



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 4  
ATLANTA FEDERAL CENTER  
61 FORSYTH STREET  
ATLANTA, GEORGIA 30303-8960

RECEIVED

DEC 22 2000

DEC 15 2000

BUREAU OF AIR REGULATION

4APT-ARB

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 US Agri-Chemicals Corporation located in Fort Meade (Polk County), Florida  
PSD-FL-278

Dear Mr. Linero:

Thank you for submitting the above referenced PSD preliminary determination (dated October 31, 2000) to the U.S. Environmental Protection Agency (EPA) for comments. The proposed project involves the increase in production capacities of Phosphoric Acid Trains A and B (from 44 to 50 tons per hour phosphorous pentoxide input each) and the Phosphoric Acid Plant Tank Farm (a proportional increase to accommodate the production capacity increases). The total emissions increase of sulfur dioxide (SO<sub>2</sub>), sulfuric acid mist, nitrogen oxides, and fluorides (F) resulting from the proposed project are above the respective significance thresholds requiring PSD review.

Based on a review of the preliminary determination, EPA has the following comments:

1. 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 with Florida Rule 62-212-400(5)(f). A *de minimis* concentration has been specified for F above which pre-construction monitoring could 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 emissions.

2. For the purpose of simplification, the applicant limited the modeling analysis used to demonstrate compliance with the Class I SO<sub>2</sub> PSD increment to only those days when the predicted impact from the proposed project was greater than significant. Although EPA does not have issue with this rationale, it is strongly recommended that such rationale be presented to the Class I area federal land manager for approval.

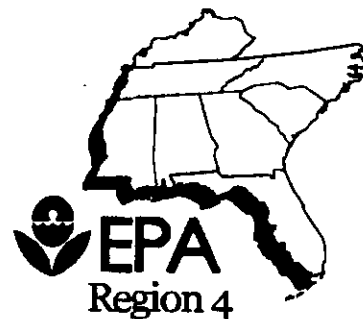
Thank you for the opportunity to comment on the US Agri-Chemicals preliminary determination. If you have any questions regarding these comments, please direct them to either Art Hofmeister at (404) 562-9115 or Jim Little at (404) 562-9118.

Sincerely,



R. Douglas Neeley, Chief  
Air and Radiation Technology Branch  
Air, Pesticides and Toxics  
Management Division

cc: *S. Briff*  
*C. Holladay*  
*G. Koogler*  
*B. Thomas, SWD*  
*G. Spence, Park Co.*  
*NPS*



facsimile  
TRANSMITTAL

Alabama, Florida, Georgia, Kentucky, Mississippi, North Carolina,  
South Carolina, Tennessee

RECEIVED

DEC 18 2000

BUREAU OF AIR REGULATION

To: AL Linero  
Florida DEP

Fax #: 850-922-6979

Subject: Comments Re: US Agri-Chemicals  
Preliminary Determination

From: Art Hofmeister Phone #: 404-562-9115

Date: Dec. 15, 2000

# of Pages: 3 (including this sheet)

Comments:

AL :

Attached are our comments regarding  
US Agri-Chemicals' preliminary determination.

Thanks,

Air & Radiation Technology Branch  
U.S. Environmental Protection Agency  
61 Forsyth Street SW, 12<sup>th</sup> Floor  
Atlanta, Georgia 30303

Phone: 404-562-9105  
Fax: 404-562-9095



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 4  
ATLANTA FEDERAL CENTER  
61 FORSYTH STREET  
ATLANTA, GEORGIA 30303-8960

DEC 15 2000

4APT-ARB

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 US Agri-Chemicals Corporation located in Fort Meade (Polk County), Florida  
PSD-FL-278

Dear Mr. Linero:

Thank you for submitting the above referenced PSD preliminary determination (dated October 31, 2000) to the U.S. Environmental Protection Agency (EPA) for comments. The proposed project involves the increase in production capacities of Phosphoric Acid Trains A and B (from 44 to 50 tons per hour phosphorous pentoxide input each) and the Phosphoric Acid Plant Tank Farm (a proportional increase to accommodate the production capacity increases). The total emissions increase of sulfur dioxide (SO<sub>2</sub>), sulfuric acid mist, nitrogen oxides, and fluorides (F) resulting from the proposed project are above the respective significance thresholds requiring PSD review.

Based on a review of the preliminary determination, EPA has the following comments:

1. 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 with Florida Rule 62-212-400(5)(f). A *de minimis* concentration has been specified for F above which pre-construction monitoring could 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 emissions.

2

2. For the purpose of simplification, the applicant limited the modeling analysis used to demonstrate compliance with the Class I SO<sub>2</sub> PSD increment to only those days when the predicted impact from the proposed project was greater than significant. Although EPA does not have issue with this rationale, it is strongly recommended that such rationale be presented to the Class I area federal land manager for approval.

Thank you for the opportunity to comment on the US Agri-Chemicals 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