



Florida Department of Environmental Protection

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October 26, 2015

Sent by Electronic Mail – Received Receipt Requested

bdonohue@pcsphosphate.com
William L. Donohue, General Manager
PCS Phosphate - White Springs
P.O. Box 300
White Springs, Florida 32096

Re: Suwannee River and Swift Creek Complex, Facility ID No. 0470002
"E" Auxiliary Boiler
Request for Boiler MACT Compliance Date Extension

Dear Mr. Donohue:

On September 25, 2015, the Florida Department of Environmental Protection (Department) received your request¹ for a one-year extension of the compliance date of the Boiler MACT Rule,² from January 31, 2016 to January 31, 2017, for the "E" Auxiliary Boiler (EU 068) at the above-referenced facility. This request for the "E" Auxiliary Boiler covers all emission limits, work practice standards, initial performance testing, monitoring, recordkeeping, reporting and other requirements applicable to this unit under the Boiler MACT. The Boiler MACT regulates emission of particulate matter (PM), hydrogen chloride (HCl), carbon monoxide (CO) and mercury (Hg).

Federal regulations³ allow for up to a one-year extension to comply with such standards for the installation of controls. The authority to grant such an extension is delegated to the Department, which operates an approved Title V air operation permit program.⁴

In the preamble to the final Boiler MACT Rule,⁵ EPA recognized that some sources might need up to a one-year extension of the compliance date to install pollution control equipment. EPA also stated, *"In a case where pollution controls are being installed ... a determination that an extra year is necessary for compliance should be relatively straightforward. In order to install controls, companies are likely to undertake a number of steps relatively soon after the effective date of the rule, including obtaining necessary building and environmental permits and hiring contractors to perform the construction of the emission controls ... This should provide sufficient information for a permitting authority to determine that emission controls are being installed"* 78 Fed. Reg. 7138, 7143 (Jan. 31, 2013).

PCS operates the existing phosphate mining and chemical production facility called the Suwannee River and Swift Creek Complex. This facility consists of two sulfuric acid plants identified as SRCC and SCCC. Almost all the steam needed for plant operations is supplied by the sulfuric acid plants; however, steam is also supplied by auxiliary boilers when the sulfuric acid plants are producing less steam or when they are shut down for maintenance. Last year, most of

¹ PCS Phosphate - White Springs [extension request](#), dated 09/25/15. Click on Public Oculus Login button to access the document.

² The Maximum Achievable Control Technology (MACT) standards are specified in the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters. See Title 40, Part 63, [Subpart DDDDD](#) of the Code of Federal Regulations, adopted and incorporated in Rule 62-204.800(11)(b)86., F.A.C.

³ See the NESHAP General Provisions at [40 CFR 63.6\(i\)](#), adopted and incorporated at Rule 62-204.800(11)(d)1., F.A.C.

⁴ See the NESHAP General Provisions at [40 CFR 63.6\(i\)\(4\)\(i\)\(A\)](#), adopted and incorporated at Rule 62-204.800(11)(d)1, F.A.C.

⁵ See p. 7143 of the [Boiler MACT Preamble](#).

the emission units at SRCC plant were shut down, including the "C" and "D" Sulfuric Acid Plants and the "C" and "D" Auxiliary Boilers. The SCCC plant is still in operation. This plant consists of the "E" and "F" Sulfuric Acid Plants which produce steam for plant use. In addition, there is an oil-fired "E" Auxiliary boiler at the plant, which was built in the 1970s that operates as needed depending on the steam requirements of the plant. While the sulfuric acid plants operate continuously all year, the "E" Auxiliary boiler is operated very little (14 hours in 2013 and 377 hours in 2014).

PCS obtained Permit No. 0470002-097-AC on August 7, 2015 to replace the "E" Auxiliary Boiler with a natural gas fired boiler. As a result of this boiler replacement project, PCS states that potential air emissions, including hazardous air pollutants regulated by Boiler MACT Rule will be greatly reduced. However, there is currently no natural gas supply line to the SCCC plant. Although the boiler replacement project will begin shortly, PCS expects that the new boiler and the associated natural gas line cannot be in place and operational until the middle of 2016, which is after the Boiler MACT rule compliance date of January 31, 2016. Consequently, PCS made this compliance date extension request in order to allow the "E" Auxiliary Boiler to continue to operate under the terms of the current Title V permit (No. 0470002-087-AV) until the new boiler is operational. Once operational, the new boiler will be in compliance with the provisions of Boiler MACT Rule and the existing boiler will be in compliance with its provisions by being permanently shut down.

PSC provided the schedule given below for the boiler replacement project:

Activity	Expected Date
On-Site Construction Activity Begins	November 1, 2015
New Boiler Installed	January 15, 2016
Natural Gas Line Installed	February 15, 2016
Startup of New Boiler	March 30, 2016
Initial Performance Testing	May 15, 2016
Commence Normal Operations	June 15, 2016
Shutdown Exiting Boiler/Final Compliance	August 30, 2016

Given the above information, the request meets the criteria for obtaining an extension for the "E" Auxiliary Boiler. However, given the facts and circumstances presented, an entire 1-year extension is not necessary for PCS to comply with the Boiler MACT. A more realistic date for PSC to achieve compliance is September 30, 2016. The Department will therefore grant a compliance date extension until September 30, 2016. The Department will incorporate the extension, along with key milestones and the proposed permit conditions in Attachment A, into a Title V permit revision (Project No. 0470002-095-AV). If you have any questions regarding this matter, please contact David Read at 850-717-9083.

Sincerely,

For:

Jeffery F. Koerner, Deputy Director
Division of Air Resource Management
cc:

William L. Donohue, PCS: bdonohue@pcsphosphate.com
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ATTACHMENT A

Conditions for Draft/Proposed Title V Operation Permit

1. **Compliance Date Extension:** For the "E" Auxiliary Boiler, the Boiler MACT compliance date is extended from January 31, 2016 to September 30, 2016 for all applicable Boiler MACT Rule requirements. [40 CFR 63.6(i); and Rule 62-204.800(11)(d)1., F.A.C.]
2. **Key Milestones:** Unless the permittee notifies the Department in advance, the permittee shall meet the following schedule for completing the installation the new natural auxiliary boiler and permanently retiring the existing "E" Auxiliary Boiler.

Project Milestone	Target Date
On-Site Construction Activity Begins	November 1, 2015
New Boiler Installed	January 15, 2016
Natural Gas Line Installed	February 15, 2016
Startup of New Boiler	March 30, 2016
Initial Performance Testing	May 15, 2016
Commence Normal Operations	June 15, 2016
Shutdown "E" Auxiliary Boiler	August 30, 2016
Compliance Date	September 30, 2016*

* *Note: Pursuant to §63.7510(e), the initial compliance demonstration must be made no later than 180 days after the compliance date.*

The permittee shall provide advance notice to the Division and the Compliance Authority if it is unable to meet a target in the above schedule and shall identify a new completion date. [40 CFR 63.6(i)(10) and (11), Rule 62-204.800(11)(d)1., F.A.C., and Rule 62-4.070, F.A.C.]

3. **Progress Reports:** By January 31, 2016, the permittee shall provide a written report to the Division and the Compliance Authority that summarizes the work completed to date and the work remaining to replace the "E" Auxiliary Boiler with the new natural gas auxiliary boiler. Thereafter, the permittee shall provide quarterly written progress reports within 30 days following each calendar quarter with an updated schedule, if necessary, to the Division and the Compliance Authority. [40 CFR 63.6(i)(10) and (11), Rule 62-204.800(11)(d)1., F.A.C., and Rule 62-4.070, F.A.C.]
4. **Boiler MACT Compliance:** In accordance with 40 CFR §63.7510, the permittee shall demonstrate initial compliance for the "E" Auxiliary Boiler by its permanent retirement with a compliance date of no later than September 30, 2016. The new natural gas auxiliary boiler shall meet all applicable requirements of the Boiler MACT Rule with a compliance date of September 30, 2016. [40 CFR 63.7510]