

STATEMENT OF BASIS

White Spring Agricultural Chemicals, Inc.
Suwannee River/Swift Creek Complex
Facility ID No. 0470002
Hamilton County

Title V Air Operation Permit Renewal
DRAFT Permit No. 0470002-048-AV

This Title V Air Operation Permit Renewal is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210 and 62-213. The above named permittee is hereby authorized to operate the facility shown on the application and approved drawing(s), plans, and other documents, attached hereto or on file with the permitting authority, in accordance with the terms and conditions of this permit.

The subject of this permit is for the renewal of Title V Air Operation Permit and the incorporation of air construction permits, No. 0470002-038-AC, No. 0470002-039-AC, No. 0470002-050-AC, and No. 0470002-053-AC. Permit No. 0470002-038-AC modifies Emissions Unit (EU) No. 004 by adding a baghouse to the materials handling area for additional particulate matter emissions and fugitive dust control. Permit No. 0470002-039-AC (PSD-FL-297) increases production rates for the B and D phosphoric acid plants, acid clarification plant, and C and D superphosphoric acid plants. Permit No. 0470002-050-AC modified the existing Y-Train Fertilizer Plant to MAP with a pipe reactor. Permit No. 0470002-053-AC clarifies the operation of phosphoric acid plant B after construction is complete as authorized in Permit No. 0470002-039-AC (PSD-FL-297). Permit 0470002-053-AC also requires the permanent shutdown of the following EU's: 1) EU No. 006- Suwannee River Mine (SRM) Silos, 2) EU No. 009- SRM East Rock Dryer, 3) EU No. 013- SRM Rock Grinder, 4) EU No. 016 #1 Phosphate Rock Grinder, 5) EU No. 017- SRM Rock Dryer, and 6) EU No. 041- Dical Acid Prep.

This facility processes phosphate rock to produce several products at the Suwannee River/Swift Creek Complex (two plants). The facility consists of one rock grinder, two phosphoric acid plants, two defluorinated phosphate (DFP) plants, one DFP feed prep plant one dical process, two diammonium phosphate (DAP) plants, one monoammonium (MAP)/DAP/ granular triple superphosphate (GTSP) storage building, one MAP/DAP screen/shipping building, four sulfuric acid plants, two phosphoric acid filters, four superphosphoric acid plants, one green superphosphoric plant, the Swift Creek Mine (SCM) rock dryer, and one acid clarification plant. The facility also has storage silos associated with the Swift Creek Mine and the DFP plant. CAM applies to the two DFP plants and the DFP feed prep plant for particulate matter, fluoride and sulfur dioxide. CAM does not apply to the two DAP plants since testing was done at the plants to show the pond water scrubbers were not used to control particulate matter, and fluoride emissions are subject to 40 CFR 63 Subpart BB.

Also included in this permit are miscellaneous unregulated/insignificant emissions units and/or activities.

Based on the Title V Air Operation Permit Renewal application received November 11, 2003 and additional information provided to the Department, this facility is a major source of hazardous air pollutants (HAPs). This facility is a PSD major facility subject to F.A.C.: Rule 62-212.300, F.A.C., General Preconstruction Review Requirements; 62-212.400, F.A.C., Prevention of Significant Deterioration; Rule 62-296.320, F.A.C.

In addition, this facility is subject to the following state and federal rules: Chapter 403, F.S., and F.A.C. Chapters 62-4, 62-210, 62-204, 62-213, 62-296, and 62-297; 40 CFR 60, Subpart H, Standards of Performance for Sulfuric Acid; 40 CFR 60, Subpart V, Standards of Performance for the Phosphate Fertilizer Industry: Diammonium Phosphate Plants; 40 CFR 60, Subpart T, Standards of Performance (NSPS) for the Phosphate Fertilizer Industry: Wet-Process Phosphoric Acid Plants; 40 CFR 60, Subpart U, Standards of Performance for Phosphate Fertilizer Industry: Superphosphoric Acid Plants; 40 CFR 63, Subpart A - General Provisions; 40 CFR 63, Subpart AA - National Emission Standards for Hazardous Air Pollutants (NESHAP) From Phosphoric Acid Manufacturing Plants; 40 CFR 63, Subpart BB - National Emission Standards for Hazardous Air Pollutants From Phosphate Fertilizers Production Plants; 40 CFR 64- Compliance Assurance Monitoring (CAM).