STATEMENT OF BASIS

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

Title V Air Operation Permit Revision
DRAFT Permit No. 0470002-060-AV

This Title V Air Operation Permit Revision 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 revision is for the purpose of revising the allowable scrubber parameter range values monitored in the CAM Plan for EUs 003, 038 and 042. For these EUs, the same pieces of equipment are regulated under the MACT 40 CFR 63, Subpart BB and the CAM Plan. Different monitoring approaches could lead to confusion with daily operations. For these reasons, only one monitoring approach is used for these emissions units and is patterned after the MACT.

CAM **does** apply.

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

Based on the Title V Air Operation Permit Revision application received March 20, 2008 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).