

STATEMENT OF BASIS

Title V Air Operation Permit Revision

Permit No. 0470002-1372-AV

APPLICANT

The applicant for this project is White Springs Agricultural Chemicals, Inc. The applicant's responsible official and mailing address are: Mr. Jeffrey Joyce, General Manager, Suwannee River/Swift Creek Complex, White Springs Agricultural Chemicals, Inc., 15843 Southeast 78th Street, White Springs, Florida 32096.

FACILITY DESCRIPTION

This existing facility processes phosphate rock to produce several products at the Suwannee River/Swift Creek Complex (two plants). The facility consists of one phosphoric acid plant, one monocal/dical process, two monoammonium/diammonium phosphate (MAP/DAP) plants, one Storage and Shipping building, one screening/shipping building, two sulfuric acid plants, two phosphoric acid filters, three superphosphoric acid plants, one green superphosphoric plant and one acid clarification plant. The facility also has storage silos associated with the Swift Creek Mine. Also at the facility are miscellaneous insignificant emissions units and/or activities.

The existing facility is comprised of the following emissions units (EUs):

EU No.	Brief Description
<i>Regulated Emissions Units</i>	
004	"X"-Train (Monocal/Dical process)
008	"Y" Train-#1 MAP/DAP Plant
010	#1 Storage and Shipping Building
015	Granular Product Shipping and Screening Facility
032	"Z"-Train #2 MAP/DAP Plant
054	Suwannee River Chemical Complex (SRCC) Molten Sulfur System
061	Green Superphosphoric Acid Plant
066	"E" Sulfuric Acid Plant
067	"F" Sulfuric Acid Plant
069	"D" Phosphoric Acid Plant
070	"C" and "D" Superphosphoric Acid Plants
071	Acid Clarification Plant
072	Molten Sulfur System for "E" and "F" Sulfuric Acid Plants
075	Relocatable Concrete Batch Plant
076	12 Emergency Engines
077	Emergency Rental Boiler
079	Natural Gas 230 MMBtu/ hour Auxiliary Boiler
080	Two 4.25 MMBtu/hr Boilers
081, 082	Gypsum Dewatering Stack, and Cooling Ponds
083	Rental 50 MMBtu/hour Boiler
<i>Unregulated Emissions Units and Activities (see Appendix U, List of Unregulated Emissions Units and/or Activities)</i>	
084	Temporary, portable Ammoniated Polyphosphate Plant to manufacture liquid fertilizer
085	Ammonia Vaporizer
086	Independent Micronutrient Storage and Handling System

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087	Engine No. 10: Diesel Engine 600KW
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PROJECT DESCRIPTION

The purpose of this permit is to clean up language in certain specific conditions. The updates are administrative in nature.

PROCESSING SCHEDULE AND RELATED DOCUMENTS

- Application for a Title V air operation permit revision received November 21, 2024.
- Draft Title V air operation permit revision issued December 26, 2024.
- Public Notice of Intent to Issue Air Permit published on January 4, 2025.
- Proof of publication (affidavit) of Public Notice of Intent to Issue Air Permit received on January 7, 2025.
- Proposed Title V air operation permit revision issued February 4, 2025.
- Final Title V air operation permit revision issued Month day, 2025.

PRIMARY REGULATORY REQUIREMENTS

Standard Industrial Classification (SIC) Code: 2874 - Phosphatic Fertilizers.

North American Industry Classification System (NAICS): 325312 - Phosphatic Fertilizer Manufacturing.

Title I - HAP: The facility is a major source of hazardous air pollutants (HAP).

NESHAP: This facility operates units subject to the National Emissions Standards for Hazardous Air Pollutants (NESHAP) a.k.a. "MACT" of 40 Code of Federal Regulations (CFR) 63. The following emissions units are subject to the NESHAP requirements.

Applicable Requirement	EU No(s).
40 CFR 61, Subpart A - NESHAP General Provisions	081, 082
40 CFR 61, Subpart R - National Emission Standards for Hazardous Air Pollutants (NESHAP) for Radon Emissions from PhosphogypsumStacks	081, 082
40 CFR 63, Subpart A, NESHAP (a.k.a. MACT) General Provisions	008, 032, 061, 069, 070, 076, 079, 080, 081, 082, 083
40 CFR 63, Subpart AA - NESHAP (a.k.a. MACT) From Phosphoric Acid Manufacturing Plants	061, 069, 070, 081, 082
40 CFR 63, Subpart BB, NESHAP (a.k.a. MACT) from Phosphate Fertilizers Production Plants	008, 032
40 CFR 63, Subpart ZZZZ - National Emission Standards for Hazardous Air Pollutants (NESHAP) for Stationary Reciprocating Internal Combustion Engines (RICE)	076 (Engine No.(s) 1-4, 6-8, and 14)
40 CFR 63, Subpart DDDDD, NESHAP for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters	079, 080, 083

The Emergency Rental Boiler, EU 077, is not regulated under - NESHAP (a.k.a. "MACT") 40 CFR 63, Subpart DDDDD as the unit is authorized to only to operate onsite as a temporary boiler. See the subpart for the specific definition of a 'Temporary boiler.'

Title IV: The facility does not operate units subject to the acid rain provisions of the Clean Air Act.

Title V: The facility is a Title V major source of air pollution in accordance with Chapter 62-213, Florida Administrative Code (F.A.C.).

PSD: The facility is a Prevention of Significant Deterioration (PSD)-major source of air pollution in accordance with Rule 62-212.400, F.A.C.

NSPS: The facility operates units subject to the New Source Performance Standards (NSPS) of 40 Code of Federal Regulations (CFR) 60.

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Applicable Requirement	EU No(s).
40 CFR 60, Subpart A, Standards of Performance for New Stationary Sources (NSPS) General Provisions	008, 032, 066, 067, 076, 077, 079, 080, 083
40 CFR 60, Subpart Db - Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units	079
40 CFR 60, Subpart Dc, Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units	077, 080, 083
40 CFR 60, Subpart H, Standards of Performance for Sulfuric Acid Plants	066, 067
40 CFR 60 Subpart T (see Subsection for applicability note)	008, 032
40 CFR 60 Subpart U (see Subsection for applicability note)	061
40 CFR 60 Subpart V (see Subsection for applicability note)	069
40 CFR 60, Subpart IIII - Standards of Performance for Stationary Compression Ignition Internal Combustion Engines	076 (Engine No.(s) 17 and 18)
40 CFR 60, Subpart JJJJ, Standards of Performance for Stationary Spark Ignition Internal Combustion Engines	076 (Engine No.(s) 15 and 16)

The Emergency Rental Boiler, EU 077, is not regulated under - NSPS 40 CFR 60 Subparts Db & Dc as the unit is authorized to only to operate onsite as a temporary boiler. See the subparts for the specific definition of a ‘*Temporary boiler.*’

CAM: Emission units at this facility are not subject to Compliance Assurance Monitoring (CAM) for one or more of the following reasons: they do not trigger the potential pre-air pollution control device major source emission thresholds; they demonstrate continuous compliance with a continuous emission monitoring system (CEMS); they are not equipped with air pollution control device(s); they are equipped with device(s) which are considered to be inherent to the process/operation; or, they satisfy CAM by meeting the post-1990 federal monitoring requirements for the same or similar air pollutants.

SIP: This facility operates units subject to the state implementation plan (SIP) of Chapter 62-210.300, F.A.C.

Applicable Requirement	EU No(s).
Rule 62-210.300, F.A.C., Permits Required	All ‘regulated’ and ‘unregulated’ EUs
Rule 62-296.320, F.A.C., General Pollutant Emission Limiting Standards	004, 008, 010, 015, 032, 054, 061, 070, 072, 075
Rule 62-296.340, BART, F.A.C.	004, 008, 010, 015, 032, 054
Rule 62-212.400, F.A.C., Prevention of Significant Deterioration (PSD), Best Available Control Technology (BACT)	032, 066, 067, 069, 070, 071
Rule 62-296.402, F.A.C., Sulfuric Acid Plants	066, 067
Rule 62-296.403, Phosphate Processing Fluorides Limits	004, 008, 010, 015, 032, 061, 069, 070
Rule 62-296.406, F.A.C., Fossil Fuel Steam Generators with less than 250 MMBtu/hour Heat Input, New and Existing Units	077, 079, 080, 083
Rule 62-296.414, F.A.C., Concrete Batching Plants, F.A.C.	075

PROJECT REVIEW

Changes were made in this Title V air operation permit revision. The major changes made in this project are overviewed here.

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{Note: Major changes made in the draft/proposed version of the permit documents were specifically shown as follows: deletions are noted in ~~strike through~~ and additions are noted in double underline. The changes will not be shown in the final permit documents. Specific conditions may be renumbered accordingly in the final permit.}

The revisions in this project are the only portions of the permit that are open for public comment or challenge. Comments received related to the remainder of the permit will not be addressed during this permitting action.

- Rule 62-296.320(4)(b), General VE, F.A.C. The general VE limit under Rule 62-296.320(4)(b), F.A.C. applies to emission units (EU) at the facility but, this rule (VE limit) is not considered to be a unit-specific applicable requirement (see Rule 62-210.200, Definitions, F.A.C.). Unit-specific applicable requirements are included in the EU subsections of Title V air operation permits. Due to its redundancy being included at the EU subsection level, the general VE and associated test methods listed are deleted from Specific Conditions A.19., A.23., A.41., B.11., B.28., B.32., C.7., C.13., C.14., D.7., D.9., D.11., F.3., F.8.-F.10., G.5., J.5., K.5., M.3., and M.7.-M.8.
- Subsection O. Updated the engine subsection O. The updates reflect the engines that are onsite to include their reference names, manufacturers, model nos., size (kW & HP) and construction dates along with the federal regulation applicability.
- Administrative Corrections. Incorrect items, items being clarified, some specific conditions clarified with a permitting note, repealed rules are updated throughout the permit.

CONCLUSION

This project revises Title V air operation permit No. 0470002-130-AV, which was effective on November 17, 2021. This Title V air operation permit revision is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Chapters 62-4, 62-210 and 62-213, F.A.C.