



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET
ATLANTA, GEORGIA 30308

JUN 19 1980

REF: 4AH-AF.

Mr. G. W. Beck, General Manager
Florida Phosphate Operations
USS Agri-Chemicals
P. O. Box 150
Bartow, Florida 33830



Re: Phosphate Chemical Complex
PSD-FL-064

Dear Mr. Beck:

EPA received on May 27, 1980 your application to construct a phosphate chemical complex. Review of this application under the Federal Prevention of Significant Deterioration (PSD) regulations (40 CFR 52.21) and the partial stay of these regulations published February 5, 1980 (45FR 7800) has shown it to be incomplete.

To allow the review to continue, please submit information on the following items:

1. The applicant should propose hourly operating capacities and hourly allowable emission rates for sulfur dioxide, acid mist, and fluoride from each proposed new and/or modified emission unit.
2. The exemption from sulfur dioxide air quality analysis under 40 CFR 52.21 (k)(iv) must be justified at each level of averaging time (hourly, daily, yearly). Therefore, the actual emissions of the existing plants vs the proposed allowable rates of the new plants should be compared on an hourly basis. Consistency between hourly and annual values should be evident.
3. The applicant should propose allowable emission limits and Best Available Control Technology (BACT) for particulates and sulfur dioxide from the new GTSP plant. Limits should be based on P_2O_5 feed rate. The information submitted should include proposed fuel sulfur content.

You are encouraged to submit these materials as soon as possible. As you know, increment rights are determined by the date on which EPA receives a complete application. Please also be aware that the United States Court of Appeals for the DC Circuit has issued a ruling in the case of Alabama Power Co. v. Douglas M. Costle (78-1006 and consolidated cases) which will have significant impacts on the EPA Prevention of Significant Deterioration (PSD) program. You are advised that review requirements of your application may be subject to reevaluation as a result of the final court decision and its ultimate effect. In addition, EPA has issued a "Partial Stay" of regulations (published February 5, 1980, 45 FR 7800) affecting applicability of sources proposed for construction prior to promulgation of the final PSD regulations. Your application has been reviewed under the provisions of the Stay and the proposed source remains subject to PSD review.

If you have any questions regarding this information, please contact Mr. Kent Williams of my staff at 404/881-4552 or Mr. Jeffrey Shumaker of TRW Inc. at 919/541-9100. TRW is under contract to EPA and its personnel are acting as authorized representatives of the Agency in providing aid to the Region IV PSD program.

Sincerely yours,

Tommie A. Gibbs

Tommie A. Gibbs, Chief
Air Facilities Branch

TAG:JWP:clu

cc: James W. Little, Dames & Moore
Steve Smallwood F.D.E.R.