



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

SEP 15 2009

REC-100

SEP 21 2009

BUREAU OF AIR REGULATION

Ms. Trina L. Vielhauer, Chief
Bureau of Air Regulation
Florida Department of Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Dear Ms. Vielhauer:

Thank you for sending the draft prevention of significant deterioration permit and preliminary determination for a modification of the Envirofocus facility located in Tampa, Florida (Hillsborough County). The modification consists of a production capacity expansion project which will include the addition of a feed dryer, reverb furnace, six new refining kettles, as well as three new baghouses. The U.S. Environmental Protection Agency (EPA) has the following comment on the evaluation supporting the draft permit.

The Region 4 office of the EPA has reviewed the permit and preliminary determination, and has the following comment:

1. In reviewing the draft permit and preliminary determination, Region 4 finds that the permitting authority has not provided an adequate rationale to support the use of the PM₁₀ surrogate approach for this project. The preliminary determination should contain an analysis as to whether or not PM₁₀ is a reasonable surrogate for PM_{2.5} under the facts and circumstances of the specific project at issue and not proceed with the general presumption that PM₁₀ is always a reasonable surrogate for PM_{2.5}.

If you have any questions about these comments or require additional information, please contact Heather Abrams at (404) 562-9185 or by email at abrams.heather@epa.gov.

Sincerely,

Gregg M. Worley
Chief
Air Permits Section