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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET, N.E.
ATLANTA, GEORGIA 30365

JAN 10 1990

4APT-APB-cdw

Ms. Patricia G. Adams
Planner
Bureau of Air Quality Management
Florida Department of Environmental
Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

RE: Royster Phosphates, Inc. (PSD-FL-144)

Dear Ms. Adams:

This is to acknowledge receipt of the permit application for the above referenced source, dated December 6, 1989. As discussed between Mr. Barry Andrews of FDER and Mr. Gregg Worley of my staff on January 8, 1990, we have the following comment.

In determining the "actual" emissions of the existing sulfuric acid plant, the maximum production rate and emission rates which occurred during the previous five years were used. The "actual" emissions, however, should be an average of the previous two years operating data unless another period is more representative. Therefore, it is likely that the actual emissions from the existing facility are in fact lower than the maximum numbers presented by the source. Consequently, the source may also be subject to PSD review for NO_x. In any case the greater changes in emissions should be included in the modelling.

By letter dated December 14, 1989, we transmitted to your office a copy of the First Circuit Court of Appeals upholding the "actual-to-potential" applicability rules of the PSD requirements. Please refer to this ruling as a basis for our comments.

Thank you for the opportunity to review this package. Any questions or comments may be directed to Mr. Gregg Worley of my staff at (404) 347-2864.

Sincerely yours,

Bruce P. Miller

Bruce P. Miller, Chief
Air Programs Branch
Air, Pesticides, and Toxics
Management Division

*copied to: J. Kline
B. Andrews
C. Hollada
K. Thompson, Chief
CHF/PT*