



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

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

DEC 28 1992

4APT-AEB

Mr. Clair H. Fancy, P.E., Chief
Bureau of Air Regulation
Florida Department of Environmental
Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

RECEIVED

DEC 31 1992

Division of Air
Resources Management

RE: Seminole Fertilizer Corporation, Bartow, Florida

(PSD-FL-191)

Dear Mr. Fancy:

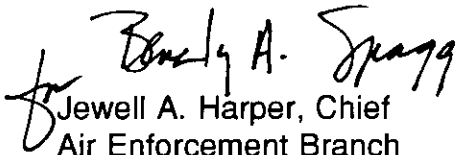
This is to acknowledge receipt of your preliminary determination and draft Prevention of Significant Deterioration (PSD) permit for the above referenced facility by your letter dated November 20, 1992. The proposed major modification to the existing facility consists of increasing the production rate at each of three sulfuric acid plants. As discussed between Mr. Cleve Holladay of your staff and Mr. Lew Nagler of my staff on December 14, 1992, we have the following comment related to the revised air quality analysis:

Our previous comment about the state needing to take some action to assure Class I increment protection is no longer required since sulfuric acid plant No. 3 may be omitted from the modeling analysis. Reductions in SO₂ and H₂SO₄ mist emissions will result from the shutdown of sulfuric acid plant No. 3. The revised analysis indicates a zero impact on the Class I Area. Increases in either SO₂ or H₂SO₄ mist emissions will not result in either a significant monitoring or air quality impact. No additional air quality analysis is required.

We also agree with your determination that double absorption process technology and high efficiency mist eliminators represent BACT for SO₂ and H₂SO₄ mist emissions, respectively.

Thank you for the opportunity to comment on this package. If you have any questions concerning modeling or monitoring, please contact Mr. Lew Nagler of my staff at (404) 347-5014. Any other questions may be directed to Mr. Stan Kukier of my staff also at (404) 347-5014.

Sincerely yours,


Jewell A. Harper, Chief
Air Enforcement Branch
Air, Pesticides, and Toxics
Management Division