Numbers or Descriptions of Emission Units with this Emission Point in Common:			
5. Discharge Type Code: <b>V</b>	6. Stack Height: <b>40 feet</b>	7. Exit Diameter: <b>4.5 feet</b>	
8. Exit Temperature: <b>140 °F</b>	9. Actual Volumetric Flow Rate: <b>30,000 acfm</b>	10. Water Vapor: <b>%</b>	
11. Maximum Dry Standard Flow Rate: <b>dscfm</b>		12. Nonstack Emission Point Height: <b>feet</b>	
13. Emission Point UTM Coordinates... Zone: East (km): North (km):		14. Emission Point Latitude/Longitude... Latitude (DD/MM/SS) Longitude (DD/MM/SS)	
15. Emission Point Comment:			

**EMISSIONS UNIT INFORMATION**

Section [1] of [1]

**D. SEGMENT (PROCESS/FUEL) INFORMATION**

**Segment Description and Rate:** Segment 1 of 1

1. Segment Description (Process/Fuel Type): <b>Fertilizer Production</b>		
2. Source Classification Code (SCC): <b>3-01-030-99</b>		3. SCC Units: <b>Tons produced</b>
4. Maximum Hourly Rate: <b>40</b>	5. Maximum Annual Rate: <b>350,000</b>	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur: <b>NA</b>	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment:		

**Segment Description and Rate:** Segment \_\_\_\_ of \_\_\_\_

1. Segment Description (Process/Fuel Type):		
2. Source Classification Code (SCC):		3. SCC Units:
4. Maximum Hourly Rate:	5. Maximum Annual Rate:	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment:		

**EMISSIONS UNIT INFORMATION**

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**EMISSIONS UNIT INFORMATION**

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**E. EMISSIONS UNIT POLLUTANTS**

**List of Pollutants Emitted by Emissions Unit**

1. Pollutant Emitted	2. Primary Control Device Code	3. Secondary Control Device Code	4. Pollutant Regulatory Code
F	000	000	EL
PM	015	000	NS



**F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION –  
 POTENTIAL/ESTIMATED FUGITIVE EMISSIONS**

(Optional for unregulated emissions units.)

**Potential/Estimated Fugitive Emissions**

**Complete for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.**

1. Pollutant Emitted: <b>F</b>	2. Total Percent Efficiency of Control:
3. Potential Emissions: <b>0.1 lb/hour</b> <b>0.5 tons/year</b>	4. Synthetically Limited? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
5. Range of Estimated Fugitive Emissions (as applicable): to                      tons/year	
6. Emission Factor: <b>0.1 lb/hr</b>  Reference: <b>FDEP Estimate</b>	7. Emissions Method Code: <b>5</b>
8. Calculation of Emissions:  <b>F= 0.1 lb/hr x 8760 hrs/yr x ton/2000 lbs = 0.5 tpy</b>	
9. Pollutant Potential/Estimated Fugitive Emissions Comment:	

**F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -  
 ALLOWABLE EMISSIONS**

Complete if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: <b>Rule</b>	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units: <b>0.1 lb/hr</b>	4. Equivalent Allowable Emissions: <b>0.1 lb/hour                      0.5 tons/year</b>
5. Method of Compliance: <b>EPA Method 13B, initial test only if F emissions are determined to be negligible.</b>	
6. Allowable Emissions Comment (Description of Operating Method): <b>BACT</b>	

Allowable Emissions Allowable Emissions \_\_\_\_\_ of \_\_\_\_\_

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour                      tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions \_\_\_\_\_ of \_\_\_\_\_

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour                      tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION –  
 POTENTIAL/ESTIMATED FUGITIVE EMISSIONS

(Optional for unregulated emissions units.)

Potential/Estimated Fugitive Emissions

Complete for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

1. Pollutant Emitted: <b>PM</b>	2. Total Percent Efficiency of Control:
3. Potential Emissions: 1 lb/hour                      4.4 tons/year	4. Synthetically Limited? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
5. Range of Estimated Fugitive Emissions (as applicable): to                      tons/year	
6. Emission Factor: <b>1 lb/hr</b>  Reference: <b>Estimate</b>	7. Emissions Method Code: <b>5</b>
9. Calculation of Emissions:  <b>F=1 lb/hr x 8760 hrs/yr x ton/2000 lbs = 4.4 tpy</b>	
9. Pollutant Potential/Estimated Fugitive Emissions Comment:	

**F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -  
 ALLOWABLE EMISSIONS**

**Complete if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.**

**Allowable Emissions** Allowable Emissions \_ of \_

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour                      tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

**Allowable Emissions** Allowable Emissions \_\_\_\_ of \_\_\_\_

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour                      tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

**Allowable Emissions** Allowable Emissions \_\_\_\_ of \_\_\_\_

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour                      tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

**EMISSIONS UNIT INFORMATION**

Section [1] of [1]

**G. VISIBLE EMISSIONS INFORMATION**

**Complete if this emissions unit is or would be subject to a unit-specific visible emissions limitation.**

**Visible Emissions Limitation:** Visible Emissions Limitation 1 of 1

1. Visible Emissions Subtype: <b>VE20</b>	2. Basis for Allowable Opacity: <input checked="" type="checkbox"/> Rule <input type="checkbox"/> Other
3. Allowable Opacity: Normal Conditions: <b>20</b> % Exceptional Conditions: % Maximum Period of Excess Opacity Allowed: min/hour	
4. Method of Compliance: <b>DEP Method 9</b>	
5. Visible Emissions Comment: <b>General VE</b>	

**Visible Emissions Limitation:** Visible Emissions Limitation \_\_\_\_ of \_\_\_\_

1. Visible Emissions Subtype:	2. Basis for Allowable Opacity: <input type="checkbox"/> Rule <input type="checkbox"/> Other
3. Allowable Opacity: Normal Conditions: % Exceptional Conditions: % Maximum Period of Excess Opacity Allowed: min/hour	
4. Method of Compliance:	
5. Visible Emissions Comment:	

**EMISSIONS UNIT INFORMATION**

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**H. CONTINUOUS MONITOR INFORMATION**

**Complete if this emissions unit is or would be subject to continuous monitoring.**

**Continuous Monitoring System:** Continuous Monitor \_\_\_\_ of \_\_\_\_ NA

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	<input type="checkbox"/> Rule <input type="checkbox"/> Other
4. Monitor Information... Manufacturer: Model Number: Serial Number:	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment:	

**Continuous Monitoring System:** Continuous Monitor \_\_\_\_ of \_\_\_\_

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	<input type="checkbox"/> Rule <input type="checkbox"/> Other
4. Monitor Information... Manufacturer: Model Number: Serial Number:	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment:	

**EMISSIONS UNIT INFORMATION**

Section [1] of [1]

**I. EMISSIONS UNIT ADDITIONAL INFORMATION**

**Additional Requirements for All Applications, Except as Otherwise Stated**

<p>1. Process Flow Diagram (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input checked="" type="checkbox"/> Attached, Document ID: <b>Attachment 1</b> <input type="checkbox"/> Previously Submitted, Date _____</p>
<p>2. Fuel Analysis or Specification (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date _____</p>
<p>3. Detailed Description of Control Equipment (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input checked="" type="checkbox"/> Attached, Document ID: <b>Attachment 1</b> <input type="checkbox"/> Previously Submitted, Date _____</p>
<p>4. Procedures for Startup and Shutdown (Required for all operation permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date _____ <input checked="" type="checkbox"/> Not Applicable (construction application)</p>
<p>5. Operation and Maintenance Plan (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date _____ <input checked="" type="checkbox"/> Not Applicable</p>
<p>6. Compliance Demonstration Reports/Records <input type="checkbox"/> Attached, Document ID: _____     Test Date(s)/Pollutant(s) Tested: _____ <input type="checkbox"/> Previously Submitted, Date: _____     Test Date(s)/Pollutant(s) Tested: _____ <input type="checkbox"/> To be Submitted, Date (if known): _____     Test Date(s)/Pollutant(s) Tested: _____ <input checked="" type="checkbox"/> Not Applicable</p> <p>Note: For FESOP applications, all required compliance demonstration records/reports must be submitted at the time of application. For Title V air operation permit applications, all required compliance demonstration reports/records must be submitted at the time of application, or a compliance plan must be submitted at the time of application.</p>
<p>7. Other Information Required by Rule or Statute <input checked="" type="checkbox"/> Attached, Document ID: <b>Attachment 1</b> <input type="checkbox"/> Not Applicable</p>

**EMISSIONS UNIT INFORMATION**

Section .[1] of [1]

**Additional Requirements for Air Construction Permit Applications**

1. Control Technology Review and Analysis (Rules 62-212.400(6) and 62-212.500(7), F.A.C.; 40 CFR 63.43(d) and (e)) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
2. Good Engineering Practice Stack Height Analysis (Rule 62-212.400(5)(h)6., F.A.C., and Rule 62-212.500(4)(f), F.A.C.) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
3. Description of Stack Sampling Facilities (Required for proposed new stack sampling facilities only) <input checked="" type="checkbox"/> Attached, Document ID: <b>Attachment 1</b> <input type="checkbox"/> Not Applicable

**Additional Requirements for Title V Air Operation Permit Applications**

1. Identification of Applicable Requirements <input type="checkbox"/> Attached, Document ID: _____
2. Compliance Assurance Monitoring <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable
3. Alternative Methods of Operation <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable
4. Alternative Modes of Operation (Emissions Trading) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable
5. Acid Rain Part Application <input type="checkbox"/> Certificate of Representation (EPA Form No. 7610-1) <input type="checkbox"/> Copy Attached, Document ID: _____ <input type="checkbox"/> Acid Rain Part (Form No. 62-210.900(1)(a)) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date: _____ <input type="checkbox"/> Repowering Extension Plan (Form No. 62-210.900(1)(a)1.) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date: _____ <input type="checkbox"/> New Unit Exemption (Form No. 62-210.900(1)(a)2.) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date: _____ <input type="checkbox"/> Retired Unit Exemption (Form No. 62-210.900(1)(a)3.) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date: _____ <input type="checkbox"/> Phase II NOx Compliance Plan (Form No. 62-210.900(1)(a)4.) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date: _____ <input type="checkbox"/> Phase II NOx Averaging Plan (Form No. 62-210.900(1)(a)5.) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date: _____ <input type="checkbox"/> Not Applicable



**EMISSIONS UNIT INFORMATION**

Section [1] of [1]

**Additional Requirements Comment**

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**ATTACHMENT 1**

**AVAILABLE PLANT INFORMATION**



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**Advanced Concepts & Design, Inc.**

77 Symons Street, Richland, WA 99352

509/943-1431

September 22, 1998

**Harvey Underwood**  
Operating Manager  
Pacific Northwest Solutions, Inc.  
2430 E. Foster Wells Road, Suite B  
Pasco, WA 99302-3140

Dear Mr. Underwood;

**RE: SOURCE TESTING RESULTS OF TRANSPORTABLE 10-34 FERTILIZER PLANT**

Advanced Concepts & Design, Inc., (AC&D) is enclosing the results of the source testing conducted at the 10-34-0 fertilizer generator during operations at the Tidewater Dock Area, Franklin County, WA. Testing was performed on August 5-6, 1998.

The data presented on the attached report describes the testing protocols and laboratory procedures used to complete this task. All methods were in general accordance with Environmental Protection Agency (EPA) Reference Methods as defined in 40 CFR 60 "Regulations on Standards of Performance for Stationary Sources, Appendix A"; EPA-Emission Measurement Center (EMC) Procedures; and in accord with AC&D's quality assurance plan.

We believe that this report and the data presented are reflective of the emissions on the day of testing and at the operational conditions of the generator. If you have any questions with this report, or the testing protocols, please call me at 509/943-1431.

Sincerely,

**Scott R. Somers**  
Source Tester

Enc.

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**Advanced Concepts & Design, Inc.**

77 Symons Street, Richland, WA 99352

509/943-1431

Date: September 22, 1998

To: Harvey Underwood  
Operating Manager  
Pacific Northwest Solutions, Inc.  
2430 E. Foster Wells Road, Suite B  
Pasco, WA 99302-3140  
509-547-5960

From: Scott R. Somers  
Source Tester  
Advanced Concepts & Design, Inc.  
77 Symons Street  
Richland, WA 99352  
509/943-1431

**RE: SOURCE TESTING RESULTS OF TRANSPORTABLE 10-34 FERTILIZER PLANT****Scope**

Advanced Concepts & Design, Inc., (AC&D) was requested by Pacific Northwest Solutions, Inc. (PNS) to conduct emissions testing of a transportable 10-34 fertilizer generator, unit number: 3304B. The scope of work was to conduct representative source tests for particulate and ammonia. This testing was similar to initial source testing which occurred on September 18, 1997. Follow-on testing was performed in order to verify operational changes and account for the additional year of PNS experience in fertilizer manufacturing. Washington State Department of Ecology (WDOE), Air Programs, Spokane Regional Office, was notified of the testing and granted a temporary air permit to PNS.

**Summary**

Source testing was conducted on August 5-6, 1998. Five representative particulate and ammonia emissions tests were performed at varying process conditions using Environmental Protection Agency's (EPA) methodologies. Detailed field notes, data sheets and laboratory results are attached. To account for different operating conditions, PNS stepped the fertilizer production rate of 36 to 42 tons per hour over the duration of the source testing.

At the operating conditions noted, the testing data indicated an overall average particulate emission rate of 0.5 pounds per hour and ammonia emission rate of 23.7 pounds per hour. Although particulate rates held fairly constant between the two different production rates (e.g. 36 and 42 tons/hr), ammonia emission rates varied noticeably based on production rates. Source test runs conducted at 36 tons/hr yielded an average ammonia rate of 9.8 lbs/hr, whereas at a production rate of 42 tons/hr yielded ammonia rates of 33.1 lbs/hr. These emission rates are far below the 1997 source testing results and, as reported by PNS, are more reflective and consistent with current process and operating parameters. Attached is a letter from PNS explaining the machine and operational improvements integrated into their 10-34 fertilizer manufacturing.

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### **Industrial Process/Operation**

This process is a method of producing fertilizer composed of nitrogen and phosphorous. The fertilizer generator is manufactured by Precision Tank and Equipment Company, Athens, IL. The process operates by combining nitrogen (anhydrous ammonia) with phosphorous (superphosphoric acid). The other raw ingredient is water, used to dilute the product to stable, standard grades of commercial fertilizer. Standard grades manufactured by this process are 10-34 and 11-37, which equates to a Nitrogen-Phosphorous Pentoxide. This plant was tested under 10-34 generation.

The production procedure is a three-step process. First, the ammonia and acid reacts. Second, reaction products are brought to correct proportions, and lastly the product is cooled. Within the reactor process temperatures reach ~650°F, discharged reactor product is then quenched and brought to the desired grade. Various water and product recirculation processes are incorporated to remove latent heat and balance final product prior to transfer to storage. Production rates for these sources are 30-40 tons/hour. Figure 1 represents a general schematic representation of these process and flow paths for 10-34 generators.

### **Description of Evaluation**

Test methods, analytical procedures, and calculations used in this testing were in general accordance with EPA Reference Methods as specified in 40 CFR 60, "Regulations on Standards of Performance for New Stationary Sources, Appendix A". The measurement and quality control procedures followed EPA Quality Assurance Handbook for Air Pollution Measurement Systems, Volume III, EPA-600/4-77-027b and AC&D quality assurance plan. All laboratory analytical and quality assurance procedures adhered to standard protocols. The methods utilized are briefly summarized below.

#### **Reference Method 1: Sample and Velocity Traverses for Stationary Sources.**

The number and locations of all isokinetic sampling traverse points were calculated using Reference Method 1 protocols. Like all transportable sources, this generator operates without a permanent stack structure. To accommodate EPA stack sampling guidelines for the extraction of representative samples from effluent sources, a temporary structure was built. The structure will allow for at least a two-duct diameter downstream and half-diameter upstream any flow disturbance. This is a rectangular discharge. Cooling tower emissions exits the 10-34 generator via a 84" x 108" demister pad, where it is immediately channeled through a canvas shroud with an exit dimension of 29" x 105". This latter dimension shall be considered the stack discharge area for computing equivalent duct diameters.

$$De = 2(L*W)/(L+W)$$
$$De = 2(105"*29")/(105"+29") = 45.4" \text{ or } \sim 4'$$

The equation indicates that sampling points must be at least 8' downstream and 2' upstream in order to attain EPA's minimum criteria. At this location, the stack area will be divided into 27 individual areas along 9 traverse lines. Each area will measure 9 5/8" x 11 5/8" and sample extraction will occur within each of these centroids. Figure 2 represents the configuration and layout of the stack extension and sampling locations.

#### **Reference Method 2: Determination of Stack Gas Velocity and Volumetric Flow Rates.**

Stack gas velocities were determined by the procedures outlined in this method. A Stausschiche (Type S) pitot tube, meeting the requirements for performance specification, calibration and operation, was used to measure velocity pressures; these pressure measurements, along with gas density determinations, were used to determine the stack velocities. Stack gas temperatures were measured at regular intervals throughout the sampling period using a Type K thermocouple. The pitot tube was found to comply with EPA specifications, and assigned a correction factor of 0.84.

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**Reference Method 4: Determination of Moisture Content in Stack Gases.**

Known volumes of gas were extracted from the stack, and the moisture was removed from the sample stream by condensation in impingers and adsorption on silica gel. Moisture determination was conducted simultaneously with particulate and ammonia emission measurements (Methods 5 and 206). Water gain in the impingers was measured volumetrically and water absorbed on the silica gel was determined gravimetrically. The impingers were kept chilled with ice over the duration of the sampling runs. The impinger catch was saved and subsequently used in Method 206 for ammonia determination.

**Reference Method 5: Determination of Particulate Emissions from Stationary Sources.**

Method 5 was used in conjunction with Reference Methods 1, 2, and 4 to determine the particulate emissions from this stationary source. Particulates were extracted isokinetically from the stack via a heated probe with a stainless steel liner and collected on a glass fiber filter housed within a hot-box located directly downstream of the probe. The probe and oven were maintained at ~250°F during sampling. The particulate matter, which includes any material that condenses at or above the specified filter temperature, were measured gravimetrically. After each run, the probe was cleaned and rinsed multiple times with an acetone/water mixture. The particulate weight contained in this rinsate was determined by heating the solution to dryness and measuring the weight gain of the container. This probe rinsate weight gain was added to the filter captured particulate mass, yielding total particulate mass. Particulate matter concentrations in the stack gas stream are expressed as grains per dry standard cubic feet (gr/dscf), as well as pounds per hour (lbs/hr).

The sampling runs consisted of isokinetic sampling at each of the 27 points. Sample time per traverse point was 3 minutes, thus yielding a total run time of 81 minutes. During sampling the isokinetic sampling rates were calculated using the nomograph supplied by the equipment manufacturer. After completing the sampling, the overall isokinetic rate for each run was calculated and were within the EPA quality control limits of 90-110 percent isokinetic. As noted on each of the test data sheets, each run satisfactorily passed the post leak test procedure, so no leak rate corrections were necessary. Sample train cleanup consisted of placing the filter and front half rinse solutions into pre-labeled containers. The impinger solution was sulfuric acid for the collection of ammonia gases as prescribed in Method 206.

**Reference Method 206: Determination of Ammonia from Stationary Sources.**

Ammonia was collected in unison with Method 5 particulates. Guidance procedures for ammonia utilized a slight modification of EPA's Draft Method 206 "Procedure for Collection and Analysis of Ammonia from Stationary Sources." The method states that ammonia collection would occur immediately after an instack filter (Method 17) using 0.1N sulfuric acid ( $H_2SO_4$ ). After review of the method, it was determined that it was not most appropriate method for this source given the large amount of free water vapor in the cooling tower discharge, thus making it impossible to apply instack filtration techniques. The method was appropriate for use with a Method 5 sampling train. WDOE and AC&D also determined that the amount of free water vapor would rapidly dilute the prescribed 0.1N acid solution, thus reducing the collection efficiency of the solution.

Upon a review of past 10-34 ammonia emission test procedures, it was noted that a 5N sulfuric acid solution has been used by the Tennessee Valley Authority (TVA) when conducting source testing of a Mears fertilizer generator. This method has been accepted by various State's Air Programs. After checking with DataChem Laboratory and WDOE, it was determined that this absorbing solution would be appropriate for this test. Therefore, after the Method 5 filter, two Greenburg-Smith impingers were filled with 100-mLs of 5N  $H_2SO_4$ . Sample recovery and

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cleanup consisted of determining impinger catch volume and then rinsing each impinger multiple times with DI water. Absorbing and rinsate solutions were combined and submitted for analysis.

**Results:**

Complete stack sampling data sheets for each of the five sample runs are attached. The average particulate and ammonia emission rates for the transportable 10-34 fertilizer generator operating between 36 to 42 tons/hour were 0.5 and 23.7 pounds per hour (lbs/hr), respectively. It was observed that particulate matter emission rates remained fairly constant and irrespective of production rate. Ammonia emission rates appeared to be more tightly bound by production rate and acid supplier. As observed, when the generator operated at 36 or 42 tons/hr the process yielded average ammonia discharges of 9.8 and 33.1 lbs/hr. A summary of the source sampling data is detailed in Table 1.

Copies of the calculation spreadsheets, field data sheets, laboratory analytical and quality control reports, generator production run sheets, and chain of custody forms are included for PNS and WDOE review and project documentation.



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**Table 1: Summary of Source Test Results, Transportable 10-34 Fertilizer Plant, August 5-6, 1998**

Parameters	Units	Run A	Run B	Run C	Run D	Run E
Process Operating Conditions	tons/hr	36	36	42	42	42
Average Barometric Pressure	"Hg	29.42	29.40	29.59	29.56	29.51
Average Stack Temperature	°F	137	134	135	139	140
Number of Traverse Points	---	27	27	27	27	27
Sample Time/Traverse Point	Minutes	3	3	3	3	3
Total Run Time	Minutes	81	81	81	81	81
Moisture Content	%H <sub>2</sub> O	26	28	29	29	30
Average Stack Velocity	ft/sec	17.43	19.35	22.67	21.70	21.79
Volumetric Flow Rate	cfm	22117	24552	28762	27530	26375
Total Moisture Gain (Impingers)	mLs	304	326	422	424	406
Total Volume Sampled	dscf	41.038	41.376	49.732	49.987	46.373
Total Particulate Mass	grams	0.005	0.008	0.009	0.013	0.010
Particulate Concentration	gr/dscf	0.002	0.003	0.003	0.004	0.003
Particulate Emission Rate	lbs/hr	0.3	0.5	0.5	0.7	0.6
Total Ammonia in Sample	mg	560	340	1260	1580	1040
Ammonia Emission Rate	lbs/hr	11.5	8.0	33.4	39.8	26.0
Isokinetic Rate	%	99	95	95	100	98

Average Particulate Emission Rate: 0.5 lbs/hr (all runs)

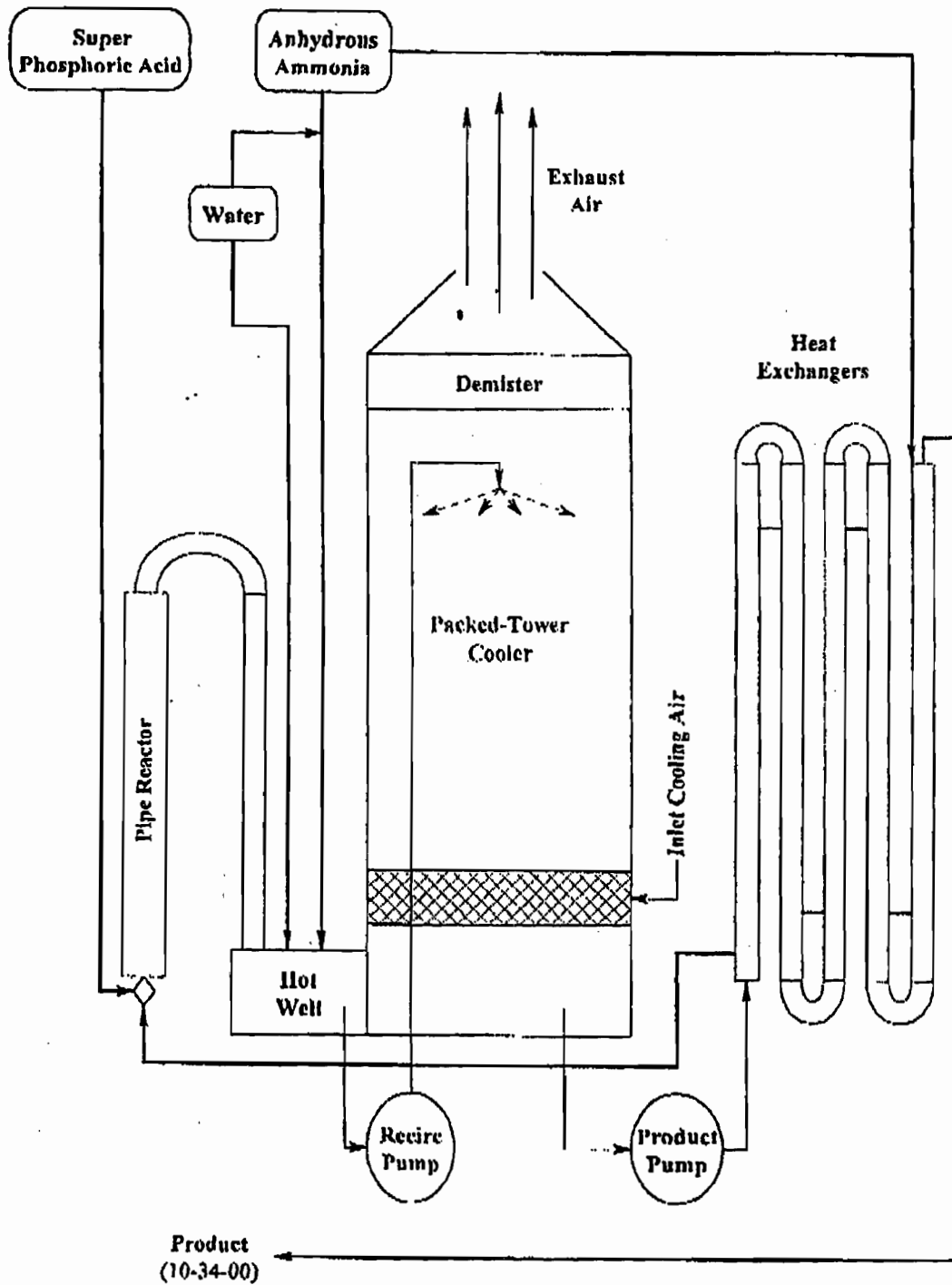
Average Ammonia Emission Rate: 23.7 lbs/hr (all runs)

Average Ammonia Emission Rate: 9.8 lbs/hr (at 36 Tons/hr)

Average Ammonia Emission Rate: 33.1 lbs/hr (at 42 Tons/hr)

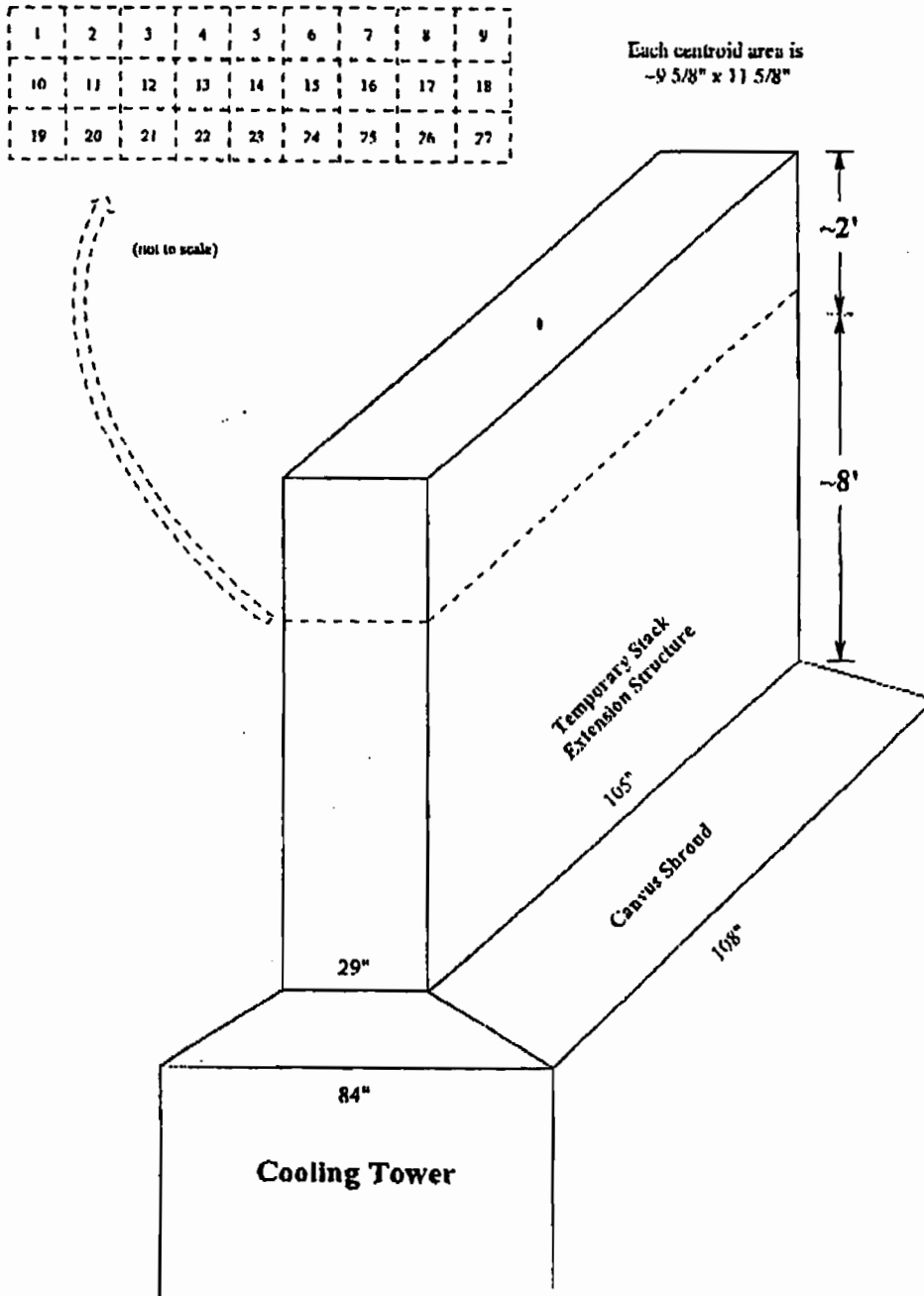
**CONFIDENTIAL INFORMATION**  
Property of Pacific Northwest Solutions, Inc.

**Figure 1: Typical 10-34 Fertilizer Generator Flowsheet**



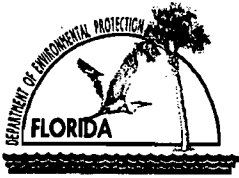
**CONFIDENTIAL INFORMATION**  
 Property of Pacific Northwest Solutions, Inc.

Figure 2: Temporary Stack Layout and Sampling Locations



Equivalent Duct Diameters (D<sub>e</sub>):

$$\frac{2(L \cdot W)}{(L+W)} \rightarrow \frac{2(29'' \cdot 105'')}{(29''+105'')} \rightarrow \frac{6090}{134} \rightarrow 45.4'' (\sim 4')$$



# Department of RECEIVED Environmental Protection

AUG 09 2004

## Division of Air Resource Management BUREAU OF AIR REGULATION APPLICATION FOR AIR PERMIT - LONG FORM

### I. APPLICATION INFORMATION

**Air Construction Permit** – Use this form to apply for an air construction permit for a proposed project:

- subject to prevention of significant deterioration (PSD) review, nonattainment area (NAA) new source review, or maximum achievable control technology (MACT) review; or
- where the applicant proposes to assume a restriction on the potential emissions of one or more pollutants to escape a federal program requirement such as PSD review, NAA new source review, Title V, or MACT; or
- at an existing federally enforceable state air operation permit (FESOP) or Title V permitted facility.

**Air Operation Permit** – Use this form to apply for:

- an initial federally enforceable state air operation permit (FESOP); or
- an initial/revised/renewal Title V air operation permit.

**Air Construction Permit & Revised/Renewal Title V Air Operation Permit (Concurrent Processing Option)**  
– Use this form to apply for both an air construction permit and a revised or renewal Title V air operation permit incorporating the proposed project.

To ensure accuracy, please see form instructions.

#### Identification of Facility

1. Facility Owner/Company Name: <b>White Springs Agricultural Chemicals, Inc.</b>	
2. Site Name: <b>Suwannee River and Swift Creek Complex</b>	
3. Facility Identification Number: <b>0470002</b>	
4. Facility Location...: Street Address or Other Locator: <b>E of SR 137, E of US 41, N of White Springs</b> City: <b>White Springs</b> County: <b>Hamilton</b> Zip Code: <b>32096</b>	
5. Relocatable Facility? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	6. Existing Title V Permitted Facility? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

#### Application Contact

1. Application Contact Name: <b>Pradeep Raval, Consultant</b>
2. Application Contact Mailing Address... Organization/Firm: <b>Koogler &amp; Associates</b> Street Address: <b>4014 N.W. 13th Street</b> City: <b>Gainesville</b> State: <b>FL</b> Zip Code: <b>32609</b>
3. Application Contact Telephone Numbers... Telephone: <b>(352) 377-5822</b> Fax: <b>(352) 377-7158</b>
4. Application Contact Email Address: <b>praval@kooglerassociates.com</b>

#### Application Processing Information (DEP Use)

1. Date of Receipt of Application:	<b>8-9-04</b>
2. Project Number(s):	<b>0470002-051-AC</b>
3. PSD Number (if applicable):	
4. Siting Number (if applicable):	

## APPLICATION INFORMATION

### Purpose of Application

**This application for air permit is submitted to obtain: (Check one)**

#### **Air Construction Permit**

Air construction permit.

#### **Air Operation Permit**

Initial Title V air operation permit.

Title V air operation permit revision.

Title V air operation permit renewal.

Initial federally enforceable state air operation permit (FESOP) where professional engineer (PE) certification is required.

Initial federally enforceable state air operation permit (FESOP) where professional engineer (PE) certification is not required.

#### **Air Construction Permit and Revised/Renewal Title V Air Operation Permit (Concurrent Processing)**

Air construction permit and Title V permit revision, incorporating the proposed project.

Air construction permit and Title V permit renewal, incorporating the proposed project.

**Note: By checking one of the above two boxes, you, the applicant, are requesting concurrent processing pursuant to Rule 62-213.405, F.A.C. In such case, you must also check the following box:**

I hereby request that the department waive the processing time requirements of the air construction permit to accommodate the processing time frames of the Title V air operation permit.

### Application Comment

**This application is submitted for a minor project proposed at the existing chemical plant of White Springs Agricultural Chemicals of installing equipment to manufacture liquid fertilizer at the Suwannee River Complex.**

**As discussed with FDEP staff, only the information being changed or added to the existing facility is submitted herein.**

# APPLICATION INFORMATION

## Scope of Application

<b>Emissions Unit ID Number</b>	<b>Description of Emissions Unit</b>	<b>Air Permit Type</b>	<b>Air Permit Proc. Fee</b>
NA	Liquid Fertilizer Plant	AC1F	0

## Application Processing Fee

Check one:  Attached - Amount: \$ \_\_\_\_\_  Not Applicable

**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:  
**Paul H. Barrett, General Manager**

2. Application Responsible Official Qualification (Check one or more of the following options, as applicable):

- 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.
- For a partnership or sole proprietorship, a general partner or the proprietor, respectively.
- For a municipality, county, state, federal, or other public agency, either a principal executive officer or ranking elected official.
- The designated representative at an Acid Rain source.

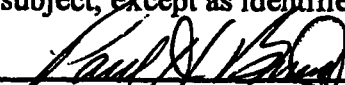
3. Application Responsible Official Mailing Address...  
Organization/Firm: **White Springs Agricultural Chemicals, Inc.**  
Street Address: **P.O. Box 300**  
City: **White Springs** State: **FL** Zip Code: **32096**

4. Application Responsible Official Telephone Numbers...  
Telephone: **(386) 397-8308** ext. Fax: **(386) 397-8390**

5. Application Responsible Official Email Address: **pbarrett@pcsposphate.com**

6. Application Responsible Official Certification:

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.

  
Signature

7-26-04  
Date

# APPLICATION INFORMATION

## Professional Engineer Certification

1. Professional Engineer Name: <b>John B. Koogler, Ph.D., P.E.</b> Registration Number: <b>12925</b>
2. Professional Engineer Mailing Address... Organization/Firm: <b>Koogler &amp; Associates</b> Street Address: <b>4014 N.W. 13th Street</b> City: <b>Gainesville</b> State: <b>FL</b> Zip Code: <b>32609</b>
3. Professional Engineer Telephone Numbers... Telephone: <b>(352) 377-5822</b> Fax: <b>(352) 377-7158</b>
4. Professional Engineer Email Address: <b>jkoogler@kooglerassociates.com</b>
5. Professional Engineer Statement: <i>I, the undersigned, hereby certify, except as particularly noted herein*, that:</i> <i>(1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this application for air permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; and</i> <i>(2) To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application.</i> <i>(3) If the purpose of this application is to obtain a Title V air operation permit (check here <input type="checkbox"/>, if so), I further certify that each emissions unit described in this application for air permit, when properly operated and maintained, will comply with the applicable requirements identified in this application to which the unit is subject, except those emissions units for which a compliance plan and schedule is submitted with this application.</i> <i>(4) If the purpose of this application is to obtain an air construction permit (check here <input checked="" type="checkbox"/>, if so) or concurrently process and obtain an air construction permit and a Title V air operation permit revision or renewal for one or more proposed new or modified emissions units (check here <input type="checkbox"/>, if so), I further certify that the engineering features of each such emissions unit described in this application have been designed or examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application.</i> <i>(5) If the purpose of this application is to obtain an initial air operation permit or operation permit revision or renewal for one or more newly constructed or modified emissions units (check here <input type="checkbox"/>, if so), I further certify that, with the exception of any changes detailed as part of this application, each such emissions unit has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with all provisions contained in such permit.</i>  Signature (seal) _____ Date <u>8/5/04</u>

\* Attach any exception to certification statement.



## II. FACILITY INFORMATION

### A. GENERAL FACILITY INFORMATION

**Facility Location and Type**

1. Facility UTM Coordinates... Zone <b>17</b> East (km) <b>328.3</b> North (km) <b>3368.8</b>		2. Facility Latitude/Longitude... Latitude (DD/MM/SS) Longitude (DD/MM/SS)	
3. Governmental Facility Code: <b>0</b>	4. Facility Status Code: <b>A</b>	5. Facility Major Group SIC Code: <b>28</b>	6. Facility SIC(s): <b>2874</b>
7. Facility Comment : <b>Title V facility</b>			

**Facility Contact**

1. Facility Contact Name: <b>Charles B. Pults, Senior Environmental Engineer</b>
2. Facility Contact Mailing Address... Organization/Firm: <b>White Springs Agricultural Chemicals, Inc.</b> Street Address: <b>P.O. Box 300</b> City: <b>White Springs</b> State: <b>FL</b> Zip Code: <b>32096</b>
3. Facility Contact Telephone Numbers: Telephone: <b>(386) 397-8442</b> Fax: <b>(386) 397-8390</b>
4. Facility Contact Email Address: <b>cpults@pcsphosphate.com</b>

**Facility Primary Responsible Official**

**Complete if an "application responsible official" is identified in Section I. that is not the facility "primary responsible official."**

1. Facility Primary Responsible Official Name:
2. Facility Primary Responsible Official Mailing Address... Organization/Firm: Street Address: City:                      State:                      Zip Code:
3. Facility Primary Responsible Official Telephone Numbers... Telephone: (    )    -    ext.      Fax:    (    )    -
4. Facility Primary Responsible Official Email Address:

**FACILITY INFORMATION**

**Facility Regulatory Classifications**

Check all that would apply *following* completion of all projects and implementation of all other changes proposed in this application for air permit. Refer to instructions to distinguish between a “major source” and a “synthetic minor source.”

1. <input type="checkbox"/> Small Business Stationary Source	<input type="checkbox"/> Unknown
2. <input type="checkbox"/> Synthetic Non-Title V Source	
3. <input checked="" type="checkbox"/> Title V Source	
4. <input checked="" type="checkbox"/> Major Source of Air Pollutants, Other than Hazardous Air Pollutants (HAPs)	
5. <input type="checkbox"/> Synthetic Minor Source of Air Pollutants, Other than HAPs	
6. <input checked="" type="checkbox"/> Major Source of Hazardous Air Pollutants (HAPs)	
7. <input type="checkbox"/> Synthetic Minor Source of HAPs	
8. <input checked="" type="checkbox"/> One or More Emissions Units Subject to NSPS (40 CFR Part 60)	
9. <input checked="" type="checkbox"/> One or More Emissions Units Subject to Emission Guidelines (40 CFR Part 60)	
10. <input checked="" type="checkbox"/> One or More Emissions Units Subject to NESHAP (40 CFR Part 61 or Part 63)	
11. <input type="checkbox"/> Title V Source Solely by EPA Designation (40 CFR 70.3(a)(5))	
12. Facility Regulatory Classifications Comment:	

**FACILITY INFORMATION**

**List of Pollutants Emitted by Facility**

1. Pollutant Emitted	2. Pollutant Classification	3. Emissions Cap [Y or N]?
PM	A	N
PM10	A	N
NOX	A	N
SO2	A	N
FL	B	N
SAM	A	N
CO	A	N
VOC	B	N

**FACILITY INFORMATION**

**B. EMISSIONS CAPS**

**Facility-Wide or Multi-Unit Emissions Caps**

1. Pollutant Subject to Emissions Cap	2. Facility Wide Cap [Y or N]? (all units)	3. Emissions Unit ID No.s Under Cap (if not all units)	4. Hourly Cap (lb/hr)	5. Annual Cap (ton/yr)	6. Basis for Emissions Cap
NA					
7. Facility-Wide or Multi-Unit Emissions Cap Comment:					

## FACILITY INFORMATION

### C. FACILITY ADDITIONAL INFORMATION

#### Additional Requirements for All Applications, Except as Otherwise Stated

1. Facility Plot Plan: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Previously Submitted, Date: _____
2. Process Flow Diagram(s): (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input checked="" type="checkbox"/> Attached, Document ID: <u>Att. 1</u> <input type="checkbox"/> Previously Submitted, Date: _____
3. Precautions to Prevent Emissions of Unconfined Particulate Matter: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Previously Submitted, Date: _____

#### Additional Requirements for Air Construction Permit Applications

1. Area Map Showing Facility Location: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable (existing permitted facility)
2. Description of Proposed Construction or Modification: <input checked="" type="checkbox"/> Attached, Document ID: <u>Att. 1</u>
3. Rule Applicability Analysis: <input checked="" type="checkbox"/> Attached, Document ID: <u>Att. 1</u>
4. List of Exempt Emissions Units (Rule 62-210.300(3)(a) or (b)1., F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable
5. Fugitive Emissions Identification (Rule 62-212.400(2), F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
6. Preconstruction Air Quality Monitoring and Analysis (Rule 62-212.400(5)(f), F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
7. Ambient Impact Analysis (Rule 62-212.400(5)(d), F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
8. Air Quality Impact since 1977 (Rule 62-212.400(5)(h)5., F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
9. Additional Impact Analyses (Rules 62-212.400(5)(e)1. and 62-212.500(4)(e), F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
10. Alternative Analysis Requirement (Rule 62-212.500(4)(g), F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable

## FACILITY INFORMATION

### Additional Requirements for FESOP Applications

- |  |
|--|
| 1. List of Exempt Emissions Units (Rule 62-210.300(3)(a) or (b)1., F.A.C.):<br><input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable (no exempt units at facility) |
|--|

### Additional Requirements for Title V Air Operation Permit Applications NA

- |   |
|---|
| 1. List of Insignificant Activities (Required for initial/renewal applications only):<br><input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable (revision application) |
|---|

- |   |
|---|
| 2. Identification of Applicable Requirements (Required for initial/renewal applications, and for revision applications if this information would be changed as a result of the revision being sought):<br><input type="checkbox"/> Attached, Document ID: _____<br><input type="checkbox"/> Not Applicable (revision application with no change in applicable requirements) |
|---|

- |  |
|--|
| 3. Compliance Report and Plan (Required for all initial/revision/renewal applications):<br><input type="checkbox"/> Attached, Document ID: _____<br>Note: A compliance plan must be submitted for each emissions unit that is not in compliance with all applicable requirements at the time of application and/or at any time during application processing. The department must be notified of any changes in compliance status during application processing. |
|--|

- |   |
|---|
| 4. List of Equipment/Activities Regulated under Title VI (If applicable, required for initial/renewal applications only):<br><input type="checkbox"/> Attached, Document ID: _____<br><input type="checkbox"/> Equipment/Activities On site but Not Required to be Individually Listed<br><input type="checkbox"/> Not Applicable |
|---|

- |  |
|--|
| 5. Verification of Risk Management Plan Submission to EPA (If applicable, required for initial/renewal applications only) :<br><input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable |
|--|

- |  |
|--|
| 6. Requested Changes to Current Title V Air Operation Permit:<br><input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable |
|--|

### Additional Requirements Comment

<b>The proposed project consists of installing equipment to manufacture liquid fertilizer.</b>
--

## EMISSIONS UNIT INFORMATION

Section [1] of [1]

### III. EMISSIONS UNIT INFORMATION

**Title V Air Operation Permit Application** - For Title V air operation permitting only, emissions units are classified as regulated, unregulated, or insignificant. If this is an application for Title V air operation permit, a separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each regulated and unregulated emissions unit addressed in this application for air permit. Some of the subsections comprising the Emissions Unit Information Section of the form are optional for unregulated emissions units. Each such subsection is appropriately marked. Insignificant emissions units are required to be listed at Section II, Subsection C.

**Air Construction Permit or FESOP Application** - For air construction permitting or federally enforceable state air operation permitting, emissions units are classified as either subject to air permitting or exempt from air permitting. The concept of an "unregulated emissions unit" does not apply. If this is an application for air construction permit or FESOP, a separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each emissions unit subject to air permitting addressed in this application for air permit. Emissions units exempt from air permitting are required to be listed at Section II, Subsection C.

**Air Construction Permit and Revised/Renewal Title V Air Operation Permit Application** - Where this application is used to apply for both an air construction permit and a revised/renewal Title V air operation permit, each emissions unit is classified as either subject to air permitting or exempt from air permitting for air construction permitting purposes and as regulated, unregulated, or insignificant for Title V air operation permitting purposes. **The air construction permitting classification must be used to complete the Emissions Unit Information Section of this application for air permit.** A separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each emissions unit subject to air permitting addressed in this application for air permit. Emissions units exempt from air construction permitting and insignificant emissions units are required to be listed at Section II, Subsection C.

If submitting the application form in hard copy, the number of this Emissions Unit Information Section and the total number of Emissions Unit Information Sections submitted as part of this application must be indicated in the space provided at the top of each page.

**EMISSIONS UNIT INFORMATION**

Section [1] of [1]

**A. GENERAL EMISSIONS UNIT INFORMATION**

**Title V Air Operation Permit Emissions Unit Classification**

1. Regulated or Unregulated Emissions Unit? (Check one, if applying for an initial, revised or renewal Title V air operation permit. Skip this item if applying for an air construction permit or FESOP only.)

The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit.

The emissions unit addressed in this Emissions Unit Information Section is an unregulated emissions unit.

**Emissions Unit Description and Status**

1. Type of Emissions Unit Addressed in this Section: (Check one)

This Emissions Unit Information Section addresses, as a single emissions unit, a single process or production unit, or activity, which produces one or more air pollutants and which has at least one definable emission point (stack or vent).

This Emissions Unit Information Section addresses, as a single emissions unit, a group of process or production units and activities which has at least one definable emission point (stack or vent) but may also produce fugitive emissions.

This Emissions Unit Information Section addresses, as a single emissions unit, one or more process or production units and activities which produce fugitive emissions only.

2. Description of Emissions Unit Addressed in this Section: **Liquid Fertilizer Plant**

3. Emissions Unit Identification Number: **NA**

4. Emissions Unit Status Code: <b>C</b>	5. Commence Construction Date: <b>NA</b>	6. Initial Startup Date: <b>NA</b>	7. Emissions Unit Major Group SIC Code: <b>28</b>	8. Acid Rain Unit? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
--	---	--	--	--

9. Package Unit: **NA**  
Manufacturer: \_\_\_\_\_ Model Number: \_\_\_\_\_

10. Generator Nameplate Rating: **NA** MW

11. Emissions Unit Comment:



**EMISSIONS UNIT INFORMATION**

Section [1] of [1]

**Emissions Unit Control Equipment**

1. Control Equipment/Method(s) Description: **Demister**

2. Control Device or Method Code(s): **015**

**EMISSIONS UNIT INFORMATION**

Section [1] of [1]

**B. EMISSIONS UNIT CAPACITY INFORMATION**

**(Optional for unregulated emissions units.)**

**Emissions Unit Operating Capacity and Schedule**

1. Maximum Process or Throughput Rate:		
2. Maximum Production Rate: <b>40 tph</b>		
3. Maximum Heat Input Rate:	million Btu/hr	
4. Maximum Incineration Rate:	pounds/hr tons/day	
5. Requested Maximum Operating Schedule:	<b>24 hours/day</b> <b>52 weeks/year</b>	<b>7 days/week</b> <b>8760 hours/year</b>
6. Operating Capacity/Schedule Comment:		

**EMISSIONS UNIT INFORMATION**

Section [1] of [1]

**C. EMISSION POINT (STACK/VENT) INFORMATION**  
**(Optional for unregulated emissions units.)**

**Emission Point Description and Type**

1. Identification of Point on Plot Plan or Flow Diagram: <b>liquid fertilizer</b>		2. Emission Point Type Code: <b>1</b>	
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking:			
4. ID Numbers or Descriptions of Emission Units with this Emission Point in Common:			
5. Discharge Type Code: <b>V</b>		6. Stack Height: <b>40 feet</b>	7. Exit Diameter: <b>4.5 feet</b>
8. Exit Temperature: <b>140 °F</b>	9. Actual Volumetric Flow Rate: <b>30,000 acfm</b>		10. Water Vapor: <b>%</b>
11. Maximum Dry Standard Flow Rate: <b>dscfm</b>		12. Nonstack Emission Point Height: <b>feet</b>	
13. Emission Point UTM Coordinates... Zone: <b>East (km):</b> <b>North (km):</b>		14. Emission Point Latitude/Longitude... Latitude (DD/MM/SS) Longitude (DD/MM/SS)	
15. Emission Point Comment:			

**EMISSIONS UNIT INFORMATION**

Section [1] of [1]

**D. SEGMENT (PROCESS/FUEL) INFORMATION**

**Segment Description and Rate: Segment 1 of 1**

1. Segment Description (Process/Fuel Type): <b>Fertilizer Production</b>		
2. Source Classification Code (SCC): <b>3-01-030-99</b>		3. SCC Units: <b>Tons produced</b>
4. Maximum Hourly Rate: <b>40</b>	5. Maximum Annual Rate: <b>350,000</b>	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur: <b>NA</b>	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment:		

**Segment Description and Rate: Segment \_\_\_\_ of \_\_\_\_**

1. Segment Description (Process/Fuel Type):		
2. Source Classification Code (SCC):		3. SCC Units:
4. Maximum Hourly Rate:	5. Maximum Annual Rate:	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment:		

**EMISSIONS UNIT INFORMATION**

Section [1] of [1]

**EMISSIONS UNIT INFORMATION**

Section [1] of [1]

**E. EMISSIONS UNIT POLLUTANTS**

**List of Pollutants Emitted by Emissions Unit**

1. Pollutant Emitted	2. Primary Control Device Code	3. Secondary Control Device Code	4. Pollutant Regulatory Code
F	000	000	EL
PM	015	000	NS

**F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION –  
 POTENTIAL/ESTIMATED FUGITIVE EMISSIONS**

**(Optional for unregulated emissions units.)**

**Potential/Estimated Fugitive Emissions**

**Complete for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.**

1. Pollutant Emitted: <b>F</b>		2. Total Percent Efficiency of Control:	
3. Potential Emissions: <b>0.1 lb/hour</b> <b>0.5 tons/year</b>		4. Synthetically Limited? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
5. Range of Estimated Fugitive Emissions (as applicable): to                      tons/year			
6. Emission Factor: <b>0.1 lb/hr</b>  Reference: <b>FDEP Estimate</b>		7. Emissions Method Code: <b>5</b>	
8. Calculation of Emissions:  <b>F= 0.1 lb/hr x 8760 hrs/yr x ton/2000 lbs = 0.5 tpy</b>			
9. Pollutant Potential/Estimated Fugitive Emissions Comment:			

**F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -  
 ALLOWABLE EMISSIONS**

Complete if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.

**Allowable Emissions** Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: <b>Rule</b>	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units: <b>0.1 lb/hr</b>	4. Equivalent Allowable Emissions: 0.1 lb/hour                      0.5 tons/year
5. Method of Compliance: <b>EPA Method 13B, initial test only if F emissions are determined to be negligible.</b>	
6. Allowable Emissions Comment (Description of Operating Method): <b>BACT</b>	

**Allowable Emissions** Allowable Emissions \_\_\_\_\_ of \_\_\_\_\_

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour                      tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

**Allowable Emissions** Allowable Emissions \_\_\_\_\_ of \_\_\_\_\_

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour                      tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

**F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION –  
 POTENTIAL/ESTIMATED FUGITIVE EMISSIONS**

**(Optional for unregulated emissions units.)**

**Potential/Estimated Fugitive Emissions**

**Complete for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.**

1. Pollutant Emitted: <b>PM</b>	2. Total Percent Efficiency of Control:
3. Potential Emissions: 1 lb/hour                      4.4 tons/year	4. Synthetically Limited? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
5. Range of Estimated Fugitive Emissions (as applicable): to                      tons/year	
6. Emission Factor: <b>1 lb/hr</b>  Reference: <b>Estimate</b>	7. Emissions Method Code: <b>5</b>
9. Calculation of Emissions:  <b>F=1 lb/hr x 8760 hrs/yr x ton/2000 lbs = 4.4 tpy</b>	
9. Pollutant Potential/Estimated Fugitive Emissions Comment:	



**F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -  
ALLOWABLE EMISSIONS**

**Complete if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.**

**Allowable Emissions** Allowable Emissions \_ of \_

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour                      tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

**Allowable Emissions** Allowable Emissions \_\_\_\_ of \_\_\_\_

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour                      tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

**Allowable Emissions** Allowable Emissions \_\_\_\_ of \_\_\_\_

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour                      tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

**EMISSIONS UNIT INFORMATION**

Section [1] of [1]

**G. VISIBLE EMISSIONS INFORMATION**

Complete if this emissions unit is or would be subject to a unit-specific visible emissions limitation.

**Visible Emissions Limitation:** Visible Emissions Limitation 1 of 1

1. Visible Emissions Subtype: <b>VE20</b>	2. Basis for Allowable Opacity: <input checked="" type="checkbox"/> Rule <input type="checkbox"/> Other
3. Allowable Opacity: Normal Conditions: <b>20</b> % Exceptional Conditions: % Maximum Period of Excess Opacity Allowed: min/hour	
4. Method of Compliance: <b>DEP Method 9</b>	
5. Visible Emissions Comment: <b>General VE</b>	

**Visible Emissions Limitation:** Visible Emissions Limitation \_\_\_\_ of \_\_\_\_

1. Visible Emissions Subtype:	2. Basis for Allowable Opacity: <input type="checkbox"/> Rule <input type="checkbox"/> Other
3. Allowable Opacity: Normal Conditions: % Exceptional Conditions: % Maximum Period of Excess Opacity Allowed: min/hour	
4. Method of Compliance:	
5. Visible Emissions Comment:	

**EMISSIONS UNIT INFORMATION**

Section [1] of [1]

**H. CONTINUOUS MONITOR INFORMATION**

**Complete if this emissions unit is or would be subject to continuous monitoring.**

**Continuous Monitoring System:** Continuous Monitor \_\_\_\_ of \_\_\_\_ NA

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	<input type="checkbox"/> Rule <input type="checkbox"/> Other
4. Monitor Information... Manufacturer: Model Number: Serial Number:	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment:	

**Continuous Monitoring System:** Continuous Monitor \_\_\_\_ of \_\_\_\_

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	<input type="checkbox"/> Rule <input type="checkbox"/> Other
4. Monitor Information... Manufacturer: Model Number: Serial Number:	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment:	

**EMISSIONS UNIT INFORMATION**

Section [1] of [1]

**I. EMISSIONS UNIT ADDITIONAL INFORMATION**

**Additional Requirements for All Applications, Except as Otherwise Stated**

1. Process Flow Diagram (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input checked="" type="checkbox"/> Attached, Document ID: <b>Attachment 1</b> <input type="checkbox"/> Previously Submitted, Date _____
2. Fuel Analysis or Specification (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date _____
3. Detailed Description of Control Equipment (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input checked="" type="checkbox"/> Attached, Document ID: <b>Attachment 1</b> <input type="checkbox"/> Previously Submitted, Date _____
4. Procedures for Startup and Shutdown (Required for all operation permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date _____ <input checked="" type="checkbox"/> Not Applicable (construction application)
5. Operation and Maintenance Plan (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date _____ <input checked="" type="checkbox"/> Not Applicable
6. Compliance Demonstration Reports/Records <input type="checkbox"/> Attached, Document ID: _____ Test Date(s)/Pollutant(s) Tested: _____ <input type="checkbox"/> Previously Submitted, Date: _____ Test Date(s)/Pollutant(s) Tested: _____ <input type="checkbox"/> To be Submitted, Date (if known): _____ Test Date(s)/Pollutant(s) Tested: _____ <input checked="" type="checkbox"/> Not Applicable  Note: For FESOP applications, all required compliance demonstration records/reports must be submitted at the time of application. For Title V air operation permit applications, all required compliance demonstration reports/records must be submitted at the time of application, or a compliance plan must be submitted at the time of application.
7. Other Information Required by Rule or Statute <input checked="" type="checkbox"/> Attached, Document ID: <b>Attachment 1</b> <input type="checkbox"/> Not Applicable

**EMISSIONS UNIT INFORMATION**

Section [1] of [1]

**Additional Requirements for Air Construction Permit Applications**

1. Control Technology Review and Analysis (Rules 62-212.400(6) and 62-212.500(7), F.A.C.; 40 CFR 63.43(d) and (e)) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
2. Good Engineering Practice Stack Height Analysis (Rule 62-212.400(5)(h)6., F.A.C., and Rule 62-212.500(4)(f), F.A.C.) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
3. Description of Stack Sampling Facilities (Required for proposed new stack sampling facilities only) <input checked="" type="checkbox"/> Attached, Document ID: <b>Attachment 1</b> <input type="checkbox"/> Not Applicable

**Additional Requirements for Title V Air Operation Permit Applications**

1. Identification of Applicable Requirements <input type="checkbox"/> Attached, Document ID: _____
2. Compliance Assurance Monitoring <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable
3. Alternative Methods of Operation <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable
4. Alternative Modes of Operation (Emissions Trading) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable
5. Acid Rain Part Application <input type="checkbox"/> Certificate of Representation (EPA Form No. 7610-1) <input type="checkbox"/> Copy Attached, Document ID: _____ <input type="checkbox"/> Acid Rain Part (Form No. 62-210.900(1)(a)) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date: _____ <input type="checkbox"/> Repowering Extension Plan (Form No. 62-210.900(1)(a)1.) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date: _____ <input type="checkbox"/> New Unit Exemption (Form No. 62-210.900(1)(a)2.) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date: _____ <input type="checkbox"/> Retired Unit Exemption (Form No. 62-210.900(1)(a)3.) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date: _____ <input type="checkbox"/> Phase II NOx Compliance Plan (Form No. 62-210.900(1)(a)4.) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date: _____ <input type="checkbox"/> Phase II NOx Averaging Plan (Form No. 62-210.900(1)(a)5.) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date: _____ <input type="checkbox"/> Not Applicable

**EMISSIONS UNIT INFORMATION**

Section [1] of [1]

**Additional Requirements Comment**

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**ATTACHMENT 1**

**AVAILABLE PLANT INFORMATION**





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*Property of Pacific Northwest Solutions, Inc.*

**Advanced Concepts & Design, Inc.**

77 Symons Street, Richland, WA 99352

509/943-1431

September 22, 1998

**Harvey Underwood**  
Operating Manager  
Pacific Northwest Solutions, Inc.  
2430 E. Foster Wells Road, Suite B  
Pasco, WA 99302-3140

Dear Mr. Underwood;

**RE: SOURCE TESTING RESULTS OF TRANSPORTABLE 10-34 FERTILIZER PLANT**

Advanced Concepts & Design, Inc., (AC&D) is enclosing the results of the source testing conducted at the 10-34-0 fertilizer generator during operations at the Tidewater Dock Area, Franklin County, WA. Testing was performed on August 5-6, 1998.

The data presented on the attached report describes the testing protocols and laboratory procedures used to complete this task. All methods were in general accordance with Environmental Protection Agency (EPA) Reference Methods as defined in 40 CFR 60 "Regulations on Standards of Performance for Stationary Sources, Appendix A"; EPA-Emission Measurement Center (EMC) Procedures; and in accord with AC&D's quality assurance plan.

We believe that this report and the data presented are reflective of the emissions on the day of testing and at the operational conditions of the generator. If you have any questions with this report, or the testing protocols, please call me at 509/943-1431.

Sincerely,

**Scott R. Somers**  
Source Tester

Enc.

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*Property of Pacific Northwest Solutions, Inc.*

**Advanced Concepts & Design, Inc.**

77 Symons Street, Richland, WA 99352  
509/943-1431

Date: September 22, 1998

To: Harvey Underwood  
Operating Manager  
Pacific Northwest Solutions, Inc.  
2430 E. Foster Wells Road, Suite B  
Pasco, WA 99302-3140  
509-547-5960

From: Scott R. Somers  
Source Tester  
Advanced Concepts & Design, Inc.  
77 Symons Street  
Richland, WA 99352  
509/943-1431

**RE: SOURCE TESTING RESULTS OF TRANSPORTABLE 10-34 FERTILIZER PLANT****Scope**

Advanced Concepts & Design, Inc., (AC&D) was requested by Pacific Northwest Solutions, Inc. (PNS) to conduct emissions testing of a transportable 10-34 fertilizer generator, unit number: 3304B. The scope of work was to conduct representative source tests for particulate and ammonia. This testing was similar to initial source testing which occurred on September 18, 1997. Follow-on testing was performed in order to verify operational changes and account for the additional year of PNS experience in fertilizer manufacturing. Washington State Department of Ecology (WDOE), Air Programs, Spokane Regional Office, was notified of the testing and granted a temporary air permit to PNS.

**Summary**

Source testing was conducted on August 5-6, 1998. Five representative particulate and ammonia emissions tests were performed at varying process conditions using Environmental Protection Agency's (EPA) methodologies. Detailed field notes, data sheets and laboratory results are attached. To account for different operating conditions, PNS stepped the fertilizer production rate of 36 to 42 tons per hour over the duration of the source testing.

At the operating conditions noted, the testing data indicated an overall average particulate emission rate of 0.5 pounds per hour and ammonia emission rate of 23.7 pounds per hour. Although particulate rates held fairly constant between the two different production rates (e.g. 36 and 42 tons/hr), ammonia emission rates varied noticeably based on production rates. Source test runs conducted at 36 tons/hr yielded an average ammonia rate of 9.8 lbs/hr, whereas at a production rate of 42 tons/hr yielded ammonia rates of 33.1 lbs/hr. These emission rates are far below the 1997 source testing results and, as reported by PNS, are more reflective and consistent with current process and operating parameters. Attached is a letter from PNS explaining the machine and operational improvements integrated into their 10-34 fertilizer manufacturing.

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### Industrial Process/Operation

This process is a method of producing fertilizer composed of nitrogen and phosphorous. The fertilizer generator is manufactured by Precision Tank and Equipment Company, Athens, IL. The process operates by combining nitrogen (anhydrous ammonia) with phosphorous (superphosphoric acid). The other raw ingredient is water, used to dilute the product to stable, standard grades of commercial fertilizer. Standard grades manufactured by this process are 10-34 and 11-37, which equates to a Nitrogen-Phosphorous Pentoxide. This plant was tested under 10-34 generation.

The production procedure is a three-step process. First, the ammonia and acid reacts. Second, reaction products are brought to correct proportions, and lastly the product is cooled. Within the reactor process temperatures reach ~650°F, discharged reactor product is then quenched and brought to the desired grade. Various water and product recirculation processes are incorporated to remove latent heat and balance final product prior to transfer to storage. Production rates for these sources are 30-40 tons/hour. Figure 1 represents a general schematic representation of these process and flow paths for 10-34 generators.

### Description of Evaluation

Test methods, analytical procedures, and calculations used in this testing were in general accordance with EPA Reference Methods as specified in 40 CFR 60, "Regulations on Standards of Performance for New Stationary Sources, Appendix A". The measurement and quality control procedures followed EPA Quality Assurance Handbook for Air Pollution Measurement Systems, Volume III, EPA-600/4-77-027b and AC&D quality assurance plan. All laboratory analytical and quality assurance procedures adhered to standard protocols. The methods utilized are briefly summarized below.

#### Reference Method 1: Sample and Velocity Traverses for Stationary Sources.

The number and locations of all isokinetic sampling traverse points were calculated using Reference Method 1 protocols. Like all transportable sources, this generator operates without a permanent stack structure. To accommodate EPA stack sampling guidelines for the extraction of representative samples from effluent sources, a temporary structure was built. The structure will allow for at least a two-duct diameter downstream and half-diameter upstream any flow disturbance. This is a rectangular discharge. Cooling tower emissions exits the 10-34 generator via a 84" x 108" demister pad, were it is immediately channeled through a canvas shroud with an exit dimension of 29" x 105". This latter dimension shall be considered the stack discharge area for computing equivalent duct diameters.

$$De = 2(L*W)/(L+W)$$

$$De = 2(105"*29")/(105"+29") = 45.4" \text{ or } \sim 4'$$

The equation indicates that sampling points must be at least 8' downstream and 2' upstream in order to attain EPA's minimum criteria. At this location, the stack area will be divided into 27 individual areas along 9 traverse lines. Each area will measure 9 5/8" x 11 5/8" and sample extraction will occur within each of these centroids. Figure 2 represents the configuration and layout of the stack extension and sampling locations.

#### Reference Method 2: Determination of Stack Gas Velocity and Volumetric Flow Rates.

Stack gas velocities were determined by the procedures outlined in this method. A Stausschiche (Type S) pitot tube, meeting the requirements for performance specification, calibration and operation, was used to measure velocity pressures; these pressure measurements, along with gas density determinations, were used to determine the stack velocities. Stack gas temperatures were measured at regular intervals throughout the sampling period using a Type K thermocouple. The pitot tube was found to comply with EPA specifications, and assigned a correction factor of 0.84.

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**Reference Method 4: Determination of Moisture Content in Stack Gases.**

Known volumes of gas were extracted from the stack, and the moisture was removed from the sample stream by condensation in impingers and adsorption on silica gel. Moisture determination was conducted simultaneously with particulate and ammonia emission measurements (Methods 5 and 206). Water gain in the impingers was measured volumetrically and water absorbed on the silica gel was determined gravimetrically. The impingers were kept chilled with ice over the duration of the sampling runs. The impinger catch was saved and subsequently used in Method 206 for ammonia determination.

**Reference Method 5: Determination of Particulate Emissions from Stationary Sources.**

Method 5 was used in conjunction with Reference Methods 1, 2, and 4 to determine the particulate emissions from this stationary source. Particulates were extracted isokinetically from the stack via a heated probe with a stainless steel liner and collected on a glass fiber filter housed within a hot-box located directly downstream of the probe. The probe and oven were maintained at ~250°F during sampling. The particulate matter, which includes any material that condenses at or above the specified filter temperature, were measured gravimetrically. After each run, the probe was cleaned and rinsed multiple times with an acetone/water mixture. The particulate weight contained in this rinsate was determined by heating the solution to dryness and measuring the weight gain of the container. This probe rinsate weight gain was added to the filter captured particulate mass, yielding total particulate mass. Particulate matter concentrations in the stack gas stream are expressed as grains per dry standard cubic feet (gr/dscf), as well as pounds per hour (lbs/hr).

The sampling runs consisted of isokinetic sampling at each of the 27 points. Sample time per traverse point was 3 minutes, thus yielding a total run time of 81 minutes. During sampling the isokinetic sampling rates were calculated using the nomograph supplied by the equipment manufacturer. After completing the sampling, the overall isokinetic rate for each run was calculated and were within the EPA quality control limits of 90-110 percent isokinetic. As noted on each of the test data sheets, each run satisfactorily passed the post leak test procedure, so no leak rate corrections were necessary. Sample train cleanup consisted of placing the filter and front half rinse solutions into pre-labeled containers. The impinger solution was sulfuric acid for the collection of ammonia gases as prescribed in Method 206.

**Reference Method 206: Determination of Ammonia from Stationary Sources.**

Ammonia was collected in unison with Method 5 particulates. Guidance procedures for ammonia utilized a slight modification of EPA's Draft Method 206 "Procedure for Collection and Analysis of Ammonia from Stationary Sources." The method states that ammonia collection would occur immediately after an instack filter (Method 17) using 0.1N sulfuric acid ( $H_2SO_4$ ). After review of the method, it was determined that it was not most appropriate method for this source given the large amount of free water vapor in the cooling tower discharge, thus making it impossible to apply instack filtration techniques. The method was appropriate for use with a Method 5 sampling train. WDOE and AC&D also determined that the amount of free water vapor would rapidly dilute the prescribed 0.1N acid solution, thus reducing the collection efficiency of the solution.

Upon a review of past 10-34 ammonia emission test procedures, it was noted that a 5N sulfuric acid solution has been used by the Tennessee Valley Authority (TVA) when conducting source testing of a Mears fertilizer generator. This method has been accepted by various State's Air Programs. After checking with DataChem Laboratory and WDOE, it was determined that this absorbing solution would be appropriate for this test. Therefore, after the Method 5 filter, two Greenburg-Smith impingers were filled with 100-mLs of 5N  $H_2SO_4$ . Sample recovery and

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cleanup consisted of determining impinger catch volume and then rinsing each impinger multiple times with DI water. Absorbing and rinsate solutions were combined and submitted for analysis.

**Results:**

Complete stack sampling data sheets for each of the five sample runs are attached. The average particulate and ammonia emission rates for the transportable 10-34 fertilizer generator operating between 36 to 42 tons/hour were 0.5 and 23.7 pounds per hour (lbs/hr), respectively. It was observed that particulate matter emission rates remained fairly constant and irrespective of production rate. Ammonia emission rates appeared to be more tightly bound by production rate and acid supplier. As observed, when the generator operated at 36 or 42 tons/hr the process yielded average ammonia discharges of 9.8 and 33.1 lbs/hr. A summary of the source sampling data is detailed in Table 1.

Copies of the calculation spreadsheets, field data sheets, laboratory analytical and quality control reports, generator production run sheets, and chain of custody forms are included for PNS and WDOE review and project documentation.

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**Table 1: Summary of Source Test Results, Transportable 10-34 Fertilizer Plant, August 5-6, 1998**

Parameters	Units	Run A	Run B	Run C	Run D	Run E
Process Operating Conditions	tons/hr	36	36	42	42	42
Average Barometric Pressure	"Hg	29.42	29.40	29.59	29.56	29.51
Average Stack Temperature	°F	137	134	135	139	140
Number of Traverse Points	---	27	27	27	27	27
Sample Time/Traverse Point	Minutes	3	3	3	3	3
Total Run Time	Minutes	81	81	81	81	81
Moisture Content	%H <sub>2</sub> O	26	28	29	29	30
Average Stack Velocity	ft/sec	17.43	19.35	22.67	21.70	21.79
Volumetric Flow Rate	cfm	22117	24552	28762	27530	26375
Total Moisture Gain (Impingers)	mLs	304	326	422	424	406
Total Volume Sampled	dscf	41.038	41.376	49.732	49.987	46.373
Total Particulate Mass	grams	0.005	0.008	0.009	0.013	0.010
Particulate Concentration	gr/dscf	0.002	0.003	0.003	0.004	0.003
Particulate Emission Rate	lbs/hr	0.3	0.5	0.5	0.7	0.6
Total Ammonia in Sample	mg	560	340	1260	1580	1040
Ammonia Emission Rate	lbs/hr	11.5	8.0	33.4	39.8	26.0
Isokinetic Rate	%	99	95	95	100	98

Average Particulate Emission Rate: 0.5 lbs/hr (all runs)

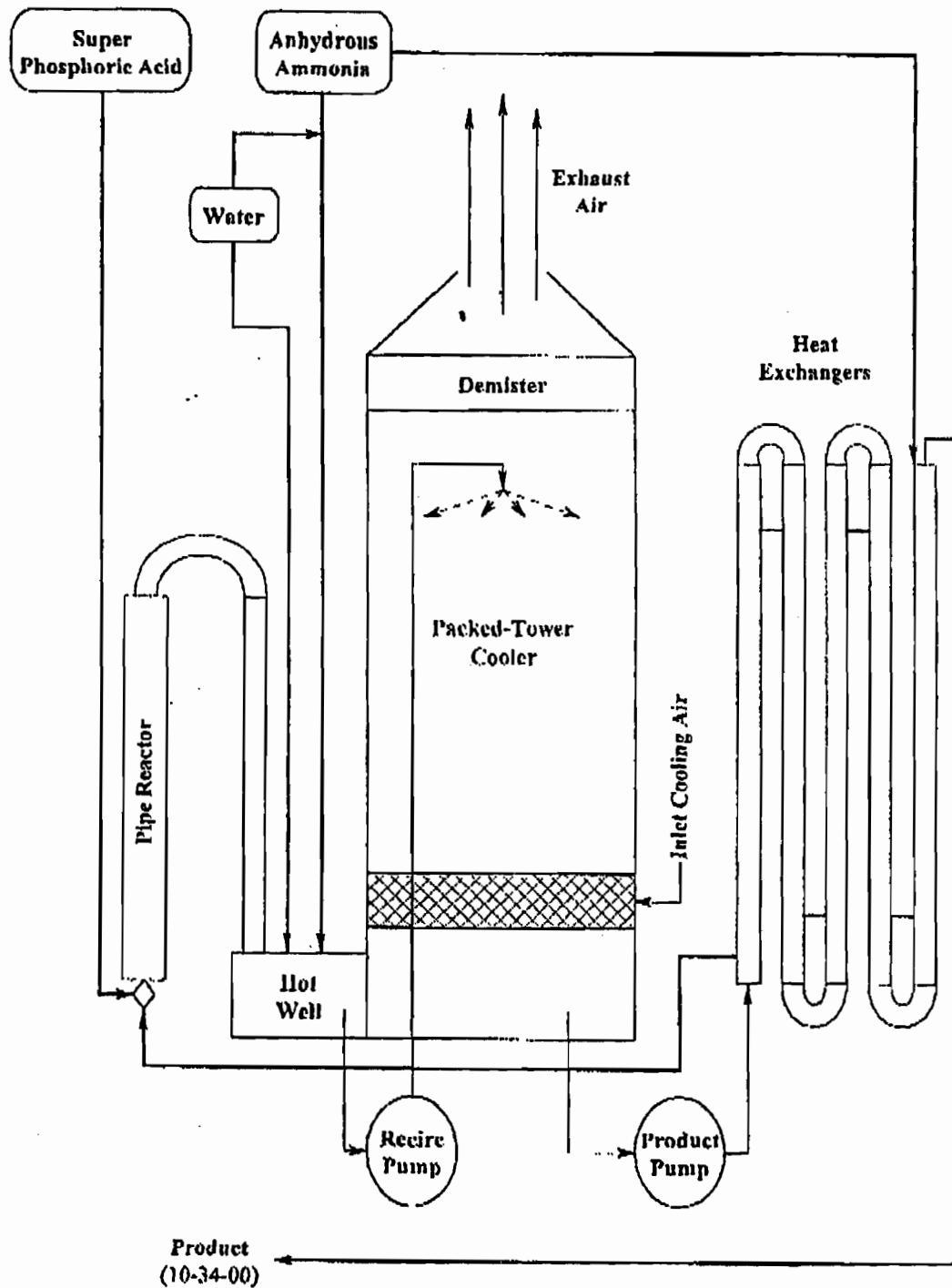
Average Ammonia Emission Rate: 23.7 lbs/hr (all runs)

Average Ammonia Emission Rate: 9.8 lbs/hr (at 36 Tons/hr)

Average Ammonia Emission Rate: 33.1 lbs/hr (at 42 Tons/hr)

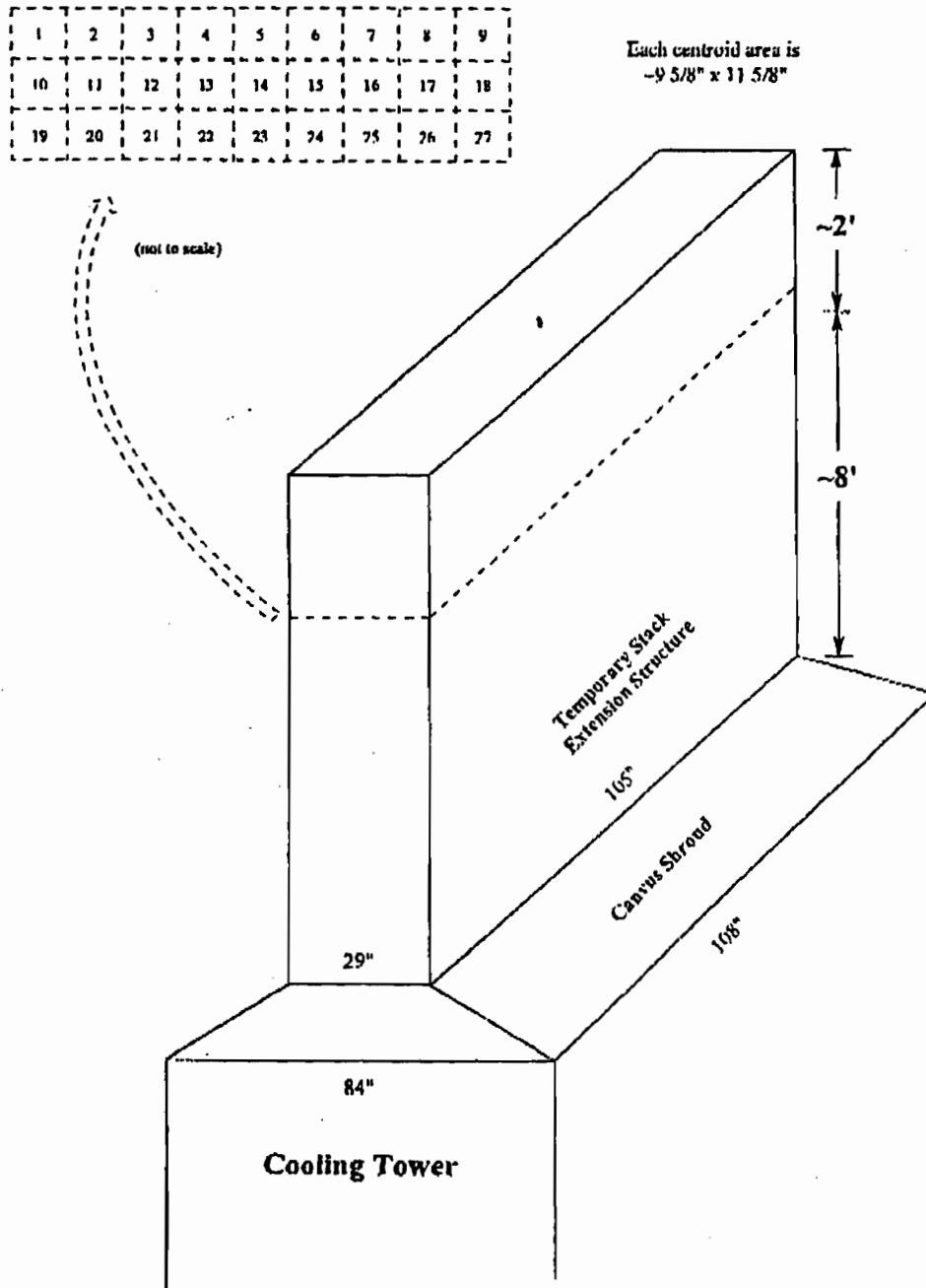
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**Figure 1: Typical 10-34 Fertilizer Generator Flowsheet**



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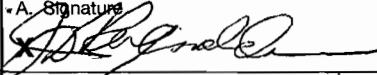
Figure 2: Temporary Stack Layout and Sampling Locations



Equivalent Duct Diameters (D<sub>e</sub>):

$$\frac{2(L \cdot W)}{(L+W)} \rightarrow \frac{2(29" \cdot 105")}{(29"+105")} \rightarrow \frac{6090}{134} \rightarrow 45.4" (\sim 4')$$



SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY	
<ul style="list-style-type: none"> <li>Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.</li> <li>Print your name and address on the reverse so that we can return the card to you.</li> <li>Attach this card to the back of the mailpiece, or on the front if space permits.</li> </ul>	A. Signature  <input checked="" type="checkbox"/> Agent <input type="checkbox"/> Addressee	
1. Article Addressed to: Mr. Paul H. Barrett White Springs Agricultural Chemicals, Inc. Post Office Box 300 White Springs, Florida 32096	B. Received by (Printed Name) J.D. Reynolds	C. Date of Delivery 11/24/01
	D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No	
	3. Service Type <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.	
	4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes	
2. Article Number (Transfer from service label)	7000 1670 0013 3109 9205	

PS Form 3811, August 2001

Domestic Return Receipt

102595-02-M-154

**U.S. Postal Service**  
**CERTIFIED MAIL RECEIPT**  
*(Domestic Mail Only; No Insurance Coverage Provided)*

OFFICIAL USE

Postage	\$	Postmark Here
Certified Fee		
Return Receipt Fee (Endorsement Required)		
Restricted Delivery Fee (Endorsement Required)		
<b>Total Postage &amp; Fees</b>	<b>\$</b>	

Mailed to: Paul H. Barrett, White Springs  
 Agricultural Chemicals, Inc.  
 Post Office Box 300  
 White Springs, Florida 32096

PS Form 3800, May 2000

See Reverse for Instructions

5026 BOTE ET00 029T 0000 7000

White Springs Agricultural Chemicals, Inc.  
Hamilton County

# The Jasper News

Published Weekly  
105 NE 2nd Avenue - Phone 792-2487  
Jasper, Hamilton County, Florida 32052

## STATE OF FLORIDA COUNTY OF HAMILTON:

Before the undersigned authority personally appeared

Melody Lee

who on oath says that she is

Legal Secretary

of The Jasper News, a weekly newspaper published at Jasper in  
Hamilton County, Florida; that the attached copy of advertisement,  
being a

Public Notice of Intent to Issue Air Construction  
Permit

in the matter of

White Springs Agricultural Chemicals, Inc.

was published in said newspaper in the issues of

October 14, 2004

Affiant further says that the said The Jasper News is a newspaper  
published at Jasper in said Hamilton County, Florida, and that the  
said newspaper has heretofore been continuously published in said  
Hamilton County, Florida, each week and has been entered as second  
class mail matter at the post office in Jasper, in said Hamilton County,  
Florida, for a period of one year next preceding the first publication of  
the attached copy of advertisement; and affiant further says that he  
has neither paid nor promised any person, firm or corporation any  
discount, rebate, commission or refund for the purpose of securing this  
advertisement for publication in said newspaper.

Melody Lee

Sworn to and subscribed before me this 20th day of October A.D 2004

Beverly J Miller  
My Commission DD104988  
Expires May 08, 2006



(SEAL)

Beverly J Miller  
Notary Public

Personally known  or produced identification

Type of identification produced \_\_\_\_\_

The Department of Environmental Protection (Department) gives notice of its intent to issue an air construction permit to White Springs Agricultural Chemicals, Inc. for construction of a 40 tons per hour liquid fertilizer production unit at the Suwannee River Chemical Complex located E of SR 137, E of US 41, N of White Springs, Hamilton County, Florida. The applicant's name and mailing address are: White Springs Agricultural Chemicals, Inc., P.O. Box 300, White Springs, FL 32096.

This project will not result in a significant increase in actual or potential emissions. Therefore, there is no requirement for review under the Department's Prevention of Significant Deterioration (PSD) rules and a Best Available Control Technology determination is not required. The liquid fertilizer production unit will consist of a pipe reactor for mixing superphosphoric acid and ammonia and associated equipment for controlling emissions from the process.

The Department will issue the FINAL permit, in accordance with the conditions of the DRAFT permit, unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The Department will accept written comments concerning the proposed permit issuance action for a period of 14 (fourteen) days from the date of publication of this Public Notice of Intent to Issue Air Construction Permit. Written comments should be provided to the Department's Bureau of Air Regulation at 2600 Blair Stone Road, Mail Station #5505, Tallahassee, FL 32399-2400. Any written comments filed shall be made available for public inspection. If comments received result in a significant change in the proposed agency action, the Department shall revise the proposed permit and require, if applicable, another Public Notice.

The Department will issue the permit with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to sections 120.569 and 120.57 F.S., before the deadline for filing a petition. The procedures for petitioning for a hearing are set forth below. Mediation is not available in this proceeding.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under sections 120.569 and 120.57 of the Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. Petitions filed by the permit applicant or any of the parties listed below must be filed within fourteen days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under section 120.60(3) of the Florida Statutes must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of this notice of intent, whichever occurs first. Under section 120.60(3), however, any person who asked the Department for notice of agency action may file a petition within fourteen days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. The failure of any person failing to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under sections 120.569 and 120.57 F.S. or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule, 28-106.205 of the Florida Administrative Code.

A petition that disputes the material facts on which the Department's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner, the name, address, and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of how and when petitioner received notice of the agency action or the proposed action; (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and (g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the agency to take with respect to the agency's proposed action.

A petition that does not dispute the material facts upon which the Department's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Department's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any such final decision of the Department on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

A complete project file is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

Department of Environmental Protection  
Bureau of Air Regulation  
111 S. Magnolia Drive, Suite 4  
Tallahassee, Florida 32301  
Telephone: 850/488-0114  
Fax: 850/921-9533

Department of Environmental Protection  
Northeast District Office  
7825 Baymeadows Way, Suite 200B  
Jacksonville, Florida 32256-7590  
Telephone: 904/807-3300  
Fax: 904/448-4319

The complete project file includes the application, Draft Permit, and the information submitted by the responsible official, exclusive of confidential records under section 403.111, F.S. Interested persons may contact the Administrator, North Permitting Section, at 111 South Magnolia Drive, Suite 4, Tallahassee, Florida 32301, or call 850/488-0114, for additional information.

10/14

**SENDER: COMPLETE THIS SECTION**

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Mr. Paul Barrett, General  
 Manager  
 White Springs Agricultural  
 Chemicals, Inc.  
 Post Office Box 300  
 White Springs, Florida 32096

2. Article Number (Copy from service label)

7000 1670 0013 3110 3414

**COMPLETE THIS SECTION ON DELIVERY**

A. Received by (Please Print Clearly)

J.D. LEYNOLD

B. Date of Delivery

10/4/04

C. Signature

X *J.D. LYNOLD*

- Agent  
 Addressee

D. Is delivery address different from item 1?

If YES, enter delivery address below:  Yes  No

3. Service Type

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SENT TO  
 Mr. Paul H. Barrett, General Manager  
 White Springs Agricultural Chemicals, Inc.  
 Street, Apt. No., or PO Box No.  
 Post Office Box 300

City, State, ZIP+4  
 White Springs Florida 32096