

Jeb Bush
Governor

Department of Environmental Protection

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

Colleen M. Castille
Secretary

June 28, 2004

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: Title V Renewal DEP File No.0470002-048-AV
Request for Additional Information Regarding CAM

Dear Mr. Barrett,

On June 10, 2004, the Department received your additional information for the renewal of the Title V permit for the White Springs Suwannee River/Swift Creek Complex. At this time, the application is deemed incomplete.

In your original CAM submittal, you requested fan amperage be used as a parameter for all the scrubbers as an alternative to pressure drop across the scrubbers. It was also specified that "An excursion is defined as operation outside the indicator range specified in the permit". However, your permit does not specify any indicator ranges. In order to be considered for CAM purposes, you will need to specify, and be able to adequately justify, the maximum and minimum fan amperage for each of the units that are subject to CAM. For all units subject to CAM, provide at least 5 years worth of test results that indicate compliance with the emissions limits, the date of the tests, the chosen surrogate parameters recorded during the tests, and the percentage of allowable operating rate during the tests. Provide the results for each of the test runs, not just the yearly average. Plot the results of the emissions tests vs. the surrogate parameters recorded during the tests. If you choose to use pressure drop as the indicator, please inform the Department of this choice along with supporting documentation. This information will be needed for scrubber liquid flow rate as well as to determine the indicator parameters for each unit.

In addition to the afore mentioned, in order to satisfy the CAM submittal requirements and to approve the previously submitted CAM plans, please submit the following information for each of the applicable units:

1. Defluorinated Phosphate (DFP) Plant A & B (EU 003 & 038). CAM is applicable for PM, SO₂, and fluoride. The choice of fan amperage and liquid flow rate through the scrubbers are acceptable indicators to monitor. The selection of the indicator ranges must

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also be clearly justified and demonstrate that operation at those levels is protective of the allowable emissions limitations. Please provide a table of test data that correlates the fan amperage and liquid flow rates to the tested PM, SO₂ and fluoride emission levels. From this data, provide a justification of your choices and clearly indicate a maximum and minimum fan amperage and water flow rate for each of the scrubbers that will assure compliance with the emission limits. For EU 003 and 038, your application doesn't list the scrubber as the primary control unit. Is the scrubber used for PM and Fluoride control the same for the SO₂? For EU 038, the percent efficiencies differ greatly from the efficiencies of EU 003. The listed minimum efficiency for EU 038 is 95.0%. Please explain the discrepancy.

2. X-Train (EU 004). CAM is applicable for PM emissions. The choice of fan amperage and liquid flow rate through the scrubbers are acceptable indicators to monitor. However, indicator ranges must be clearly stated in the monitoring approach table. The selection of the indicator ranges must also be clearly justified and demonstrate that operation at those levels is protective of the allowable emissions limitations. Please provide a table of test data that correlates the fan amperage and flow rates to the tested PM and fluoride emission levels. From this data, provide a justification of your choices and clearly indicate a maximum and minimum fan amperage and water flow rate for each of the scrubbers that will assure compliance with the emission limits with a margin of safety that allows for corrective action to be taken before a permit limit is exceeded. Please explain and justify why the scrubber is not used for the control of SO₂ as in EU 003 and 038.

3. Y Train (EU 008). CAM is applicable for PM and fluoride. The choice of fan amperage and liquid flow rate through the scrubbers are acceptable indicators to monitor. However, indicator ranges must be clearly stated in the monitoring approach table. The selection of the indicator ranges must also be clearly justified and demonstrate that operation at those levels is protective of the allowable emissions limitations. Please provide a table of test data that correlates the pressure differentials and flow rates to the tested PM and fluoride emission levels. From this data, provide a justification of your choices and clearly indicate a maximum and minimum fan amperage and water flow rate for the scrubber that will assure compliance with the emission limits. Please explain and justify why the scrubber is not used for the control of SO₂ as in EU 003 and 038.

4. #1 Storage Building (EU 010). You stated that TSP will not be manufactured. Please clarify whether or not TSP is being processed at this time, or if production has completely ceased. If future TSP production is to take place under the renewal permit, please provide a determination for CAM applicability for fluoride. If no future production is planned, please provide a statement that you wish for us to remove TSP from your permit.

5. Screening & Shipping Operation, Z-Train, DFP Feed Plant, A & B DFP Coolers, SCM Rock Dryers, and SCM Silos (EU 015, 032, 042, 044, 064, & 065). CAM is applicable for PM emissions. The choice of fan amperage and liquid flow rate through the scrubbers are acceptable indicators to monitor. However, indicator ranges must be clearly stated in the monitoring approach table. The selection of the indicator ranges must also be clearly justified and demonstrate that operation at those levels is protective of the allowable emissions limitations. Please provide a table of test data that correlates the fan amperage and flow rates to the tested PM and fluoride emission levels. From this data, provide a

justification of your choices and clearly indicate a maximum and minimum fan amperage and water flow rate for each of the scrubbers that will assure compliance with the emission limits with a margin of safety that allows for corrective action to be taken before a permit limit is exceeded.

6. Phosphoric Acid Plant B (EU 020). CAM is applicable for fluoride. The choice of fan amperage and liquid flow rate through the scrubber are acceptable indicators to monitor. However, indicator ranges must be clearly stated in the monitoring approach table. The selection of the indicator ranges must also be clearly justified and demonstrate that operation at those levels is protective of the allowable emissions limitations. Please provide a table of test data that correlates the fan amperage and flow rates to the tested fluoride emission levels. From this data, provide a justification of your choices and clearly indicate a maximum and minimum fan amperage and water flow rate that will assure compliance with the emission limit. You stated that EU 020 will be modified where there will be no PM limit on the unit. Please explain and justify the modification to this emission unit. If the current PM limit was established in an air construction permit, then an application must be submitted to modify the unit and remove the limitation.

7. #2 Phosphate Rock Grinder, "C" Sulfuric Acid Plant, "D" Sulfuric Acid Plant, "E" Sulfuric Acid Plant, and "F" Sulfuric Acid Plant (EU 001, 021, 022, 066, & 067).

Provide an explanation and justification for all of these units claiming to be process equipment.

8. A & B DFP Coolers (EU 044). Please explain and justify using only 90% efficiency for this emission unit. Your application does not list any type of control unit for Fluoride, but does list single cyclone devices for particulate matter control with control efficiency of 99%. Does the PM scrubber also remove Fluoride? Why isn't the efficiency 95%, as with other units listed in the CAM applicability table? Your current permit (0470002-033-AV) states that a cyclonic wet scrubber is used to control particulate matter for both A and B Coolers. At 95% efficiency, this unit would be subject to CAM for Fluoride emissions.

9. D Phosphoric Acid Plant (EU 069). Please explain and justify why PM emissions are not included in the CAM analysis. The permitted emission limit is 185.73 tpy, controlled by a wet scrubber with 95% efficiency. This information is present in both your current Title V permit and your renewal application.

10. South Phosphoric Acid Filters, North Phosphoric Acid Filters, and Acid Clarification Plant (EU 034, 035, & 071). Please explain and justify your calculations for these units.

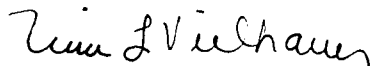
Mr. Paul H. Barrett

June 28, 2004

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Please submit all requested information 30 days upon receipt of this letter to Mr. Bobby Bull at FDEP Bureau of Air Regulation, MS 5505, 2600 Blairstone Road, Tallahassee, FL 32399-2400. In addition, please submit an electronic copy of your response and the updated CAM plan, in Word format, along with your response. If you have any questions regarding this request for additional information, please contact Mr. Bull at Robert.Bull@dep.state.fl.us or (850) 921-9585. In the future, if there are any tests used to establish new parameter ranges, please submit a copy to Bobby Bull in addition to the required submittal to the Southwest District. To discuss the specific CAM requirements, please contact Mr. Jonathan Holtom at (850) 921-9531 or Jonathan.Holtom@dep.state.fl.us.

Sincerely,



Trina Vielhauer, Chief
Bureau of Air Regulation

cc: Christopher Kirts, DEP-NED
Pradeep Raval, Consultant, Kooger and Associates
Charles Pults, Sr. Environmental Engineer, White Springs Agricultural Chemicals