



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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BUREAU OF AIR REGULATION

Mr. A. A. Linero, P.E.  
Administrator  
New Source Review Section  
Florida Department of Environmental Protection  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

SUBJ: Prevention of Significant Deterioration (PSD) Preliminary Determination for White Springs Agricultural Chemicals, Inc. located in White Springs (Hamilton County), Florida  
PSD-FL-297

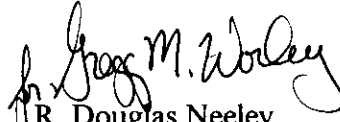
Dear Mr. Linero:

Thank you for submitting the above referenced PSD preliminary determination dated September 25, 2000, to the U.S. Environmental Protection Agency (EPA) for comments. The proposed project involves the conversion of the B Phosphoric Acid Plant from prayon to a hemi-hydrate process and the increase in production capacities of B Phosphoric Acid Plant, D Phosphoric Acid Plant, Acid Clarification, C & D Phosphoric Acid Plant, and the X Train (dical) process. The total emissions increase of fluorides (F) resulting from the proposed project is above the significance threshold requiring PSD review.

Based on a review of the preliminary determination, EPA has the following comment. Although no ambient air quality standard or PSD increment exists for F, the applicant must still address the requirement for pre-construction monitoring of F. This is in direct accordance to Florida Rule 62-212-400(5)(f). A de minimis concentration has been specified for F (see Table C-3 of EPA's *New Source Review Workshop Manual*) above which pre-construction monitoring would typically be required. The applicant needs to model the proposed increase in F emissions and compare the predicted impact to this de minimis level to determine whether or not pre-construction monitoring will be required. Also, the applicant must address the additional impacts on soils, vegetation, wildlife, and visibility with respect to F.

Thank you for the opportunity to comment on the White Springs preliminary determination. If you have any questions regarding these comments, please direct them to either Art Hofmeister at (404) 562-9115 or Jim Little at (404) 562-9118.

Sincerely,



R. Douglas Neeley

Chief

Air and Radiation Technology Branch  
Air, Pesticides and Toxics  
Management Division

cc: S. Arif  
C. Halladay  
C. Kirts, NED  
G. Kooser  
NPS