Memorandum

Florida Department of
Environmental Protection

TO: Howard L. Rhodes

THRU: Clair Fancy

THRU: Al Linero

FROM Syed Arif

DATE: November 20, 2000

SUBJECT: White Springs Agricultural Chemicals, Inc.
DEP File No. 0470002-039-AC; PSD-FL-297

Attached for your approval and signature is the final construction permit to ~~increase~~ reallocate production at the PCS (formerly Oxychem) facility in White Springs.

The A and C Phosphoric Acid Plants will be shut down, while process modifications and production increases at other phosphoric and superphoric acid plants will occur. The production of Dical (animal feed) will increase too.

Controls for fluoride emissions consist of scrubbers using process pond water. The BACT determination concluded that the existing control equipment meets BACT requirements. The fluoride BACT limits for the Dical and phosphoric acid plants were decreased from 0.02 to 0.012 lb/ton. The new limits were based on recent compliance tests conducted during 1995-1999. The lower value is equal to the lowest fluoride limit issued to-date for a phosphoric acid plant.

There was a comment from EPA during the public notice period. They want modeling of fluoride to determine whether predicted impacts from the proposed increase in fluoride emissions would be greater than the preconstruction monitoring de minimus impact level. They also want at least a qualitative assessment of the fluoride emissions on soils, vegetation, wildlife, and visibility.

We recognize the requirement to perform this modeling and the qualitative assessment. However, even if the de minimus level is exceeded there are no state or EPA-specified monitoring methods for fluoride.

The company has agreed to perform the modeling, but requests the permit at this time. We will require all future applicants to submit this information during the completeness review period and to provide a qualitative assessment of impacts.

I recommend your approval and signature.

AAL/sa

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
NOTICE OF FINAL PERMIT

In the Matter of an
Application for Permit

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

DEP File No. 0470002-039-AC
PSD-FL-297

Enclosed is the FINAL Permit Number PSD-FL-297 for increasing the production rates of B and D Phosphoric Acid Plants, Acid Clarification, C & D Superphosphoric Acid Plants and the X-Train (Dical) at the existing White Springs facility in Hamilton County. This permit is issued pursuant to Chapter 403, Florida Statutes and in accordance with Rule 62-212.400., F.A.C. - Prevention of Significant Deterioration(PSD).

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.

C.H. Fancy, P.E., 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 11/27/00 to the person(s) listed:

Vernon J. Lloyd, WSAC *
Gregg Worley, EPA
John Bunyak, NPS
Chris Kirts, DEP
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.

Charlotte D. Hayes 11/27/00
(Clerk) (Date)

FINAL DETERMINATION

White Springs Agricultural Chemicals, Inc.

Permit No. 0470002-039-AC, PSD-FL-297

Agricultural Chemicals Complex

An Intent to Issue an air construction permit to White Springs Agricultural Chemicals, Inc., to reallocate the phosphoric acid production capability within the complex in Hamilton County, was distributed on September 21, 2000. The Notice of Intent was published in the Jasper News on September 28, 2000. Copies of the draft construction permit were available for public inspection at the Department offices in Jacksonville and Tallahassee.

Comments from the U.S. Fish and Wildlife were received and addressed during the application review period. No additional comments were received during the public comment period following issuance of the Draft Permit.

The only comment during the 30-day public comment period was from EPA. The comment is as follows:

> *In its letter dated October 30, 2000, EPA comments that although no ambient air quality standard or PSD increment exists for F, the applicant must still address the requirement for pre-construction monitoring of F. This is in direct accordance to Florida Rule 62-212-400(5)(f). A de minimis concentration has been specified for F (see Table C-3 of EPA's New Source Review Workshop Manual) above which pre-construction monitoring would typically be required. The applicant needs to model the proposed increase in F emissions and compare the predicted impact to the de minimis level to determine whether or not pre-construction monitoring will be required. Also the applicant must address the additional impacts on soils, vegetation, wildlife, and visibility with respect to F.*

The Department has not specified an ambient monitoring method for fluorides. Also the Department does not have assessment techniques to make quantitative predictions of additional fluoride impacts on soils, vegetation, wildlife, and visibility.

The present project is a re-allocation of production among existing plants. Although emissions will increase based on a comparison of past actual to future potential emissions, actual emissions will probably remain about the same. Therefore no measurable impacts are likely.

The Department will require future applicants to perform the modeling as required by the rules and to qualitatively address the impacts of fluoride emissions on the soils, vegetation, wildlife, and visibility. The applicant and its consultant have agreed to provide the required modeling for the record on this project.

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

Department of Environmental Protection

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

Jeb Bush
Governor

David B. Struhs
Secretary

PERMITTEE:

White Springs Agricultural Chemicals, Inc.
Post Office Box 300
White Springs, Florida 32096

File No.	0470002-039-AC
Permit No.	PSD-FL-297
SIC No.	2874
Project:	Agricultural Chemicals Complex
Expires:	October 1, 2003

Authorized Representative:

Vernon J. Lloyd
Vice President, Production

PROJECT AND LOCATION:

Permit for the construction /modification of the Agricultural Chemicals Complex to increase production rates of B and D Phosphoric Acid Plants, Acid Clarification, C & D Superphosphoric Acid Plant and the X Train (Dical) at the White Springs facility, east of State Road 137, north of White Springs, Hamilton County. UTM coordinates are Zone 17; 328.3 km E; 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 the Florida Administrative Code (F.A.C.) Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297. The above named permittee is authorized to modify 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 ARE MADE A PART OF THIS PERMIT:

Appendix BD	BACT Determination
Appendix GC	Construction Permit General Conditions

Howard L. Rhodes, Director
Division of Air Resources Management

SECTION I. FACILITY INFORMATION

FACILITY DESCRIPTION

The Agricultural Chemicals Complex at White Springs is an agricultural chemicals manufacturing facility. Phosphate rock is reacted with sulfuric acid (purchased or produced on-site) to make phosphoric acid. The phosphoric acid is further processed into various products, including superphosphoric acid, monoammonium phosphate (MAP), diammonium phosphate (DAP) and animal feed ingredients.

This permit allows conversion of the B Phosphoric Acid Plant to a hemi-hydrate process and an increase in the processing rate from 83 to 100 tons per hour P_2O_5 input; an increase in the processing rate of D Phosphoric Acid Plant from 95 to 110 tons per hour P_2O_5 input; an increase in the processing rate of Acid Clarification from 100 to 110 tons per hour P_2O_5 input; an increase in the processing rate of C & D Superphosphoric Acid Plant from 95 to 110 tons per hour P_2O_5 input; and an increase in the production rate of the X Train (Dical) from 45 to 55 tons per hour product.

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.

PERMIT SCHEDULE:

- 07-26-2000: Date of Receipt of Application
- 08-11-2000: Application deemed complete
- 09-21-2000: Intent issued

RELEVANT DOCUMENTS:

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

- Application received 07-26-2000
- Department's incompleteness letter dated 08-09-2000
- Applicant's letter dated 08-11-2000
- Fish and Wildlife Service letter dated 08-04-2000
- Technical Evaluation and Preliminary Determination dated 09-21-2000
- EPA letter dated October 30, 2000
- Best Available Control Technology determination (issued concurrently with permit)

SECTION II. EMISSION UNIT(S) ADMINISTRATIVE REQUIREMENTS

1. Regulating Agencies: All documents related to applications for permits to operate, reports, tests, minor modifications and notifications shall be submitted to the Department of Environmental Protection, Northeast District Office located at 7825 Baymeadows Way, Suite B-200, Jacksonville, Florida 32256-7590, and phone number (904) 448-4310. All applications for permits to construct or modify an emission unit(s) *subject to the Prevention of Significant Deterioration (PSD)* should be submitted to the Bureau of Air Regulation (BAR), Florida Department of Environmental Protection (FDEP) located at 2600 Blairstone Road, Tallahassee, Florida 32399-2400 and phone number (850)488-0114.
2. General Conditions: The owner and 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.]**
3. Terminology: The terms used in this permit have specific meanings as defined in the corresponding chapters of the Florida Administrative Code.
4. Forms and Application Procedures: 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. **[Rule 62-210.900, F.A.C.]**
5. Expiration: This air construction permit shall expire on **October 1, 2003. [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 permitting authority 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]**
6. Applicable Regulations: The facility is subject to the following regulations: Florida Administrative Code Chapters 62-4; 62-103; 62-204; 62-210; 62-212, 62-296, and 62-297. Issuance of this permit does not relieve the facility owner or operator from compliance with any applicable federal, state, or local permitting requirements or regulations. **[Rule 62-210.300, F.A.C.]**

COMMON CONDITIONS: 40 CFR 60 - NEW SOURCE PERFORMANCE STANDARDS

This permit addresses the following emission units.

EMISSION UNIT NO.	EMISSION UNIT DESCRIPTION
020	B Phosphoric Acid Plant
069	D Phosphoric Acid Plant
070	C & D Superphosphoric Acid Plant

These emission units shall comply with all applicable requirements of 40 CFR 60, General provisions, Subpart A, adopted by reference in Rule 62-204.800(7), F.A.C.

- 40 CFR 60.7, Notification and record keeping
- 40 CFR 60.8, Performance tests
- 40 CFR 60.11, Compliance with standards and maintenance requirements
- 40 CFR 60.12, Circumvention
- 40 CFR 60.13, Monitoring requirements
- 40 CFR 60.19, General notification and reporting requirements

The B and D Phosphoric Acid Plants are subject to the applicable requirements of the New Source Performance Standards (NSPS) adopted by reference in Rules 62-204.800, F.A.C., including:

- 40 CFR 60 Subpart T, Standards of Performance for Wet-Process Phosphoric Acid Plants

The C & D Superphosphoric Acid Plant is subject to the applicable requirements of the New Source Performance Standards (NSPS) adopted by reference in Rules 62-204.800, F.A.C., including:

- 40 CFR 60 Subpart U, Standards of Performance for Superphosphoric Acid Plants

SPECIFIC CONDITIONS :

The Specific Conditions listed in this subsection apply to the following emission units:

EMISSION UNIT NO.	EMISSION UNIT DESCRIPTION
004	X-Train (Dical)
020	B Phosphoric Acid Plant
069	D Phosphoric Acid Plant
070	C & D Superphosphoric Acid Plant
071	Acid Clarification

1. Unless otherwise indicated, the construction and operation of the subject Agricultural Chemicals production facilities shall be in accordance with the capacities and specifications stated in the application. **[Rule 62-210.300, F.A.C.]**

2. The subject emissions units shall comply with all applicable provisions of the 40 CFR 60 New Source Performance Standards for Wet-Process Phosphoric Acid Plants, Subpart T and Superphosphoric Acid Plants, Subpart U. **[Rule 62-204.800 F.A.C.]**

3. The maximum daily (24-hour) average and annual operation rates shall not exceed:

   a. X-Train (Dical) – 55 tons per hour (tph) product, 400,000 tons per year (tpy) product;

   b. B Phosphoric Acid Plant - 100 tph P_2O_5 input, 600,000 tpy P_2O_5 input;

   c. D Phosphoric Acid Plant - 110 tph P_2O_5 input, 800,000 tpy P_2O_5 input;

   d. C & D Superphosphoric Acid Plant - 110 tph P_2O_5 input, 876,000 tpy P_2O_5 input; and,

   e. Acid Clarification - 110 tph P_2O_5 input, 876,000 tpy P_2O_5 input.

   [Rule 62-210.200, F.A.C. (Definitions - Potential Emissions)]

4. The subject emission units are allowed to operate continuously (8760 hours/year).

   [Rule 62-210.200, F.A.C. (Definitions - Potential Emissions)]

5. Total fluoride emissions shall not exceed the following:

   a. X-Train (Dical) – 1.1 lb/hr and 4.0 tpy, based on 0.02 lb/ton product;

   b. B Phosphoric Acid Plant – 1.2 lb/hr and 3.6 tpy, based on 0.012 lb/ton P_2O_5 input;

   c. D Phosphoric Acid Plant - 1.32 lb/hr and 4.8 tpy, based on 0.012 lb/ton P_2O_5 input;

   d. C & D Superphos. Acid Plant – 0.96 lb/hr and 3.8 tpy, based on 0.0087 lb/ton P_2O_5 input;

   e. Acid Clarification – 3.3 lb/hr and 13.1tpy, based on 0.03 lb/ton P_2O_5 input.

   [Rule 62-212.400, F.A.C.]

6. Particulate matter emissions shall not exceed the following:

   a. X Train – 9.9 lb/hr and 36.0 TPY;

   b. Dedust Baghouse – 3.2 lb/hr and 11.6 TPY;

   c. Shipping Baghouse – 2.3 lb/hr and 8.4 TPY;

   d. Limestone Bin Baghouse – 0.77 lb/hr and 2.8 TPY;

   e. Reclaim Bin Baghouse – 0.77 lb/hr and 2.8 TPY; and,

   f. Fugitive Dust Collection Baghouse – 5.1 lb/hr and 18.0 TPY.

   [Rule 62-210.200, F.A.C.]

7. Visible emissions from all scrubber stacks shall not exceed 20% opacity.

   [Rule 62-212.400, F.A.C.]

8. The X-Train natural gas firing rate shall not exceed 564 MMCF per year. The permittee shall maintain records of the fuel use. **[Rule 62-210.200, F.A.C.]**

9. Visible emissions from all baghouse stacks shall not exceed 20% opacity.

   [Rule 62-296.320, F.A.C.]

10. The permittee shall install, calibrate, operate and maintain monitoring devices that continuously measure and record the total pressure drop across each scrubbing system. Accuracy of the monitoring devices shall be ± 5% over the operating range. **[Rules 62-297.310, 62-204.800, F.A.C.; 40 CFR 60.203; 40 CFR 60. 213]**

11. Before this construction permit expires, the subject emission units shall be tested for compliance with the above emission limits. For the duration of all tests the emission unit 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.]**

12. The Department's Northeast District office in Jacksonville shall be notified in writing at least 15 days prior to the compliance tests. 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.]**

13. The compliance test procedures shall be in accordance with EPA Reference Methods 1, 2, 3, 4, 5, 9 and 13A or 13B, as appropriate, as published in 40 CFR 60, Appendix A. 60, Appendix A. Testing using EPA Reference Method 5 shall be waived for all baghouses when a visible emission limit of 5 percent opacity is met. **[Rules 62-204.800 and 62-297.310(7)(c), F.A.C.]**

14. All measurements, records, and other data required to be maintained by this facility shall be retained for at least five (5) years following the data on which such measurements, records, or data are recorded. These data shall be made available to the Department upon request. **[Rule 62-4.070(3), F.A.C.]**

15. The permittee shall install, calibrate, maintain, and operate monitoring devices which can be used to determine the mass flow of phosphorus-bearing feed material to the phosphoric and superphosphoric acid processes. The monitoring devices shall have an accuracy of ±5 percent over the operating range. The permittee shall maintain a daily record of equivalent P_2O_5 feed by first determining the total mass rate in metric ton/hour of phosphorus bearing feed using the flow monitoring device meeting the requirements of 40 CFR 60.203(a), or 40 CFR 60.213(a), and then by proceeding according to 40 CFR 60.204(b)(3) or 40 CFR 60.214(b)(3), as applicable. **[Rule 62-204.800, F.A.C.; 40 CFR 60.203(b); 40 CFR 60.213(b)]**

16. No person shall cause, suffer, allow, or permit the discharge of air pollutants which cause or contribute to an objectionable odor. **[Rule 62-296.320, F.A.C.]**

17. No person shall circumvent any air pollution control device, or allow the emission of air pollutants without the applicable air pollution control device operating properly. **[Rule 62-210.650, F.A.C.]**

18. The subject emissions units shall be subject to the following:

- Excess emissions resulting from startup, shutdown or malfunction of any source shall be permitted providing (1) best operational practices to minimize emissions are adhered to and (2) the duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration. **[Rule 62-210.700, F.A.C.]**
- Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during startup, shutdown, or malfunction shall be prohibited. **[Rule 62-210.700, F.A.C.]**
- Considering operational variations in types of industrial equipment operations affected by this rule, the Department may adjust maximum and minimum factors to provide reasonable and practical regulatory controls consistent with the public interest. **[Rule 62-210.700, F.A.C.]**
- In case of excess emissions resulting from malfunctions, each source shall notify the Department or the appropriate Local Program in accordance with Rule 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the Department. **[Rule 62-210.700, F.A.C.]**

19. The permittee shall submit an Annual Operating Report using DEP Form 62-210.900(4) to the Department's Northeast District office by March 1 of the following year for the previous year's operation. **[Rule 62-210.370, F.A.C.]**

20. The permittee shall permanently shut down A and C Phosphoric Acid Plants upon commencing commercial operation of the B and D Phosphoric Acid Plants. **[Rule 62-210.200, F.A.C. (Definitions - Potential Emissions)]**

21. By February 1, 2001 the permittee shall submit predictions of fluoride concentrations caused by this project for comparison to the fluoride de minimus ambient impact level. Modeling shall be performed using Department and EPA modeling techniques. **[Rule 62-212.400(5)(f), F.A.C.]**

APPENDIX BD
BEST AVAILABLE CONTROL TECHNOLOGY DETERMINATION (BACT)

Agricultural Chemicals Complex
White Springs Agricultural Chemicals, Inc.
PSD-FL-297/ 0470002-039-AC
White Springs, Hamilton County

The project proposed by White Springs Agricultural Chemicals, Inc. includes the conversion of the B Phosphoric Acid Plant to a hemi-hydrate process and an increase in the processing rate from 83 to 100 tons per hour P_2O_5 input; an increase in the processing rate of D Phosphoric Acid Plant from 95 to 110 tons per hour P_2O_5 input; an increase in the processing rate of Acid Clarification from 100 to 110 tons per hour P_2O_5 input; an increase in the processing rate of C & D Superphosphoric Acid Plant from 95 to 110 tons per hour P_2O_5 input; and an increase in the production rate of the X Train (Dical) from 45 to 55 tons per hour product.

The proposed modification will result in a significant increase in emissions of fluorides (F). The project is, therefore, subject to Prevention of Significant Deterioration (PSD) review in accordance with Rule 62-212.400, Florida Administrative Code (F.A.C.). A Best Available Control Technology (BACT) determination is part of the review required by Rules 62-212.400 and 62-296, F.A.C.

DATE OF RECEIPT OF COMPLETE BACT APPLICATION:

August 11, 2000

BACT DETERMINATION PROCEDURE:

In accordance with Chapter 62-212, F.A.C., this BACT determination is based on the maximum degree of reduction of each pollutant emitted which the Department of Environmental Protection (Department), on a case by case basis, taking into account energy, environmental and economic impacts, and other costs, determines is achievable through application of production processes and available methods, systems, and techniques. In addition, the regulations state that, in making the BACT determination, the Department shall give consideration to:

- Any Environmental Protection Agency determination of BACT pursuant to Section 169, and any emission limitation contained in 40 CFR Part 60 - Standards of Performance for New Stationary Sources or 40 CFR Part 61 - National Emission Standards for Hazardous Air Pollutants.

- All scientific, engineering, and technical material and other information available to the Department.

- The emission limiting standards or BACT determination of any other state.

- The social and economic impact of the application of such technology.

The EPA currently stresses that BACT should be determined using the "top-down" approach. The first step in this approach is to determine, for the emission unit in question, the most stringent control available for a similar or identical emission unit or emission unit category. If it is shown that this level of control is technically or economically unfeasible for the emission unit in question, then the next most stringent level of control is determined and similarly evaluated. This process continues until the BACT level under consideration cannot be eliminated by any substantial or unique technical, environmental, or economic objections.

The air pollutant emissions from this facility can be grouped into categories based upon the control equipment and techniques that are available to control emissions from these emission units. Using this approach, the emissions can be classified as indicated below:

- ***Fluorides*** (HF, SiF_4). Controlled generally by scrubbing with pond water.
- ***Particulate Matter*** (PM, PM_{10}). Controlled generally by wet scrubbing or filtration.
- ***Combustion Products*** (SO_2, NO_X, PM). Controlled generally by good combustion of clean fuels.
- ***Products of Incomplete Combustion*** (CO, VOC). Controlled generally by proper combustion.

Grouping the pollutants in this manner facilitates the BACT analysis because it enables the equipment available to control the type or group of pollutants emitted and the corresponding energy, economic, and environmental impacts to be examined on a common basis.

Although all of the pollutants addressed in the BACT analysis may be subject to a specific emission limiting standard as a result of PSD review, the control of "non-regulated" air pollutants is considered in imposing a more stringent BACT limit on a "regulated" pollutant (i.e., PM, SO_2, H_2SO_4, fluorides, etc.), if a reduction in "non-regulated" air pollutants can be directly attributed to the control device selected as BACT for the abatement of the "regulated" pollutants.

BACT LIMITS PROPOSED BY APPLICANT:

POLLUTANT	EMISSION LIMIT	LIMIT BASIS	CONTROL TECHNOLOGY
F (X Train)	1.65 lb/hr	0.03 lb/ton product	Wet scrubbers using pond water
F (B Phos.Acid)	1.35 lb/hr	0.0135 lb/ton P_2O_5 input	Wet scrubbers using pond water
F (D Phos.Acid)	1.49 lb/hr	0.0135 lb/ton P_2O_5 input	Wet scrubbers using pond water
F (C&D Superphos.)	0.96 lb/hr	0.0087 lb/ton P_2O_5 input	Wet scrubbers using pond water
F(Acid Clarification)	3.3 lb/hr	0.03 lb/ton P_2O_5 input	Wet scrubbers using pond water

BACT POLLUTANT ANALYSIS

Fluoride-containing gases, including hydrogen fluoride (HF), are evolved during the chemical reactions from the processes associated with the above emission units. Scrubbing the gas stream with pond water removes most of the fluoride evolved from the process. The applicant has proposed that the existing emission control equipment be considered as BACT.

BACT DETERMINATION BY THE DEPARTMENT:

Based on the information provided by the applicant and other information available to the Department, the following emission limits are established employing the top-down BACT approach.

POLLUTANT	EMISSION LIMIT	LIMIT BASIS	CONTROL TECHNOLOGY
F (X Train)	1.1 lb/hr	0.02 lb/ton product	Wet scrubbers using pond water
F (B Phos.Acid)	1.2 lb/hr	0.012 lb/ton P_2O_5 input	Wet scrubbers using pond water
F (D Phos.Acid)	1.32 lb/hr	0.012 lb/ton P_2O_5 input	Wet scrubbers using pond water
F (C&D Superphos.)	0.96 lb/hr	0.0087 lb/ton P_2O_5 input	Wet scrubbers using pond water
F(Acid Clarification)	3.3 lb/hr	0.03 lb/ton P_2O_5 input	Wet scrubbers using pond water

The top-down BACT determination for fluorides identified the control technologies listed below starting with the most stringent:

1. Packed scrubber using once-through fresh water.
2. Packed scrubber using neutralized water from a dedicated pond (fresh water makeup).
3. Existing scrubber, using packing, and process cooling pond water.

Use of once-through fresh water would achieve the highest level of fluoride removal but this option is not practical for operations where water conservation is required and plant water balance problems would be created.

Option 2 is possible, the main considerations being the cost of installing the pond and equipment and the cost of operating a lime treatment unit. Costs for Option 2, based on data for a similar project amounted to almost $40,000 per ton of fluorides removed. FDEP considers this figure sufficiently high to rule out Option 2. However, it should be noted that the low magnitude of fluoride emissions relative to their potential environmental impact justifies the consideration of higher fluoride cost effectiveness figures relative to the high tonnage pollutants such as sulfur dioxide and nitrogen oxides.

For the proposed project, Option 3 is determined by the top-down approach as the basis for the fluoride BACT emission limit.

The BACT limits tabulated above for the emission units evaluated are based on the recent compliance test results for the units between 1995 - 1999. These limits have been demonstrated to be achievable based on the historical test data for the emission units.

COMPLIANCE

Compliance with the fluoride limit shall be demonstrated using EPA Reference Method 13A or 13B as contained in 40 CFR 60, Appendix A.

DETAILS OF THE ANALYSIS MAY BE OBTAINED BY CONTACTING:

Syed Arif, P.E., Permit Engineer, New Source Review Section
Department of Environmental Protection
Bureau of Air Regulation
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Recommended By:

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

11/22/00
Date:

Approved By:

Howard L. Rhodes, Director
Division of Air Resources Management

11/22/00
Date:

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 Statutes. Such evidence shall only be used to the extend 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 *(X)*
(b) Determination of Prevention of Significant Deterioration *(X)*; and
(c) Compliance with New Source Performance Standards *(X)*.

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 for 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.

Is your RETURN ADDRESS completed on the reverse side?

SENDER:
- Complete items 1 and/or 2 for additional services.
- Complete items 3, 4a, and 4b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write *"Return Receipt Requested"* on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):
1. ☐ Addressee's Address
2. ☐ Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:

Mr. Vernon J. Lloyd
White Springs Agricultural
Chemicals, Inc.
PO Box 300
White Springs, FL 32096

4a. Article Number
7099 3400 0000 1453 3402

4b. Service Type
☐ Registered ☒ Certified
☐ Express Mail ☐ Insured
☐ Return Receipt for Merchandise ☐ COD

7. Date of Delivery
11-30-00

5. Received By: *(Print Name)*
J. D. REYNOLDS

6. Signature: *(Addressee or Agent)*
X

8. Addressee's Address *(Only if requested and fee is paid)*

PS Form **3811**, December 1994 102595-98-B-0229 Domestic Return Receipt

Thank you for using Return Receipt Service.

7099 3400 0000 1453 3402

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

Article Sent To:
Mr. Vernon J. Lloyd

Postage	$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	$

White Springs Chemical
Postmark Here

Name (Please Print Clearly) (to be completed by mailer)
Mr. Vernon J. Lloyd
Street, Apt. No.; or PO Box No.
PO Box 300
City, State, ZIP+4
White Springs, FL 32096

PS Form 3800, July 1999 See Reverse for Instructions

The Jasper News

Published Weekly
Post Office Drawer D - Phone 792-2487
Jasper, Hamilton County, Florida 32052

STATE OF FLORIDA

COUNTY OF HAMILTON

Before the undersigned authority personally a

Angie Sparks

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

in the matter of

Air construction permit

was published in said newspaper in the issues of

September 28, 2000

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.

Angie Sparks

Sworn to and subscribed before me this 29th

day of September ,A.D 20 00

Christine M. White

CHRISTINE M. WHITE
Notary Public, State of Florida
My comm. exp. Sept. 4, 2004
Comm. No. CC 964976

(SEAL) Notary Public

Personally known_____or produced identification_____

Type of identification produced_____

RECEIVED

OCT 09 2000

BUREAU OF AIR REGULATION

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
DEP File No. 0470002-039-AC (PSD-FL-297)
Agricultural Chemical Complex
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. to reallocate the phosphoric acid production capability within the complex and to increase the processing rates of the Acid Clarification Plant, C & D Superphosphoric Acid Plant and the X Train (Dical) at its White Springs facility. The plant is located east of State Road 137, north of White Springs, Hamilton County.

A Best Available Control Technology (BACT) determination was required for fluorides pursuant to Rule 62-212.400, F.A.C. The applicant's name and address are: White Springs Agricultural Chemicals, Inc., P.O. Box 300, White Springs, Florida 32096.

The A and C Phosphoric Acid Plants will be shut down; the B Phosphoric Acid Plant will be converted to a hemi-hydrate process and the process rate will be increased from 83 to 100 tons per hour P2O5 input; the D Phosphoric Acid Plant process rate will be increased from 95 to 110 tons per hour P2O5 input; the Acid Clarification process rate will be increased from 100 to 110 tons per hour P2O5 input; the C & D Superphosphoric Acid Plant process rate will be increased from 95 to 110 tons per hour P2O5 input; and, the X Train (Dical) production rate will be increased from 45 to 55 tons per hour product. Controls for fluoride emissions consist of scrubbers using process pond water. An air quality impact analysis was not required.

The Department will issue the Draft Air Construction Permit and subsequent Final Air Construction Permit in accordance with the conditions of the Draft Air Construction Permit unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions. The permitting authority has determined that an Air Construction Permit is required.

The Department will accept written comments concerning the proposed permit issuance action for a period of 30 (thirty) days from the date of publication of iPUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT.i 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 written comments received result in a significant change in the proposed agency action, the Department shall revise the proposad 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 personis 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.

Department of
Environmental Protection

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

Jeb Bush
Governor

David B. Struhs
Secretary

September 18, 2000

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

Re: DRAFT Permit No. 0470002-039-AC (PSD-FL-297)
White Springs Facility, Agricultural Chemicals Complex

Dear Mr. Lloyd:

Enclosed is one copy of the Draft Air Construction Permit for the White Springs Facility, Agricultural Chemicals Complex located at east of State Road 137, north of White Springs, Hamilton County. The Technical Evaluation and Preliminary Determination, Best Available Control Technology, the Department's Intent to Issue Air Construction Permit and the "PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT" are also included.

The "PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT" must be published. Proof of publication, i.e., newspaper affidavit, must be provided to the Department's Bureau of Air Regulation office within 7 (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 A. A. Linero, P.E., Administrator, New Source Review Section at the above letterhead address. If you have any other questions, please contact Syed Arif, P.E., at 850/921-9528.

Sincerely,

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

CHF/sa

Enclosures

Memorandum

Florida Department of
Environmental Protection

TO: Clair Fancy

THRU: Al Linero

FROM: Syed Arif

DATE: September 13, 2000

SUBJECT: White Springs Agricultural Chemicals, Inc.
0470002-039-AC (PSD-FL-297)

Attached is the Public Notice package for increasing the production rate at the above referenced facility.

The A and C Phosphoric Acid Plants will be shut down; the B Phosphoric Acid Plant will be converted to a hemi-hydrate process and the process rate will be increased from 83 to 100 tons per hour P_2O_5 input; the D Phosphoric Acid Plant process rate will be increased from 95 to 110 tons per hour P_2O_5 input; the Acid Clarification process rate will be increased from 100 to 110 tons per hour P_2O_5 input; the C & D Superphosphoric Acid Plant process rate will be increased from 95 to 110 tons per hour P_2O_5 input; and, the X Train (Dical) production rate will be increased from 45 to 55 tons per hour product. An air quality impact analysis was not required.

The only pollutant that underwent PSD review was Fluorides. Controls for fluoride emissions consist of scrubbers using process pond water. The BACT determination concluded that the existing control equipment meets BACT requirements. The fluoride BACT limit for X-Train, B & D Phosphoric acid plants were reduced to 0.02 lb/ton product for the X-Train and 0.012 lb/ton P_2O_5 input for the B & D Phosphoric acid plants. The new limits were based on the past actuals as demonstrated during the compliance test results for 1995-1999.

September 13 is Day 29 for the project.

I recommend your approval and signature.

AAL/sa

Attachments

In the Matter of an
Application for Permit by:

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

DEP File No. 0470002-039-AC
Draft Permit No. PSD-FL-297
Agricultural Chemicals Complex
Hamilton County

INTENT TO ISSUE AIR CONSTRUCTION PERMIT

The Department of Environmental Protection (Department) gives notice of its intent to issue an air construction permit (copy of DRAFT Permit attached) for the proposed project, detailed in the application specified above and the attached Technical Evaluation and Preliminary Determination, for the reasons stated below.

The applicant, White Springs Agricultural Chemicals, Inc., submitted a complete application on August 11, 2000 to the Department for an air construction permit to reallocate the phosphoric acid production capability within the complex and to increase the processing rates of the Acid Clarification Plant, C & D Superphosphoric Acid Plant and the X Train (Dical) at its White Springs facility located east of State Road 137, north of White Springs, Hamilton County.

The Department has permitting jurisdiction under the provisions of Chapter 403, Florida Statutes (F.S.), and 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 a review for the Prevention of Significant Deterioration (PSD), a determination of Best Available Control Technology (BACT) and an air construction permit are required for the proposed work.

The Department intends to issue this Air Construction Permit based on the belief that reasonable assurances have been provided to indicate that operation of these emission units 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, and 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 Draft Air Construction Permit and subsequent Final Air Construction Permit in accordance with the conditions of the attached Draft Air Construction 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 30 (thirty) days from the date of publication of 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 written comments received result in a significant change in the Draft Air Construction Permit, the permitting authority shall issue a Revised Draft Air Construction 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.

C. H. Fancy, P.E., 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, Technical Evaluation and Preliminary Determination, Draft BACT Determination, and the DRAFT permit) was sent by certified mail (*) and copies were mailed by U.S. Mail before the close of business on 9/21/00 to the person(s) listed:

Vernon J. Lloyd, WSAC*
Gregg Worley , EPA
John Bunyak, NPS
Chris Kirts, DEP
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.

Charlotte J. Hayes (Clerk) 9/21/00 (Date)

NOTICE TO BE PUBLISHED
IN THE NEWSPAPER

PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
DEP File No. 0470002-039-AC (PSD-FL-297)
Agricultural Chemical Complex
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. to reallocate the phosphoric acid production capability within the complex and to increase the processing rates of the Acid Clarification Plant, C & D Superphosphoric Acid Plant and the X Train (Dical) at its White Springs facility. The plant is located east of State Road 137, north of White Springs, Hamilton County.

A Best Available Control Technology (BACT) determination was required for fluorides pursuant to Rule 62-212.400, F.A.C. The applicant's name and address are: White Springs Agricultural Chemicals, Inc., P.O. Box 300, White Springs, Florida 32096.

The A and C Phosphoric Acid Plants will be shut down; the B Phosphoric Acid Plant will be converted to a hemi-hydrate process and the process rate will be increased from 83 to 100 tons per hour P_2O_5 input; the D Phosphoric Acid Plant process rate will be increased from 95 to 110 tons per hour P_2O_5 input; the Acid Clarification process rate will be increased from 100 to 110 tons per hour P_2O_5 input; the C & D Superphosphoric Acid Plant process rate will be increased from 95 to 110 tons per hour P_2O_5 input; and, the X Train (Dical) production rate will be increased from 45 to 55 tons per hour product. Controls for fluoride emissions consist of scrubbers using process pond water. An air quality impact analysis was not required.

The Department will issue the Draft Air Construction Permit and subsequent Final Air Construction Permit in accordance with the conditions of the Draft Air Construction Permit unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions. The permitting authority has determined that an Air Construction Permit is required.

The Department will accept written comments concerning the proposed permit issuance action for a period of 30 (thirty) days from the date of publication of "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 written 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

NOTICE TO BE PUBLISHED
IN THE NEWSPAPER

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:

Dept. of Environmental Protection
Bureau of Air Regulation
111 S. Magnolia Drive, Suite 4
Tallahassee, Florida 32301
Telephone: 850/488-0114
Fax: 850/922-6979

Dept. of Environmental Protection
Northeast District
7825 Baymeadows Way, Suite B-200
Jacksonville, Florida 32256-7590
Telephone: 904/448-4310
Fax: 904/448-4363

The complete project file includes the application, technical evaluations, 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, New Resource Review Section at 111 South Magnolia Drive, Suite 4, Tallahassee, Florida 32301, or call 850/488-0114, for additional information.

TECHNICAL EVALUATION

AND

PRELIMINARY DETERMINATION

WHITE SPRINGS AGRICULTURAL CHEMICALS, INC.

Agricultural Chemicals Complex
White Springs, Hamilton County

DEP File No. 0470002-039-AC
PSD-FL-297

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

September 13, 2000

1. APPLICATION INFORMATION

1.1 Applicant Name and Address

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

Authorized Representative: Mr. Vernon J. Lloyd, V.P. - Production

1.2 Reviewing and Process Schedule

07-20-2000: Date of Receipt of Application
08-09-2000: DEP Completeness Request
08-11-2000: Applicant's response to DEP's Completeness Request
09-xx-2000: Issue Intent

2. FACILITY INFORMATION

2.1 Facility Location

The agricultural chemicals manufacturing facility is located east of State Road 137, north of White Springs, Hamilton County. This site is approximately 25 kilometers from the Okefenokee National Wilderness Area, a Class I Area. The UTM coordinates of this facility are Zone 17; 328.3 km E; 3368.8 km N.

2.2 Standard Industrial Classification Codes (SIC)

Major Group No.	28	Chemicals and Allied Products
Industry Group No.	2874	Phosphate Fertilizers

2.3 Facility Category

This agricultural chemicals facility makes sulfuric acid, phosphoric acid, superphosphoric acid, monoammonium phosphate (MAP), diammonium phosphate (DAP) and animal feed ingredients.

The sulfuric acid is produced on-site by burning elemental sulfur, converting the resulting sulfur dioxide to sulfur trioxide, and absorbing it into a recirculating sulfuric acid solution. Phosphoric acid is made by acidulation of phosphate rock with sulfuric acid. Waste gypsum is produced and stacked. The phosphoric acid is reacted with ammonia to make MAP and DAP. The phosphoric acid is reacted with limestone and other raw materials to make animal feed ingredients. The facility is classified as a major or Title V source of air pollution because emissions of at least one regulated air pollutant, such as particulate matter (PM/PM_{10}), sulfur dioxide (SO_2), nitrogen oxides (NO_X), carbon monoxide (CO), or volatile organic compounds (VOC) exceed 100 TPY.

This industry is included in the list of the 28 Major Facility Categories per Table 62-212.400-1, F.A.C. Because emissions are greater than 100 TPY for at least one criteria pollutant, the facility is also a major facility with respect to Rule 62-212.400, Prevention of Significant Deterioration (PSD). Per Table 62-212.400-2, modifications at the facility resulting in emissions increases greater than 3 TPY of fluorides, require review per the PSD rules and a determination of Best Available Control Technology (BACT) per Rule 62-212, F.A.C.

3. PROCESS DESCRIPTION

Phosphoric acid is made by reacting wet phosphate rock with sulfuric acid in reaction tanks, filtering the acid, concentrating the acid, and pumping the acid to various processes and/or storage, as necessary. Waste gypsum from the process is pumped and stacked. Air emissions of fluorides are controlled by scrubbers using pond water.

The acid clarification process uses additives to remove certain impurities from the phosphoric acid. Purified acid is pumped into storage tanks. Air emissions of fluorides are controlled by scrubbers using pond water.

Superphosphoric acid is made by concentrating phosphoric acid, using high vacuum and high pressure steam, to a strength of about 70 percent P_2O_5. Air emissions of fluorides are controlled by scrubbers using pond water.

The X Train (dical) process reacts limestone with phosphoric acid in a pugmill. The resulting slurry is then dryed in a fossil fuel fired direct contact rotary dryer. The dried solids are then screened to remove on size product. The product size material is conveyed to storage. The over-sized and under-sized materials are crushed and recirculated to the pugmill. Air emissions of fluorides and particulate matter are controlled by the add-on wet scrubbers and baghouses, as appropriate.

4. PROJECT DESCRIPTION

This permit addresses the following emissions units:

EMISSION UNIT NO.	SYSTEM	EMISSION UNIT DESCRIPTION
004	Product	X-Train (Dical)
020	Process	B Phosphoric Acid Plant
069	Process	D Phosphoric Acid Plant
070	Process	C & D Superphosphoric Acid Plant
071	Process	Acid Clarification

The proposed project includes the conversion of the B Phosphoric Acid Plant from prayon to a hemi-hydrate process and an increase in the processing rate from 83 to 100 tons per hour P_2O_5 input; an increase in the processing rate of D Phosphoric Acid Plant from 95 to 110 tons per hour P_2O_5 input; an increase in the processing rate of Acid Clarification from 100 to 110 tons per hour P_2O_5 input; an increase in the processing rate of C & D Superphosphoric Acid Plant from 95 to 110 tons per hour P_2O_5 input; and an increase in the production rate of the X Train (Dical) from 45 to 55 tons per hour product.

Some equipment changes and upgrades will be necessary to increase the production rates of the emission units. The proposed project will result in actual increases in fluorides (Fl) and particulate

matter (PM/PM_{10}). There will also be minimal emissions increases of sulfur dioxide (SO_2), nitrogen oxides (NO_x), carbon monoxide (CO) and volatile organic compounds (VOC). Emissions increases of PM/PM_{10}, SO_2, NO_x, CO and VOC are below their respective significant emission levels per Table 62-212.400-2, F.A.C., and do not require PSD or non-attainment new source review. However, PSD review is required for fluorides since emissions, per the application, will increase by more than PSD significant levels.

5. RULE APPLICABILITY

The project is subject to the federal new source performance standards (NSPS) for wet-process phosphoric acid plants (40 CFR 60, Subpart T) and for superphosphoric acid plants (40 CFR 60, Subpart U), incorporated by reference in Rule 62-204.800, F.A.C.

The proposed project is also subject to permitting, preconstruction review, emissions limits and compliance requirements under the provisions of Chapter 403, Florida Statutes, and Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297 of the Florida Administrative Code (F.A.C.).

This facility is located in Hamilton County, an area designated as attainment for all criteria pollutants in accordance with Rule 62-204.360, F.A.C. The proposed project is subject to review under Rule 62-212.400, F.A.C., Prevention of Significant Deterioration (PSD), because the potential emission increases for fluorides exceed the significant emission rates given in Chapter 62-212, Table 62-212.400-2, F.A.C. PSD review requires an assessment of air quality impacts and a determination of Best Available Control Technology (BACT).

The emission units affected by this permit modification shall comply with all applicable provisions of the Florida Administrative Code (including applicable portions of the Code of Federal Regulations incorporated therein) and, specifically, the following Chapters and Rules:

Chapter 62-4	Permits.
Rule 62-204.220	Ambient Air Quality Protection
Rule 62-204.240	Ambient Air Quality Standards
Rule 62-204.260	Prevention of Significant Deterioration Increments
Rule 62-204.360	Designation of Prevention of Significant Deterioration Areas
Rule 62-204.800	Federal Regulations Adopted by Reference
Rule 62-210.300	Permits Required
Rule 62-210.350	Public Notice and Comments
Rule 62-210.370	Reports
Rule 62-210.550	Stack Height Policy
Rule 62-210.650	Circumvention
Rule 62-210.700	Excess Emissions
Rule 62-210.900	Forms and Instructions
Rule 62-212.300	General Preconstruction Review Requirements
Rule 62-212.400	Prevention of Significant Deterioration
Rule 62-213	Operation Permits for Major Sources of Air Pollution
Rule 62-296.320	General Pollutant Emission Limiting Standards
Rule 62-297.310	General Test Requirements

Rule 62-297.401	Compliance Test Methods
Rule 62-297.520	EPA Continuous Monitor Performance Specifications

6. SOURCE IMPACT ANALYSIS

6.1 Air Quality Analysis

As stated in the application, the proposed project will increase emissions of fluorides in excess of PSD significant amounts. F is a non-criteria pollutant and has no AAQS or PSD increments defined for it; therefore, no air quality impact analysis was required for F. Instead, the BACT requirements will establish the F emission limit for this project. The PSD regulations require an analysis of impacts on soils, vegetation, visibility, growth-related air quality impacts and impacts on the air quality related values.

Based on the required analyses, the Department has reasonable assurance that the proposed project, as described in this report and subject to the conditions of approval proposed herein, will not cause or significantly contribute to a violation of any AAQS or PSD increment. However, the following EPA-directed stack height language is included: "In approving this permit, the Department has determined that the application complies with the applicable provisions of the stack height regulations as revised by EPA on July 8, 1985 (50 FR 27892). Portions of the regulations have been remanded by a panel of the U.S. Court of Appeals for the D.C. Circuit in NRDC v. Thomas, 838 F. 2d 1224 (D.C. Cir. 1988). Consequently, this permit may be subject to modification if and when EPA revises the regulation in response to the court decision. This may result in revised emission limitations or may affect other actions taken by the source owners or operators."

7. CONCLUSION

Based on the foregoing technical evaluation of the application and additional information submitted by the applicant, the Department has made a preliminary determination that the proposed project will comply with all applicable state and federal air pollution regulations, provided the Department's BACT determination is implemented.

Syed Arif, P.E.

PERMITTEE:

White Springs Agricultural Chemicals, Inc.
Post Office Box 300
White Springs, Florida 32096

File No.	0470002-039-AC
Permit No.	PSD-FL-297
SIC No.	2874
Project:	Agricultural Chemicals Complex
Expires:	October 1, 2003

Authorized Representative:

Vernon J. Lloyd
Vice President, Production

PROJECT AND LOCATION:

Permit for the construction /modification of the Agricultural Chemicals Complex to increase production rates of B and D Phosphoric Acid Plants, Acid Clarification, C & D Superphosphoric Acid Plant and the X Train (Dical) at the White Springs facility, east of State Road 137, north of White Springs, Hamilton County. UTM coordinates are Zone 17; 328.3 km E; 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 the Florida Administrative Code (F.A.C.) Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297. The above named permittee is authorized to modify 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 ARE MADE A PART OF THIS PERMIT:

Appendix BD	BACT Determination
Appendix GC	Construction Permit General Conditions

Howard L. Rhodes, Director
Division of Air Resources
Management

SECTION I. FACILITY INFORMATION

FACILITY DESCRIPTION

The Agricultural Chemicals Complex at White Springs is an agricultural chemicals manufacturing facility. Phosphate rock is reacted with sulfuric acid (purchased or produced on-site) to make phosphoric acid. The phosphoric acid is further processed into various products, including superphosphoric acid, monoammonium phosphate (MAP), diammonium phosphate (DAP) and animal feed ingredients.

This permit allows conversion of the B Phosphoric Acid Plant to a hemi-hydrate process and an increase in the processing rate from 83 to 100 tons per hour P_2O_5 input; an increase in the processing rate of D Phosphoric Acid Plant from 95 to 110 tons per hour P_2O_5 input; an increase in the processing rate of Acid Clarification from 100 to 110 tons per hour P_2O_5 input; an increase in the processing rate of C & D Superphosphoric Acid Plant from 95 to 110 tons per hour P_2O_5 input; and an increase in the production rate of the X Train (Dical) from 45 to 55 tons per hour product.

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.

PERMIT SCHEDULE:

- 07-20-2000: Date of Receipt of Application
- 08-11-2000: Application deemed complete
- 09-xx-2000: Intent issued

RELEVANT DOCUMENTS:

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

- Application received 07-20-2000
- Department's incompleteness letter dated 08-9-2000
- Applicant's letter dated 08-11-2000
- Fish and Wildlife Service letter dated 08-04-2000
- Technical Evaluation and Preliminary Determination dated 09-xx-2000
- Best Available Control Technology determination (issued concurrently with permit)

SECTION II. EMISSION UNIT(S) ADMINISTRATIVE REQUIREMENTS

1. Regulating Agencies: All documents related to applications for permits to operate, reports, tests, minor modifications and notifications shall be submitted to the Department of Environmental Protection, Northeast District Office located at 7825 Baymeadows Way, Suite B-200, Jacksonville, Florida 32256-7590, and phone number (904) 448-4310. All applications for permits to construct or modify an emission unit(s) *subject to the Prevention of Significant Deterioration (PSD)* should be submitted to the Bureau of Air Regulation (BAR), Florida Department of Environmental Protection (FDEP) located at 2600 Blairstone Road, Tallahassee, Florida 32399-2400 and phone number (850)488-0114.
2. General Conditions: The owner and 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.]**
3. Terminology: The terms used in this permit have specific meanings as defined in the corresponding chapters of the Florida Administrative Code.
4. Forms and Application Procedures: 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. **[Rule 62-210.900, F.A.C.]**
5. Expiration: This air construction permit shall expire on **October 1, 2003. [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 permitting authority 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]**
6. Applicable Regulations: The facility is subject to the following regulations: Florida Administrative Code Chapters 62-4; 62-103; 62-204; 62-210; 62-212, 62-296, and 62-297. Issuance of this permit does not relieve the facility owner or operator from compliance with any applicable federal, state, or local permitting requirements or regulations. **[Rule 62-210.300, F.A.C.]**

COMMON CONDITIONS: 40 CFR 60 - NEW SOURCE PERFORMANCE STANDARDS

This permit addresses the following emission units.

EMISSION UNIT NO.	EMISSION UNIT DESCRIPTION
020	B Phosphoric Acid Plant
069	D Phosphoric Acid Plant
070	C & D Superphosphoric Acid Plant

These emission units shall comply with all applicable requirements of 40 CFR 60, General provisions, Subpart A, adopted by reference in Rule 62-204.800(7), F.A.C.

- 40 CFR 60.7, Notification and record keeping
- 40 CFR 60.8, Performance tests
- 40 CFR 60.11, Compliance with standards and maintenance requirements
- 40 CFR 60.12, Circumvention
- 40 CFR 60.13, Monitoring requirements
- 40 CFR 60.19, General notification and reporting requirements

The B and D Phosphoric Acid Plants are subject to the applicable requirements of the New Source Performance Standards (NSPS) adopted by reference in Rules 62-204.800, F.A.C., including:

- 40 CFR 60 Subpart T, Standards of Performance for Wet-Process Phosphoric Acid Plants

The C & D Superphosphoric Acid Plant is subject to the applicable requirements of the New Source Performance Standards (NSPS) adopted by reference in Rules 62-204.800, F.A.C., including:

- 40 CFR 60 Subpart U, Standards of Performance for Superphosphoric Acid Plants

SPECIFIC CONDITIONS :

The Specific Conditions listed in this subsection apply to the following emission units:

EMISSION UNIT NO.	EMISSION UNIT DESCRIPTION
004	X-Train (Dical)
020	B Phosphoric Acid Plant
069	D Phosphoric Acid Plant
070	C & D Superphosphoric Acid Plant
071	Acid Clarification

1. Unless otherwise indicated, the construction and operation of the subject Agricultural Chemicals production facilities shall be in accordance with the capacities and specifications stated in the application. **[Rule 62-210.300, F.A.C.]**

2. The subject emissions units shall comply with all applicable provisions of the 40 CFR 60 New Source Performance Standards for Wet-Process Phosphoric Acid Plants, Subpart T and Superphosphoric Acid Plants, Subpart U. **[Rule 62-204.800 F.A.C.]**
3. The maximum daily (24-hour) average and annual operation rates shall not exceed:
   a. X-Train (Dical) – 55 tons per hour (tph) product, 400,000 tons per year (tpy) product;
   b. B Phosphoric Acid Plant - 100 tph P_2O_5 input, 600,000 tpy P_2O_5 input;
   c. D Phosphoric Acid Plant - 110 tph P_2O_5 input, 800,000 tpy P_2O_5 input;
   d. C & D Superphosphoric Acid Plant - 110 tph P_2O_5 input, 876,000 tpy P_2O_5 input; and,
   e. Acid Clarification - 110 tph P_2O_5 input, 876,000 tpy P_2O_5 input.

   [Rule 62-210.200, F.A.C. (Definitions - Potential Emissions)]
4. The subject emission units are allowed to operate continuously (8760 hours/year).

   [Rule 62-210.200, F.A.C. (Definitions - Potential Emissions)]
5. Total fluoride emissions shall not exceed the following:
   a. X-Train (Dical) – 1.1 lb/hr and 4.0 tpy, based on 0.02 lb/ton product;
   b. B Phosphoric Acid Plant – 1.2 lb/hr and 3.6 tpy, based on 0.012 lb/ton P_2O_5 input;
   c. D Phosphoric Acid Plant - 1.32 lb/hr and 4.8 tpy, based on 0.012 lb/ton P_2O_5 input;
   d. C & D Superphos. Acid Plant – 0.96 lb/hr and 3.8 tpy, based on 0.0087 lb/ton P_2O_5 input;
   e. Acid Clarification – 3.3 lb/hr and 13.1tpy, based on 0.03 lb/ton P_2O_5 input.

   [Rule 62-212.400, F.A.C.]
6. Particulate matter emissions shall not exceed the following:
   a. X Train – 9.9 lb/hr and 36.0 TPY;
   b. Dedust Baghouse – 3.2 lb/hr and 11.6 TPY;
   c. Shipping Baghouse – 2.3 lb/hr and 8.4 TPY;
   d. Limestone Bin Baghouse – 0.77 lb/hr and 2.8 TPY;
   e. Reclaim Bin Baghouse – 0.77 lb/hr and 2.8 TPY; and,
   f. Fugitive Dust Collection Baghouse – 5.1 lb/hr and 18.0 TPY.

   [Rule 62-210.200, F.A.C.]
7. Visible emissions from all scrubber stacks shall not exceed 20% opacity.

   [Rule 62-212.400, F.A.C.]
8. The X-Train natural gas firing rate shall not exceed 564 MMCF per year. The permittee shall maintain records of the fuel use. **[Rule 62-210.200, F.A.C.]**

9. Visible emissions from all baghouse stacks shall not exceed 20% opacity.

   [Rule 62-296.320, F.A.C.]

10. The permittee shall install, calibrate, operate and maintain monitoring devices that continuously measure and record the total pressure drop across each scrubbing system. Accuracy of the monitoring devices shall be ± 5% over the operating range. **[Rules 62-297.310, 62-204.800, F.A.C.; 40 CFR 60.203; 40 CFR 60. 213]**

11. Before this construction permit expires, the subject emission units shall be tested for compliance with the above emission limits. For the duration of all tests the emission unit 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.]**

12. The Department's Northeast District office in Jacksonville shall be notified in writing at least 15 days prior to the compliance tests. 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.]**

13. The compliance test procedures shall be in accordance with EPA Reference Methods 1, 2, 3, 4, 5, 9 and 13A or 13B, as appropriate, as published in 40 CFR 60, Appendix A. 60, Appendix A. Testing using EPA Reference Method 5 shall be waived for all baghouses when a visible emission limit of 5 percent opacity is met. **[Rules 62-204.800 and 62-297.310(7)(c), F.A.C.]**

14. All measurements, records, and other data required to be maintained by this facility shall be retained for at least five (5) years following the data on which such measurements, records, or data are recorded. These data shall be made available to the Department upon request. **[Rule 62-4.070(3), F.A.C.]**

15. The permittee shall install, calibrate, maintain, and operate monitoring devices which can be used to determine the mass flow of phosphorus-bearing feed material to the phosphoric and superphosphoric acid processes. The monitoring devices shall have an accuracy of ±5 percent over the operating range. The permittee shall maintain a daily record of equivalent P_2O_5 feed by first determining the total mass rate in metric ton/hour of phosphorus bearing feed using the flow monitoring device meeting the requirements of 40 CFR 60.203(a), or 40 CFR 60.213(a), and then by proceeding according to 40 CFR 60.204(b)(3) or 40 CFR 60.214(b)(3), as applicable. **[Rule 62-204.800, F.A.C.; 40 CFR 60.203(b); 40 CFR 60.213(b)]**

16. No person shall cause, suffer, allow, or permit the discharge of air pollutants which cause or contribute to an objectionable odor. **[Rule 62-296.320, F.A.C.]**

17. No person shall circumvent any air pollution control device, or allow the emission of air pollutants without the applicable air pollution control device operating properly. **[Rule 62-210.650, F.A.C.]**

18. The subject emissions units shall be subject to the following:

    - Excess emissions resulting from startup, shutdown or malfunction of any source shall be permitted providing (1) best operational practices to minimize emissions are adhered to and (2) the duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration. **[Rule 62-210.700, F.A.C.]**
    - Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during startup, shutdown, or malfunction shall be prohibited. **[Rule 62-210.700, F.A.C.]**
    - Considering operational variations in types of industrial equipment operations affected by this rule, the Department may adjust maximum and minimum factors to provide reasonable and practical regulatory controls consistent with the public interest. **[Rule 62-210.700, F.A.C.]**
    - In case of excess emissions resulting from malfunctions, each source shall notify the Department or the appropriate Local Program in accordance with Rule 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the Department. **[Rule 62-210.700, F.A.C.]**

19. The permittee shall submit an Annual Operating Report using DEP Form 62-210.900(4) to the Department's Northeast District office by March 1 of the following year for the previous year's operation. **[Rule 62-210.370, F.A.C.]**

20. The permittee shall permanently shut down A and C Phosphoric Acid Plants upon commencing commercial operation of the B and D Phosphoric Acid Plants. **[Rule 62-210.200, F.A.C. (Definitions - Potential Emissions)]**

Agricultural Chemicals Complex
White Springs Agricultural Chemicals, Inc.
PSD-FL-297 / 0470002-039-AC
White Springs, Hamilton County

The project proposed by White Springs Agricultural Chemicals, Inc. includes the conversion of the B Phosphoric Acid Plant to a hemi-hydrate process and an increase in the processing rate from 83 to 100 tons per hour P_2O_5 input; an increase in the processing rate of D Phosphoric Acid Plant from 95 to 110 tons per hour P_2O_5 input; an increase in the processing rate of Acid Clarification from 100 to 110 tons per hour P_2O_5 input; an increase in the processing rate of C & D Superphosphoric Acid Plant from 95 to 110 tons per hour P_2O_5 input; and an increase in the production rate of the X Train (Dical) from 45 to 55 tons per hour product.

The proposed modification will result in a significant increase in emissions of fluorides (F). The project is, therefore, subject to Prevention of Significant Deterioration (PSD) review in accordance with Rule 62-212.400, Florida Administrative Code (F.A.C.). A Best Available Control Technology (BACT) determination is part of the review required by Rules 62-212.400 and 62-296, F.A.C.

DATE OF RECEIPT OF COMPLETE BACT APPLICATION:

August 11, 2000

BACT DETERMINATION PROCEDURE:

In accordance with Chapter 62-212, F.A.C., this BACT determination is based on the maximum degree of reduction of each pollutant emitted which the Department of Environmental Protection (Department), on a case by case basis, taking into account energy, environmental and economic impacts, and other costs, determines is achievable through application of production processes and available methods, systems, and techniques. In addition, the regulations state that, in making the BACT determination, the Department shall give consideration to:

- Any Environmental Protection Agency determination of BACT pursuant to Section 169, and any emission limitation contained in 40 CFR Part 60 - Standards of Performance for New Stationary Sources or 40 CFR Part 61 - National Emission Standards for Hazardous Air Pollutants.

- All scientific, engineering, and technical material and other information available to the Department.

- The emission limiting standards or BACT determination of any other state.

- The emission limiting standards or BACT determination of any other state.

- The social and economic impact of the application of such technology.

The EPA currently stresses that BACT should be determined using the "top-down" approach. The first step in this approach is to determine, for the emission unit in question, the most stringent control available for a similar or identical emission unit or emission unit category. If it is shown that this level of control is technically or economically unfeasible for the emission unit in question, then the next most stringent level of control is determined and similarly evaluated. This process continues until the BACT level under consideration cannot be eliminated by any substantial or unique technical, environmental, or economic objections.

The air pollutant emissions from this facility can be grouped into categories based upon the control equipment and techniques that are available to control emissions from these emission units. Using this approach, the emissions can be classified as indicated below:

- ***Fluorides*** (HF, SiF_4). Controlled generally by scrubbing with pond water.

- ***Particulate Matter*** (PM, PM_{10}). Controlled generally by wet scrubbing or filtration.

- ***Combustion Products*** (SO_2, NO_X, PM). Controlled generally by good combustion of clean fuels.

- ***Products of Incomplete Combustion*** (CO, VOC). Controlled generally by proper combustion.

Grouping the pollutants in this manner facilitates the BACT analysis because it enables the equipment available to control the type or group of pollutants emitted and the corresponding energy, economic, and environmental impacts to be examined on a common basis.

Although all of the pollutants addressed in the BACT analysis may be subject to a specific emission limiting standard as a result of PSD review, the control of "non-regulated" air pollutants is considered in imposing a more stringent BACT limit on a "regulated" pollutant (i.e., PM, SO_2, H_2SO_4, fluorides, etc.), if a reduction in "non-regulated" air pollutants can be directly attributed to the control device selected as BACT for the abatement of the "regulated" pollutants.

BACT LIMITS PROPOSED BY APPLICANT:

POLLUTANT	EMISSION LIMIT	LIMIT BASIS	CONTROL TECHNOLOGY
F (X Train)	1.65 lb/hr	0.03 lb/ton product	Wet scrubbers using pond water
F (B Phos.Acid)	1.35 lb/hr	0.0135 lb/ton P_2O_5 input	Wet scrubbers using pond water
F (D Phos.Acid)	1.49 lb/hr	0.0135 lb/ton P_2O_5 input	Wet scrubbers using pond water
F (C&D Superphos.)	0.96 lb/hr	0.0087 lb/ton P_2O_5 input	Wet scrubbers using pond water
F(Acid Clarification)	3.3 lb/hr	0.03 lb/ton P_2O_5 input	Wet scrubbers using pond water

BACT POLLUTANT ANALYSIS

Fluoride-containing gases, including hydrogen fluoride (HF), are evolved during the chemical reactions from the processes associated with the above emission units. Scrubbing the gas stream with pond water removes most of the fluoride evolved from the process. The applicant has proposed that the existing emission control equipment be considered as BACT.

BACT DETERMINATION BY THE DEPARTMENT:

Based on the information provided by the applicant and other information available to the Department, the following emission limits are established employing the top-down BACT approach.

POLLUTANT	EMISSION LIMIT	LIMIT BASIS	CONTROL TECHNOLOGY
F (X Train)	1.1 lb/hr	0.02 lb/ton product	Wet scrubbers using pond water
F (B Phos.Acid)	1.2 lb/hr	0.012 lb/ton P_2O_5 input	Wet scrubbers using pond water
F (D Phos.Acid)	1.32 lb/hr	0.012 lb/ton P_2O_5 input	Wet scrubbers using pond water
F (C&D Superphos.)	0.96 lb/hr	0.0087 lb/ton P_2O_5 input	Wet scrubbers using pond water
F(Acid Clarification)	3.3 lb/hr	0.03 lb/ton P_2O_5 input	Wet scrubbers using pond water

The top-down BACT determination for fluorides identified the control technologies listed below starting with the most stringent:

1. Packed scrubber using once-through fresh water.
2. Packed scrubber using neutralized water from a dedicated pond (fresh water makeup).
3. Existing scrubber, using packing, and process cooling pond water.

Use of once-through fresh water would achieve the highest level of fluoride removal but this option is not practical for operations where water conservation is required and plant water balance problems would be created.

Option 2 is possible, the main considerations being the cost of installing the pond and equipment and the cost of operating a lime treatment unit. Costs for Option 2, based on data for a similar project amounted to almost $40,000 per ton of fluorides removed. FDEP considers this figure sufficiently high to rule out Option 2. However, it should be noted that the low magnitude of fluoride emissions relative to their potential environmental impact justifies the consideration of higher fluoride cost effectiveness figures relative to the high tonnage pollutants such as sulfur dioxide and nitrogen oxides.

For the proposed project, Option 3 is determined by the top-down approach as the basis for the fluoride BACT emission limit.

The BACT limits tabulated above for the emission units evaluated are based on the recent compliance test results for the units between 1995 - 1999. These limits have been demonstrated to be achievable based on the historical test data for the emission units.

COMPLIANCE

Compliance with the fluoride limit shall be demonstrated using EPA Reference Method 13A or 13B as contained in 40 CFR 60, Appendix A.

DETAILS OF THE ANALYSIS MAY BE OBTAINED BY CONTACTING:

Syed Arif, P.E., Permit Engineer, New Source Review Section
Department of Environmental Protection
Bureau of Air Regulation
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Recommended By:

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

Date:

Approved By:

Howard L. Rhodes, Director
Division of Air Resources Management

Date:

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

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 Statutes. Such evidence shall only be used to the extend 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 *(X)*
(b) Determination of Prevention of Significant Deterioration *(X)*; and
(c) Compliance with New Source Performance Standards *(X)*.

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.

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.
P. O. Box 300
White Springs, Fl 32096

COMPLETE THIS SECTION ON DELIVERY

A. Received by *(Please Print Clearly)* | B. Date of Delivery 9-25-00

C. Signature
X [signature] ☐ 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

2. Article Number *(Copy from service label)*
7099 3400 0000 1453 2429

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)

Article Sent To: Vernon Lloyd

Postage	$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	$

Postmark Here

Na Mr. Vernon J. Lloyd
St Vice President - Production
Ci White Springs Agricultural
Chemicals, Inc.
PO Box 300
PS White Springs, FL 32096

or Instructions

7099 3400 0000 1453 2429

Department of
Environmental Protection

Jeb Bush
Governor

Marjory Stoneman Douglas Building
3900 Commonwealth Boulevard
Tallahassee, Florida 32399-3000

David B. Struhs
Secretary

July 28, 2000

CERTIFIED MAIL – RETURN RECEIPT REQUESTED

Mr. Gregg Worley, Chief
Air, Radiation Technology Branch
Preconstruction/HAP Section
U.S. EPA – Region 4
61 Forsyth Street
Atlanta, GA 30303

RE: White Springs Agricultural Chemicals, Inc.
Swift Creek and Suwannee River Complex
PSD-FL-297
Facility ID No. 0470002-039-AC

Dear Mr. Worley:

Enclosed for your review and comment is an application for a modification to a PSD source. The applicant, White Springs Agricultural Chemicals, Inc., proposes a reallocation of phosphoric acid production capability amongst their existing plants at the Suwannee River and Swift Creek Chemical Complex in Hamilton County resulting in increase in annual fluoride emissions.

Your comments may be forwarded to my attention at the letterhead address or faxed to the Bureau of Air Regulation at 850/922-6979. If you have any questions, please contact the project engineer, Syed Arif, at 850/921-9528.

Sincerely,

Patty Adams

for Al Linero, P.E.
Administrator
New Source Review Section

AAL/saa

Enclosures

KOOGLER & ASSOCIATES
ENVIRONMENTAL SERVICES
4014 NW THIRTEENTH STREET
GAINESVILLE, FLORIDA 32609
352/377-5822 ▪ FAX/377-7158

KA 102-00-02

July 20, 2000

RECEIVED
JUL 26 2000
BUREAU OF AIR REGULATION

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

Subject: PSD Permit Application
White Springs Agricultural Products, Inc

Dear Mr. Linero:

Enclosed are eight (8) copies of a PSD permit application for White Springs Agricultural Products, Inc.

The proposed project involves the reallocation of phosphoric acid production capability amongst the existing plants at Suwannee River and Swift Creek Chemical Complex. The proposed project also includes an increase in the processing rates of the acid clarification system, superphosphoric acid plant and a dicalcium phosphate plant.

A check in the amount of $7500 (permit application fee) is enclosed.

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

Very truly yours,

KOOGLER & ASSOCIATES

John B. Koogler

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

JBK:par
Enc.

c: C. Pults, WSAC
S. Arif, FDEP
C. Kirta
EPA
NPS
C. Holladay

Department of
Environmental Protection

Jeb Bush
Governor

Marjory Stoneman Douglas Building
3900 Commonwealth Boulevard
Tallahassee, Florida 32399-3000

David B. Struhs
Secretary

July 28, 2000

CERTIFIED MAIL – RETURN RECEIPT REQUESTED

Mr. John Bunyak, Chief
Policy, Planning & Permit Review Branch
NPS – Air Quality Division
P.O. Box 25287
Denver, Colorado, 80225

RE: White Springs Agricultural Chemicals, Inc.
Swift Creek and Suwannee River Complex
PSD-FL-297
Facility ID No. 0470002-039-AC

Dear Mr. Bunyak:

Enclosed for your review and comment is an application for a modification to a PSD source. The applicant, White Springs Agricultural Chemicals, Inc., proposes a reallocation of phosphoric acid production capability amongst their existing plants at the Suwannee River and Swift Creek Chemical Complex in Hamilton County resulting in increase in annual fluoride emissions.

Your comments may be forwarded to my attention at the letterhead address or faxed to the Bureau of Air Regulation at 850/922-6979. If you have any questions, please contact the project engineer, Syed Arif, at 850/921-9528.

Sincerely,

Patty Adams

for Al Linero, P.E.
Administrator
New Source Review Section

AAL/saa

Enclosures

Department of
Environmental Protection

Jeb Bush
Governor

Marjory Stoneman Douglas Building
3900 Commonwealth Boulevard
Tallahassee, Florida 32399-3000

David B. Struhs
Secretary

July 28, 2000

CERTIFIED MAIL – RETURN RECEIPT REQUESTED

Mr. Gregg Worley, Chief
Air, Radiation Technology Branch
Preconstruction/HAP Section
U.S. EPA – Region 4
61 Forsyth Street
Atlanta, GA 30303

RE: White Springs Agricultural Chemicals, Inc.
Swift Creek and Suwannee River Complex
PSD-FL-297
Facility ID No. 0470002-039-AC

Dear Mr. Worley:

Enclosed for your review and comment is an application for a modification to a PSD source. The applicant, White Springs Agricultural Chemicals, Inc., proposes a reallocation of phosphoric acid production capability amongst their existing plants at the Suwannee River and Swift Creek Chemical Complex in Hamilton County resulting in increase in annual fluoride emissions.

Your comments may be forwarded to my attention at the letterhead address or faxed to the Bureau of Air Regulation at 850/922-6979. If you have any questions, please contact the project engineer, Syed Arif, at 850/921-9528.

Sincerely,

Patty Adams

for Al Linero, P.E.
Administrator
New Source Review Section

AAL/saa

Enclosures

BEST AVAILABLE COPY

File in PSD 297

facsimile TRANSMITTAL

EPA Region 4

Alabama, Florida, Georgia, Kentucky, Mississippi, North Carolina, South Carolina, Tennessee

To: Al Linero

Florida DEP

Fax #: (850) 922-6979

Subject: Comments Re: PSD Preliminary Determination for White Springs Chemicals.

From: Art Hofmeister **Phone #:** 404-562-9115

Date: 10-30-00

# of Pages: 3 (including this sheet)

Comments:

Air & Radiation Technology Branch
U.S. Environmental Protection Agency
61 Forsyth Street SW, 12th Floor
Atlanta, Georgia 30303

Phone: 404-562-9105
Fax: 404-562-9095

BEST AVAILABLE COPY

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

OCT 30 2000

4APT-ARB

Mr. A. A. Linero, P.E.
Administrator
New Source Review Section
Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

SUBJ: Prevention of Significant Deterioration (PSD) Preliminary Determination for White Springs Agricultural Chemicals, Inc. located in White Springs (Hamilton County), Florida PSD-FL-297

Dear Mr. Linero:

Thank you for submitting the above referenced PSD preliminary determination dated September 25, 2000, to the U.S. Environmental Protection Agency (EPA) for comments. The proposed project involves the conversion of the B Phosphoric Acid Plant from prayon to a hemi-hydrate process and the increase in production capacities of B Phosphoric Acid Plant, D Phosphoric Acid Plant, Acid Clarification, C & D Phosphoric Acid Plant, and the X Train (dical) process. The total emissions increase of fluorides (F) resulting from the proposed project is above the significance threshold requiring PSD review.

Based on a review of the preliminary determination, EPA has the following comment. Although no ambient air quality standard or PSD increment exists for F, the applicant must still address the requirement for pre-construction monitoring of F. This is in direct accordance to Florida Rule 62-212-400(5)(f). A de minimis concentration has been specified for F (see Table C-3 of EPA's *New Source Review Workshop Manual*) above which pre-construction monitoring would typically be required. The applicant needs to model the proposed increase in F emissions and compare the predicted impact to this de minimis level to determine whether or not pre-construction monitoring will be required. Also, the applicant must address the additional impacts on soils, vegetation, wildlife, and visibility with respect to F.

BEST AVAILABLE COPY

Thank you for the opportunity to comment on the White Springs preliminary determination. If you have any questions regarding these comments, please direct them to either Art Hofmeister at (404) 562-9115 or Jim Little at (404) 562-9118.

Sincerely,

for Greg M. Worley

R. Douglas Neeley
Chief
Air and Radiation Technology Branch
Air, Pesticides and Toxics
Management Division

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

OCT 3 0 2000

RECEIVED
NOV 0 1 2000
BUREAU OF AIR REGULATION

4APT-ARB

Mr. A. A. Linero, P.E.
Administrator
New Source Review Section
Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

SUBJ: Prevention of Significant Deterioration (PSD) Preliminary Determination for White Springs Agricultural Chemicals, Inc. located in White Springs (Hamilton County), Florida PSD-FL-297

Dear Mr. Linero:

Thank you for submitting the above referenced PSD preliminary determination dated September 25, 2000, to the U.S. Environmental Protection Agency (EPA) for comments. The proposed project involves the conversion of the B Phosphoric Acid Plant from prayon to a hemi-hydrate process and the increase in production capacities of B Phosphoric Acid Plant, D Phosphoric Acid Plant, Acid Clarification, C & D Phosphoric Acid Plant, and the X Train (dical) process. The total emissions increase of fluorides (F) resulting from the proposed project is above the significance threshold requiring PSD review.

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Thank you for the opportunity to comment on the White Springs preliminary determination. If you have any questions regarding these comments, please direct them to either Art Hofmeister at (404) 562-9115 or Jim Little at (404) 562-9118.

Sincerely,

for Gregg M. Worley

R. Douglas Neeley
Chief
Air and Radiation Technology Branch
Air, Pesticides and Toxics
Management Division

cc: S. Arif
C. Halladay
C. Kirts, NED
G. Kooger
NPS

KOOGLER & ASSOCIATES
ENVIRONMENTAL SERVICES
4014 NW THIRTEENTH STREET
GAINESVILLE, FLORIDA 32609
352/377-5822 ▪ FAX/377-7158

KA 102-00-03

August 11, 2000

RECEIVED
AUG 15 2000
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: Additional Information for PSD Application
White Springs Agricultural Products, Inc
File No. 0470002-39-AC, PSD-FL-297

Dear Mr. Arif:

This is in response to Mr. Linero's letter dated August 9, 2000, requesting additional information on the above referenced project. The responses below are presented in the order of the issues raised.

ITEM 1: Stack Test Data

It is our understanding, based on your recent telephone conversation with Pradeep Raval, that the historical stack test information being requested may be summarized in order to facilitate the data review. Such a summary is presented in Attachment 1. Since this information is being requested to determine appropriate permit limits, data on units to be shut down have been excluded. Copies of all the respective stack test reports can be submitted, if necessary for FDEP's review.

Emission calculations presented in Appendix A of the application have not been revised to reflect the "lb/ton" emissions data presented in Attachment 1. The use of a different method of calculating actual fluoride emissions will not affect rule applicability for the proposed project.

ITEMS 2 and 3: Hours of Operation

It is requested that all the emission units addressed in the application be allowed to operate continuously. The operating rates for all units included an hourly maximum operating rate (based on a daily average) and an annual maximum operating rate. The annual operation

caps are requested in recognition of the fact that the hourly maximum operating rates cannot be sustained for 8760 hours on an annual basis. As the emission calculations presented in the application were based on the requested operation caps, no changes in the application are necessary.

ITEM 4: Reference for X-Train Emission Factors

The following references were used in emission calculations for the X-Train:

- PM/PM10: 0.18 lb/ton product – Based on an estimate by plant personnel familiar with the plant operations.
- SO2: 0.6 lb/MMCF – Based on AP-42, Table 1.4-2 emission factor for natural gas combustion.
- NOX: 100 lb/MMCF - Based on AP-42, Table 1.4-1 emission factor for natural gas combustion.
- CO: 84 lb/MMCF - Based on AP-42, Table 1.4-1 emission factor for natural gas combustion.
- VOC: 2.8 lb/MMCF (non-methane) - Based on AP-42, Table 1.4-3 emission factor for natural gas combustion.
- BAGHOUSE: 0.015 gr/cf – based on performance of similar unit, including a reasonable margin of safety (see Attachment 2). As almost all such baghouses have a compliance demonstration requirement by conducting visible emissions testing in lieu of particulate matter testing, there is limited available test data.

ITEM 5: RBLC Data on BACT Limits

Our computer search of the RBLC data regarding BACT for fluorides from the units addressed in the application yeilded very limited information. The available information is presented in Attachment 3.

ITEM 6: USFWS Comments

We concur with the USFWS comment that the proposed limits conform to BACT limits.

Mr. Syed Arif, P.E.
Florida Department of
Environmental Protection

August 11, 2000

Regarding the magnitude of the estimated fluoride emissions increase as a result of the proposed project, please note that this estimate is a result of the calculation procedure imposed under PSD review. In accordance with the NSR requirements, the past actual emissions are subtracted from the future potential emissions. As most plants do not operate 8760 hours per year at their maximum allowable emission rate, this calculation procedure always results in an artificially magnified emissions increase. Industry has long argued for a fair calculation methodology of comparing past allowable emissions to future allowable emissions, or alternatively, past actual emissions to future actual emissions. However, such an approach has not been acceptable to EPA for calculating net emission changes from existing chemical plants.

Regarding the need for higher emission limits, WSAC seeks emission limits that both meet BACT criteria and allow for the typical variability in emissions under normal operating conditions. Furthermore, a greater "safety margin" is required at the proposed higher operating levels due to increased potential variability that can be expected under the higher operating levels.

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
Enc.

c: C. Pults, WSAC
D. Arif
C. Holladay
EPA
NPS
C. Kirts, NEP

ATTACHMENT 1

HISTORICAL FLUORIDES TEST DATA

HISTORICAL FLUORIDES TEST DATA

WSAC

B PHOSPHORIC ACID PLANT

Year	F, lb/hr	Product, tph	F, lb/ton	Stk. acfm	Scrbr. gpm	DP, "H2O
1995	0.17	71.3	0.002	24811	1664	0.9
1996	0.11	73.9	0.001	23413	1560	0.7
1997	0.39	76.9	0.005	21857	1721	2.9
1998	0.08	70.7	0.001	23309	1640	NA
1999	0.13	79.8	0.002	29154	1737	2.15

NOTE: lb/ton is based on tons output; NA = not available.

D PHOSPHORIC ACID PLANT

Year	F, lb/hr	Product, tph	F, lb/ton	Stk. acfm	Scrbr. gpm	DP, "H2O
1995	0.08	72.8	0.001	29832	1250	NA
1996	0.2	72.2	0.003	35700	NA	3.8
1997	0.19	79.2	0.002	32637	NA	NA
1998	0.37	91.9	0.004	32041	NA	NA
1999	0.2	86.5	0.002	32205	NA	2.25

NOTE: lb/ton is based on tons output; NA = not available.

C&D SUPERPHOSPHORIC ACID PLANT

Year	F, lb/hr	Product, tph	F, lb/ton	Stk. acfm	Scrbr. gpm	DP, "H2O
1995	1.08	67	0.016	11948	850	0.12
1995	0.1	84.7	0.001	15184	1140	1
1997	0.52	94.5	0.006	16546	709	1.5
1998	NA	NA	NA	NA	NA	NA
1999	NA	NA	NA	NA	NA	NA

NOTE: lb/ton is based on tons output; NA = not available.

ACID CLARIFICATION

Year	F, lb/hr	Product, tph	F, lb/ton	Stk. acfm	Scrbr. gpm	DP, "H2O
1995	2.12	98.5	0.022	32150	800	NA
1996	1.52	90.2	0.017	34281	726	7.1
1997	2.57	92.5	0.028	17241	625	1.7
1998	1.79	89.8	0.020	29735	994	3.1
1999	0.61	90.2	0.007	36155	930	4.9

NOTE: lb/ton is based on tons output; NA = not available.

X-TRAIN

Year	F, lb/hr	Product, tph	F, lb/ton	Stk. acfm	Reactor Scrbr. gpm	Reactor DP, "H2O
1995	0.28	36.4	0.008	102200	NA	NA
1995	0.22	39.6	0.006	91366	309	NA
1996	0.19	35.7	0.005	87266	300	NA
1996	0.14	39.6	0.004	91887	NA	NA
1997	0.25	37.8	0.007	103672	390	NA
1997	0.29	44.5	0.007	97915	290	NA
1998	0.21	33.9	0.006	97640	NA	NA
1998	0.15	35.3	0.004	94085	NA	NA
1999	0.23	35.3	0.007	93737	NA	14.3

NOTE: lb/ton is based on tons output; NA = not available.

ATTACHMENT 2

BAGHOUSE PERFORMANCE DATA

TABLE 1

SUMMARY OF SOURCE EMISSION TEST DATA

[redacted]
Fugitive Dust Collection System
August 20, 1998

Run No.	Process Weight Rate (Tons/hr)	Stack Gas Flow Rate (SCFMD)	Stack Gas Temperature (F)	Stack Gas Moisture (%)	Particulate Matter Conc. (gr/dscf)	Particulate Matter Emission Rate (Lbs/Hr)
1	160.20	45,946	105	4.8	0.0090	3.54
2	155.19	45,761	105	4.4	0.0076	2.97
3	132.78	46,017	103	4.0	0.0096	3.80
Average	149.4	45,908	104	4.4	0.0087	3.43

Allowable Particulate Matter Emission Rate = [redacted] lbs/Hr

ATTACHMENT 3

EPA RBLC DATABASE INFORMATION

EPA United States Environmental Protection Agency

Query Results | Facility Information | Plantwide Information | Process Information

To learn more about the processes associated with this facility, click the Process Information button above.
You can then view pollutant information for each process.

Facility Details

Completed

ID/Company: FL-0112 / CARGILL FERTILIZER
Plant Name:

Contact: JOHN REYNOLDS
Phone: (904) 488-1344 E-Mail:
Street: 8813 HIGHWAY 41 SOUTH
City: RIVERVIEW
State: FL Zip: 33569- County: HILLSBOROUGH
Region: 4 SIC: 2874 Universal Plant ID:

Agency: FL001 - FLORIDA DEPT OF ENV REGULATION
Contact: JOHN REYNOLDS
Phone: (850) 921-9536 E-Mail:
Street:
City:
State: FL Zip:

		EST/ACT DATE
Permit#:	0570008-004-AC	Appl. Rcvd.:
New or Modified:		Permit Issued: ACT 08/27/1996
		Start-Up:
		Compl. Verified:

UTM zone/coordinate information not provided.

No affected Class 1 areas identified.

Facility Notes:

INCREASE IN PRODUCTION RATE FROM 139 TO 170 TONS P2O5/HR FOR NO. 3 AND 4 PHOSPHORIC ACID PLANTS. PACKED SCRUBBER USING POND WATER USED TO CONTROL FLUORIDES.

Date Entered: 11/25/1996 Date Last Changed: 11/25/1996

For information about the pollutants related to this process, click on the Pollutant Information button above.

Process Details

Completed

ID/Company:FL-0112 / CARGILL FERTILIZER
Plant Name:

Process: PHOSPHORIC ACID PRODUCTION
Primary Fuel: H2SO4 AND PHOS. ROCK
Throughput: 170 TONS P2O5/HR

Process Code: 62.010
SCC Code: 3-01-016

6 Complia ce Verified? No
Verificatio Method

T St ck Testing: No

EPA United States Environmental Protection Agency

Query Results | Facility Information | Plantwide Information | Process Information | Pollutant Information

Click on the Pollutant Information button to return to the list of pollutants for this process or click on the Process Information button to return to the list of processes.

Pollutant Details

Completed

ID/Company: FL-0112 / CARGILL FERTILIZER
Plant Name:
Process: PHOSPHORIC ACID PRODUCTION

Pollutant: FLUORIDES **CAS Number:** 16984-48-8

Pollution Prevention/Add-on Control Equipment/Both/No Controls Feasible: A
P2/Add-on Description:

PACKED SCRUBBER USING POND WATER

Ranking Info: Number Considered: 0
Rank Selected: 0

EMISSION LIMITS:

Primary:	0.0135 LB F/TON P2O5	**Basis:** BACT-PSD
Alternate:	2.2900 LB/HR **% Efficiency:** 0	
Standardized:	0.0000 **Emission Type:** P	

COST DATA: **Verified by Agency?** No **Year Used in Cost Estimates:**

Capital Cost of Control Equip:	$	0
Annualized Cost:	$	0
Cost Effectiveness:		0 $/ton

EPA United States Environmental Protection Agency

Query Results | Facility Information | Plantwide Information | Process Information

To learn more about the processes associated with this facility, click the Process Information button above.
You can then view pollutant information for each process.

Facility Details

Completed

ID/Company: FL-0120 / CARGILL FERTILIZER, INC.
Plant Name:

Contact: JOHN REYNOLDS
Phone: (850) 921-9536 E-Mail:
Street: 8813 HWY 40 SOUTH
City: RIVERVIEW
State: FL Zip: 33569- County: HILLSBOROUGH
Region: 4 SIC: 2874 Universal Plant ID: 057008

Agency: FL001 - FLORIDA DEPT OF ENV REGULATION
Contact: JOHN REYNOLDS
Phone: (850) 921-9536 E-Mail:
Street:
City:
State: FL Zip:

		EST/ACT DATE
Permit#:	PSD-FL-234A	Appl. Rcvd.:
New or Modified:		Permit Issued: ACT 06/08/1999
		Start-Up:
		Compl. Verified:

UTM zone/coordinate information not provided.

No affected Class 1 areas identified.

Facility Notes:

PROCESS MODIFIED: DEFLUORINATION OF PHOSPHORIC ACID BY REACTION WITH DIATOM ACEOUS EARTH AND LIMESTONE TO FORM A GRANULATED ANIMAL FEED PRODUCT INGREDI ENT. THIS ACTION WAS A PRODUCTION INCREASE.

Date Entered: 07/16/1999 Date Last Changed: 11/11/1999

EPA United States Environmental Protection Agency

Query Results | Facility Information | Plantwide Information | Process Information | Pollutant Information

For information about the pollutants related to this process, click on the Pollutant Information button above.

Process Details

Completed

ID/Company:FL-0120 / CARGILL FERTILIZER, INC.
Plant Name:

```
     Process: FEED PRODUCTION, ANIMAL, AMMONIUM PHOSPHATE BASED
Primary Fuel: NATURAL GAS
  Throughput: 770 T/D

Process Code: 70.007
    SCC Code: 30103002

Compliance Verified?  No
Verification Method
-----------------------
       Stack Testing: No
         Inspections: No
         Calculation: No
        Other Method: No
         Description: EPA METHODS 5,13A,9

Process Notes:
```

ANIMAL FEED INGREDIENT PRODUCTION

GEPROTECT=OFF
@PJL SET RESOLUTION=600
@PJL ENTER LANGUAGE=PCL

Click on the Pollutant Information button to return to the list of pollutants for this process or click on the Process Information button to return to the list of processes.

Pollutant Details

Completed

ID/Company: FL-0120 / CARGILL FERTILIZER, INC.
Plant Name:
Process: FEED PRODUCTION, ANIMAL, AMMONIUM PHOSPHATE BASED

Pollutant: FLUORIDE **CAS Number:** 16984-48-8

Pollution Prevention/Add-on Control Equipment/Both/No Controls Feasible: A
P2/Add-on Description:

PACKED SCRUBBER, AND POND WITH WATER

Ranking Info: Number Considered: 0
Rank Selected: 0

EMISSION LIMITS:

Primary:	0.5000 LB/H (BATCH)	**Basis:** BACT-PSD
Alternate:	4.3000 T/YR **% Efficiency:** 0	
Standardized:	0.0000 **Emission Type:** P	

COST DATA: **Verified by Agency?** No **Year Used in Cost Estimates:**

Capital Cost of Control Equip: $	0
Annualized Cost: $	0
Cost Effectiveness:	0 $/ton

EPA United States Environmental Protection Agency

Query Results | Facility Information | Plantwide Information | Process Information | Pollutant Information

Click on a highlighted pollutant name in the list below for more information.

Pollutant List

Completed

ID/Company: FL-0120 / CARGILL FERTILIZER, INC.
Plant Name:
Process: FEED PRODUCTION, ANIMAL, AMMONIUM PHOSPHATE BASED

Pollutant	Primary Emission Limit	Basis
FLUORIDE	.5 LB/H (BATCH)	BACT-PSD
PM	8 LB/H	BACT-PSD

EPA United States Environmental Protection Agency

Query Results | Facility Information | Plantwide Information | Process Information | Pollutant Information

Click on the Pollutant Information button to return to the list of pollutants for this process or click on the Process Information button to return to the list of processes.

Pollutant Details

Completed

ID/Company: FL-0120 / CARGILL FERTILIZER, INC.
Plant Name:
Process: FEED PRODUCTION, ANIMAL, AMMONIUM PHOSPHATE BASED

Pollutant: PM **CAS Number:** PM

Pollution Prevention/Add-on Control Equipment/Both/No Controls Feasible: A
P2/Add-on Description:

VENTURI SCRUBBER (GRANULATION AND PRODUCT HANDLIN)

Ranking Info: Number Considered: 0
Rank Selected: 0

EMISSION LIMITS:

Primary:	8.0000 LB/H		**Basis:** BACT-PSD
Alternate:	35.0000 T/YR	**% Efficiency:** 0	
Standardized:	0.0000	**Emission Type:** P	

COST DATA: **Verified by Agency?** No **Year Used in Cost Estimates:**

Capital Cost of Control Equip:	$	0
Annualized Cost:	$	0
Cost Effectiveness:		0 $/ton

Department of Environmental Protection

Jeb Bush
Governor

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

David B. Struhs
Secretary

August 9, 2000

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Vernon J. Lloyd, VP-Production
White Springs Agricultural Chemicals, Inc.
P.O. Box 300
White Springs, Florida 32096

Re: DEP File No. 0470002-039-AC, PSD-FL-297
Phosphoric Acid Production Reallocation

Dear Mr. Lloyd:

The Department has received the application on July 26, 2000 for the reallocation of phosphoric acid production capability amongst the existing plants at Suwannee River and Swift Creek Chemical Complex. The proposed project also includes an increase in the processing rates of the acid clarification system, superphosphoric acid plant and a dicalcium phosphate plant. Based on our initial review of the proposed project, we have determined that additional information is needed in order to continue processing this application package. Please submit the information requested below to the Department's Bureau of Air Regulation:

1. The application contains only a summary of fluoride stack test data. Please submit the detailed test reports for the 1998 and 1999 annual fluoride stack tests containing data on production rates, stack flows, scrubber conditions, etc. for each test run. Please redo Appendix A of the application by showing actual emissions in terms of lb F/ton P_2O_5. Also, include additional three years of stack test data summary, if available, for fluoride emissions.

2. Emission calculations in Appendix A for Fluorides indicate restriction in annual hours of operation for the Phosphoric Acid Plants, Acid Clarification Plant, Superphosphoric Acid Plant. The calculations restricts the 'B' and 'D' phos acid plants to 6,000 and 7,273 hrs/yr respectively, the acid clarification plant to 7,964 hrs/yr and the C & D superphosphoric acid plant to 7,964 hrs/yr. Please indicate if the intent of the application is to restrict the operation of these plants, otherwise redo the calculations based on 8,760 hrs/yr operation.

3. Emission calculations in Appendix A for Fluorides and Particulate Matter indicate restriction in annual hours of operation for the X-Train (Dical). The calculations restrict the X-Train to 7,273 hrs/yr. Please indicate if the intent of the application is to restrict the operation of this plant, otherwise redo the calculations for all the affected pollutants including F, PM/PM_{10}, SO_2, NO_x, CO and VOC based on 8,760 hrs/yr operation.

4. Please provide the references for the emission factors used in calculating proposed emissions for PM/PM_{10} (0.18 lb/ton), SO_2 (0.6 lb/MMCF), NO_x (100 lb/MMCF), CO (84 lb/MMCF) and VOC (2.8 lb/MMCF) for the X-Train. Also, provide the justification in using 0.015 gr/cf PM/PM_{10} grain loading for the baghouses at the Dical Plant.

5. Please provide the RBLC data on BACT limits established for fluorides for superphosphoric acid plants, acid clarification plants and dical plants.

6. Enclosed are preliminary comments submitted by the US Fish & Wildlife Service. Please respond to their concerns. We are still awaiting comments from EPA, which will be forwarded to you, after we receive them.

The Department will resume processing this application after receipt of the requested information. Rule 62-4.050(3), F.A.C. requires that all applications for a Department permit must be certified by a professional engineer registered in the State of Florida. This requirement also applies to responses to Department requests for additional information of an engineering nature. A new certification statement by the authorized representative or responsible official must accompany any material changes to the application. Rule 62-4.055(1), F.A.C. now requires applicants to respond to requests for information within 90 days.

We will be happy to meet and discuss the details with you and your staff. Mr. Syed Arif, P.E. is responsible for the technical review of the application. He may be contacted at 850/921-9528.

Sincerely,

8/9

A. A. Linero, P.E., Administrator
Bureau of Air Regulation

Enclosure
AAL/sa

cc: John B. Koogler, P.E., K & A
Chris Kirts, DEP NED
Gregg Worley, EPA Region IV
John Bunyak, NPS

U.S.FISH&WILDLIFE SERVICE
AIR QUALITY BRANCH

P.O. BOX 25287, Denver, CO 80225-0287

Date: August 4, 2000

Telephone: (303) 969-2617
Fax: (303) 969-2822

To: Al Linero
Syed Arif

From: Ellen Porter
Kirsten King

Subject: White Springs Agricultural Chemicals, Inc.

White Springs Agricultural Chemicals, Inc. (WSAC) is proposing to reallocate phosphoric acid production among the existing A, B, C, and D Plants at their Suwannee River and Swift Creek Chemical Complex in Hamilton County, Florida. The WSAC facility is located 40 km southwest of Okefenokee Wilderness, a Class I air quality area administered by the U.S. Fish and Wildlife Service. WSAC proposes to shut down phosphoric acid production at plants A and C. WSAC will convert plant B to hemi-hydrate process and increase capacity from 83 to 100 tons per hour P2O5 input and increase the capacity of Plant D from 95 to 110 tons per hour P2O5 input. These changes will result in a 24 ton per year increase in fluoride emissions.

Best Available Control Technology (BACT) Analysis

WSAC proposes fluoride emission limits of:

0.03 lb/ton product from the X-Train;

0.0135 lb/ton P2O5 input from the phosphoric acid plants;

0.03 lb/ton P2O5 input from the acid clarification process; and

0.0087 lb/ton P2O5 input from C& D Superphosphoric Acid Plant (SPA).

The proposed limits do conform to BACT limits, however, we would like WSAC to explain why a decrease in production with BACT level limits causes a 24 ton per year increase in fluoride emissions. Based on the information provided in the tables of the application it appears that WSAC's previous emissions were significantly below the levels being proposed. We would like to understand why WSAC needs the higher emission limits.

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
VP-Production
White Springs Agricultural
Chemicals, Inc.
PO Box 300
White Springs, FL 32096

COMPLETE THIS SECTION ON DELIVERY

A. Received by *(Please Print Clearly)* B. Date of Delivery 8-11-00

C. Signature
X [signature] ☑ 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

2. Article Number *(Copy from service label)*
7099 3400 0000 1453 2849

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)

Article Sent To:
Mr. Vernon J. Lloyd, White Springs Agricultural Chemicals

Postage	$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	$

8/9/00 Postmark Here

7099 3400 0000 1453 2849

Name (Please Print Clearly) (to be completed by mailer)
Vernon J. Lloyd
Street, Apt. No., or PO Box No.
PO Box 300
City, State, ZIP+4
White Springs, FL 32096

PS Form 3800, July 1999 See Reverse for Instructions

Department of Environmental Protection

Division of Air Resources Management

RECEIVED
JUL 26 2000
BUREAU OF AIR REGULATION

APPLICATION FOR AIR PERMIT - TITLE V SOURCE

See Instructions for Form No. 62-210.900(1)

I. APPLICATION INFORMATION

Identification of Facility

1. Facility Owner/Company Name: **White Springs Agricultural Chemicals, Inc.**	
2. Site Name: **Suwannee River and Swift Creek Complex**	
3. Facility Identification Number: **0470002** [ ] Unknown	
4. Facility Location: Street Address or Other Locator: **E of SR 137, E of US 41, N of White Springs** City: **White Springs** County: **Hamilton** Zip Code: **32096**	
5. Relocatable Facility? [ ] Yes [X] No	6. Existing Permitted Facility? [X] Yes [ ] No

Application Contact

1. Name and Title of Application Contact: **Pradeep Raval, Project Engineer**
2. Application Contact Mailing Address: Organization/Firm: **Koogler & Associates** Street Address: **4014 N.W. 13th Street** City: **Gainesville** State: **FL** Zip Code: **32609**
3. Application Contact Telephone Numbers: Telephone: **(352) 377-5822** Fax: **(352) 377-7158**

Application Processing Information (DEP Use)

1. Date of Receipt of Application:	7-26-00
2. Permit Number:	047 0002 - 039 - AC
3. PSD Number (if applicable):	PSD-FL-291
4. Siting Number (if applicable):	

Purpose of Application

Air Operation Permit Application

This Application for Air Permit is submitted to obtain: (Check one)

[ ] Initial Title V air operation permit for an existing facility which is classified as a Title V source.

[ ] Initial Title V air operation permit for a facility which, upon start up of one or more newly constructed or modified emissions units addressed in this application, would become classified as a Title V source.

Current construction permit number:_____

[ ] Title V air operation permit revision to address one or more newly constructed or modified emissions units addressed in this application.

Current construction permit number:_____

Operation permit number to be revised:_____

[ ] Title V air operation permit revision or administrative correction to address one or more proposed new or modified emissions units and to be processed concurrently with the air construction permit application. (Also check Air Construction Permit Application below.)

Operation permit number to be revised/corrected:_____

[ ] Title V air operation permit revision for reasons other than construction or modification of an emissions unit. Give reason for the revision; e.g., to comply with a new applicable requirement or to request approval of an "Early Reductions" proposal.

Operation permit number to be revised:_____

Reason for revision:_____

Air Construction Permit Application

This Application for Air Permit is submitted to obtain: (Check one)

[X] Air construction permit to construct or modify one or more emissions units.

[ ] Air construction permit to make federally enforceable an assumed restriction on the potential emissions of one or more existing, permitted emissions units.

[ ] Air construction permit for one or more existing, but unpermitted, emissions units.

Owner/Authorized Representative or Responsible Official

1. Name and Title of Owner/Authorized Representative or Responsible Official:
Vernon J. Lloyd, VP-Production

2. Owner/Authorized Representative or 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**

3. Owner/Authorized Representative or Responsible Official Telephone Numbers:
Telephone: **(904) 397-8101** Fax: **(904) 397-1026**

4. Owner/Authorized Representative or Responsible Official Statement:

I, the undersigned, am the owner or authorized representative(check here [ ], if so) or the responsible official (check here [ ], if so) of the Title V source addressed in this application, whichever is applicable. 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. 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 any permitted emissions unit.*

Vernon J. Lloyd — Signature

7/24/00 — Date

* Attach letter of authorization if not currently on file.

Professional Engineer Certification

1. Professional Engineer Name: **John B. Koogler, Ph.D., P.E.**
Registration Number: **12925**

2. Professional Engineer Mailing Address:
Organization/Firm: **Koogler & Associates**
Street Address: **4014 N.W. 13th Street**
City: **Gainesville** State: **FL** Zip Code: **32609**

3. Professional Engineer Telephone Numbers:
Telephone: **(352) 377-5822** Fax: **(352) 377-7158**

4. Professional Engineer Statement:

I, the undersigned, hereby certify, except as particularly noted herein, that:*

(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

(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.

If the purpose of this application is to obtain a Title V source air operation permit (check here [ ], 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 schedule is submitted with this application.

If the purpose of this application is to obtain an air construction permit for one or more proposed new or modified emissions units (check here [X], 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.

If the purpose of this application is to obtain an initial air operation permit or operation permit revision for one or more newly constructed or modified emissions units (check here [ ], 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.

Signature _____ Date 7/20/00

(seal)

* Attach any exception to certification statement.

Scope of Application

Emissions Unit ID	Description of Emissions Unit	Permit Type	Processing Fee
004	X Train	AC1A	7500
020	B Phosphoric Acid Plant	AC1A	-
069	D Phosphoric Acid Plant	AC1A	-
070	C&D Superphosphoric Acid Plant	AC1A	-
071	Acid Clarification Plant	AC1A	-

Application Processing Fee

Check one: [**X**] Attached - Amount: **$7500** [ ] Not Applicable

Construction/Modification Information

1. Description of Proposed Project or Alterations:

WSAC proposes to reallocate the phosphoric acid production capability amongst the existing plants at Suwannee River and Swift Creek Chemical Complex. The A and C Phosphoric Acid Plants will be permanently shut down; the production rate of the B Phosphoric Acid Plant will be increased to 100 tph P2O5 input and the plant will be converted to a hemi-hydrate process; the production rate of the D Phosphoric Acid Plant will be increased to 110 tph P2O5 input. This reallocation will result in an increase in the processing rates of the Acid Clarification Plant and the C&D Superphosphoric Acid Plant. The proposed project also includes an increase in the production rate of the X-Train (Dical). The proposed project will trigger PSD review for fluorides. Supplemental information is presented in the attached report.

2. Projected or Actual Date of Commencement of Construction: **8/00**

3. Projected Date of Completion of Construction: **8/03**

Application Comment

A PSD application fee of $7500, as discussed with Mr. Syed Arif of FDEP, is enclosed for the proposed project.

II. FACILITY INFORMATION

A. GENERAL FACILITY INFORMATION

Facility Location and Type

1. Facility UTM Coordinates: Zone: **17** East (km): **328.3** North (km): **3368.8**			
2. Facility Latitude/Longitude: Latitude (DD/MM/SS): Longitude (DD/MM/SS):			
3. Governmental Facility Code: **0**	4. Facility Status Code: **A**	5. Facility Major Group SIC Code: **28**	6. Facility SIC(s): **2874**
7. Facility Comment (limit to 500 characters):			

Facility Contact

1. Name and Title of Facility Contact: **Charles B. Pults, Senior Environmental Engineer**
2. Facility Contact Mailing Address: Organization/Firm: **White Springs Agricultural Chemicals, Inc.** Street Address: **P.O. Box 300** City: **White Springs** State: **FL** Zip Code: **32906**
3. Facility Contact Telephone Numbers: Telephone: **(904) 397-8442** Fax: **(904) 397-7087**

Facility Regulatory Classifications

Check all that apply:

1. [ ] Small Business Stationary Source? [ ] Unknown
2. [X] Major Source of Pollutants Other than Hazardous Air Pollutants (HAPs)?
3. [ ] Synthetic Minor Source of Pollutants Other than HAPs?
4. [ ] Major Source of Hazardous Air Pollutants (HAPs)?
5. [X] Synthetic Minor Source of HAPs?
6. [X] One or More Emissions Units Subject to NSPS?
7. [ ] One or More Emission Units Subject to NESHAP?
8. [ ] Title V Source by EPA Designation?
9. Facility Regulatory Classifications Comment (limit to 200 characters):

List of Applicable Regulations

Title V Core List	
F.S. 403	
Rule 62-4, 204, 210, 212, 213, 214, 252, 256, 257, 281, 296, 297, FAC	
40 CFR 52, 60, 82.	

B. FACILITY POLLUTANTS

List of Pollutants Emitted

1. Pollutant Emitted	2. Pollutant Classif.	3. Requested Emissions Cap lb/hour	tons/year	4. Basis for Emissions Cap	5. Pollutant Comment
PM	**A**				
PM10	**A**				
NOX	**A**				
SO2	**A**				
FL	**B**				
SAM	**A**				
CO	**A**				
VOC	**B**				

C. FACILITY SUPPLEMENTAL INFORMATION

Supplemental Requirements

1. Area Map Showing Facility Location: [X] Attached, Document ID: **Report** [ ] Not Applicable [ ] Waiver Requested
2. Facility Plot Plan: [X] Attached, Document ID: **Report** [ ] Not Applicable [ ] Waiver Requested
3. Process Flow Diagram(s): [X] Attached, Document ID: **Report** [ ] Not Applicable [ ] Waiver Requested
4. Precautions to Prevent Emissions of Unconfined Particulate Matter: [X] Attached, Document ID: **Report** [ ] Not Applicable [ ] Waiver Requested
5. Fugitive Emissions Identification: [X] Attached, Document ID: **Report** [ ] Not Applicable [ ] Waiver Requested
6. Supplemental Information for Construction Permit Application: [X] Attached, Document ID: **Report** [ ] Not Applicable
7. Supplemental Requirements Comment: **See attached report in support of PSD application.**

Additional Supplemental Requirements for Title V Air Operation Permit Applications NA

8. List of Proposed Insignificant Activities:
   [ ] Attached, Document ID:_____ [ ] Not Applicable

9. List of Equipment/Activities Regulated under Title VI:
   [ ] Attached, Document ID:_____
   [ ] Equipment/Activities On site but Not Required to be Individually Listed
   [ ] Not Applicable

10. Alternative Methods of Operation:
    [ ] Attached, Document ID:_____ [ ] Not Applicable

11. Alternative Modes of Operation (Emissions Trading):
    [ ] Attached, Document ID:_____ [ ] Not Applicable

12. Identification of Additional Applicable Requirements:
    [ ] Attached, Document ID:_____ [ ] Not Applicable

13. Risk Management Plan Verification:
    [ ] Plan previously submitted to Chemical Emergency Preparedness and Prevention Office (CEPPO). Verification of submittal attached (Document ID:_____) or previously submitted to DEP (Date and DEP Office:_____)
    [ ] Plan to be submitted to CEPPO (Date required:_____)
    [ ] Not Applicable

14. Compliance Report and Plan:
    [ ] Attached, Document ID:_____ [ ] Not Applicable

15. Compliance Certification (Hard-copy Required):
    [ ] Attached, Document ID:_____ [ ] Not Applicable

III. EMISSIONS UNIT INFORMATION

A separate Emissions Unit Information Section (including subsections A through J as required) must be completed for each emissions unit addressed in this Application for Air Permit. If submitting the application form in hard copy, indicate, in the space provided at the top of each page, the number of this Emissions Unit Information Section and the total number of Emissions Unit Information Sections submitted as part of this application.

A. GENERAL EMISSIONS UNIT INFORMATION
(All Emissions Units)

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).

[X] 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. Regulated or Unregulated Emissions Unit? (Check one)

[X] 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.

3. Description of Emissions Unit Addressed in This Section (limit to 60 characters):
X-Train (Dical) Process

4. Emissions Unit Identification Number:
ID: **004**
[ ] No ID
[ ] ID Unknown

5. Emissions Unit Status Code: **A**	6. Initial Startup Date: **NA**	7. Emissions Unit Major Group SIC Code: **28**	8. Acid Rain Unit? [ ]

9. Emissions Unit Comment: (Limit to 500 Characters)
X-Train produces dicalcium and monocalcium phosphate in two methods of operation:
(1) 18.5%P
(2) 21.0%P

Emissions Unit Control Equipment

1. Control Equipment/Method Description (Limit to 200 characters per device or method):
Baghouse, Wet Scrubber –Venturi, and Cyclones

2. Control Device or Method Code(s): **002, 018, 075**

Emissions Unit Details NA

1. Package Unit:		
Manufacturer:	Model Number:	
2. Generator Nameplate Rating:	MW	
3. Incinerator Information:		
Dwell Temperature:		°F
Dwell Time:		seconds
Incinerator Afterburner Temperature:		°F

B. EMISSIONS UNIT CAPACITY INFORMATION
(Regulated Emissions Units Only)

Emissions Unit Operating Capacity and Schedule

1. Maximum Heat Input Rate:		mmBtu/hr
2. Maximum Incineration Rate:	lb/hr	tons/day
3. Maximum Process or Throughput Rate:		
4. Maximum Production Rate: **55 tph**		
5. Requested Maximum Operating Schedule:		
	24 hours/day	**7** days/week
	52 weeks/year	**8760** hours/year
6. Operating Capacity/Schedule Comment (limit to 200 characters): **Dical production rate.**		

C. EMISSIONS UNIT REGULATIONS
(Regulated Emissions Units Only)

List of Applicable Regulations

See Page 8.	

D. EMISSION POINT (STACK/VENT) INFORMATION
(Regulated Emissions Units Only)

Emission Point Description and Type

1. Identification of Point on Plot Plan or Flow Diagram?	2. Emission Point Type Code: **3**

3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking (limit to 100 characters per point):
EP 1 = X-Train Stack
EP 2 = Dedust bin
EP 3 = Shipping area
EP 4 = Limestone bin
EP 5 = Reclaim/fines bin
EP 6 = Fugitive Dust Collection

4. ID Numbers or Descriptions of Emission Units with this Emission Point in Common:

5. Discharge Type Code: **V**	6. Stack Height: **120** feet	7. Exit Diameter: **7** feet
8. Exit Temperature: **120** °F	9. Actual Volumetric Flow Rate: **92,400** acfm	10. Water Vapor: **NA** %

11. Maximum Dry Standard Flow Rate: **NA** dscfm	12. Nonstack Emission Point Height: **NA** feet

13. Emission Point UTM Coordinates:
Zone: East (km): North (km):

14. Emission Point Comment (limit to 200 characters):

EP1 (Wet Scrubber) is the representative stack for this unit based on maximum emissions.

Information for Other Emission Points

	Discharge Type	Stck Ht. (ft)	Exit Dia. (ft)	Exit Temp (F)	Flowrate (acfm)
EP2	**V**	**20**	**3.5**	**120**	**25,000**
EP3	**V**	**100**	**3.0**	**115**	**18,000**
EP4	**V**	**105**	**1.0**	**115**	**6,000**
EP5	**V**	**10**	**1.0**	**110**	**6,000**
EP6	**H**	**-**	**-**	**115**	**40,000**

E. SEGMENT (PROCESS/FUEL) INFORMATION
(All Emissions Units)

Segment Description and Rate: Segment __1___ of __2___

1. Segment Description (Process/Fuel Type) (limit to 500 characters): **Dical Production**		
2. Source Classification Code (SCC): **3-01-999-99**	3. SCC Units: **Tons Product**	
3. Maximum Hourly Rate: **55 tph**	4. Maximum Annual Rate: **400,000**	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment (limit to 200 characters): **The plant is not expected to operate at 55 tph for all 8760 hours of operation.**		

Segment Description and Rate: Segment __2___ of __2___

1. Segment Description (Process/Fuel Type) (limit to 500 characters): **In-Process Fuel (Natural Gas)**		
2. Source Classification Code (SCC): **3-90-005-89**	3. SCC Units: **Million Cubic Feet Burned**	
4. Maximum Hourly Rate: **0.064**	5. Maximum Annual Rate: **564**	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit: **1025**
10. Segment Comment (limit to 200 characters):		

F. EMISSIONS UNIT POLLUTANTS
(All Emissions Units)

1. Pollutant Emitted	2. Primary Control Device Code	3. Secondary Control Device Code	4. Pollutant Regulatory Code
PM/PM10	**018**	**000**	**EL**
FL	**002**	**000**	**EL**
CO	**000**	**000**	**NS**
VOC	**000**	**000**	**NS**
NOX	**000**	**000**	**NS**
SO2	**000**	**000**	**NS**

Emissions Unit Information Section __1____ of ___5___

Pollutant Detail Information Page __1____ of ___2___

G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units -
Emissions-Limited and Preconstruction Review Pollutants Only)

Potential/Fugitive Emissions

1. Pollutant Emitted: **PM/PM10**	2. Total Percent Efficiency of Control:

3. Potential Emissions: **22.0** lb/hour **79.6** tons/year	4. Synthetically Limited? [X]
5. Range of Estimated Fugitive Emissions: [ ] 1 [ ] 2 [ ] 3 _____ to _____ tons/year	
6. Emission Factor: **See Appendix A** Reference:	7. Emissions Method Code:
7. Calculation of Emissions (limit to 600 characters): **See Appendix A**	
8. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): **Combined emissions from emission points.**	

Allowable Emissions Allowable Emissions ___1___ of ___1___

1. Basis for Allowable Emissions Code: **Other**	2. Future Effective Date of Allowable Emissions: **NA**
3. Requested Allowable Emissions and Units: **22.0 lb/hr**	4. Equivalent Allowable Emissions: **22.0** lb/hour **79.6** tons/year
5. Method of Compliance (limit to 60 characters): **EPA Method 5**	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): **Combined emissions from emission points.**	

Emissions Unit Information Section __1____ of ___5___

Pollutant Detail Information Page __2____ of ___2___

G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units - Emissions-Limited and Preconstruction Review Pollutants Only)

Potential/Fugitive Emissions

1. Pollutant Emitted: **FL**	2. Total Percent Efficiency of Control: **90**

3. Potential Emissions: **1.65** lb/hour **6.0** tons/year	4. Synthetically Limited? [**X**]

5. Range of Estimated Fugitive Emissions:
[ ] 1 [ ] 2 [ ] 3 _____ to _____ tons/year

6. Emission Factor: **0.03 lb/ton product** Reference: **Engineering estimate**	7. Emissions Method Code:

9. Calculation of Emissions (limit to 600 characters):

FL, hr = 0.03 lb/ton x 55 tph
= 1.65 lb/hr
FL, yr = 0.03 lb/ton x 400,000 tpy x ton/2000 lbs
= 6.0 tpy

10. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters):

Allowable Emissions Allowable Emissions ___1___ of ___1___

1. Basis for Allowable Emissions Code: **Other**	2. Future Effective Date of Allowable Emissions: **NA**
3. Requested Allowable Emissions and Units: **1.65 lb/hr**	4. Equivalent Allowable Emissions: **1.65** lb/hour **6.0** tons/year

5. Method of Compliance (limit to 60 characters):
EPA Method 13B

6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters):

H. VISIBLE EMISSIONS INFORMATION
(Only Regulated Emissions Units Subject to a VE Limitation)

Visible Emissions Limitation: Visible Emissions Limitation __1__ of __1__

1. Visible Emissions Subtype: **VE20**	2. Basis for Allowable Opacity: [X] Rule [ ] Other
3. Requested Allowable Opacity: Normal Conditions: **20** % Exceptional Conditions: % Maximum Period of Excess Opacity Allowed: min/hour	
4. Method of Compliance: **EPA Method 9**	
5. Visible Emissions Comment (limit to 200 characters):	

I. CONTINUOUS MONITOR INFORMATION
(Only Regulated Emissions Units Subject to Continuous Monitoring)

Continuous Monitoring System: Continuous Monitor _____ of _____

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	[ ] Rule [ ] Other
4. Monitor Information: Manufacturer: Model Number:	Serial Number:
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment (limit to 200 characters):	

J. EMISSIONS UNIT SUPPLEMENTAL INFORMATION
(Regulated Emissions Units Only)

Supplemental Requirements

1. Process Flow Diagram [X] Attached, Document ID: **Report** [ ] Not Applicable [ ] Waiver Requested
2. Fuel Analysis or Specification **(natural gas)** [ ] Attached, Document ID:_____ [ ] Not Applicable [X] Waiver Requested
3. Detailed Description of Control Equipment [X] Attached, Document ID: **Report** [ ] Not Applicable [ ] Waiver Requested
4. Description of Stack Sampling Facilities [ ] Attached, Document ID:_____ [X] Not Applicable [ ] Waiver Requested
5. Compliance Test Report [ ] Attached, Document ID:_____ [ ] Previously submitted, Date:_____ [X] Not Applicable
6. Procedures for Startup and Shutdown [ ] Attached, Document ID:_____ [X] Not Applicable [ ] Waiver Requested
7. Operation and Maintenance Plan [ ] Attached, Document ID:_____ [X] Not Applicable [ ] Waiver Requested
8. Supplemental Information for Construction Permit Application [X] Attached, Document ID: **Report** [ ] Not Applicable
9. Other Information Required by Rule or Statute [ ] Attached, Document ID:_____ [X] Not Applicable
10. Supplemental Requirements Comment:

Additional Supplemental Requirements for Title V Air Operation Permit Applications NA

11. Alternative Methods of Operation
[ ] Attached, Document ID:_____ [ ] Not Applicable

12. Alternative Modes of Operation (Emissions Trading)
[ ] Attached, Document ID:_____ [ ] Not Applicable

13. Identification of Additional Applicable Requirements
[ ] Attached, Document ID:_____ [ ] Not Applicable

14. Compliance Assurance Monitoring Plan
[ ] Attached, Document ID:_____ [ ] Not Applicable

15. Acid Rain Part Application (Hard-copy Required)

[ ] Acid Rain Part - Phase II (Form No. 62-210.900(1)(a))
Attached, Document ID:_____

[ ] Repowering Extension Plan (Form No. 62-210.900(1)(a)1.)
Attached, Document ID:_____

[ ] New Unit Exemption (Form No. 62-210.900(1)(a)2.)
Attached, Document ID:_____

[ ] Retired Unit Exemption (Form No. 62-210.900(1)(a)3.)
Attached, Document ID:_____

[ ] Phase II NOx Compliance Plan (Form No. 62-210.900(1)(a)4.)
Attached, Document ID:_____

[ ] Phase NOx Averaging Plan (Form No. 62-210.900(1)(a)5.)
Attached, Document ID:_____

[ ] Not Applicable

III. EMISSIONS UNIT INFORMATION

A separate Emissions Unit Information Section (including subsections A through J as required) must be completed for each emissions unit addressed in this Application for Air Permit. If submitting the application form in hard copy, indicate, in the space provided at the top of each page, the number of this Emissions Unit Information Section and the total number of Emissions Unit Information Sections submitted as part of this application.

A. GENERAL EMISSIONS UNIT INFORMATION
(All Emissions Units)

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).

[X] 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. Regulated or Unregulated Emissions Unit? (Check one)

[X] 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.

3. Description of Emissions Unit Addressed in This Section (limit to 60 characters):
B Phosphoric Acid Plant

4. Emissions Unit Identification Number:
ID: **020**
[ ] No ID
[ ] ID Unknown

5. Emissions Unit Status Code: **A**	6. Initial Startup Date: **NA**	7. Emissions Unit Major Group SIC Code: **28**	8. Acid Rain Unit? [ ]

10. Emissions Unit Comment: (Limit to 500 Characters)

Emissions Unit Control Equipment

5. Control Equipment/Method Description (Limit to 200 characters per device or method):
Packed wet scrubber

2. Control Device or Method Code(s): **002**

Emissions Unit Details NA

1. Package Unit:		
Manufacturer:	Model Number:	
2. Generator Nameplate Rating:	MW	
3. Incinerator Information:		
Dwell Temperature:		°F
Dwell Time:		seconds
Incinerator Afterburner Temperature:		°F

B. EMISSIONS UNIT CAPACITY INFORMATION
(Regulated Emissions Units Only)

Emissions Unit Operating Capacity and Schedule

1. Maximum Heat Input Rate:		mmBtu/hr
2. Maximum Incineration Rate:	lb/hr	tons/day
3. Maximum Process or Throughput Rate:		
4. Maximum Production Rate: **100 tph P2O5 input**		
5. Requested Maximum Operating Schedule:		
	24 hours/day	**7** days/week
	52 weeks/year	**8760** hours/year
11. Operating Capacity/Schedule Comment (limit to 200 characters):		

C. EMISSIONS UNIT REGULATIONS
(Regulated Emissions Units Only)

List of Applicable Regulations

See Page 8.	

D. EMISSION POINT (STACK/VENT) INFORMATION
(Regulated Emissions Units Only)

Emission Point Description and Type

1. Identification of Point on Plot Plan or Flow Diagram? **B Phos Acid**	2. Emission Point Type Code: **3**	
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking (limit to 100 characters per point): **Scrubber stack**		
4. ID Numbers or Descriptions of Emission Units with this Emission Point in Common:		
5. Discharge Type Code: **V**	6. Stack Height: **106** feet	7. Exit Diameter: **4** feet
8. Exit Temperature: **100** °F	9. Actual Volumetric Flow Rate: **40,000** acfm	10. Water Vapor: **NA** %
11. Maximum Dry Standard Flow Rate: **NA** dscfm	12. Nonstack Emission Point Height: **NA** feet	
13. Emission Point UTM Coordinates: Zone: East (km): North (km):		
14. Emission Point Comment (limit to 200 characters):		

E. SEGMENT (PROCESS/FUEL) INFORMATION
(All Emissions Units)

Segment Description and Rate: Segment __1___ of __1___

2. Segment Description (Process/Fuel Type) (limit to 500 characters): **Phosphoric Acid/Wet Process**		
6. Source Classification Code (SCC): **3-01-016-01**	3. SCC Units: **Tons Processed**	
7. Maximum Hourly Rate: **100 tph**	8. Maximum Annual Rate: **600,000 tpy**	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment (limit to 200 characters): **P2O5 input**		

Segment Description and Rate: Segment _____ of _____

1. Segment Description (Process/Fuel Type) (limit to 500 characters):		
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 (limit to 200 characters):		

F. EMISSIONS UNIT POLLUTANTS
(All Emissions Units)

1. Pollutant Emitted	2. Primary Control Device Code	3. Secondary Control Device Code	4. Pollutant Regulatory Code
FL	**002**	**000**	**EL**

Emissions Unit Information Section __2____ of ___5___

Pollutant Detail Information Page __1____ of ___1___

G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units - Emissions-Limited and Preconstruction Review Pollutants Only)

Potential/Fugitive Emissions

1. Pollutant Emitted: **FL**	2. Total Percent Efficiency of Control: **90**
3. Potential Emissions: **1.35** lb/hour **4.1** tons/year	4. Synthetically Limited? [ ]
5. Range of Estimated Fugitive Emissions: [ ] 1 [ ] 2 [ ] 3 _____ to _____ tons/year	
6. Emission Factor: **0.0135 lb/ton P2O5 input** Reference: **BACT**	7. Emissions Method Code:
12. Calculation of Emissions (limit to 600 characters): **FL, hr = 0.0135 lb/ton P2O5 input x 100 tph P2O5 input = 1.35 lb/hr** **FL, yr = 0.0135 lb/ton P2O5 input x 600000 tpy P2O5 input x ton/2000 lbs = 4.1 tpy**	
13. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters):	

Allowable Emissions Allowable Emissions ___1___ of ___1___

1. Basis for Allowable Emissions Code: **Rule**	2. Future Effective Date of Allowable Emissions: **NA**
3. Requested Allowable Emissions and Units: **1.35 lb/hr**	4. Equivalent Allowable Emissions: **1.35** lb/hour **4.1** tons/year
5. Method of Compliance (limit to 60 characters): **EPA Method 13B**	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): **BACT**	

H. VISIBLE EMISSIONS INFORMATION
(Only Regulated Emissions Units Subject to a VE Limitation)

Visible Emissions Limitation: Visible Emissions Limitation _____ of _____

1. Visible Emissions Subtype: **NA**	2. Basis for Allowable Opacity: [ ] Rule [ ] Other
3. Requested Allowable Opacity: Normal Conditions: % Exceptional Conditions: % Maximum Period of Excess Opacity Allowed: min/hour	
4. Method of Compliance:	
5. Visible Emissions Comment (limit to 200 characters): **No VE standard**	

I. CONTINUOUS MONITOR INFORMATION
(Only Regulated Emissions Units Subject to Continuous Monitoring)

Continuous Monitoring System: Continuous Monitor __1___ of __2___

1. Parameter Code: **PRS**	2. Pollutant(s): **F**
3. CMS Requirement:	[**X**] Rule [ ] Other
4. Monitor Information: **To be submitted (TBS)** Manufacturer: Model Number: Serial Number:	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment (limit to 200 characters):	

I. CONTINUOUS MONITOR INFORMATION
(Only Regulated Emissions Units Subject to Continuous Monitoring)

Continuous Monitoring System: Continuous Monitor __2__ of __2__

1. Parameter Code: **Mass FLOW**	2. Pollutant(s): **F**
3. CMS Requirement:	[X] Rule [ ] Other
4. Monitor Information: **To be submitted (TBS)** Manufacturer: Model Number:	Serial Number:
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment (limit to 200 characters):	

J. EMISSIONS UNIT SUPPLEMENTAL INFORMATION
(Regulated Emissions Units Only)

Supplemental Requirements

1. Process Flow Diagram [X] Attached, Document ID: **Report** [ ] Not Applicable [ ] Waiver Requested
2. Fuel Analysis or Specification [ ] Attached, Document ID:_____ [X] Not Applicable [ ] Waiver Requested
3. Detailed Description of Control Equipment [X] Attached, Document ID: **Report** [ ] Not Applicable [ ] Waiver Requested
4. Description of Stack Sampling Facilities [ ] Attached, Document ID:_____ [X] Not Applicable [ ] Waiver Requested
5. Compliance Test Report [ ] Attached, Document ID:_____ [ ] Previously submitted, Date:_____ [X] Not Applicable
6. Procedures for Startup and Shutdown [ ] Attached, Document ID:_____ [X] Not Applicable [ ] Waiver Requested
7. Operation and Maintenance Plan [ ] Attached, Document ID:_____ [X] Not Applicable [ ] Waiver Requested
8. Supplemental Information for Construction Permit Application [X] Attached, Document ID: **Report** [ ] Not Applicable
9. Other Information Required by Rule or Statute [ ] Attached, Document ID:_____ [X] Not Applicable
10. Supplemental Requirements Comment:

Additional Supplemental Requirements for Title V Air Operation Permit Applications NA

11. Alternative Methods of Operation
[ ] Attached, Document ID:_____ [ ] Not Applicable

12. Alternative Modes of Operation (Emissions Trading)
[ ] Attached, Document ID:_____ [ ] Not Applicable

13. Identification of Additional Applicable Requirements
[ ] Attached, Document ID:_____ [ ] Not Applicable

14. Compliance Assurance Monitoring Plan
[ ] Attached, Document ID:_____ [ ] Not Applicable

15. Acid Rain Part Application (Hard-copy Required)

[ ] Acid Rain Part - Phase II (Form No. 62-210.900(1)(a))
Attached, Document ID:_____

[ ] Repowering Extension Plan (Form No. 62-210.900(1)(a)1.)
Attached, Document ID:_____

[ ] New Unit Exemption (Form No. 62-210.900(1)(a)2.)
Attached, Document ID:_____

[ ] Retired Unit Exemption (Form No. 62-210.900(1)(a)3.)
Attached, Document ID:_____

[ ] Phase II NOx Compliance Plan (Form No. 62-210.900(1)(a)4.)
Attached, Document ID:_____

[ ] Phase NOx Averaging Plan (Form No. 62-210.900(1)(a)5.)
Attached, Document ID:_____

[ ] Not Applicable

III. EMISSIONS UNIT INFORMATION

A separate Emissions Unit Information Section (including subsections A through J as required) must be completed for each emissions unit addressed in this Application for Air Permit. If submitting the application form in hard copy, indicate, in the space provided at the top of each page, the number of this Emissions Unit Information Section and the total number of Emissions Unit Information Sections submitted as part of this application.

A. GENERAL EMISSIONS UNIT INFORMATION
(All Emissions Units)

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).

[X] 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. Regulated or Unregulated Emissions Unit? (Check one)

[X] 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.

3. Description of Emissions Unit Addressed in This Section (limit to 60 characters):
D Phosphoric Acid Plant

4. Emissions Unit Identification Number:
ID: **069**
[ ] No ID
[ ] ID Unknown

5. Emissions Unit Status Code: **A**	6. Initial Startup Date: **NA**	7. Emissions Unit Major Group SIC Code: **28**	8. Acid Rain Unit? [ ]

11. Emissions Unit Comment: (Limit to 500 Characters)

Emissions Unit Control Equipment

9. Control Equipment/Method Description (Limit to 200 characters per device or method):
Packed wet scrubber

2. Control Device or Method Code(s): **002**

Emissions Unit Details NA

1. Package Unit:		
Manufacturer:	Model Number:	
2. Generator Nameplate Rating:	MW	
3. Incinerator Information:		
Dwell Temperature:		°F
Dwell Time:		seconds
Incinerator Afterburner Temperature:		°F

B. EMISSIONS UNIT CAPACITY INFORMATION
(Regulated Emissions Units Only)

Emissions Unit Operating Capacity and Schedule

1. Maximum Heat Input Rate:		mmBtu/hr
2. Maximum Incineration Rate:	lb/hr	tons/day
3. Maximum Process or Throughput Rate:		
4. Maximum Production Rate: **110 tph P2O5 input**		
5. Requested Maximum Operating Schedule:		
	24 hours/day	**7** days/week
	52 weeks/year	**8760** hours/year
14. Operating Capacity/Schedule Comment (limit to 200 characters):		

C. EMISSIONS UNIT REGULATIONS
(Regulated Emissions Units Only)

List of Applicable Regulations

See Page 8.	

D. EMISSION POINT (STACK/VENT) INFORMATION
(Regulated Emissions Units Only)

Emission Point Description and Type

1. Identification of Point on Plot Plan or Flow Diagram? **D Phos Acid**	2. Emission Point Type Code: **3**	
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking (limit to 100 characters per point): **Scrubber stack**		
4. ID Numbers or Descriptions of Emission Units with this Emission Point in Common:		
5. Discharge Type Code: **V**	6. Stack Height: **105** feet	7. Exit Diameter: **3** feet
8. Exit Temperature: **100** °F	9. Actual Volumetric Flow Rate: **35,000** acfm	10. Water Vapor: **NA** %
11. Maximum Dry Standard Flow Rate: **NA** dscfm	12. Nonstack Emission Point Height: **NA** feet	
13. Emission Point UTM Coordinates: Zone: East (km): North (km):		
14. Emission Point Comment (limit to 200 characters):		

E. SEGMENT (PROCESS/FUEL) INFORMATION
(All Emissions Units)

Segment Description and Rate: Segment __1___ of __1___

3. Segment Description (Process/Fuel Type) (limit to 500 characters): **Phosphoric Acid/Wet Process**		
10. Source Classification Code (SCC): **3-01-016-01**	3. SCC Units: **Tons Processed**	
11. Maximum Hourly Rate: **110 tph**	12. Maximum Annual Rate: **800,000 tpy**	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment (limit to 200 characters): **P2O5 input**		

Segment Description and Rate: Segment _____ of _____

1. Segment Description (Process/Fuel Type) (limit to 500 characters):		
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 (limit to 200 characters):		

F. EMISSIONS UNIT POLLUTANTS
(All Emissions Units)

1. Pollutant Emitted	2. Primary Control Device Code	3. Secondary Control Device Code	4. Pollutant Regulatory Code
FL	**002**	**000**	**EL**

Emissions Unit Information Section __3____ of ___5___

Pollutant Detail Information Page __1____ of ___1___

G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units - Emissions-Limited and Preconstruction Review Pollutants Only)

Potential/Fugitive Emissions

1. Pollutant Emitted: **FL**	2. Total Percent Efficiency of Control: **90**
3. Potential Emissions: **1.49** lb/hour **5.4** tons/year	4. Synthetically Limited? [ ]
5. Range of Estimated Fugitive Emissions: [ ] 1 [ ] 2 [ ] 3 _____ to _____ tons/year	
6. Emission Factor: **0.0135 lb/ton P2O5 input** Reference: **BACT**	7. Emissions Method Code:
15. Calculation of Emissions (limit to 600 characters): **FL, hr = 0.0135 lb/ton P2O5 input x 110 tph P2O5 input = 1.49 lb/hr** **FL, yr = 0.0135 lb/ton P2O5 input x 800000 tpy P2O5 input x ton/2000 lbs = 5.4 tpy**	
16. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters):	

Allowable Emissions Allowable Emissions ___1___ of ___1___

1. Basis for Allowable Emissions Code: **Rule**	2. Future Effective Date of Allowable Emissions: **NA**
3. Requested Allowable Emissions and Units: **1.49 lb/hr**	4. Equivalent Allowable Emissions: **1.49** lb/hour **5.4** tons/year
5. Method of Compliance (limit to 60 characters): **EPA Method 13B**	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): **BACT**	

H. VISIBLE EMISSIONS INFORMATION
(Only Regulated Emissions Units Subject to a VE Limitation)

Visible Emissions Limitation: Visible Emissions Limitation _____ of _____

1. Visible Emissions Subtype: **NA**	2. Basis for Allowable Opacity: [ ] Rule [ ] Other
3. Requested Allowable Opacity: Normal Conditions: % Exceptional Conditions: % Maximum Period of Excess Opacity Allowed: min/hour	
4. Method of Compliance:	
5. Visible Emissions Comment (limit to 200 characters): **No VE standard**	

I. CONTINUOUS MONITOR INFORMATION
(Only Regulated Emissions Units Subject to Continuous Monitoring)

Continuous Monitoring System: Continuous Monitor ___1__ of __2___

1. Parameter Code: **PRS**	2. Pollutant(s): **F**
3. CMS Requirement:	**[X]** Rule [ ] Other
4. Monitor Information: **TBS** Manufacturer: Model Number: Serial Number:	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment (limit to 200 characters):	

I. CONTINUOUS MONITOR INFORMATION
(Only Regulated Emissions Units Subject to Continuous Monitoring)

Continuous Monitoring System: Continuous Monitor ___2__ of __2___

1. Parameter Code: **Mass FLOW**	2. Pollutant(s): **F**
3. CMS Requirement:	[X] Rule [ ] Other
4. Monitor Information: **TBS** Manufacturer: Model Number:	Serial Number:
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment (limit to 200 characters):	

J. EMISSIONS UNIT SUPPLEMENTAL INFORMATION
(Regulated Emissions Units Only)

Supplemental Requirements

1. Process Flow Diagram [X] Attached, Document ID: **Report** [ ] Not Applicable [ ] Waiver Requested
2. Fuel Analysis or Specification [ ] Attached, Document ID:_____ [X] Not Applicable [ ] Waiver Requested
3. Detailed Description of Control Equipment [X] Attached, Document ID: **Report** [ ] Not Applicable [ ] Waiver Requested
4. Description of Stack Sampling Facilities [ ] Attached, Document ID:_____ [X] Not Applicable [ ] Waiver Requested
5. Compliance Test Report [ ] Attached, Document ID:_____ [ ] Previously submitted, Date:_____ [X] Not Applicable
6. Procedures for Startup and Shutdown [ ] Attached, Document ID:_____ [X] Not Applicable [ ] Waiver Requested
7. Operation and Maintenance Plan [ ] Attached, Document ID:_____ [X] Not Applicable [ ] Waiver Requested
8. Supplemental Information for Construction Permit Application [X] Attached, Document ID: **Report** [ ] Not Applicable
9. Other Information Required by Rule or Statute [ ] Attached, Document ID:_____ [X] Not Applicable
10. Supplemental Requirements Comment:

Additional Supplemental Requirements for Title V Air Operation Permit Applications NA

11. Alternative Methods of Operation
[ ] Attached, Document ID:_____ [ ] Not Applicable

12. Alternative Modes of Operation (Emissions Trading)
[ ] Attached, Document ID:_____ [ ] Not Applicable

13. Identification of Additional Applicable Requirements
[ ] Attached, Document ID:_____ [ ] Not Applicable

14. Compliance Assurance Monitoring Plan
[ ] Attached, Document ID:_____ [ ] Not Applicable

15. Acid Rain Part Application (Hard-copy Required)

[ ] Acid Rain Part - Phase II (Form No. 62-210.900(1)(a))
Attached, Document ID:_____

[ ] Repowering Extension Plan (Form No. 62-210.900(1)(a)1.)
Attached, Document ID:_____

[ ] New Unit Exemption (Form No. 62-210.900(1)(a)2.)
Attached, Document ID:_____

[ ] Retired Unit Exemption (Form No. 62-210.900(1)(a)3.)
Attached, Document ID:_____

[ ] Phase II NOx Compliance Plan (Form No. 62-210.900(1)(a)4.)
Attached, Document ID:_____

[ ] Phase NOx Averaging Plan (Form No. 62-210.900(1)(a)5.)
Attached, Document ID:_____

[ ] Not Applicable

III. EMISSIONS UNIT INFORMATION

A separate Emissions Unit Information Section (including subsections A through J as required) must be completed for each emissions unit addressed in this Application for Air Permit. If submitting the application form in hard copy, indicate, in the space provided at the top of each page, the number of this Emissions Unit Information Section and the total number of Emissions Unit Information Sections submitted as part of this application.

A. GENERAL EMISSIONS UNIT INFORMATION
(All Emissions Units)

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).

[X] 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. Regulated or Unregulated Emissions Unit? (Check one)

[X] 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.

3. Description of Emissions Unit Addressed in This Section (limit to 60 characters):
C & D Superphosphoric Acid (SPA) Plants

4. Emissions Unit Identification Number:
ID: **070**
[ ] No ID
[ ] ID Unknown

5. Emissions Unit Status Code: **A**	6. Initial Startup Date: **NA**	7. Emissions Unit Major Group SIC Code: **28**	8. Acid Rain Unit? [ ]

12. Emissions Unit Comment: (Limit to 500 Characters)

Emissions Unit Control Equipment

13. Control Equipment/Method Description (Limit to 200 characters per device or method): **Wet scrubber**
2. Control Device or Method Code(s): **002**

Emissions Unit Details NA

1. Package Unit: Manufacturer:	Model Number:	
2. Generator Nameplate Rating:	MW	
3. Incinerator Information: Dwell Temperature: Dwell Time: Incinerator Afterburner Temperature:		°F seconds °F

B. EMISSIONS UNIT CAPACITY INFORMATION
(Regulated Emissions Units Only)

Emissions Unit Operating Capacity and Schedule

1. Maximum Heat Input Rate:		mmBtu/hr
2. Maximum Incineration Rate:	lb/hr	tons/day
3. Maximum Process or Throughput Rate:		
4. Maximum Production Rate: **110 tph P2O5 input**		
5. Requested Maximum Operating Schedule:		
	24 hours/day	**7** days/week
	52 weeks/year	**8760** hours/year
17. Operating Capacity/Schedule Comment (limit to 200 characters):		

C. EMISSIONS UNIT REGULATIONS
(Regulated Emissions Units Only)

List of Applicable Regulations

See Page 8.	

D. EMISSION POINT (STACK/VENT) INFORMATION
(Regulated Emissions Units Only)

Emission Point Description and Type

1. Identification of Point on Plot Plan or Flow Diagram? **C&D SPA**	2. Emission Point Type Code: **3**	
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking (limit to 100 characters per point):		
4. ID Numbers or Descriptions of Emission Units with this Emission Point in Common:		
5. Discharge Type Code: **V**	6. Stack Height: **60** feet	7. Exit Diameter: **3.6** feet
8. Exit Temperature: **95** °F	9. Actual Volumetric Flow Rate: **15,000** acfm	10. Water Vapor: **NA** %
11. Maximum Dry Standard Flow Rate: **NA** dscfm	12. Nonstack Emission Point Height: **NA** feet	
13. Emission Point UTM Coordinates: Zone:	East (km):	North (km):
14. Emission Point Comment (limit to 200 characters):		

E. SEGMENT (PROCESS/FUEL) INFORMATION
(All Emissions Units)

Segment Description and Rate: Segment __1___ of __1___

4. Segment Description (Process/Fuel Type) (limit to 500 characters): **Phosphoric Acid/Wet Process**		
14. Source Classification Code (SCC): **3-01-016-99**	3. SCC Units: **Tons Processed**	
15. Maximum Hourly Rate: **110 tph**	16. Maximum Annual Rate: **876,000 tpy**	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment (limit to 200 characters): **P2O5 input**		

Segment Description and Rate: Segment _____ of _____

1. Segment Description (Process/Fuel Type) (limit to 500 characters):		
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 (limit to 200 characters):		

F. EMISSIONS UNIT POLLUTANTS
(All Emissions Units)

1. Pollutant Emitted	2. Primary Control Device Code	3. Secondary Control Device Code	4. Pollutant Regulatory Code
FL	**002**	**000**	**EL**

Emissions Unit Information Section __4____ of ___5___

Pollutant Detail Information Page __1____ of ___1___

G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units -
Emissions-Limited and Preconstruction Review Pollutants Only)

Potential/Fugitive Emissions

1. Pollutant Emitted: **FL**	2. Total Percent Efficiency of Control:
3. Potential Emissions: **0.96** lb/hour **3.8** tons/year	4. Synthetically Limited? [ ]
5. Range of Estimated Fugitive Emissions: [ ] 1 [ ] 2 [ ] 3 _____ to _____ tons/year	
6. Emission Factor: **0.0087 lb/ton P2O5 input** Reference: **BACT**	7. Emissions Method Code:
18. Calculation of Emissions (limit to 600 characters): **FL, hr = 0.0087 lb/ton P2O5 input x 110 tph P2O5 input = 0.96 lb/hr** **FL, yr = 0.0087 lb/ton P2O5 input x 876,000 tpy P2O5 input x ton/2000 lbs = 3.8 tpy**	
19. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters):	

Allowable Emissions Allowable Emissions ___1___ of ___1___

1. Basis for Allowable Emissions Code: **Rule**	2. Future Effective Date of Allowable Emissions: **NA**
3. Requested Allowable Emissions and Units: **0.96 lb/hr**	4. Equivalent Allowable Emissions: **0.96** lb/hour **3.8** tons/year
5. Method of Compliance (limit to 60 characters): **EPA Method 13B**	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): **BACT**	

H. VISIBLE EMISSIONS INFORMATION
(Only Regulated Emissions Units Subject to a VE Limitation)

Visible Emissions Limitation: Visible Emissions Limitation _____ of _____

1. Visible Emissions Subtype: **NA**	2. Basis for Allowable Opacity: [ ] Rule [ ] Other
3. Requested Allowable Opacity: Normal Conditions: % Exceptional Conditions: % Maximum Period of Excess Opacity Allowed: min/hour	
4. Method of Compliance:	
5. Visible Emissions Comment (limit to 200 characters): **No VE standard**	

I. CONTINUOUS MONITOR INFORMATION
(Only Regulated Emissions Units Subject to Continuous Monitoring)

Continuous Monitoring System: Continuous Monitor ___1__ of __2___

1. Parameter Code: **PRS**	2. Pollutant(s): **F**
3. CMS Requirement:	[**X**] Rule [ ] Other
4. Monitor Information: **TBS** Manufacturer: Model Number: Serial Number:	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment (limit to 200 characters):	

I. CONTINUOUS MONITOR INFORMATION
(Only Regulated Emissions Units Subject to Continuous Monitoring)

Continuous Monitoring System: Continuous Monitor ___2__ of __2___

1. Parameter Code: **Mass FLOW**	2. Pollutant(s): **F**
3. CMS Requirement:	[**X**] Rule [ ] Other
4. Monitor Information: **TBS** Manufacturer: Model Number:	Serial Number:
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment (limit to 200 characters):	

J. EMISSIONS UNIT SUPPLEMENTAL INFORMATION
(Regulated Emissions Units Only)

Supplemental Requirements

1. Process Flow Diagram [X] Attached, Document ID: **Report** [ ] Not Applicable [ ] Waiver Requested
2. Fuel Analysis or Specification [ ] Attached, Document ID:_____ [X] Not Applicable [ ] Waiver Requested
3. Detailed Description of Control Equipment [X] Attached, Document ID: **Report** [ ] Not Applicable [ ] Waiver Requested
4. Description of Stack Sampling Facilities [ ] Attached, Document ID:_____ [X] Not Applicable [ ] Waiver Requested
5. Compliance Test Report [ ] Attached, Document ID:_____ [ ] Previously submitted, Date:_____ [X] Not Applicable
6. Procedures for Startup and Shutdown [ ] Attached, Document ID:_____ [X] Not Applicable [ ] Waiver Requested
7. Operation and Maintenance Plan [ ] Attached, Document ID:_____ [X] Not Applicable [ ] Waiver Requested
8. Supplemental Information for Construction Permit Application [X] Attached, Document ID: **Report** [ ] Not Applicable
9. Other Information Required by Rule or Statute [ ] Attached, Document ID:_____ [X] Not Applicable
10. Supplemental Requirements Comment:

Additional Supplemental Requirements for Title V Air Operation Permit Applications NA

11. Alternative Methods of Operation
[ ] Attached, Document ID:_____ [ ] Not Applicable

12. Alternative Modes of Operation (Emissions Trading)
[ ] Attached, Document ID:_____ [ ] Not Applicable

13. Identification of Additional Applicable Requirements
[ ] Attached, Document ID:_____ [ ] Not Applicable

14. Compliance Assurance Monitoring Plan
[ ] Attached, Document ID:_____ [ ] Not Applicable

15. Acid Rain Part Application (Hard-copy Required)

[ ] Acid Rain Part - Phase II (Form No. 62-210.900(1)(a))
Attached, Document ID:_____

[ ] Repowering Extension Plan (Form No. 62-210.900(1)(a)1.)
Attached, Document ID:_____

[ ] New Unit Exemption (Form No. 62-210.900(1)(a)2.)
Attached, Document ID:_____

[ ] Retired Unit Exemption (Form No. 62-210.900(1)(a)3.)
Attached, Document ID:_____

[ ] Phase II NOx Compliance Plan (Form No. 62-210.900(1)(a)4.)
Attached, Document ID:_____

[ ] Phase NOx Averaging Plan (Form No. 62-210.900(1)(a)5.)
Attached, Document ID:_____

[ ] Not Applicable

III. EMISSIONS UNIT INFORMATION

A separate Emissions Unit Information Section (including subsections A through J as required) must be completed for each emissions unit addressed in this Application for Air Permit. If submitting the application form in hard copy, indicate, in the space provided at the top of each page, the number of this Emissions Unit Information Section and the total number of Emissions Unit Information Sections submitted as part of this application.

A. GENERAL EMISSIONS UNIT INFORMATION
(All Emissions Units)

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).

[X] 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. Regulated or Unregulated Emissions Unit? (Check one)

[X] 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.

3. Description of Emissions Unit Addressed in This Section (limit to 60 characters):
Acid Clarification Plant

4. Emissions Unit Identification Number:
ID: **070**
[ ] No ID
[ ] ID Unknown

5. Emissions Unit Status Code: **A**	6. Initial Startup Date: **NA**	7. Emissions Unit Major Group SIC Code: **28**	8. Acid Rain Unit? [ ]

13. Emissions Unit Comment: (Limit to 500 Characters)

Emissions Unit Control Equipment

17. Control Equipment/Method Description (Limit to 200 characters per device or method): **Wet scrubber**
2. Control Device or Method Code(s): **002**

Emissions Unit Details NA

1. Package Unit: Manufacturer:	Model Number:	
2. Generator Nameplate Rating:	MW	
3. Incinerator Information: Dwell Temperature: Dwell Time: Incinerator Afterburner Temperature:		°F seconds °F

B. EMISSIONS UNIT CAPACITY INFORMATION
(Regulated Emissions Units Only)

Emissions Unit Operating Capacity and Schedule

1. Maximum Heat Input Rate:		mmBtu/hr
2. Maximum Incineration Rate:	lb/hr	tons/day
3. Maximum Process or Throughput Rate:		
4. Maximum Production Rate: **110 tph P2O5 input**		
5. Requested Maximum Operating Schedule:		
	24 hours/day	**7** days/week
	52 weeks/year	**8760** hours/year
20. Operating Capacity/Schedule Comment (limit to 200 characters):		

C. EMISSIONS UNIT REGULATIONS
(Regulated Emissions Units Only)

List of Applicable Regulations

See Page 8.	

D. EMISSION POINT (STACK/VENT) INFORMATION
(Regulated Emissions Units Only)

Emission Point Description and Type

1. Identification of Point on Plot Plan or Flow Diagram? **Acid Clarification**	2. Emission Point Type Code: **3**	
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking (limit to 100 characters per point):		
4. ID Numbers or Descriptions of Emission Units with this Emission Point in Common:		
5. Discharge Type Code: **V**	6. Stack Height: **60** feet	7. Exit Diameter: **3.6** feet
8. Exit Temperature: **95** °F	9. Actual Volumetric Flow Rate: **35,000** acfm	10. Water Vapor: **NA** %
11. Maximum Dry Standard Flow Rate: **NA** dscfm	12. Nonstack Emission Point Height: **NA** feet	
13. Emission Point UTM Coordinates: Zone:	East (km):	North (km):
14. Emission Point Comment (limit to 200 characters):		

E. SEGMENT (PROCESS/FUEL) INFORMATION
(All Emissions Units)

Segment Description and Rate: Segment __1___ of __1___

5. Segment Description (Process/Fuel Type) (limit to 500 characters): **Phosphoric Acid/Wet Process for ACP**		
18. Source Classification Code (SCC): **3-01-016-99**	3. SCC Units: **Tons Processed**	
19. Maximum Hourly Rate: **110 tph**	20. Maximum Annual Rate: **876,000 tpy**	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment (limit to 200 characters): **P2O5 input**		

Segment Description and Rate: Segment _____ of _____

1. Segment Description (Process/Fuel Type) (limit to 500 characters):		
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 (limit to 200 characters):		

F. EMISSIONS UNIT POLLUTANTS
(All Emissions Units)

1. Pollutant Emitted	2. Primary Control Device Code	3. Secondary Control Device Code	4. Pollutant Regulatory Code
FL	**002**	**000**	**EL**

Emissions Unit Information Section __5____ of ___5___

Pollutant Detail Information Page __1____ of ___1___

G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units -
Emissions-Limited and Preconstruction Review Pollutants Only)

Potential/Fugitive Emissions

1. Pollutant Emitted: **FL**	2. Total Percent Efficiency of Control: **90**
3. Potential Emissions: **3.3** lb/hour **13.1** tons/year	4. Synthetically Limited? [ ]
5. Range of Estimated Fugitive Emissions: [ ] 1 [ ] 2 [ ] 3 _____ to _____ tons/year	
6. Emission Factor: **0.03 lb/ton P2O5 input** Reference: **BACT**	7. Emissions Method Code:
21. Calculation of Emissions (limit to 600 characters): **FL, hr = 0.03 lb/ton P2O5 input x 110 tph P2O5 input = 3.3 lb/hr** **FL, yr = 0.03 lb/ton P2O5 input x 876,000 tpy P2O5 input x ton/2000 lbs = 13.1 tpy**	
22. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters):	

Allowable Emissions Allowable Emissions ___1___ of ___1___

1. Basis for Allowable Emissions Code: **Rule**	2. Future Effective Date of Allowable Emissions: **NA**
3. Requested Allowable Emissions and Units: **3.3 lb/hr**	4. Equivalent Allowable Emissions: **3.3** lb/hour **13.1** tons/year
5. Method of Compliance (limit to 60 characters): **EPA Method 13B**	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): **BACT**	

H. VISIBLE EMISSIONS INFORMATION
(Only Regulated Emissions Units Subject to a VE Limitation)

Visible Emissions Limitation: Visible Emissions Limitation _____ of _____

1. Visible Emissions Subtype: **NA**	2. Basis for Allowable Opacity: [ ] Rule [ ] Other
3. Requested Allowable Opacity: Normal Conditions: % Exceptional Conditions: % Maximum Period of Excess Opacity Allowed: min/hour	
4. Method of Compliance:	
5. Visible Emissions Comment (limit to 200 characters): **No VE standard**	

I. CONTINUOUS MONITOR INFORMATION
(Only Regulated Emissions Units Subject to Continuous Monitoring)

Continuous Monitoring System: Continuous Monitor _____ of _____ **NA**

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	[ ] Rule [ ] Other
4. Monitor Information: Manufacturer: Model Number: Serial Number:	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment (limit to 200 characters):	

J. EMISSIONS UNIT SUPPLEMENTAL INFORMATION
(Regulated Emissions Units Only)

Supplemental Requirements

1. Process Flow Diagram [X] Attached, Document ID: **Report** [ ] Not Applicable [ ] Waiver Requested
2. Fuel Analysis or Specification [ ] Attached, Document ID:_____ [X] Not Applicable [ ] Waiver Requested
3. Detailed Description of Control Equipment [X] Attached, Document ID: **Report** [ ] Not Applicable [ ] Waiver Requested
4. Description of Stack Sampling Facilities [ ] Attached, Document ID:_____ [X] Not Applicable [ ] Waiver Requested
5. Compliance Test Report [ ] Attached, Document ID:_____ [ ] Previously submitted, Date:_____ [X] Not Applicable
6. Procedures for Startup and Shutdown [ ] Attached, Document ID:_____ [X] Not Applicable [ ] Waiver Requested
7. Operation and Maintenance Plan [ ] Attached, Document ID:_____ [X] Not Applicable [ ] Waiver Requested
8. Supplemental Information for Construction Permit Application [X] Attached, Document ID: **Report** [ ] Not Applicable
9. Other Information Required by Rule or Statute [ ] Attached, Document ID:_____ [X] Not Applicable
10. Supplemental Requirements Comment:

Additional Supplemental Requirements for Title V Air Operation Permit Applications NA

11. Alternative Methods of Operation
[ ] Attached, Document ID:_____ [ ] Not Applicable

12. Alternative Modes of Operation (Emissions Trading)
[ ] Attached, Document ID:_____ [ ] Not Applicable

13. Identification of Additional Applicable Requirements
[ ] Attached, Document ID:_____ [ ] Not Applicable

14. Compliance Assurance Monitoring Plan
[ ] Attached, Document ID:_____ [ ] Not Applicable

15. Acid Rain Part Application (Hard-copy Required)

[ ] Acid Rain Part - Phase II (Form No. 62-210.900(1)(a))
Attached, Document ID:_____

[ ] Repowering Extension Plan (Form No. 62-210.900(1)(a)1.)
Attached, Document ID:_____

[ ] New Unit Exemption (Form No. 62-210.900(1)(a)2.)
Attached, Document ID:_____

[ ] Retired Unit Exemption (Form No. 62-210.900(1)(a)3.)
Attached, Document ID:_____

[ ] Phase II NOx Compliance Plan (Form No. 62-210.900(1)(a)4.)
Attached, Document ID:_____

[ ] Phase NOx Averaging Plan (Form No. 62-210.900(1)(a)5.)
Attached, Document ID:_____

[ ] Not Applicable

A REPORT IN SUPPORT OF
PSD PERMIT APPLICATION

PREPARED FOR:

WHITE SPRINGS AGRICULTURAL CHEMICALS, INC.
WHITE SPRINGS, FLORIDA

JULY 2000

PREPARED BY:

KOOGLER & ASSOCIATES
4014 N.W. 13TH STREET
GAINESVILLE, FLORIDA 32609
(352) 377-5822

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LIST OF TABLES

1.0 INTRODUCTION

White Springs Agricultural Chemicals, Inc. (WSAC) proposes to reallocate the phosphoric acid production amongst the existing A, B, C and D Plants. Specifically, Plants A and C will be permanently shut down; Plant B will be converted from Prayon to hemi-hydrate process with an increase in capacity from 83 to 100 tons per hour (tph) P2O5 input; and, Plant D will increase its hemi-hydrate capacity from 95 to 110 tph P2O5 input. This represents an overall decrease in the phosphoric acid production capacity at WSAC from 242 to 210 tph.

The reallocation will result in reduced processing capacity of downstream emission units also. However, in order to accommodate higher short-term processing rates, WSAC is requesting an increase in the processing rate of "C&D" Acid Clarification from 100 to 110 tph P2O5 input and "C&D" Superphosphoric Acid Plant from 95 to 110 tph P2O5 input. The proposed project also includes an increase in the production rate of the X-Train (Dical), from 45 to 55 tph product.

The proposed project will result in a significant increase, as defined in Rule 62-212, Florida Administrative Code (FAC), in the emissions of fluorides.

The proposed project will be subject to a Prevention of Significant Deterioration (PSD) review, including a determination of Best Available Control Technology (BACT) and an air impact analysis pursuant to Rule 62-212, FAC.

2.0 FACILITY DESCRIPTION

The WSAC facility is located near White Springs, Hamilton County, Florida. The site location and area location maps are presented in Figures 2-1 and 2-2, respectively.

The existing operation processes wet phosphate rock into several different products. This is accomplished by reacting the phosphate rock with sulfuric acid to produce phosphoric acid and then converting the phosphoric acid to various products. The chemical complex includes sulfuric acid plants, phosphoric acid plants, super phosphoric acid plants, monoammonium phosphate (MAP) and diammonium phosphate (DAP) plants, animal feed ingredient plants, and storage, handling, grinding and shipping facilities for phosphate rock, ammonia, limestone, sulfur, animal feed ingredient and other agricultural products. Plot plans presented in Figures 2-3 and 2-4, show the location of the existing plants at the Suwannee River Chemical Complex (SRC) and Swift Creek Chemical Complex (SCC), respectively.

FIGURE 2-1

Location Map

White Springs, Florida

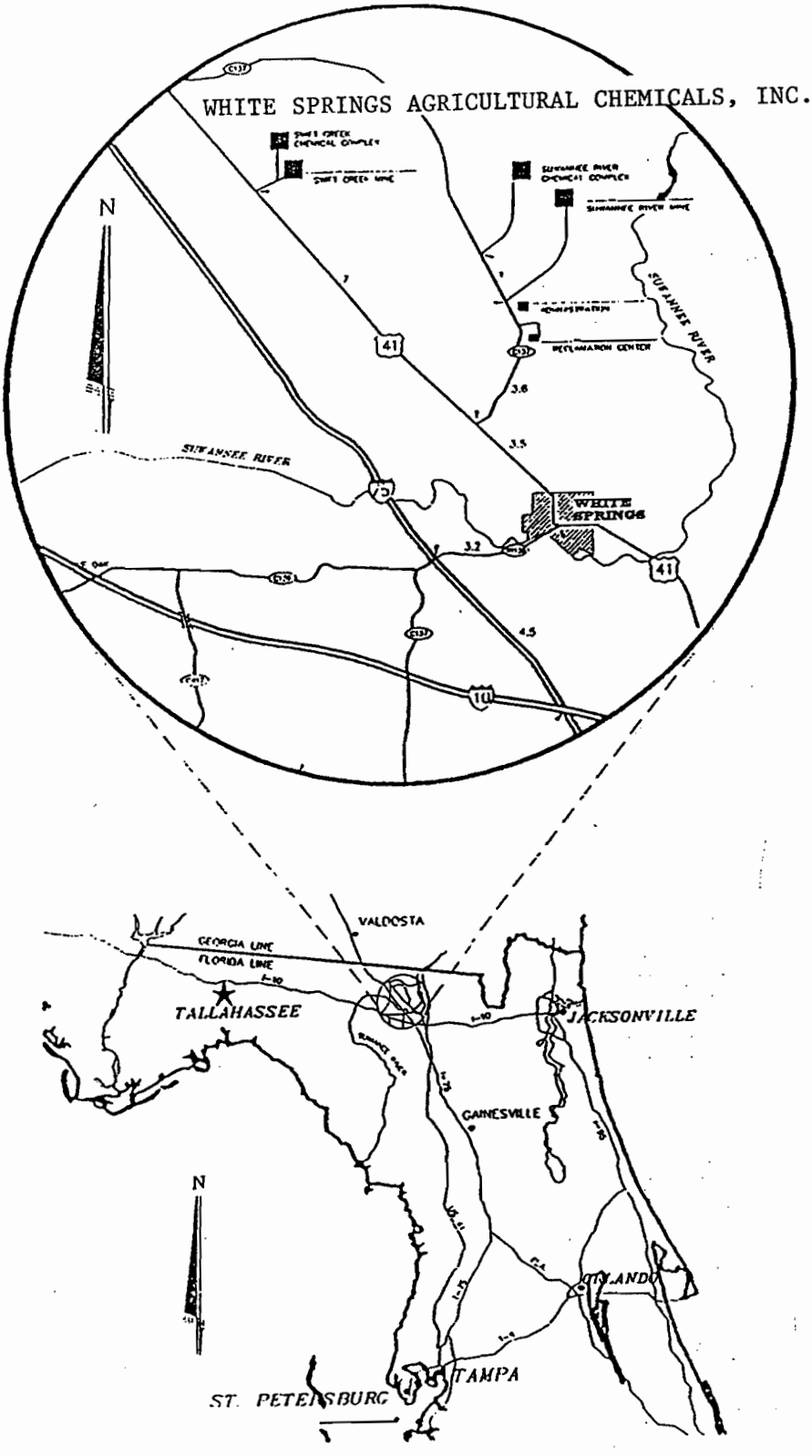


FIGURE 2-2

AREA LOCATION MAP

WHITE SPRINGS AGRICULTURAL CHEMICALS, INC.

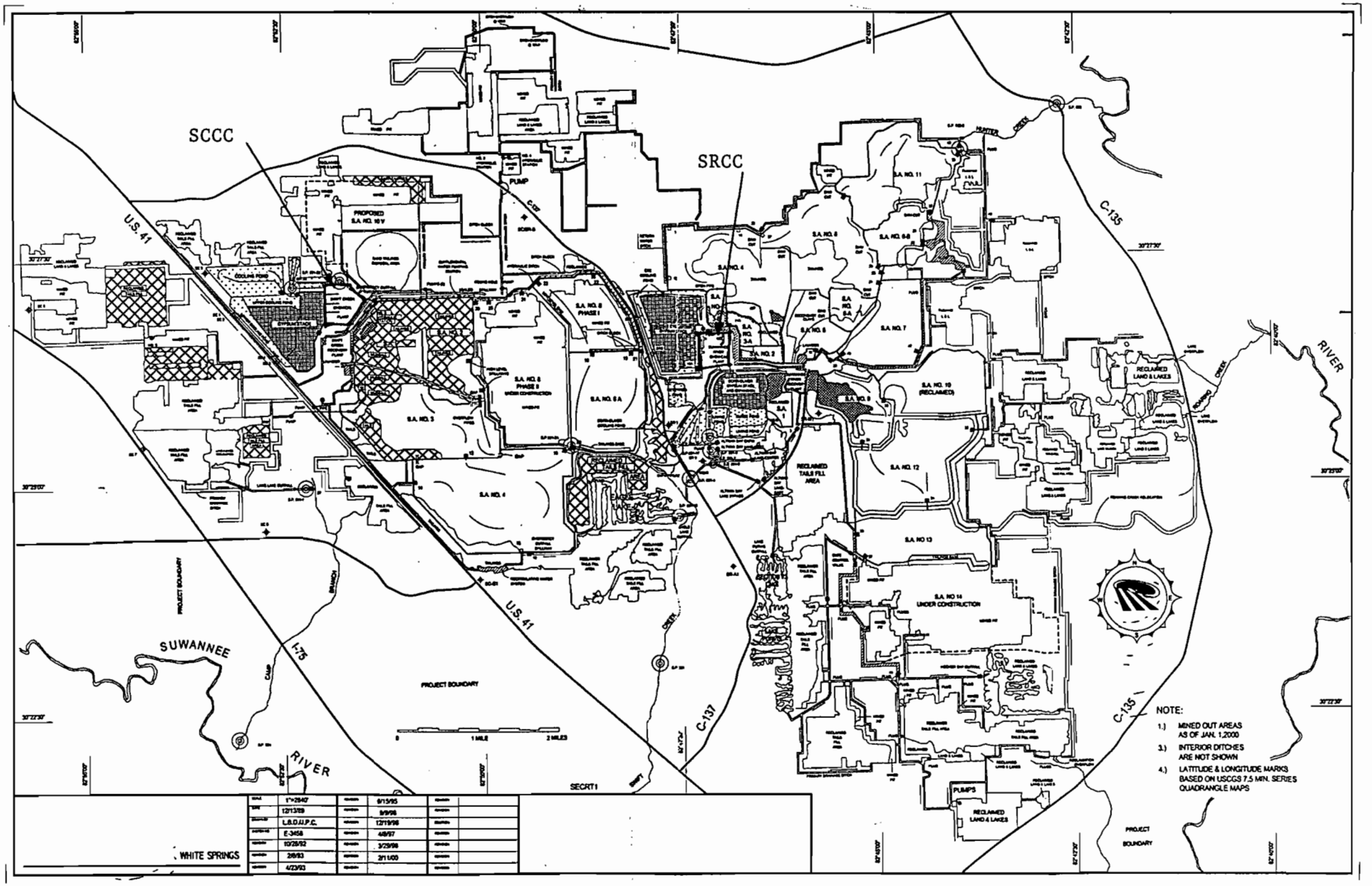
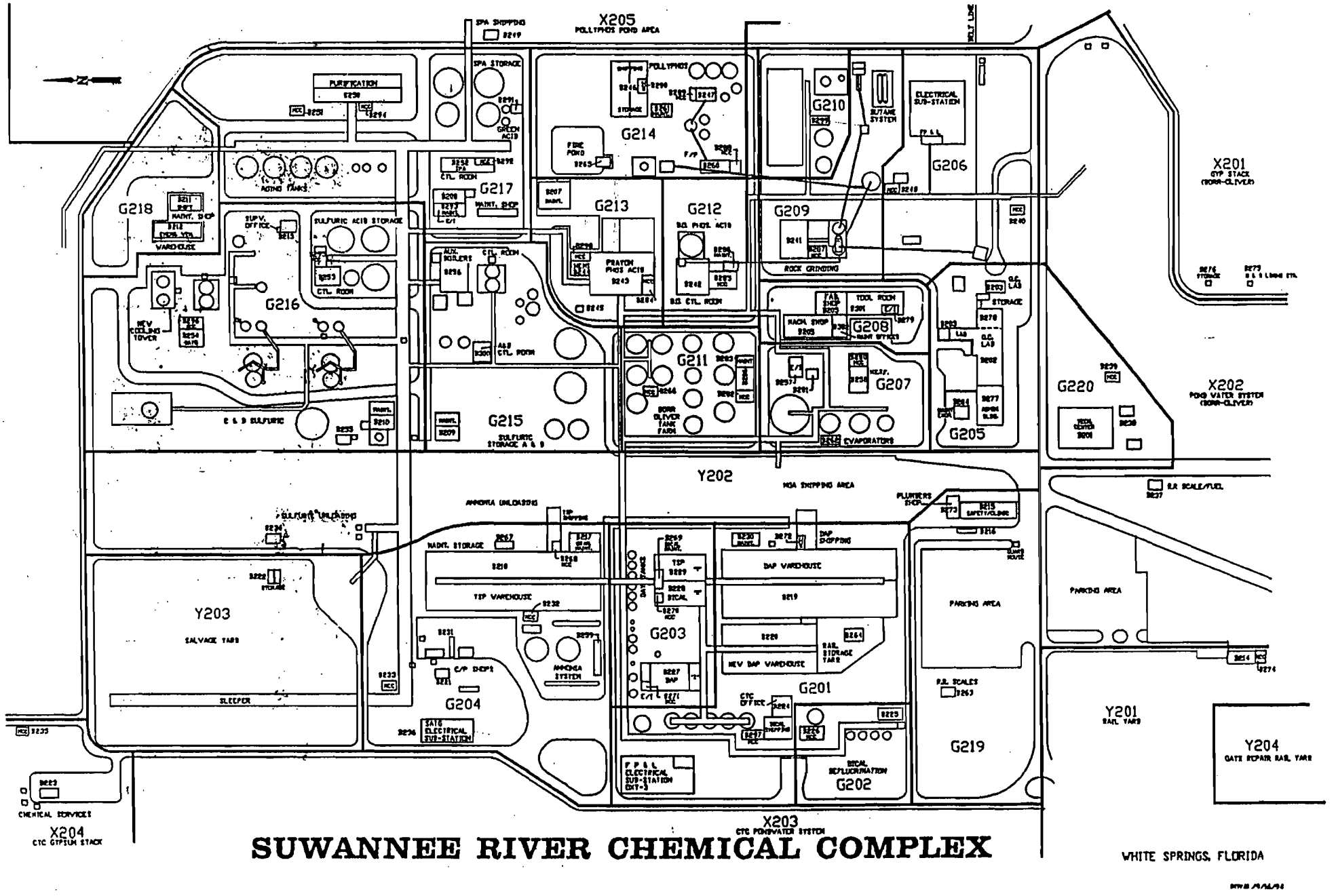


FIGURE 2-3

PLOT PLAN OF SRCC

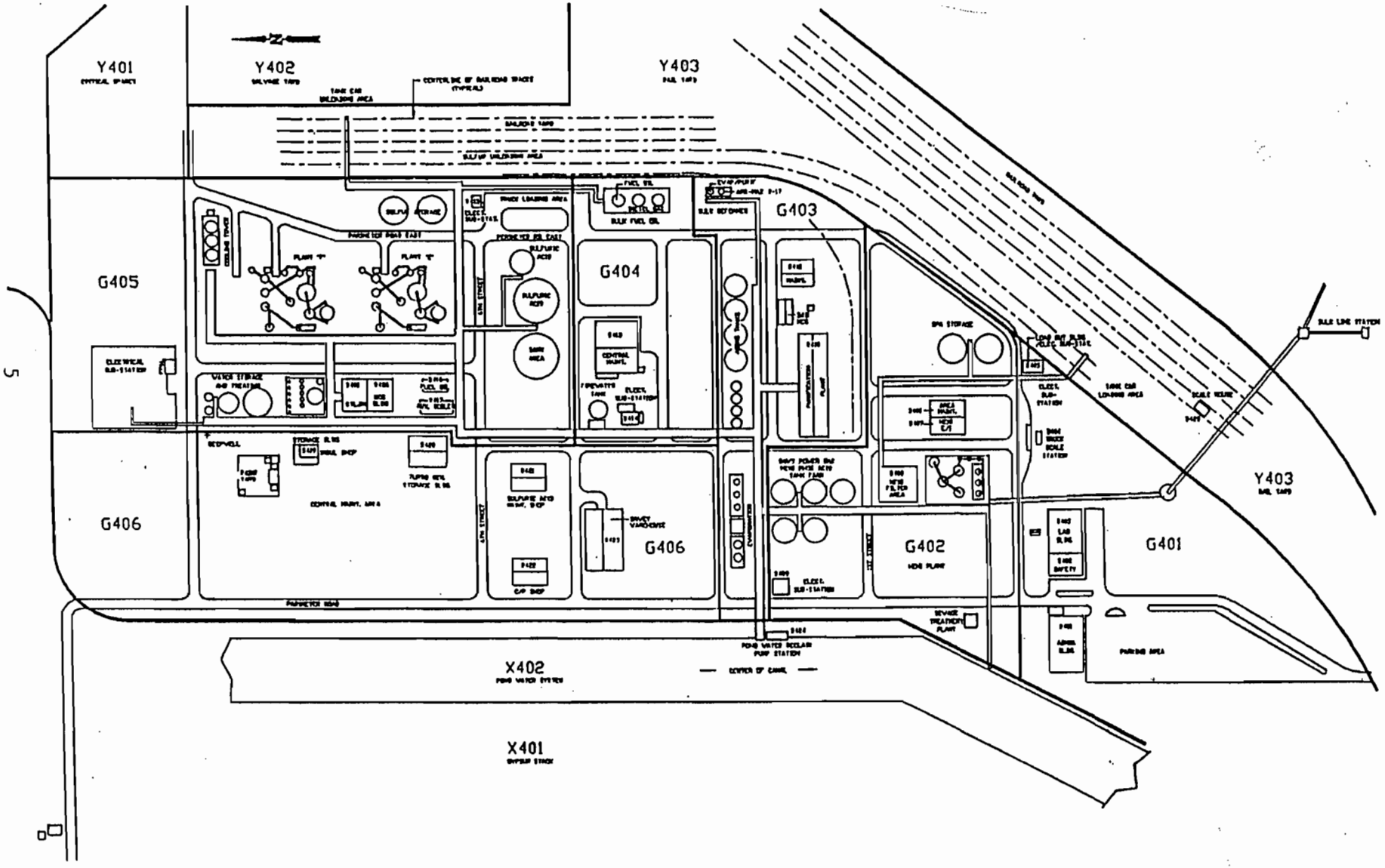


SUWANNEE RIVER CHEMICAL COMPLEX

WHITE SPRINGS, FLORIDA

FIGURE 2-4

PLOT PLAN OF SCCC



SWIFT CREEK CHEMICAL COMPLEX

3.0 PROPOSED PROJECT

3.1 PROJECT DESCRIPTION

WSAC proposes to reallocate their phosphoric acid production capability and increase the production rate of the X-Train (Dical). Other emissions units affected by this change include the C & D Superphosphoric Acid Plant and Acid Clarification.

3.1.1 X-Train

At WSAC, Dical will be produced by mixing limestone with defluorinated phosphoric acid in a high speed mixer, reacting it in a pugmill, drying it in a natural gas fired unit, conveying it through a series of screens and mills to product storage and loadout.

The scope of the proposed project includes improvements in dust control equipment and other equipment changes necessary to accomplish an increase in the production rate of the existing dical plant from 45 to 55 tph product, as follows:

- Replace two existing pugmills with one larger unit.

- Add a high-speed mixer to the pugmill.

- Increase dryer scrubber fan capacity from 40,000 to 55,000 cfm.

- Replace a 45 MMBtu/hr natural gas burner with a 66 MMBtu/hr unit.

The dust control improvements that will be implemented include:

- Replace the existing limestone bin baghouse with a new 6000 cfm unit.

- Replace the existing fines return baghouse with a new 6000 cfm unit.

- Add a new 40,000 cfm baghouse to pick up dust from screens, elevators and drag conveyor.

- Divert exhaust from some of the dust sources in the material handling area currently served by cyclones and the main scrubber to the new baghouse.

- Remove the existing fluid bed deduster.

- Add 2 new screens in the product shipping area.

- Add a fines holding bin in the shipping area.

- Replace 4 existing screens with 4 new larger product screens to reduce the fines content.

- Replace 2 existing chain mills with 2 new larger capacity cage mills.

- Modify ductwork, piping, and other minor equipment, as necessary.

The air emissions, primarily particulate matter, will be controlled by baghouses, and a combination of cyclones and wet venturi scrubbers, as shown on the process flow diagram presented in Figure 3-1. The X-Train is not a significant source of fluorides as defluorinated acid is used in the process. Products of natural gas combustion are emitted from the dryer. The air emission calculations are presented in Appendix A and the projected emissions are summarized in Table 3-1.

3.1.2 B Phosphoric Acid Plant

At WSAC, phosphoric acid is made by reacting wet phosphate rock with sulfuric acid in reaction tanks, filtering the acid, concentrating the acid, and pumping the acid to various processes and/or storage, as necessary.

The proposed project includes the conversion of the existing Prayon process to the hemi-hydrate process. The proposed hemi-hydrate process will operate in a higher concentration and temperature zone than the present dihydrate process. The acid from the hemi-hydrate process, when evaporated to the same strength, will have less impurities than acid from the dihydrate process. The A and C Phosphoric Acid plants will be shut down after the modified B Phosphoric Acid Plant is operational. The existing A and C Plant filters and scrubbers may continue to be utilized, as shown in Figure 3-2.

The scope of the project includes the addition of tanks, pumps, piping, controls and ducting, as necessary.

The fluoride emissions from the process will be controlled by a number of wet scrubbers, as shown on the process flow diagram presented in Figure 3-2. The air emission calculations are presented in Appendix A and the projected emissions are summarized in Table 3-1.

3.1.3 D Phosphoric Acid Plant

This existing hemi-hydrate plant will continue to operate in its current configuration. The process is similar to that described above for the B Phosphoric Acid Plant. The proposed project includes a request for higher operating rates, as and when necessary. Consequently, the only associated equipment changes will be in the type and size of pumps and piping, as

necessary.

The fluoride emissions from the process will be controlled by wet scrubbers, as shown on the process flow diagram presented in Figure 3-3. The air emission calculations are presented in Appendix A and the projected emissions are summarized in Table 3-1.

3.1.4 Acid Clarification

This existing acid clarification process will continue to operate in its current configuration. The process uses additives for removing certain impurities from the phosphoric acid. The proposed project includes a request for higher operating rates, as and when necessary. Consequently, the only associated equipment changes will be in the type and size of pumps and piping, as necessary.

The fluoride emissions from the process will be controlled by a packed wet scrubber, as shown on the process flow diagram presented in Figure 3-4. The air emission calculations are presented in Appendix A and the projected emissions are summarized in Table 3-1.

3.1.5 C & D Superphosphoric Acid Plant

This existing C & D SPA Plant will continue to operate in its current configuration where phosphoric acid is concentrated to about 70 percent P2O5 using high vacuum and high pressure steam. The proposed project includes a request for higher operating rates, as and when necessary. Consequently, the only associated equipment changes will be in the type and size of pumps and piping, as necessary.

The fluoride emissions from the process will be controlled by a packed wet scrubber, as shown on the process flow diagram presented in Figure 3-4. The air emission calculations are presented in Appendix A and the projected emissions are summarized in Table 3-1.

3.1.6 Summary

The net emission changes as a result of the proposed project, summarized in Table 3-2, indicate that there will be a significant net increase in the annual emissions of FL, as defined in Rule 62-212, FAC. Consequently, the proposed project is subject to a PSD review for fluorides.

3.2 RULE REVIEW

The following are the state and federal air regulatory requirements that apply to new or modified sources subject to a PSD review.

In accordance with EPA and state of Florida PSD review requirements, all major new or modified sources of air pollutants regulated under the Clean Air Act (CAA) are subject to preconstruction review. Florida's State Implementation Plan (SIP), approved by the EPA, authorizes the Florida Department of Environmental Protection (FDEP) to manage the air pollution program in Florida.

The PSD review determines whether or not significant air quality deterioration will result from a new or modified facility. Federal PSD regulations are contained in 40CFR52.21, Prevention of Significant Deterioration of Air Quality. The state of Florida has adopted PSD regulations that are essentially identical to the federal regulations and are contained in Chapter 62-212 of the Florida Administration Code (FAC). All new major sources and major modifications to existing sources are subject to control technology review, source impact analysis, air quality analysis and additional impact analyses for each pollutant subject to a PSD review. A facility must also comply with the Good Engineering Practice (GEP) stack height rule.

A major facility is defined in the PSD rules as any one of the 28 specific source categories (see Table 3-3) which has the potential to emit 100 tons per year (tpy) or more, or any other stationary facility which has the potential to emit 250 tpy or more, of any pollutant regulated under the CAA. A major modification is defined in the PSD rules as a change at an existing major facility which increases the actual emissions by greater than significant amounts (see Table 3-4).

3.2.1 Ambient Air Quality Standards

The EPA and the state of Florida have developed/adopted ambient air quality standards, AAQS (see Table 3-5). Primary AAQS protect the public health while the secondary AAQS protect the public welfare from adverse effects of air pollution. Areas of the country have been designated as attainment or nonattainment for specific pollutants. Areas not meeting the AAQS for a given pollutant are designated as nonattainment areas for that pollutant. Any new source or expansion of existing sources in or near these nonattainment areas is usually subject to more stringent air permitting requirements. Projects proposed in attainment areas are subject to air permit requirements that ensure continued attainment status.

3.2.2 PSD Increments

In promulgating the 1977 CAA Amendments, Congress quantified concentration increases above an air quality baseline concentration levels for sulfur dioxide (SO_2) and particulate matter (PM/TSP) which would constitute significant deterioration. The size of the allowable increment depends on the classification of the area in which the source would be located or have an impact. Class I areas include specific national parks, wilderness areas and memorial parks. Class II areas are all areas not designated as Class I areas and Class III areas are

are no designated Class III areas in Florida.

In 1988, EPA promulgated PSD regulations for nitrogen oxides (NOx) and PSD increments for nitrogen dioxide (NO_2) concentrations. FDEP adopted the NO_2 increments in July 1990 (see Table 3-6 for PSD increments).

In the PSD regulations, as amended August 7, 1980, baseline concentration is defined as the ambient concentration level for a given pollutant which exists in the baseline area at the time of the applicable baseline date and includes the actual emissions representative of facilities in existence on the applicable baseline date, and the allowable emissions of major stationary facilities which commenced construction before January 6, 1975, but were not in operation by the applicable baseline date.

The emissions not included in the baseline concentration and, therefore, affecting PSD increment consumption are the actual emissions from any major stationary facility on which construction commenced after January 6, 1975, for SO_2 and PM (TSP) and February 8, 1988, for NO_2, and the actual emission increases and decreases at any stationary facility occurring after the baseline date.

3.2.3 Control Technology Evaluation

The PSD control technology review requires that all applicable federal and state emission limiting standards be met and that Best Available Control Technology (BACT) be applied to the source. The BACT requirements are applicable to all regulated pollutants subject to a PSD review.

BACT is defined in Chapter 62-212, FAC as an emission limitation, including a visible emission standard, based on the maximum degree of reduction of each pollutant emitted which the Department, on a case-by-case basis, taking into account energy, environmental, and economic impacts, and other costs, determines is achievable through application of production processes and available methods, systems, and techniques (including fuel cleaning or treatment or innovative fuel combustion techniques) for control of such pollutant.

If the Department determines that technological or economic limitations on the application of measurement methodology to a particular part of a source or facility would make the imposition of an emission standard infeasible, a design, equipment, work practice, operational standard or combination thereof, may be prescribed instead, to satisfy the requirement for the application of BACT. Such standard shall, to the degree possible, set forth the emissions reductions achievable by implementation of such design, equipment, work practice or operation. Each BACT determination shall include applicable test methods or shall provide for determining compliance with the standard(s) by means that achieve equivalent results.

The reason for evaluating the BACT is to minimize as much as possible the consumption of PSD increments and to allow future growth without significantly degrading air quality. The BACT review also analyzes if the most current control systems are incorporated in the design of a proposed facility. The BACT, as a minimum, has to comply with the applicable New Source Performance Standard for the source. The BACT analysis requires the evaluation of the available air pollution control methods including a cost-benefit analysis of the alternatives. The cost-benefit analysis includes consideration of materials, energy, and economic penalties associated with the control systems, as well as environmental benefits derived from the alternatives.

EPA determined that the bottom-up approach (starting at NSPS and working up to BACT) was not providing the level of BACT originally intended. As a result, in December 1987, EPA strongly suggested changes in the implementation of the PSD program including the "top-down" approach to BACT. The top-down approach requires an applicant to start with the most stringent control alternative, often Lowest Achievable Emission Rate (LAER), and justify its rejection or acceptance as BACT. Rejection of control alternatives may be based on technical or economical infeasibility, physical differences, locational differences, and environmental or energy impact differences when comparing a proposed project with a project previously subject to that BACT.

3.2.4 Air Quality Monitoring

An application for a PSD permit requires an analysis of ambient air quality in the area affected by the proposed facility or major modification. For a new major facility, the affected pollutants are those that the facility would potentially emit in significant amounts. For a major modification, the pollutants are those for which the net emissions increase exceeds the significant emission rate.

Ambient air monitoring for a period of up to one year, but no less than four months, is required. Existing ambient air data for a location in the vicinity of the proposed project is acceptable if the data meet FDEP quality assurance requirements. If not, additional data would need to be gathered. There are guidelines available for designing a PSD air monitoring network in EPA's "Ambient Monitoring Guidelines for Prevention of Significant Deterioration."

FDEP may exempt a proposed major stationary facility or major modification from the monitoring requirements with respect to a particular pollutant if the emissions increase of the pollutant from the facility or modification would cause air quality impacts less than the de minimis levels (see Table 3-4).

3.2.5 Ambient Impact Analysis

A source impact analysis is required for a proposed major source subject to PSD for each

pollutant for which the increase in emissions exceeds the significant emission rate. Specific atmospheric dispersion models are required in performing the impact analysis. The analysis should demonstrate the project's compliance with AAQS and allowable PSD increments. The impact analysis for criteria pollutants may be limited to only the new or modified source if the net increase in impacts due to the new or modified source is below significant impact levels.

Typically, a five-year period is used for the evaluation of the highest, second-highest short-term concentrations for comparison to AAQS or PSD increments. The term "highest, second-highest" refers to the highest of the second-highest concentrations at all receptors. The second-highest concentration is considered because short-term AAQS specify that the standard should not be exceeded at any location more than once a year. If less than five years of meteorological data are used in the modeling analysis, the highest concentration at each receptor is normally used.

3.2.6 Additional Impact Analysis

The PSD rules also require analyses of the impairment to visibility and the impact on soils and vegetation resulting from a project. A visibility impairment analysis must be conducted for PSD Class I areas. Impacts due to commercial, residential, industrial, and other growth associated with the source must be addressed. The National Park Service also requires an Air Quality Related Values (AQRV) Analysis for a Class I area.

3.2.7 Good Engineering Practice Stack Height

In accordance with Chapter 62, FAC, the degree of emission limitation required for control of any pollutant should not be affected by a stack height that exceeds GEP, or any other dispersion technique. GEP stack height is defined as the greater of:

1. 65 meters (m), or
2. A height established by applying the formula:

   $Hg = H + 1.5\ L$

   where:

   Hg - GEP stack height,

   H - Height of the structure or nearby structure, and

   L - Lesser dimension, height or projected width of nearby structure(s)

3. A height demonstrated by a model or field study.

The GEP stack height regulations require that the stack height used in modeling for determining compliance with AAQS and PSD increments not exceed the GEP stack height. The actual stack height may be higher or lower.

3.3 RULE APPLICABILITY

The proposed project at WSAC, as previously described herein, is classified as a major modification to a major source subject to both state and federal regulations as set forth in Rule 62-212, FAC.

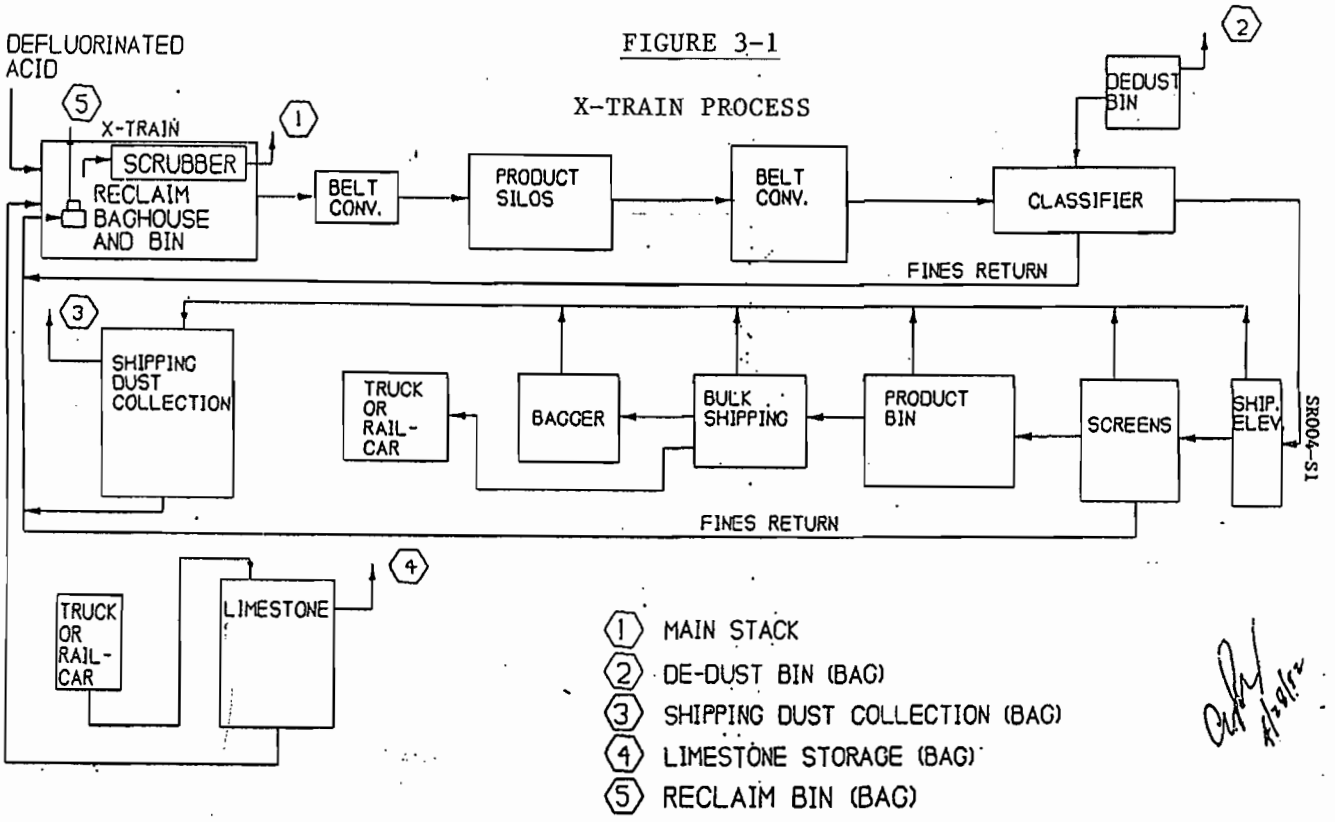
The facility is located in an area classified as attainment for each of the regulated air pollutants in accordance with Rule 62-275, FAC.

The proposed project will result in significant increases in the emissions of fluorides; as defined in Rule 62-212, FAC; and, will therefore be subject to PSD preconstruction review requirements (see Table 3-2).

The PSD review will include a determination of Best Available Control Technology, an air quality review, Good Engineering Practice stack height analysis and an evaluation of impacts on soils, vegetation and visibility.

FIGURE 3-1

X-TRAIN PROCESS



(EXPANDED VIEW AROUND 1)

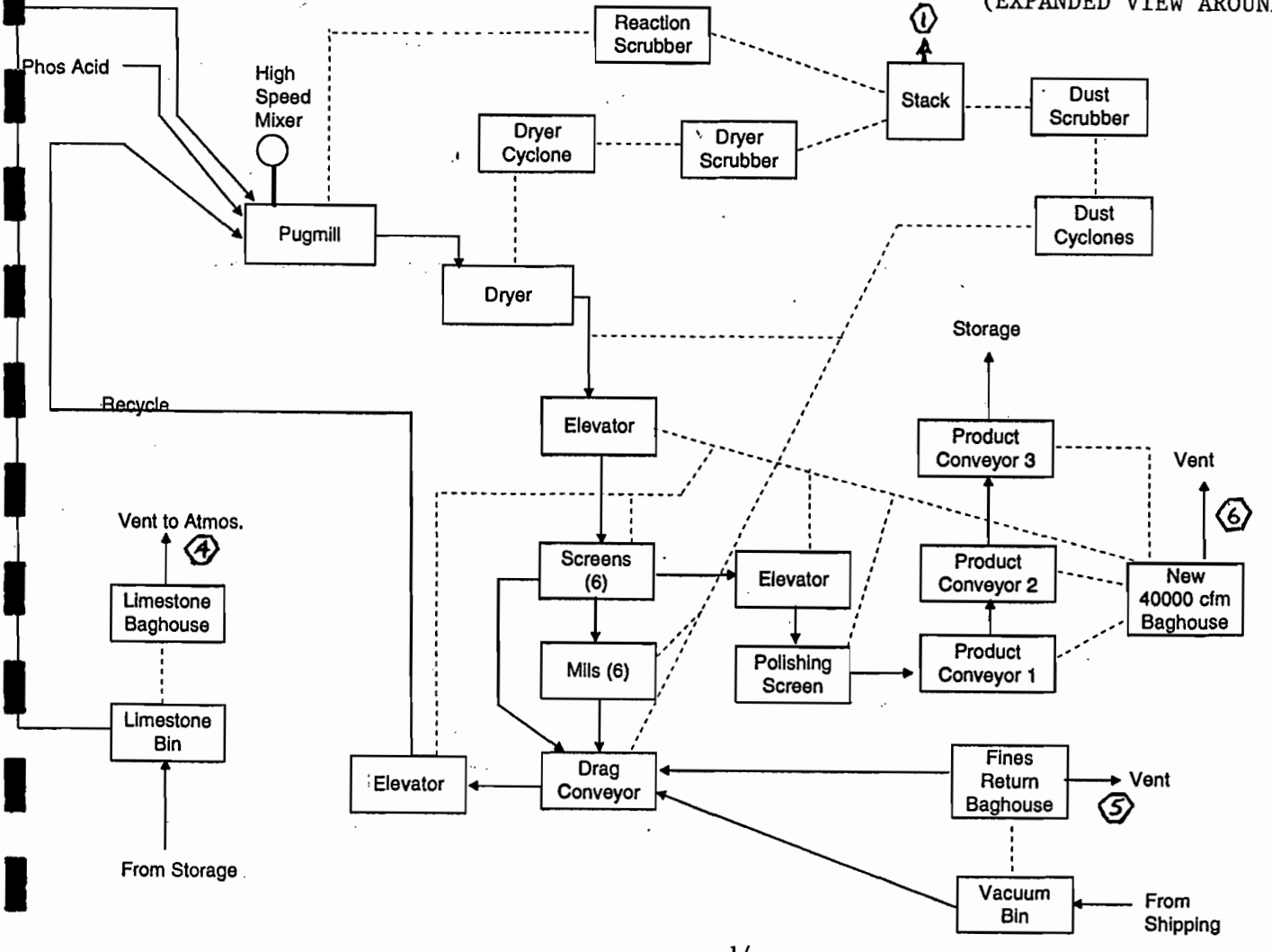
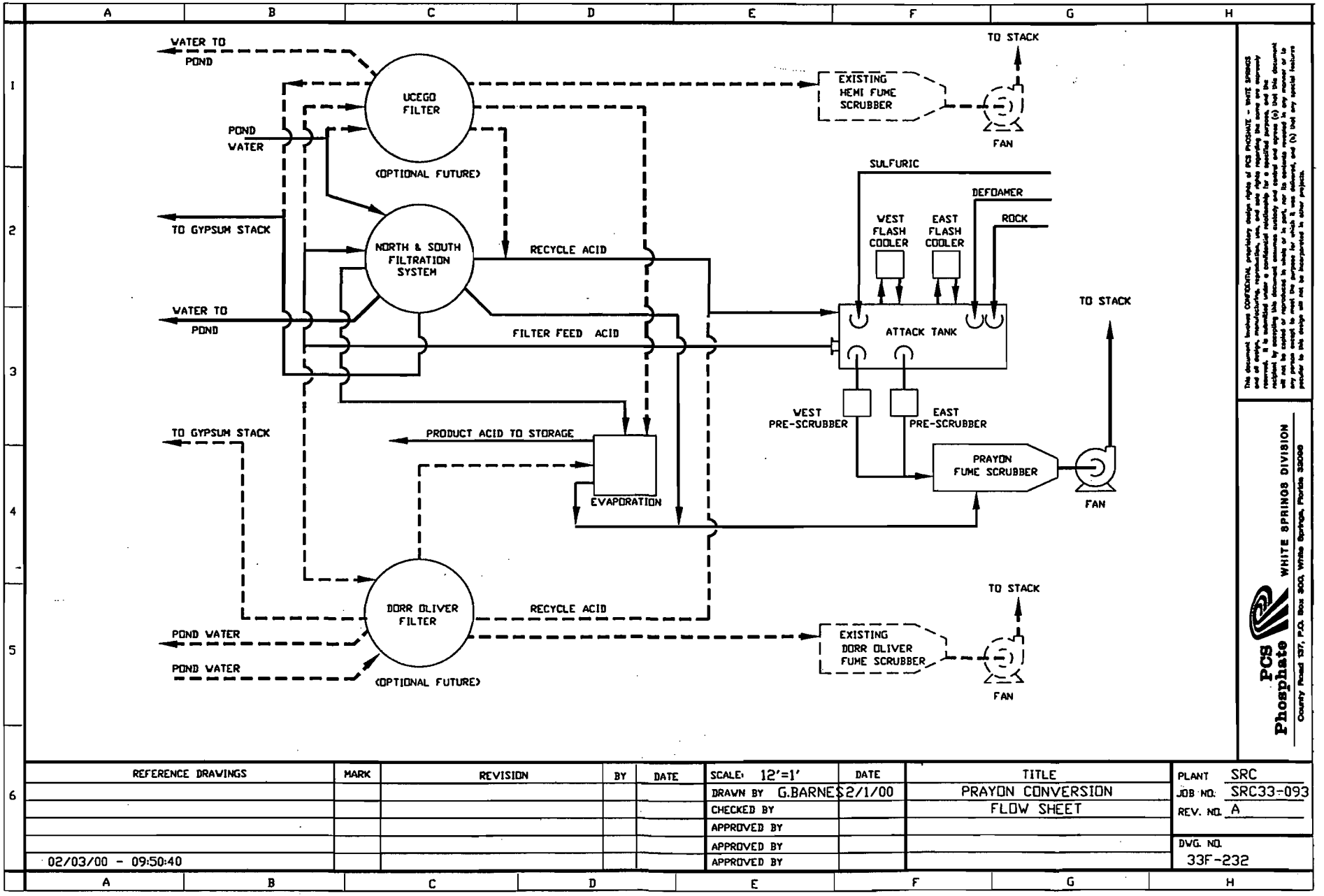


FIGURE 3-2

B PHOSPHORIC ACID PLANT PROCESS



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PCS Phosphate — WHITE SPRINGS DIVISION
County Road 137, P.O. Box 300, White Springs, Florida 32096

REFERENCE DRAWINGS	MARK	REVISION	BY	DATE
02/03/00 - 09:50:40				

SCALE: 12'=1'	DATE	TITLE
DRAWN BY G.BARNES	2/1/00	PRAYON CONVERSION
CHECKED BY		FLOW SHEET
APPROVED BY		
APPROVED BY		
APPROVED BY		

PLANT	SRC
JOB NO.	SRC33-093
REV. NO.	A
DWG. NO.	33F-232

FIGURE 3-3

D PHOSPHORIC ACID PLANT PROCESS

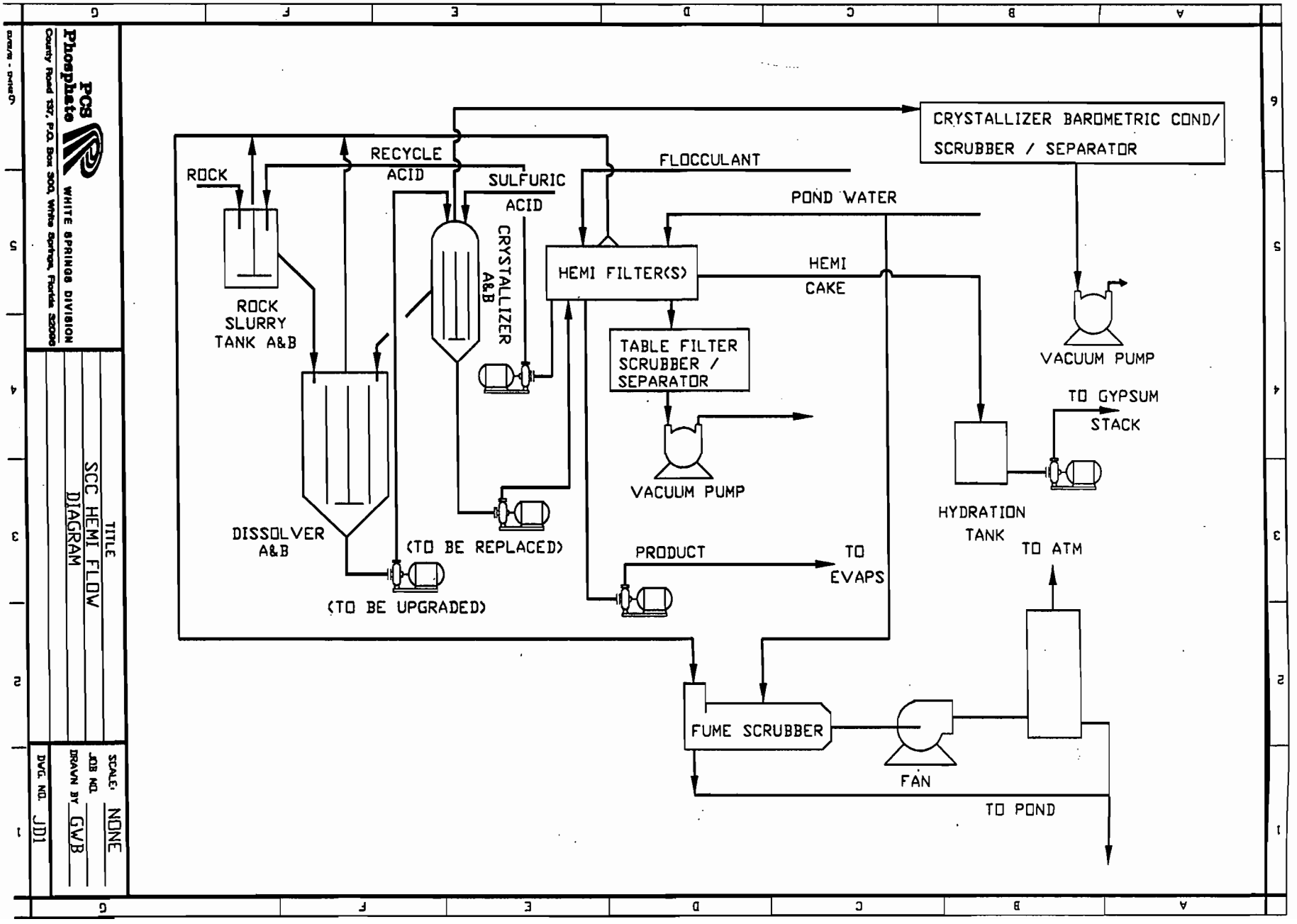

FIGURE 3-4

ACID CLARIFICATION PROCESS
AND
C&D SPA PLANT PROCESS

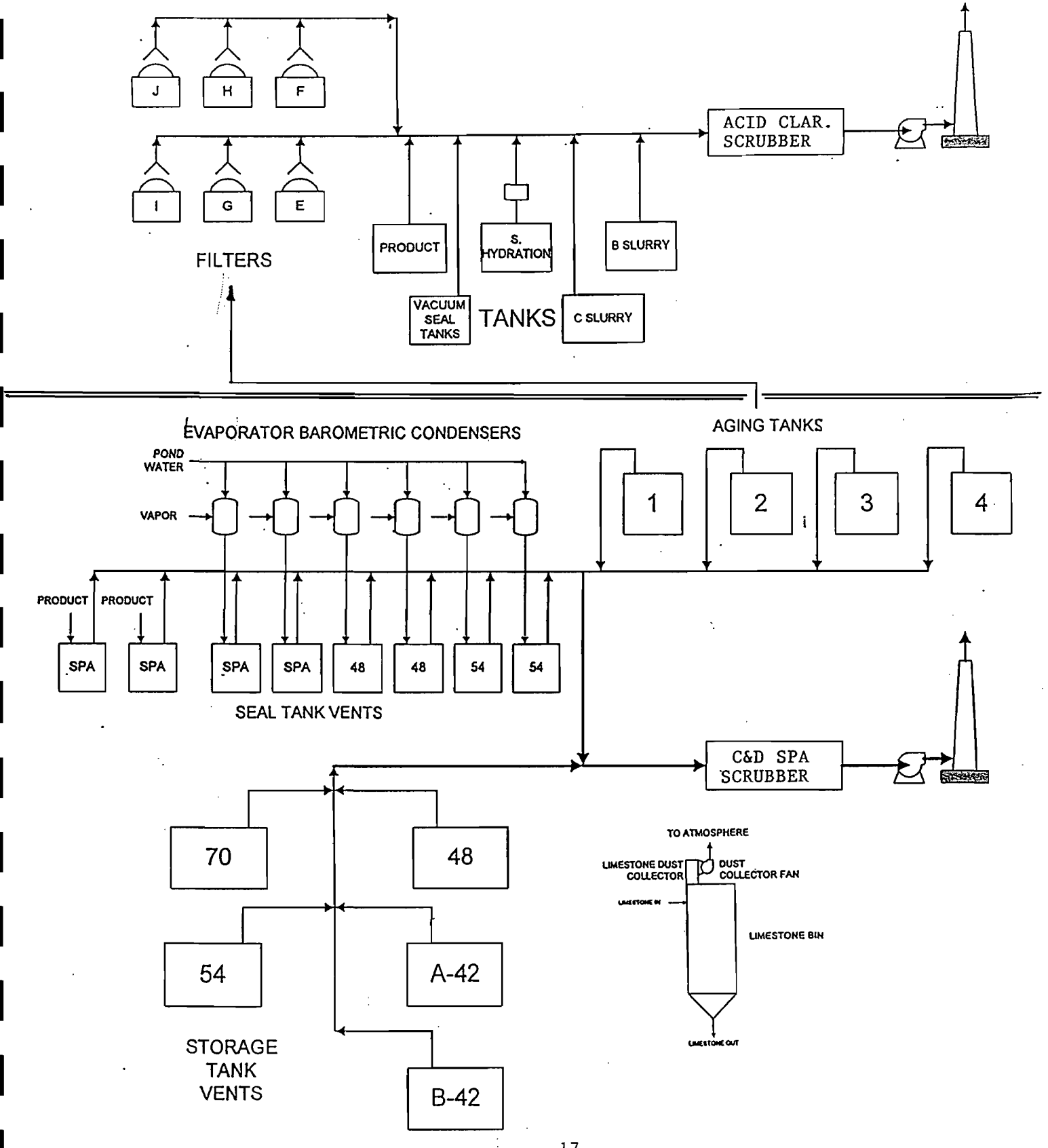

TABLE 3-1

SUMMARY OF EMISSION RATES

UNIT	1998 LB/HR	1998 HOURS	1998 TPY	1999 LB/HR	1999 HOURS	1999 TPY	AVERAGE TPY	PROPOSED LB/HR	PROPOSED TPY
FLUORIDES									
A PHOSPHORIC ACID	0.04	6774	0.14	0.03	3664	0.05	0.10	0	0
B PHOSPHORIC ACID	0.08	7385	0.30	0.13	8091	0.53	0.42	1.35	4.1
C PHOSPHORIC ACID	0.23	6982	0.80	0.23	2410	0.28	0.54	0	0
D PHOSPHORIC ACID	0.37	7752	1.43	0.20	7615	0.76	1.10	1.49	5.4
ACID CLARIFICATION	1.79	6878	6.15	0.61	6976	2.13	4.14	3.3	13.1
C&D SPA	0.52	6283	1.63	0.52	6703	1.74	1.69	0.96	3.8
X-TRAIN	0.18	3925	0.35	0.23	4202	0.48	0.43	1.65	6.0
PARTICULATE MATTER									
X-TRAIN	7.7	3925	15.0	6.8	4202	14.2	14.6	9.9	36.0
DEDUST	6.4	1361	4.36	6.4	1742	5.57	5.0	3.2	11.6
SHIPPING	4.6	1361	3.13	4.6	1742	4.0	3.6	2.3	8.4
LIMESTONE	1.0	1154	0.6	1.0	1883	0.94	1.1	0.77	2.8
RECLAIM	1.0	1361	0.68	1.0	1742	0.87	1.2	0.77	2.8
FUGITIVE DUST COLLECTIO	0	0	0	0	0	0	0.0	5.1	18.0
OTHER X-TRAIN EMISSIONS:		(mmcf gas)			(mmcf gas)				
SULFUR DIOXIDE	0.03	144	0.04	0.03	220	0.07	0.06	0.04	0.17
NITROGEN OXIDES	4.4	144	7.2	4.4	220	11.0	9.10	6.4	28.2
CARBON MONOXIDE	3.7	144	6.0	3.7	220	9.2	7.60	5.4	23.7
VOLATILE ORGANIC. CPDS.	0.12	144	0.2	0.12	220	0.31	0.26	0.18	0.79

NOTE: CALCULATIONS PRESENTED IN APPENDIX A.

TABLE 3-2

SUMMARY OF EMISSION CHANGES

POLLUTANT	EMISSIONS (TPY)					
	ACTUAL	PROPOSED	CONTEMPORANEOUS	CHANGE	PSD SIG.	PSD REVIEW?
FLUORIDES	8.4	32.4	0	24.0	3	YES
PARTICULATE MATTER	25.5	79.6	-42.7	11.4	15	NO
SULFUR DIOXIDE	0.06	0.15	0	0.09	40	NO
NITROGEN OXIDES	9.1	25.7	0	16.6	40	NO
CARBON MONOXIDE	7.6	21.5	0	13.9	100	NO
VOLATILE ORGANICS	0.26	0.72	0	0.46	40	NO

NOTE: CALCULATIONS PRESENTED IN APPENDIX A

TABLE 3-3
MAJOR FACILITY CATEGORIES

Fossil fuel fired steam electric plants of more than 250 MMBTU/hr heat input
Coal cleaning plants (with thermal dryers)
Kraft pulp mills
Portland cement plants
Primary zinc smelters
Iron and steel mill plants
Primary aluminum ore reduction plants
Primary copper smelters
Municipal incinerators capable of charging more than 250 tons of refuse per day
Hydrofluoric acid plants
Sulfuric acid plants
Nitric acid plants
Petroleum refineries
Lime plants
Phosphate rock processing plants
Coke oven batteries
Sulfur recovery plants
Carbon black plants (furnace process)
Primary lead smelters
Fuel conversion plants
Sintering plants
Secondary metal production plants
Chemical process plants
Fossil fuel boilers (or combinations thereof) totaling more than 250 million BTU/hr heat input
Petroleum storage and transfer units with total storage capacity exceeding 300,000 barrels
Taconite ore processing plants
Glass fiber processing plants
Charcoal production plants

TABLE 3-4
REGULATED AIR POLLUTANTS - SIGNIFICANT EMISSION RATES

Pollutant	Significant Emission Rate tons/yr	De Minimis Ambient Impacts ug/m^3
CO	100	575 (8-hour)
NOx	40	14 (NO_2, Annual)
SO_2	40	13 (24-hour)
Ozone	40 (VOC)	-
PM	25	10 (24-hour)
PM10	15	10 (24-hour)
TRS (including H2S)	10	0.2 (1-hour)
H_2SO_4 mist	7	-
Fluorides	3	0.25 (24-hour)
MSW Combustor:		
Organics (Dioxins/Furans)	3.5E-6	
Metals (PM)	15	
Acid Gases (SO2/HCl)	40	
MSW Landfill Gases (NMOC)	50	
	pounds/yr	
Lead	1200	0.1 (Quarterly avg)
Mercury	200	0.25 (24-hour)

TABLE 3-5
AMBIENT AIR QUALITY STANDARDS

Pollutant		FDEP (State) ug/m³	FDEP (State) PPM	USEPA (National) Primary ug/m³	USEPA (National) Primary PPM	USEPA (National) Secondary ug/m³	USEPA (National) Secondary PPM
SO_2,	3-hour	1,300	0.5	-	-	1300	0.5
	24-hour	260	0.1	365	0.14	-	-
	Annual	60	0.02	80	0.03	-	-
PM10,	24-hour	150	-	150	-	150	-
	Annual	50	-	50	-	50	-
CO,	1-hour	40,000	35	40,000	35	-	-
	8-hour	10,000	9	10,000	9	-	-
Ozone,	1-hour	235	0.12	235	0.12	235	0.12
NO_2,	Annual	100	0.053	100	-	100	-
Lead,	Quarterly	1.5	-	1.5	-	1.5	-

TABLE 3-6
PSD INCREMENTS

Pollutant	Allowable PSD Increments (State/National) Class I ug/m^3	Class II ug/m^3	Class III ug/m^3
TSP, Annual	5	19	37
24-hour	10	37	75
SO_2, Annual	2	20	40
24-hour	5	91	182
3-hour	5	512	700
NO_2, Annual	2.5	25	50

4.0 BEST AVAILABLE CONTROL TECHNOLOGY

As indicated in the rule applicability in the permit application, the proposed project is subject to PSD review requirements pursuant to Rule 62-212, FAC. A Best Available Control Technology (BACT) evaluation is presented below for fluoride emissions from the proposed project.

4.1 EMISSION STANDARDS

Federal New Source Performance Standards (NSPS) for wet process phosphoric acid plants, codified in 40 CFR 60, Subpart T, limit fluoride emissions to no more than 0.02 pound per ton P2O5 input. For the purposes of the standard, the affected facility includes any combination of reactors, filters, evaporators and hot wells. It should be noted that phosphoric acid product storage tanks are not included under the standard as they are not an affected facility.

NSPS for Superphosphoric acid plants, codified in 40 CFR 60, Subpart U, limit fluoride emissions to no more than 0.01 pound per ton P2O5 input. For the purposes of the standard, the affected facility includes any combination of evaporators, hot wells, acid sumps, and cooling tanks.

There are no NSPS applicable to the X-Train (dicalcium phosphate plant) and acid clarification.

Rule 62-296, FAC contains source specific fluoride emission standards for new or modified phosphate processing facilities, as follows:

- Wet process phosphoric acid plant are limited to 0.02 lb/ton P2O5 input; and,
- All plants not specifically listed must use best available control technology.

More recently, additional federal standards were promulgated under 40 CFR 63 Subpart AA, National Emission Standards for Hazardous Air Pollutants From Phosphoric Acid Manufacturing Plants. The fluoride emission standard under these NESHAPs for existing phosphoric and superphosphoric acid plants are identical to that under NSPS, at 0.02 lb/ton P2O5 feed. The fluoride emission standard for new phosphoric and superphosphoric acid plants is limited to 0.0135 and 0.0087 lb/ton P2O5 feed, respectively. However, these standards apply only to major sources of HAPs. As WSAC is not a major source of HAPs, these standards do not apply to the proposed project.

There are no fluoride emission standards for tank farms.

4.2 CONTROL TECHNOLOGIES FOR FLUORIDES

The most common pollution control equipment used to control fluorides from a wet process phosphoric acid plant is a wet scrubber. There is some variation in the wet scrubbing system

configurations from plant to plant, often depending on the preference of the plant designers and suppliers.

The use of fresh water as scrubbing medium, in place of pond water, would result in increased capture of gaseous fluorides. Aside from the current water restrictions, this option is not practical as the increased fresh water use would upset the facility water balance and increase effluent emissions.

The existing X-Train scrubbing system consist of venturi scrubbers using recirculating acid slurry. These scrubbers are ideal for the particulate matter emissions control required in this process. The plant is not a significant fluoride source as it uses defluorinated phosphoric acid.

Packed scrubbers offer superior gaseous fluoride removal, however the industry experience indicates that the packing tends to plug frequently causing maintenance problems where significant particulate matter is encountered. The resulting plant down time cuts into the overall plant efficiency and productivity. Consequently, the use of packed scrubbers, in place of the existing venturi scrubbers, is not considered for this application. However, this BACT evaluation addresses the costs associated with the use of packed scrubbers, in series with the existing venturi scrubbers.

The existing B and D Phosphoric Acid Plants utilize packed cross-flow scrubbers with pond water for control of fluorides. These scrubbers are considered BACT for this process.

Although the C&D Superphosphoric Acid (SPA) Plants emit very little fluoride, since the fluorides are removed during the preceding evaporation steps, the existing pond water scrubber does utilize some packing (pads) that enhances gaseous fluoride removal.

The fluorides from the Acid Clarification area tanks is routed to the C&D SPA scrubber. However, the filters are exhausted to the Acid Clarification pond water scrubber. This scrubber also utilizes some packing (pads) that enhances gaseous fluoride removal.

For the above processes that already utilize packed scrubbers, this BACT evaluation addresses the use of an additional packed scrubber, in series.

The cost associated with the use of a cross-flow packed scrubber, based on a recent cost proposal for a similar application, is estimated below for each unit.

Total Capital Cost:	With Equipment Cost of $190,000	
	Purchased Equip. Cost (1.18, EPA factor)	= $ 224,200
	Installation Cost (0.85 PEC, EPA factor)	= $ 190,570
	Indirect Cost (0.35 PEC, EPA factor)	= $ 78,470
	Total Capital Cost	= $ 493,240
Direct Annual Cost	Labor (O.5 hr/shift, EPA factor)	= $ 10,000

	Maintenance (1.0 hr/shift, EPA factor)	= $ 20,000
	Electricity (fan, pumps)	= $110,000
	Total DC	= $ 60,000
Indirect Annual Cost	(0.1715 TCI, EPA combined factor) (includes capital recovery at 15 year life, 10% int.)	= $ 84,600
Total Annual Cost	(DC + IC)	= $284,600

A preliminary cost evaluation can be made for each plant individually using the above cost figure and the respective estimated annual emissions. While significant additional fluoride removal is unlikely, it is assumed for the purposes of this cost analysis that all the fluorides from the scrubbing systems proposed by WSAC are captured by the additional scrubber.

For the B Phosphoric Acid Plant, the cost of fluoride control can be estimated as follows:

Annual cost of fluoride control = ($284,600 / 4.1 tpy) = $ 69,400/ton

For the D Phosphoric Acid Plant, the cost of fluoride control can be estimated as follows:

Annual Cost of fluoride control = ($284,600 / 5.4 tpy) = $ 52,700/ton

For the C&D Superphosphoric Acid Plant, the cost of fluoride control can be estimated as follows:

Annual Cost of fluoride control = ($284,600 / 3.8 tpy) = $ 74,900/ton

For Acid Clarification, the cost of fluoride control can be estimated as follows:

Annual Cost of fluoride control = ($284,600 / 13.1 tpy) = $ 21,700/ton

For the X-Train (dical), the cost of fluoride control can be estimated as follows:

Annual Cost of fluoride control = ($284,600 / 6.0 tpy) = $ 47,400/ton

The use of additional packed scrubbers is rejected as BACT based on the above preliminary cost evaluation.

Treated water recirculation is rejected as BACT based on costs evaluated for a similar project for a lined pond and lime treatment that exceed even the costs associated with a packed scrubber. Further, the treated water containment integrity and storm contingencies can add considerable unnecessary environmental liability.

It should be noted that the historical fluoride emissions measurements from the phosphoric

acid and SPA plants indicate that the current scrubber configurations result in emissions of fluorides well below the respective NSPS.

Although WSAC is not subject to the MACT standards, the proposed fluoride emission limits for the phosphoric and SPA plants are equivalent to the respective standards under 40 CFR 63. Furthermore, the proposed fluoride emission rate for the phosphoric acid plant is as stringent as the limit imposed by FDEP, of 0.0135 lb/ton P2O5 input on Cargill Fertilizer's phosphoric acid plant, reflecting FDEP's most recent BACT determination for this source category.

The product acid tanks are also subject to BACT, as they are included in the proposed project. However, BACT-based emissions limits are usually not considered for this relatively minor source. The tank emissions are presently adequately controlled by the pond water scrubber that also serves the C&D SPA plant. This scrubbing arrangement is considered BACT for this source. Indeed, many facilities do not even control fluoride emissions from the phosphoric acid tanks.

4.3 BACT CONCLUSION

Based on the above discussion, WSAC proposes the continued use of the existing pond water scrubbers as BACT and will limit fluoride emissions to the following levels:

X-Train, using venturi scrubbers, 0.03 lb/ton product.
B Phosphoric Acid Plant, using packed cross-flow scrubber, 0.0135 lb/ton P2O5 input.
D Phosphoric Acid Plant, using packed cross-flow scrubber, 0.0135 lb/ton P2O5 input.
Acid Clarification, using packed wet scrubber, 0.03 lb/ton P2O5 input
C&D SPA, using packed wet scrubber, 0.0087 lb/ton P2O5 input.
Product Acid Tanks, using common packed wet scrubber serving the C&D SPA.

5.0 AIR IMPACTS ANALYSIS

No ambient air standards analysis is required for fluorides as there are no applicable standards.

6.0 GOOD ENGINEERING PRACTICE STACK HEIGHT

The criteria for good engineering practice stack height states that the height of a stack should not exceed the greater of 65 meters (213) feet or the height of nearby structures plus the lesser of 1.5 times the height or cross-wind width of the nearby structure. This stack height policy is designed to prevent achieving ambient air quality goals solely through the use of excessive stack heights and air dispersion.

The stacks associated with the proposed project are less than 213 feet in height above-grade. This satisfies the good engineering practice (GEP) stack height criteria.

7.0 IMPACTS ON SOILS, VEGETATION AND VISIBILITY

7.1 IMPACTS ON SOILS AND VEGETATION

No adverse effects are expected on the soils, vegetation or visibility from the fluorides emissions associated with the proposed project based on past FDEP assessment of fluoride levels in the vicinity of the proposed project.

7.2 GROWTH RELATED IMPACTS

The proposed project will require no increase in personnel to operate the plant. No project related growth impacts are expected.

7.3 VISIBILITY IMPACTS

As fluoride gas is not visible, no adverse visibility impacts are expected as a result of the proposed project.

7.4 IMPACTS ON AIR QUALITY RELATED VALUES

As the proposed project is near a Class I Area (Okefenokee), an AQRV is required. The proposed project will result in an overall reduction in phosphoric acid production capacity at the site. Consequently, AQRV impacts from the proposed project are expected to be insignificant.

8.0 CONCLUSION

It can be concluded from the information in this report that the proposed project, as described in this report, will not cause or contribute to a violation of any air quality standard, PSD increment, or any other provision of Chapter 62, FAC.

APPENDIX A

EMISSION CALCULATIONS

The emission changes resulting from the proposed project can be estimated using the following approach:

NET EMISSIONS = PROPOSED – ACTUAL – CONTEPORANEOUS

1.0 Proposed Emissions

The emissions from A and C Phosphoric Acid Plants will be zero, as these plant will be permanently shut down.

1.1 B Phosphoric Acid Plant

F, hr = 100 tph P2O5 input x 0.0135 lbF/ton P2O5 input
= 1.35 lbs/hr

F, yr = 600,000 tpy P2O5 input x 0.0135 lbF/ton P2O5 input x ton/2000 lbs
= 4.1 tpy

1.2 D Phosphoric Acid Plant

F, hr = 110 tph P2O5 input x 0.0135 lbF/ton P2O5 input
= 1.49 lbs/hr

F, yr = 800,000 tpy P2O5 input x 0.0135 lbF/ton P2O5 input x ton/2000 lbs
= 5.4 tpy

1.3 Acid Clarification Plant

F, hr = 110 tph P2O5 input x 0.03 lbF/ton P2O5 input
= 3.3 lbs/hr

F, yr = 876,000 tpy P2O5 input x 0.03 lbF/ton P2O5 input x ton/2000 lbs
= 13.1 tpy

1.4 C&D Superphosphoric Acid Plant

F, hr = 110 tph P2O5 input x 0.0087 lbF/ton P2O5 input
= 0.96 lbs/hr

F, yr = 876,000 tpy P2O5 input x 0.0087 lbF/ton P2O5 input x ton/2000 lbs
= 3.8 tpy

1.5 X-Train (Dical)

Main Stack:

F, hr = 55 tph product x 0.03 lbF/ton product
= 1.65 lbs/hr

F, yr = 400,000 tpy product x 0.03 lbF/ton product x ton/2000 lbs
= 6.0 tpy

PM/PM10, hr = 55 tph product x 0.18 lb/ton product
= 9.9 lbs/hr

PM/PM10, yr = 400,000 tpy product x 0.18 lb/ton product x ton/2000 lbs
= 36.0 tpy

SO2, hr = 0.064 MMCF/hr x 0.6 lb/MMCF
= 0.04 lbs/hr

SO2, yr = 564 MMCF/yr x 0.6 lb/MMCF x ton/2000 lbs
= 0.17 tpy

NOX, hr = 0.064 MMCF/hr x 100 lb/MMCF
= 6.4 lbs/hr

NOX, yr = 564 MMCF/yr x 100 lb/MMCF x ton/2000 lbs
= 28.2 tpy

CO, hr = 0.064 MMCF/hr x 84 lb/MMCF
= 5.4 lbs/hr

CO, yr = 564 MMCF/yr x 84 lb/MMCF x ton/2000 lbs
= 23.7 tpy

VOC, hr = 0.064 MMCF/hr x 2.8 lb/MMCF
= 0.18 lbs/hr

VOC, yr = 564 MMCF/yr x 2.8 lb/MMCF x ton/2000 lbs
= 0.79 tpy

Dedust Baghouse (25,000 cfm)

PM/PM10 = 25,000 cf/min x 0.015 gr/cf x lb/7000 gr x 60 min/hr
= 3.2 lb/hr
x hr/55 ton product
= 0.058 lb/ton product

PM/PM10, yr = 400,000 tpy product x 0.058 lb/ton product x ton/2000 lbs
= 11.6 tpy

Shipping Area Baghouse (18,000 cfm)

PM/PM10 = 18,000 cf/min x 0.015 gr/cf x lb/7000 gr x 60 min/hr
= 2.3 lb/hr
x hr/55 ton product
= 0.042 lb/ton product

PM/PM10, yr = 400,000 tpy product x 0.042 lb/ton product x ton/2000 lbs
= 8.4 tpy

Limestone Bin Baghouse (6,000 cfm)

PM/PM10 = 6,000 cf/min x 0.015 gr/cf x lb/7000 gr x 60 min/hr
= 0.77 lb/hr
x hr/55 ton product
= 0.014 lb/ton product

PM/PM10, yr = 400,000 tpy product x 0.014 lb/ton product x ton/2000 lbs
= 2.8 tpy

Fines Baghouse (6,000 cfm)

PM/PM10 = 6,000 cf/min x 0.015 gr/cf x lb/7000 gr x 60 min/hr
= 0.77 lb/hr
x hr/55 ton product
= 0.014 lb/ton product

PM/PM10, yr = 400,000 tpy product x 0.014 lb/ton product x ton/2000 lbs
= 2.8 tpy

New Fugitive Dust Collection Baghouse (40,000 cfm)

PM/PM10 = 40,000 cf/min x 0.015 gr/cf x lb/7000 gr x 60 min/hr
= 5.1 lb/hr
x hr/55 ton product
= 0.09 lb/ton product

PM/PM10, yr = 400,000 tpy product x 0.09 lb/ton product x ton/2000 lbs
= 18.0 tpy

2.0 Actual Emissions

Actual emissions are estimated using stack test data and annual operating hours.

2.1 A Phosphoric Acid Plant

F, 1998 = 0.04 lb/hr x 6774 hrs/yr x ton/2000 lbs
= 0.14 tpy

F, 1999 = 0.03 lb/hr x 3664 hrs/yr x ton/2000 lbs
= 0.05 tpy

F, Avg. = (0.14 + 0.05) tpy /2
= 0.10 tpy

2.2 B Phosphoric Acid Plant

F, 1998 = 0.08 lb/hr x 7385 hrs/yr x ton/2000 lbs
= 0.30 tpy

F, 1999 = 0.13 lb/hr x 8091 hrs/yr x ton/2000 lbs
= 0.53 tpy

F, Avg. = (0.30 + 0.53) tpy /2
= 0.42 tpy

2.3 C Phosphoric Acid Plant (not tested in 1999)

F, 1998 = 0.23 lb/hr x 6982 hrs/yr x ton/2000 lbs
= 0.80 tpy

F, 1999 = 0.23 lb/hr x 2410 hrs/yr x ton/2000 lbs
= 0.28 tpy

F, Avg. = (0.80 + 0.28) tpy /2
= 0.54 tpy

2.4 D Phosphoric Acid Plant

F, 1998 = 0.37 lb/hr x 7752 hrs/yr x ton/2000 lbs
= 1.43 tpy

F, 1999 = 0.20 lb/hr x 7615 hrs/yr x ton/2000 lbs
= 0.76 tpy

F, Avg. = (1.43 + 0.76) tpy /2
= 1.10 tpy

2.5 Acid Clarification Plant

F, 1998 = 1.79 lb/hr x 6878 hrs/yr x ton/2000 lbs
= 6.15 tpy

F, 1999 = 0.61 lb/hr x 6976 hrs/yr x ton/2000 lbs
= 2.13 tpy

F, Avg. = (6.15 + 2.13) tpy /2
= 4.14 tpy

2.6 C&D Superphosphoric Acid Plant (tested every five years)

F, 1998 = 0.52 lb/hr x 6283 hrs/yr x ton/2000 lbs
= 1.63 tpy

F, 1999 = 0.52 lb/hr x 6703 hrs/yr x ton/2000 lbs
= 1.74 tpy

F, Avg. = (1.63 + 1.74) tpy /2
= 1.69 tpy

2.7 X-Train (Dical)

Main Stack:

F, 1998 = (0.15 + 0.21) / 2 lb/hr x 3925 hrs/yr x ton/2000 lbs
= 0.35 tpy

F, 1999 = 0.23 lb/hr x 4202 hrs/yr x ton/2000 lbs
= 0.48 tpy

F, Avg. = (0.38 + 0.48) tpy /2
= 0.43 tpy

PM, 1998 = (8.38 + 6.91) / 2 lb/hr x 3925 hrs/yr x ton/2000 lbs
= 15.0 tpy

PM, 1999 = 6.78 lb/hr x 4202 hrs/yr x ton/2000 lbs
= 14.2 tpy

PM, Avg. = (15.0 + 14.2) tpy /2
= 14.6 tpy

Emissions of products of combustion are estimated based on the annual natural gas use.

N. Gas Use, hr = 0.044 MMCF
N. Gas Use, 1998 = 144 MMCF
N. Gas Use, 1999 = 220 MMCF

SO2, hr = 0.044 MMCF/yr x 0.6 lb/MMCF
= 0.03 lb/hr

SO2, 1998 = 144 MMCF/yr x 0.6 lb/MMCF x ton/2000 lbs
= 0.04 tpy

SO2, 1999 = 220 MMCF/yr x 0.6 lb/MMCF x ton/2000 lbs
= 0.07 tpy

SO2, avg. = (0.04 +0.07) tpy
= 0.06 tpy

NOX, hr = 0.044 MMCF/yr x 100 lb/MMCF
= 4.4 lb/hr

NOX, 1998 = 144 MMCF/yr x 100 lb/MMCF x ton/2000 lbs
= 7.2 tpy

NOX, 1999 = 220 MMCF/yr x 100 lb/MMCF x ton/2000 lbs
= 11.0 tpy

NOX, avg. = (7.2 +11.0) tpy
= 9.1 tpy

CO, hr = 0.044 MMCF/yr x 84 lb/MMCF
= 3.7 lb/hr

CO, 1998 = 144 MMCF/yr x 84 lb/MMCF x ton/2000 lbs
= 6.0 tpy

CO, 1999 = 220 MMCF/yr x 84 lb/MMCF x ton/2000 lbs
= 9.2 tpy

CO, avg. = (6.0 +9.2) tpy
= 7.6 tpy

VOC, hr = 0.044 MMCF/yr x 2.8 lb/MMCF
= 0.12 lb/hr

VOC, 1998 = 144 MMCF/yr x 2.8 lb/MMCF x ton/2000 lbs
= 0.20 tpy

VOC, 1999 = 220 MMCF/yr x 2.8 lb/MMCF x ton/2000 lbs
= 0.31 tpy

VOC, avg. = (0.20 +0.31) tpy
= 0.26 tpy

As the existing miscellaneous baghouses are providing inadequate dust control, actual emissions from these baghouses are estimated using an oulet particulate matter loading of 0.03 gr/cf.

Dedust Baghouse (25,000 cfm)

PM/PM10 = 25,000 cf/min x 0.03 gr/cf x lb/7000 gr x 60 min/hr
= 6.4 lb/hr
x (1361 + 1742) hrs / 2 x ton/2000 lbs
= 5.0 tpy

Shipping Area Baghouse (18,000 cfm)

PM/PM10 = 18,000 cf/min x 0.03 gr/cf x lb/7000 gr x 60 min/hr
= 4.6 lb/hr
x (1361 + 1742) hrs / 2 x ton/2000 lbs
= 3.6 tpy

Limestone Bin Baghouse (6,000 cfm)

PM/PM10 = 6,000 cf/min x 0.03 gr/cf x lb/7000 gr x 60 min/hr
= 1.5 lb/hr
x (1154 + 1883) hrs / 2 x ton/2000 lbs
= 1.1 tpy

Fines Baghouse (6,000 cfm)

PM/PM10 = 6,000 cf/min x 0.03 gr/cf x lb/7000 gr x 60 min/hr
= 1.5 lb/hr
x (1361 + 1742) hrs / 2 x ton/2000 lbs
= 1.2 tpy

3.0 Contemporaneous Emissions

The new fugitive dust collection baghouse will reduce the particulate loading to the existing dust scrubber and capture fugitive dust currently generated by inadequate airflow in the X-Train dust control system. The PM emissions reduction is estimated using the plant engineering staff's knowledge of the process and AP-42 factors.

The potential annual emissions from the product and recycle (~7 x production rate) material handling area, based on a PM emission factor from AP-42, Table 8.5.3-1, of 0.06 lb/ton, are estimated as follows:

PM = 0.06 lb/ton x 40 tph x 7 x 8760 hrs/yr x ton/2000 lbs = 73.6 tpy

Based on the proposed change, about 10,000 cfm from the current 40,000 cfm (30,000 cfm optimum) dust scrubber inlet will be diverted to the new baghouse operating at 40,000 cfm, or a resulting total of 70,000 cfm for the material handling area. Assuming PM emissions are proportional to airflow, a preliminary estimate of the emissions to the new baghouse is as follows:

PM = 73.6 tpy x (1 - 30/70) = 42.1 tpy

The PM emissions material drop on the floor of the plant, based on an amount of 5 tons per week estimated by plant staff, are estimated using AP-42 Equation 1 and tabulated values in Chapter 13.2.4 .

$E = k \times 0.0032 \times (U/5)^{1.3} \times 1/(M/2)^{1.4}$

Where: E = emission factor, lb/ton
k = particle size multiplier (use 0.74)
U = mean wind speed, mph (use 5)
M = material moisture % (use 2)

$E = 0.74 \times 0.0032 \times (5/5)^{1.3} \times 1/(2/2)^{1.4} = 0.0024$ lb/ton

PM = 0.0024 lb/ton x 5 tons/wk x 52 wks/yr = 0.6 tpy

Total PM = (42.1 + 0.6) tpy = 42.7 tpy

Emissions from new Material Handling Area Baghouse (40,000 cfm)

PM/PM10 = 40,000 cf/min x 0.015 gr/cf x lb/7000 gr x 60 min/hr
= 5.1 lb/hr
x hr/55 ton product
= 0.09 lb/ton product

PM/PM10, yr = 400,000 tpy product x 0.09 lb/ton product x ton/2000 lbs
= 18.0 tpy

Net PM emissions <u>decrease</u> = (42.7 – 18.0) tpy = 24.7 tpy

Reductions in fugitive emissions from the storage and shipping areas can be similarly evaluated if deemed necessary by FDEP.

APPENDIX B

CURRENT TITLE V PERMIT CONDITIONS

(Please refer to 0470002-033-AV)

Subsection [B] This section addresses the following emissions unit(s).

E.U. ID No.	Brief Description
002	"A" Phosphoric Acid Plant with fluoride and particulate matter emissions are controlled by a Multi-Staged Wet Cyclone and High Efficiency Wet Scrubber in series.

The following specific conditions apply to the emissions unit(s) listed above:

Essential Potential to Emit (PTE) Parameters

B.1. Permitted Capacity. The rate shall not exceed the Maximum 12-MRA Hourly Rate = 33.04 tons of 100% P2O5 input or Maximum Daily 1-Hour Average Rate = 37 tons 100% P2O5 input.
12-MRA (MRA - Monthly Rolling Average) Hourly Rate Maximum shall not be exceeded by the 12-MRA hourly rate calculated by averaging each monthly hourly average with the previous 11 monthly hourly averages.
[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.; permit 0470002-034-AC]

B.2. Hours of Operation. The hours of operation for this emissions unit shall not exceed 8760 hours/year.
[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.]

Emission Limitations and Standards

{Permitting note: Table 1-1, Summary of Air Pollutant Standards and Terms, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

B.3. Fluoride emissions shall not exceed 0.92 lb/hr and 4.0 TPY.
[Rule 62-296.403(2), F.A.C.]

B.4. Particulate Matter Emissions shall not exceed 36.54 lbs/hr and 160.0 TPY.
[Rule 62-296.320(4)(a), F.A.C.]

B.5. Visible Emissions shall not be equal to greater than 20% opacity.
[Rule 62-296.320(4)(b), F.A.C.]

Test Methods and Procedures

{Permitting note: Table 2-1, Summary of Compliance Requirements, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

B.6. Fluoride emissions stack test method shall be EPA Method 13A or 13B incorporated and adopted by reference in Chapter 62-297, F.A.C. and be performed annually with a frequency base date of 09/01.
[Rule 62-296.403(3), F.A.C.; Rule 62-297.401, F.A.C.]

B.7. Particulate Matter Emissions stack test method shall be EPA Method 5 incorporated and adopted by reference in Chapter 62-297, F.A.C. and be performed every five years or on request with a frequency base date of 09/01/94.
[Rule 62-296.320(4)(a), F.A.C.; Rule 62-297.401, F.A.C.]

B.8. Visible Emissions test method shall be EPA Method 9 incorporated and adopted by reference in Chapter 62-297, F.A.C. and be performed annually with a frequency base date of 09/01.
Rule 62-296.320(4)(b), F.A.C.; Rule 62-297.401; F.A.C.]

Common Conditions - F.A.C. Test Requirements

B.9. This emissions unit is also subject to applicable F.A.C. Test Requirements in Subsection NN.

Subsection [D] This section addresses the following emissions unit(s).

E.U. ID No.	Brief Description
004	X-Train (Dical Process) with emissions controlled from EP (Emissions Points) below: 1. X-Train with Venturi and Cyclonic Scrubbers 2. Dedust bin with Baghouse 3. Shipping area with Baghouse 4. Limestone silo with Baghouse 5. Reclaim bin with Baghouse.

The following specific conditions apply to the emissions unit(s) listed above:

Essential Potential to Emit (PTE) Parameters

D.1. Permitted Capacity. The rate shall not exceed the Maximum 12-MRA Hourly Rate = 40 tons of product or Maximum Daily 1-Hour Average Rate = 45 tons of product.
12-MRA (MRA - Monthly Rolling Average) Hourly Rate Maximum shall not be exceeded by the 12-MRA hourly rate calculated by averaging each monthly hourly average with the previous 11 monthly hourly averages.
[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.; permit 0470002-034-AC]

D.2. Methods of Operation are as follows:
1. In mode 1, Dical (dicalcium phosphate) with 18.5% P is produced.
2. In mode 2, Dical (dicalcium phosphate) with 21.0% P is produced.
Fuels fired are natural gas or fuel oil with a maximum sulfur content of 1.50%.
[Rule 62-213.410, F.A.C.]

D.3. Hours of Operation. The hours of operation for this emissions unit shall not exceed 8760 hours/year.
[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.]

Emission Limitations and Standards

{Permitting note: Table 1-1, Summary of Air Pollutant Standards and Terms, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

D.4. For EP 1, mode 1 or 2, Fluoride emissions shall not exceed 0.63 lb/hr and 2.76 TPY.
[Rule 62-296.403(2), F.A.C.]

D.5. For EP 1, mode 1, Particulate Matter Emissions shall not exceed 46.11 lbs/hr and 201.96 TPY.
[Rule 62-296.320(4)(a), F.A.C.]

D.6. For EP 1, mode 2, Particulate Matter Emissions shall not exceed 45.11 lbs/hr and 197.62 TPY.
[Rule 62-296.320(4)(a), F.A.C.]

D.7. For EP 1, mode 1 or 2, Sulfur Dioxide Emissions shall not exceed 11.10 lbs/hr and 48.62 TPY.
[From PSD FL-83]

D.8. For EP 1, mode 1 or 2, Visible Emissions shall not be equal to greater than 20% opacity.
[Rule 62-296.320(4)(b), F.A.C.]

D.9. For EP 2, Visible Emissions shall not exceed 5% opacity.
[Rule 62-297.620(4), F.A.C.]

D.10. For EP 3, Visible Emissions shall not exceed 5% opacity.
[Rule 62-297.620(4), F.A.C.]

D.11. For EP 4, Visible Emissions shall not exceed 5% opacity.
[Rule 62-297.620(4), F.A.C.]

D.12. For EP 5, Visible Emissions shall not exceed 5% opacity.
[Rule 62-297.620(4), F.A.C.]

Test Methods and Procedures

{Permitting note: Table 2-1, Summary of Compliance Requirements, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

D.13. For EP 1, mode 1 or 2, Fluoride emissions stack test method shall be EPA Method 13A or 13B incorporated and adopted by reference in Chapter 62-297, F.A.C. and be performed annually with a frequency base date of 03/11.
[Rule 62-296.403(3), F.A.C.; Rule 62-297.401, F.A.C.]

D.14. For EP 1, mode 1 or 2, Particulate Matter Emissions stack test method shall be EPA Method 5 incorporated and adopted by reference in Chapter 62-297, F.A.C. and be performed annually with frequency base date of 03/11
[Rule 62-296.320(4)(a), F.A.C.; Rule 62-297.401, F.A.C.]

D.15. Sulfur Dioxide Emissions in lieu of testing shall comply with the applicable in requirements Rule 62-297.440(1), F.A.C. or maintain a record of acceptable, certified analyses of all fuel oil fired and report annually with frequency base date of 03/01.

D.16. For EP 1, mode 1 or 2, Visible Emissions test method shall be EPA Method 9 incorporated and adopted by reference in Chapter 62-297, F.A.C. and be performed annually with a frequency base date of 03/11.
Rule 62-296.320(4)(b), F.A.C.; Rule 62-297.401; F.A.C.]

D.17. For EP 2, Visible Emissions test method shall be EPA Method 9 incorporated and adopted by reference in Chapter 62-297, F.A.C. and be performed annually with a frequency base date of 03/11.
Rule 62-296.320(4)(b), F.A.C.; Rule 62-297.401; F.A.C.]

D.18. For EP 3, Visible Emissions test method shall be EPA Method 9 incorporated and adopted by reference in Chapter 62-297, F.A.C. and be performed annually with a frequency base date of 03/11.
Rule 62-296.320(4)(b), F.A.C.; Rule 62-297.401; F.A.C.]

D.19. For EP 4, Visible Emissions test method shall be EPA Method 9 incorporated and adopted by reference in Chapter 62-297, F.A.C. and be performed annually with a frequency base date of 03/11.
Rule 62-296.320(4)(b), F.A.C.; Rule 62-297.401; F.A.C.]

D.20. For EP 5, Visible Emissions test method shall be EPA Method 9 incorporated and adopted by reference in Chapter 62-297, F.A.C. and be performed annually with a frequency base date of 03/11.
Rule 62-296.320(4)(b), F.A.C.; Rule 62-297.401; F.A.C.]

Common Conditions - On-Spec Used Oil/Lead

D.21. This emissions unit is also subject to the On-Spec Used Oil/Lead conditions in Subsection NN.

Common Conditions - **F.A.C. Test Requirements**

D.22. This emissions unit is also subject to applicable F.A.C. Test Requirements in Subsection NN.

Subsection [M] This section addresses the following emissions unit(s).

E.U. ID No.	Brief Description
019	"C" Phosphoric Acid Plant with fluoride and particulate matter emissions are controlled by a packed wet scrubber (F-4).

The following specific conditions apply to the emissions unit(s) listed above:

Essential Potential to Emit (PTE) Parameters

M.1. Permitted Capacity. The rate shall not exceed the Maximum 12-MRA Hourly Rate = 23.67 tons of 100% P2O5 input or Maximum Daily 1-Hour Average Rate = 27 tons 100% P2O5 input.
12-MRA (MRA - Monthly Rolling Average) Hourly Rate Maximum shall not be exceeded by the 12-MRA hourly rate calculated by averaging each monthly hourly average with the previous 11 monthly hourly averages.
[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.; permit 0470002-034-AC]

M.2. Hours of Operation. The hours of operation for this emissions unit shall not exceed 8760 hours/year.
[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.]

Emission Limitations and Standards

{Permitting note: Table 1-1, Summary of Air Pollutant Standards and Terms, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

M.3. Fluoride emissions shall not exceed 0.47 lb/hr and 2.05 TPY.
[Rule 62-204.800(7)(b)25., F.A.C.; 40 CFR 60.202, Subpart T]

M.4. Particulate Matter Emissions shall not exceed 5.0 lbs/hr and 21.9 TPY.
[PSD model allocation]

M.5. Visible Emissions shall not be equal to greater than 20% opacity.
[Rule 62-296.320(4)(b), F.A.C.]

Test Methods and Procedures

{Permitting note: Table 2-1, Summary of Compliance Requirements, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

M.6. Fluoride emissions stack test method shall be EPA Method 13A or 13B incorporated and adopted by reference in Chapter 62-297, F.A.C. and be performed annually with a frequency base day of 06/18.
[Rule 62-204.800(7)(b)25., F.A.C.; 40 CFR 60.202, Subpart T; Rule 62-297.401, F.A.C.]

M.7. Particulate Matter Emissions stack test method shall be EPA Method 9 incorporated and adopted by reference in Chapter 62-297, F.A.C. and be performed every five years or on request with a frequency base date 06/18/95.
[Rule 62-296.320(4)(a), F.A.C.; Rule 62-297.401; F.A.C.]

M.8. Visible Emissions test method shall be EPA Method 9 incorporated and adopted by reference in Chapter 62-297, F.A.C. and be performed annually with a frequency base date of 06/18.
[Rule 62-296.320(4)(b), F.A.C.; Rule 62-297.401; F.A.C.]

Continuous Monitoring Requirements

M.9. A mass flow continuous monitoring system shall comply with the requirements in 40 CFR 60.203 incorporated and adopted by reference in Rule 62-204.800(7)(b), F.A.C.

M.10. A scrubber total pressure drop continuous monitoring system shall comply with the requirements in 40 CFR 60.203 incorporated and adopted by reference in Rule 62-204.800(7)(b), F.A.C.

Common Conditions - F.A.C. Test Requirements

M.11. This emissions unit is also subject to applicable F.A.C. Test Requirements in Subsection NN.

Subsection [N] This section addresses the following emissions unit(s).

E.U. ID No.	Brief Description
020	"B" Phosphoric Acid Plant with fluoride and particulate matter emissions are controlled by a packed wet scrubber.

The following specific conditions apply to the emissions unit(s) listed above:

Essential Potential to Emit (PTE) Parameters

N.1. Permitted Capacity. The rate shall not exceed the Maximum 12-MRA Hourly Rate = 74.99 tons of 100% P2O5 input or Maximum Daily 1-Hour Average Rate = 83 tons 100% P2O5 input.
12-MRA (MRA - Monthly Rolling Average) Hourly Rate Maximum shall not be exceeded by the 12-MRA hourly rate calculated by averaging each monthly hourly average with the previous 11 monthly hourly averages.
[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.; permit 0470002-034-AC]

N.2. Hours of Operation. The hours of operation for this emissions unit shall not exceed 8760 hours/year.
[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.]

Emission Limitations and Standards

{Permitting note: Table 1-1, Summary of Air Pollutant Standards and Terms, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

N.3. Fluoride emissions shall not exceed 1.50 lb/hr and 6.57 TPY.
[Rule 62-204.800(7)(b)25., F.A.C.; 40 CFR 60.202, Subpart T]

N.4. Particulate Matter Emissions shall not exceed 5.0 lbs/hr and 21.9 TPY.
[PSD model allocation]

N.5. Visible Emissions shall not be equal to greater than 20% opacity.
[Rule 62-296.320(4)(b), F.A.C.]

Test Methods and Procedures

{Permitting note: Table 2-1, Summary of Compliance Requirements, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

N.6. Fluoride emissions stack test method shall be EPA Method 13A or 13B incorporated and adopted by reference in Chapter 62-297, F.A.C. and be performed annually with a frequency base day of 09/26.
[Rule 62-204.800(7)(b)25., F.A.C.; 40 CFR 60.202, Subpart T; Rule 62-297.401, F.A.C.]

N.7. Particulate Matter Emissions stack test method shall be EPA Method 5 incorporated and adopted by reference in Chapter 62-297, F.A.C. and be performed every five years or on request with a frequency base date of 09/26/96.
[Rule 62-296.320(4)(a), F.A.C.; Rule 62-297.401; F.A.C.]

N.8. Visible Emissions test method shall be EPA Method 9 incorporated and adopted by reference in Chapter 62-297, F.A.C. and be performed annually with a frequency base date of 09/26.
[Rule 62-296.320(4)(b), F.A.C.; Rule 62-297.401; F.A.C.]

Continuous Monitoring Requirements

N.9. A mass flow continuous monitoring system shall comply with the requirements in 40 CFR 60.203 incorporated and adopted by reference in Rule 62-204.800(7)(b), F.A.C.

N.10. A scrubber total pressure drop continuous monitoring system shall comply with the requirements in 40 CFR 60.203 incorporated and adopted by reference in Rule 62-204.800(7)(b), F.A.C.

Common Conditions - F.A.C. Test Requirements

N.11. This emissions unit is also subject to applicable F.A.C. Test Requirements in Subsection NN.

Subsection [II] This section addresses the following emissions unit(s).

E.U. ID No.	Brief Description
069	"D" Phosphoric Acid Plant with fluoride and particulate matter emissions controlled by a wet scrubber.

The following specific conditions apply to the emissions unit(s) listed above:

Essential Potential to Emit (PTE) Parameters

II.1. Permitted Capacity. The rate shall not exceed the Maximum 12-MRA Hourly Rate = 85.22 tons of 100% P2O5 input (from 274.92 TPH of 31% phosphate rock) or Maximum Daily 1-Hour Average Rate = 95 tons 100% P2O5 input.
12-MRA (MRA - Monthly Rolling Average) Hourly Rate Maximum shall not be exceeded by the 12-MRA hourly rate calculated by averaging each monthly hourly average with the previous 11 monthly hourly averages.
[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.; permit 0470002-034-AC]

II.2. Hours of Operation. The hours of operation for this emissions unit shall not exceed 8760 hours/year.
[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.]

Emission Limitations and Standards

{Permitting note: Table 1-1, Summary of Air Pollutant Standards and Terms, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

II.3. Fluoride emissions shall not exceed 1.70 lb/hr and 7.43 TPY.
[Rule 62-204.800(7)(b)25., F.A.C.; 40 CFR 60.202, Subpart T]

II.4. Particulate Matter Emissions shall not exceed 42.52 lbs/hr and 185.73 TPY.
[Rule 62-296.320(4)(a), F.A.C.]

II.5. Visible Emissions shall not be equal to greater than 20% opacity.
[Rule 62-296.320(4)(b), F.A.C.]

Test Methods and Procedures

{Permitting note: Table 2-1, Summary of Compliance Requirements, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

II.6.. Fluoride emissions stack test method shall be EPA Method 13A or 13B incorporated and adopted by reference in Chapter 62-297, F.A.C. and be performed annually with a frequency base date of 06/18.
[Rule 62-204.800(7)(b)25., F.A.C.; 40 CFR 60.202, Subpart T; Rule 62-297.401; F.A.C.]

II.7. Particulate Matter Emissions stack test method shall be EPA Method 5 incorporated and adopted by reference in Chapter 62-297, F.A.C. and be performed every five years or request with a frequency base date 06/18/95.
[Rule 62-296.320(4)(a), F.A.C.; Rule 62-297.401; F.A.C.]

II.8. Visible Emissions test method shall be EPA Method 9 incorporated and adopted by reference in Chapter 62-297, F.A.C. and be performed annually with a frequency base date of 06/18.
[Rule 62-296.320(4)(b), F.A.C. Rule 62-297.401; F.A.C.]

Continuous Monitoring Requirements

II.9. A mass flow continuous monitoring system shall comply with the requirements in 40 CFR 60.203 incorporated and adopted by reference in Rule 62-204.800(7)(b), F.A.C.

II.10. A scrubber total pressure drop continuous monitoring system shall comply with the requirements in 40 CFR 60.203 incorporated and adopted by reference in Rule 62-204.800(7)(b), F.A.C.

Common Conditions - **F.A.C. Test Requirements**

II.11. This emissions unit is also subject to applicable F.A.C. Test Requirements in Subsection NN.

Subsection [JJ] This section addresses the following emissions unit(s).

E.U. ID No.	Brief Description
070	"C" & "D" Superphosphoric Acid (SPA) Plants and east & west phosphoric acid storage tanks with fluoride emissions are controlled by a scrubber. Since the Synspar Plant has no air emissions, the limerock (LR) bin associated with it is included here for recordkeeping purposes. The particulate matter emissions from this bin are controlled by a bag collector.

The following specific conditions apply to the emissions unit(s) listed above:

Essential Potential to Emit (PTE) Parameters

JJ.1. Permitted Capacity. The combined rate shall not exceed the Maximum 12-MRA Hourly Rate = 84.2 tons of 100% P2O5 input or Maximum Daily 1-Hour Average Rate = 95 tons of 100% P2O5 input.
12-MRA (MRA - Monthly Rolling Average) Hourly Rate Maximum shall not be exceeded by the 12-MRA hourly rate calculated by averaging each monthly hourly average with the previous 11 monthly hourly averages.
[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.; permit 0470002-034-AC]

JJ.2. Hours of Operation. The hours of operation for this emissions unit shall not exceed 8760 hours/year.
[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.]

Emission Limitations and Standards

{Permitting note: Table 1-1, Summary of Air Pollutant Standards and Terms, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

JJ.3. From stack, Fluoride emissions shall not exceed 0.01 lb FL per ton P2O5 input; 0.84 lbs/hr and 3.69 TPY.
[Rule 62-204.800(7)(b), F.A.C.; 40 CFR 60.212, Subpart U]

JJ.4. From vent (LR), Visible Emissions shall not exceed 5% opacity.
[Rule 62-297.620(4), F.A.C.]

Test Methods and Procedures

{Permitting note: Table 2-1, Summary of Compliance Requirements, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

JJ.5 Fluoride emissions stack test method shall be EPA Method 13A or 13B incorporated and adopted by reference in Chapter 62-297, F.A.C. and be performed every 5 years with a frequency base date 09/04/95.
[Rule 62-204.800(7)(b), F.A.C.; 40 CFR 60.214, Subpart U; Rule 62-297.401; F.A.C.]

JJ.6. From vent (LR), Visible Emissions test method shall be EPA Method 9 incorporated and adopted by reference in Chapter 62-297, F.A.C. and be performed annually with a frequency base date of 09/04.
[Rule 62-297.401; F.A.C.]

Continuous Monitoring Requirements

JJ.7. A mass flow continuous monitoring system shall comply with the requirements in 40 CFR 60.213 incorporated and adopted by reference in Rule 62-204.800(7)(b), F.A.C.

JJ.8. A scrubber total pressure drop continuous monitoring system shall comply with the requirements in 40 CFR 60.213 incorporated and adopted by reference in Rule 62-204.800(7)(b), F.A.C.

Common Conditions - F.A.C. Test Requirements

JJ.9. This emissions unit is also subject to applicable F.A.C. Test Requirements in Subsection NN.

Subsection [KK] This section addresses the following emissions unit(s).

E.U. ID No.	Brief Description
071	Acid Clarification Plant with fluoride emissions controlled by a wet scrubber.

The following specific conditions apply to the emissions unit(s) listed above:

Essential Potential to Emit (PTE) Parameters

KK.1. Permitted Capacity. The rate shall not exceed the Maximum 12-MRA Hourly Rate = 90.18 tons of 100% P2O5 input or Maximum Daily 1-Hour Average Rate = 100 tons 100% P2O5 input.
12-MRA (MRA - Monthly Rolling Average) Hourly Rate Maximum shall not be exceeded by the 12-MRA hourly rate calculated by averaging each monthly hourly average with the previous 11 monthly hourly averages.
[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.; permit 0470002-034-AC]

KK.2. Hours of Operation. The hours of operation for this emissions unit shall not exceed 8760 hours/year.
[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.]

Emission Limitations and Standards

{Permitting note: Table 1-1, Summary of Air Pollutant Standards and Terms, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

KK.3. Fluoride emissions shall not exceed (0.05 lb FL per ton P2O5 input)[1]; 4.51 lbs/hr and 19.75 TPY.
[Rule 62-210.200(42), F.A.C.; ([1]BACT from AC24-2722 issued 02-28-78)]

Test Methods and Procedures

{Permitting note: Table 2-1, Summary of Compliance Requirements, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

KK.4. Fluoride emissions stack test method shall be EPA Method 13A or 13B incorporated and adopted by reference in Chapter 62-297, F.A.C. and be performed annually with a frequency base date of 06/17.
[Rule 62-297.401; F.A.C.]

Common Conditions - F.A.C. Test Requirements

KK.5. This emissions unit is also subject to applicable F.A.C. Test Requirements in Subsection NN.

Harvey, Mary

From: Harvey, Mary
Sent: Friday, December 14, 2007 3:31 PM
To: 'W.K. Thornton, White Springs Agricultural Chemicals, Inc.'; 'C. Pults, White Springs Agricultural Chemicals, Inc.'; Kirts, Christopher
Cc: Adams, Patty; Koerner, Jeff; Arif, Syed; Gibson, Victoria
Subject: Extension Request/DEP File #0470002-059-AC(PSD-FL-297)
Attachments: 0470002.059.AC.D_pdf.zip

Tracking:

Recipient	Delivery	Read
'W.K. Thornton, White Springs Agricultural Chemicals, Inc.'		
'C. Pults, White Springs Agricultural Chemicals, Inc.'		
Kirts, Christopher	Delivered: 12/14/2007 3:31 PM	
Adams, Patty	Delivered: 12/14/2007 3:31 PM	Read: 12/14/2007 3:54 PM
Koerner, Jeff	Delivered: 12/14/2007 3:31 PM	
Arif, Syed	Delivered: 12/14/2007 3:31 PM	Read: 12/16/2007 1:13 AM
Gibson, Victoria	Delivered: 12/14/2007 3:31 PM	Read: 12/17/2007 9:15 AM

Dear Sir/Madam:

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

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

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

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

Thank you,

DEP, Bureau of Air Regulation

Florida Department of
Environmental Protection

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

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

December 13, 2007

Electronically sent with received receipt requested.

Mr. W. K. Thornton, General Manager
White Springs Agricultural Chemicals, Inc.
Suwannee River/Swift Creek Complex
Post Office Box 300
White Springs, Florida 32096-0300

Re: Extension Request/DEP File No. 0470002-059-AC (PSD-FL-297)
Suwannee River/Swift Creek Complex

Dear Mr. Thornton:

The Department has reviewed your letter of October 8, 2007, requesting an extension of the expiration date of the construction permit No. 0470002-039-AC from December 31, 2007 to December 31, 2008. This request is necessary because of a long lead time for ordering the filter pans, which are large items that cost $3 million. Corporate approval has been obtained to purchase one set of filter pans for installation during the plant's turnaround in June 2008. The extension through December of 2008 will allow sufficient time to complete the installation, make any required adjustments, and complete appropriate testing.

Determination: The expiration date is hereby extended from **December 31, 2007** to **December 31, 2008** for the purpose of installing one set of filter pans at the B-Phosphoric Acid Plant. This possibility was recognized during the last extension, which was issued in July of 2006. The Department will grant this last extension. Any future work associated with this plant will require a new application and a new construction permit. A copy of this letter shall be filed with the referenced permit and shall become part of the permit. This permitting decision is issued pursuant to Chapter 403, Florida Statutes.

Permitting Authority: Applications for air construction permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4, 62-210, and 62-212 of the Florida Administrative Code (F.A.C.). The proposed project is not exempt from air permitting requirements and an air permit is required to perform the proposed work. The Department of Environmental Protection's Bureau of Air Regulation is the Permitting Authority responsible for making a determination for this project. The Permitting Authority's physical address is: 111 South Magnolia Drive, Suite #4, Tallahassee, Florida 32301. The Permitting Authority's mailing address is: 2600 Blair Stone Road, MS #5505, Tallahassee, Florida 32399-2400. The Permitting Authority's telephone number is 850/488-0114.

Petitions: A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed with (received by) the Department's Agency Clerk in the Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000 (Telephone: 850/245-2241 / Facsimile: 850/245-2303). Petitions must be filed within 14 days of receipt of this permit extension. 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 (in a proceeding initiated by another

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Permit Extension was sent by electronic mail with received receipt requested before the close of business on 12/14/07 to the persons listed below.

W.K. Thornton, White Springs Agricultural Chemicals, Inc. (wkthornton@pcsphosphate.com)
C. Pults, White Springs Agricultural Chemicals, Inc. (cpults@pcsphosphate.com)
C. Kirts, DEP-NED (christopher.kirts@dep.state.fl.us)

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.

Mary J. Harry 12/14/07
(Clerk) (Date)

party) will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the Permitting Authority'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 when and how each petitioner received notice of the agency action or proposed decision; (d) A statement of all disputed issues of material fact; (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 including an explanation of how the alleged facts relate to the specific rules or statutes; and, (g) A statement of the relief sought by the petitioner, stating precisely the action the 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 Permitting Authority'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, F.A.C.

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

Mediation: Mediation is not available in this proceeding.

Effective Date: 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 action will not be effective until further order of the Department.

Judicial Review: Any party to this permitting decision (order) has the right to seek judicial review of it under Section 120.68, F.S., 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 30 days after this order is filed with the clerk of the Department.

Executed in Tallahassee, Florida.

Trina L Vielhauer

Trina Vielhauer, Bureau Chief
Bureau of Air Regulation

Harvey, Mary

From: wkthornton@pcsphosphate.com
Sent: Friday, December 14, 2007 3:56 PM
To: Harvey, Mary
Cc: sPosey@pcsphosphate.com; SBeckel@Pcsphosphate.com
Subject: Re: Extension Request/DEP File #0470002-059-AC(PSD-FL-297)
Attachments: 0470002.059.AC.D_pdf.zip

Thank you,
W.K. Thornton

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

12/14/07 03:30 PM

To "W.K. Thornton, White Springs Agricultural Chemicals, Inc." <wkthornton@pcsphosphate.com>, "C. Pults, White Springs Agricultural Chemicals, Inc." <cpults@pcsphosphate.com>, "Kirts, Christopher" <Christopher.Kirts@dep.state.fl.us>

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

Subject Extension Request/DEP File #0470002-059-AC(PSD-FL-297)

Dear Sir/Madam:

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

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

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

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

Thank you,
DEP, Bureau of Air Regulation

[illegible] verify receipt of the attached documents [illegible]

Harvey, Mary

From: Adams, Patty
To: Harvey, Mary
Sent: Friday, December 14, 2007 3:54 PM
Subject: Read: Extension Request/DEP File #0470002-059-AC(PSD-FL-297)

Your message

To:	'W.K. Thornton, White Springs Agricultural Chemicals, Inc.'; 'C. Pults, White Springs Agricultural Chemicals, Inc.'; Kirts, Christopher
Cc:	Adams, Patty; Koerner, Jeff; Arif, Syed; Gibson, Victoria
Subject:	Extension Request/DEP File #0470002-059-AC(PSD-FL-297)
Sent:	12/14/2007 3:31 PM

was read on 12/14/2007 3:54 PM.

Harvey, Mary

From: cPults@pcsphosphate.com
Sent: Friday, December 14, 2007 3:52 PM
To: Harvey, Mary
Subject: Re: Extension Request/DEP File #0470002-059-AC(PSD-FL-297)

Got it.

Thanks
Charlie

Merry Christmas

Harvey, Mary

From: Gibson, Victoria
To: Harvey, Mary
Sent: Monday, December 17, 2007 9:15 AM
Subject: Read: Extension Request/DEP File #0470002-059-AC(PSD-FL-297)

Your message

To:	'W.K. Thornton, White Springs Agricultural Chemicals, Inc.'; 'C. Pults, White Springs Agricultural Chemicals, Inc.'; Kirts, Christopher
Cc:	Adams, Patty; Koerner, Jeff; Arif, Syed; Gibson, Victoria
Subject:	Extension Request/DEP File #0470002-059-AC(PSD-FL-297)
Sent:	12/14/2007 3:31 PM

was read on 12/17/2007 9:15 AM.

Harvey, Mary

From: Arif, Syed
To: Harvey, Mary
Sent: Sunday, December 16, 2007 1:13 AM
Subject: Read: Extension Request/DEP File #0470002-059-AC(PSD-FL-297)

Your message

To:	'W.K. Thornton, White Springs Agricultural Chemicals, Inc.'; 'C. Pults, White Springs Agricultural Chemicals, Inc.'; Kirts, Christopher
Cc:	Adams, Patty; Koerner, Jeff; Arif, Syed; Gibson, Victoria
Subject:	Extension Request/DEP File #0470002-059-AC(PSD-FL-297)
Sent:	12/14/2007 3:31 PM

was read on 12/16/2007 1:13 AM.

Department of
Environmental Protection

Jeb Bush
Governor

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

Colleen M. Castille
Secretary

August 9, 2005

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Paul H. Barrett, General Manager
White Springs Agricultural Chemicals, Inc.
Suwannee River/Swift Creek Complex
Post Office Box 300
White Springs, Florida 32096-0300

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

Dear Mr. Barrett:

The Department reviewed your request of August 4, 2005 submitted by Koogler & Associates on your behalf to extend the expiration date of the above referenced construction permit from October 1, 2005 to December 31, 2007.

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. List all projects included in PSD-FL-297 which have been completed and compliance demonstrated. The letter states completion of the D-Phosphoric Acid Plant modification by December 2007 and the B-Phosphoric Acid Plant by March 2006. Please indicate what equipment changes and upgrades will be necessary to complete the modification, and what improvements have been done so far for each of those plants.
3. 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 for all the emission units that underwent modification.

4. Identify additional production and emission testing that needs to be conducted and provide estimated dates for completion of those tasks.
5. 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,

Syed Arif, P.E.
North Permitting Section

cc: Rita Felton-Smith, DEP-NED
Charlie Pults, WSAC
Pradeep Raval, Koogler & Associates

7001 0320 0001 3692 2404

NDER: 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 32096-0300

COMPLETE THIS SECTION ON DELIVERY

A. Signature
X [signature] ☐ Agent ☐ Addressee

B. Received by (Printed Name) T.D. Reynolds
C. Date of Delivery 8/12/01

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 *(Transfer from service label)* 7001 0320 0001 3692 2404

PS Form 3811, August 2001 Domestic Return Receipt 102595-02-M-1540

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

OFFICIAL USE

Postage	$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	

Postmark Here

7001 0320 0001 3692 2404

Se
Sti
or
Ci

Mr. Paul Barrett, General Manager
White Springs Agricultural Chemicals, Inc.
Post Office Box 300
White Springs, Florida 32096-0300

PS Form 3800, January 2001 See Reverse for Instructions

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
VP-Production
White Springs Agricultural
Chemicals, Inc.
PO Box 300
White Springs, FL 32096

COMPLETE THIS SECTION ON DELIVERY

A. Received by *(Please Print Clearly)* B. Date of Delivery 8-11-00

C. Signature
X [signature] ☑ 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

2. Article Number *(Copy from service label)*
7099 3400 0000 1453 2849

PS Form **3811**, July 1999 Domestic Return Receipt 102595-99-M-1789

7099 3400 0000 1453 2849

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

Article Sent To:
Mr. Vernon J. Lloyd, White Springs Agricultural Chemicals

Postage	$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	$

8/9/00 Postmark Here

Name (Please Print Clearly) (to be completed by mailer)
Vernon J. Lloyd
Street, Apt. No.; or PO Box No.
PO Box 300
City, State, ZIP+4
White Springs, FL 32096

PS Form 3800, July 1999 See Reverse for Instructions

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.
P. O. Box 300
White Springs, Fl 32096

COMPLETE THIS SECTION ON DELIVERY

A. Received by *(Please Print Clearly)* | B. Date of Delivery 9-25-00

C. Signature
X [signature] ☐ 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

2. Article Number *(Copy from service label)*
7099 3400 0000 1453 2429

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)

Article Sent To: Vernon Lloyd

Postage	$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	$

Postmark Here

Na Mr. Vernon J. Lloyd
Sti Vice President - Production
Cit White Springs Agricultural
Chemicals, Inc.
PO Box 300
PS White Springs, FL 32096

or Instructions

7099 3400 0000 1453 2429

Is your RETURN ADDRESS completed on the reverse side?

SENDER:
- Complete items 1 and/or 2 for additional services.
- Complete items 3, 4a, and 4b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write *"Return Receipt Requested"* on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):
1. ☐ Addressee's Address
2. ☐ Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:

Mr. Vernon J. Lloyd
White Springs Agricultural
Chemicals, Inc.
PO Box 300
White Springs, FL 32096

4a. Article Number
7099 3400 0000 1453 3402

4b. Service Type
☐ Registered ☒ Certified
☐ Express Mail ☐ Insured
☐ Return Receipt for Merchandise ☐ COD

7. Date of Delivery
11-30-00

5. Received By: *(Print Name)*
D. D. REYNOLDS

6. Signature: *(Addressee or Agent)*
X

8. Addressee's Address *(Only if requested and fee is paid)*

Thank you for using Return Receipt Service.

PS Form **3811**, December 1994 102595-98-B-0229 Domestic Return Receipt

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

Article Sent To:
Mr. Vernon J. Lloyd

Postage	$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	$

White Springs Chemical
Postmark Here

Name (Please Print Clearly) (to be completed by mailer)
Mr. Vernon J. Lloyd
Street, Apt. No.; or PO Box No.
PO Box 300
City, State, ZIP+4
White Springs, FL 32096

PS Form 3800, July 1999 See Reverse for Instructions

7099 3400 0000 1453 3402