



**FLORIDA DEPARTMENT OF  
ENVIRONMENTAL PROTECTION**

BOB MARTINEZ CENTER  
2600 BLAIR STONE ROAD  
TALLAHASSEE, FLORIDA 32399-2400

RICK SCOTT  
GOVERNOR

CARLOS LOPEZ-CANTERA  
LT. GOVERNOR

JONATHAN P. STEVERSON  
SECRETARY

*Sent by Electronic mail – Received Receipt Requested*

Mr. William Donohue, General Manager  
White Springs Agricultural Chemicals INC.  
P.O. Box 300  
White Springs, Florida 32096

Re: ASP Request 15-T-AP  
Alternate Monitoring Plan to that Required by 40 CFR 63 Subparts AA and BB  
White Springs Complex  
Facility ID No. 0470002

Dear Mr. Donohue:

The Office of Permitting and Compliance received a request on behalf of White Springs Agricultural Chemicals, INC. from Mr. Pradeep Raval of Koogler and Associates seeking approval for a modification to the requirements of 40 CFR 63 Subparts AA and BB for the monitoring of scrubber parameters for scrubbers that remove hydrogen fluoride (HF) from the emission stream. This request is to allow the use of the monitoring of fan amperages in lieu of maximum pressure drop. This request was previously approved by the Department in 2004 in ASP 04-I-AP for the same facility. Specifically, this request is for monitoring of Green SPA, SPA C and D, Acid Clarification, and D Phosphoric Acid Plant. The previous ASP included the A and B Phosphoric Acid Plants, DAP/MAP Y and Z-Trains, North and South Phosphoric Acid Filters, A and B SPA, and SCM Rock Dryer, which have been permanently inactivated.

Petitioner shall conduct monitoring of scrubber parameters for scrubbers that remove hydrogen fluoride (HF) from the emission stream using the monitoring of fan amperages in lieu of maximum pressure drop.

Petitioner has provided reasonable assurance that the monitoring of scrubber parameters for scrubbers that remove hydrogen fluoride (HF) from the emission stream using the monitoring of fan amperages in lieu of maximum pressure drop will provide reasonable assurance of compliance with applicable requirements of the permit cited above. The Department's conclusion is based upon review and knowledge of 40 CFR 63, past determinations, and professional experience.

The applicant shall incorporate this alternate procedure into the permit at the next opening for revision or renewal.

Please call Jim Pennington at 850/717-9102 if you have any questions regarding this determination.

The Department's proposed agency action shall become final unless a petition for an administrative hearing is timely under Sections 120.569 and 120.57, F.S., before the deadline for filing a petition set forth below. On the filing of a timely petition, this action will not be final and effective until further order of the Department or the petition has been dismissed or withdrawn. Because the administrative hearing process is designed to formulate final agency action, the hearing process may result in a modification of the agency action or even reversal of the agency action.

A person whose substantial interests are affected by the proposed decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. Petitions filed by the applicant or any of the parties listed below must be filed within 14 days of receipt of this written notice. Petitions filed by any other person must be filed within 14 days of receipt of this proposed action. A petitioner must mail a copy of the petition to the applicant at the address indicated above, at the time of filing. A petition for administrative hearing must contain the information set forth below and must be filed (received) with the Agency Clerk in the Office of General Counsel, 3900 Commonwealth Boulevard, MS 35, Tallahassee, Florida 32399-3000, [Agency.Clerk@dep.state.fl.us](mailto:Agency.Clerk@dep.state.fl.us), before the deadline.

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, F.A.C.

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, any email address, telephone number and any facsimile number of the petitioner; the name, address, any email address, telephone number, and any facsimile 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 each petitioner received notice of the agency action or proposed action; (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate; (e) A concise statement of the ultimate facts alleged, as well as the rules and statutes which entitle the petitioner to relief; (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 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 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 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.

Once this decision becomes final, any party to this order has the right to seek judicial review by the filing of a Notice of Appeal pursuant to Rules 9.110 and 9.190, Florida Rules of Appellate Procedure, with the Clerk of the Department in the Office of General Counsel, 3900 Commonwealth Boulevard, MS 35, Tallahassee, Florida, 32399-3000, [Agency.Clerk@dep.state.fl.us](mailto:Agency.Clerk@dep.state.fl.us); 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 thirty days from the date this action is filed with the Agency Clerk.

Mediation is not available in this proceeding.

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**Alternate Sampling Procedure**

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Any party to this order has the right to seek judicial review of it under Section 120.68, F.S., by the filing of a Notice of Appeal, under Rule 9.110 of the Florida Rules of Appellate Procedure, with the Clerk of the Department in the Office of General Counsel, 3900 Commonwealth Boulevard, Mail Station #35, 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 of Appeal must be filed within thirty days from the date this notice is filed with the Clerk of the permitting authority.

Executed in Tallahassee, Florida.

Syed Arif, Environmental Administrator  
Office of Permitting and Compliance  
Division of Air Resource Management

**CERTIFICATE OF SERVICE**

The undersigned duly designated deputy agency clerk hereby certifies that this letter of authorization for an alternate sampling procedure was sent by electronic mail with received receipt requested before the close of business on the date indicated below to the following persons.

Mr. William Donohue; White Springs Agricultural Chemicals: [bdonohue@pcsphosphate.com](mailto:bdonohue@pcsphosphate.com)  
Mr. David Still, White Springs Agricultural Chemicals: [dastill@potashcorp.com](mailto:dastill@potashcorp.com)  
Mr. Pradeep Raval, Koogler and Associates: [praval@kooglerassociates.com](mailto:praval@kooglerassociates.com)  
Ms. Leslie Maybin, Northeast District: [leslie.maybin@dep.state.fl.us](mailto:leslie.maybin@dep.state.fl.us)  
Mr. David McNeal, US EPA Region 4: [mcneal.dave@epa.gov](mailto:mcneal.dave@epa.gov)  
Ms. Barbara Friday, DEP OPC: [barbara.friday@dep.state.fl.us](mailto:barbara.friday@dep.state.fl.us)  
Ms. Lynn Searce, DEP OPC: [lynn.searce@dep.state.fl.us](mailto:lynn.searce@dep.state.fl.us)

**FILING AND ACKNOWLEDGMENT FILED**, on this date,  
pursuant to Section 120.52(7), Florida Statutes, with the  
designated agency clerk, receipt of which is hereby  
acknowledged.

SA/jp