

3/17/05

Dear Catherine,

Thanks for the phone call this morning and the e-mail. I sincerely appreciate the comments. I will ask the company and our modeler (Cleve Holladay) to make sure, on the resubmittal, that this issue has been addressed appropriately prior to determining completeness and issuing an "Intent to Issue an Construction Permit" (or "denial") for the project. As soon as the resubmittal is provided, we will immediately forward a copy to John Bunyak for review. Again, many thanks and take care.

Bruce Mitchell  
Florida DEP/DARM/BAR  
850/413-9198

-----Original Message-----

**From:** Catherine\_Collins@fws.gov [mailto:Catherine\_Collins@fws.gov]  
**Sent:** Thursday, March 17, 2005 12:13 PM  
**To:** Mitchell, Bruce  
**Subject:** Gerdau Ameristeel -- Jacksonville

Bruce -- This is in follow-up to our conversation this morning about the Gerdau Ameristeel -- Jacksonville Steel Mill PSD permit application. There are two tables (6-13 and 6-14) that have data evaluating the maximum predicted SO<sub>2</sub> Impacts at the Okefenokee NWA as compared the the PSD Class I increments. In table 6-13, the SO<sub>2</sub> 24-hr averaging time shows there are two concentrations at 5.1 ug/m<sup>3</sup> which are above the PSD Class I increment of 5 (ug/m<sup>3</sup>). In table 6-14, the modeled concentrations for all sources shows 4 concentrations ranging from 5.16 to 7.05 ug/m<sup>3</sup> that exceed the greater than 5 ug/m<sup>3</sup>.

In our conversation, you explained that the source is changing the project and will tear down the two stacks as associated baghouses and replace them with one stack and new baghouse. This will require remodeling the project and could impact the increment issue above. I will have our modeler take a look at the last permit application and see if he has any comments for the new modeling analysis. Please call or email if you have further questions.

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