



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

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DIVISION OF AIR
RESOURCES MANAGEMENT

4APT-ATMB

Howard L. Rhodes, Director
Division of Air Resources Management
FL Department of Environmental Protection
Division of Air Resource Management
Mail Station 5500
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Dear Mr. Rhodes:

The purpose of this letter is to provide you with a determination regarding an alternative monitoring and recordkeeping proposal contained in the enclosed May 23, 2002, letter from Koogler & Associates Environmental Services (Koogler). In this letter, Koogler requested approval to use English units, instead of metric units for the monitoring and recordkeeping required under four New Source Performance Standards (NSPS) that are applicable to facilities at the U.S. Agri-Chemicals Corporation (USAC) plant in Polk County, Florida. These proposed alternatives are acceptable to U.S. Environmental Protection Agency (EPA) Region 4. Details regarding these proposals and the basis for our determination are provided in the remainder of this letter.

According to Koogler's May 23, 2002, letter, the USAC plant in Polk County contains emission units that are subject to the following NSPS in 40 C.F.R. Part 60:

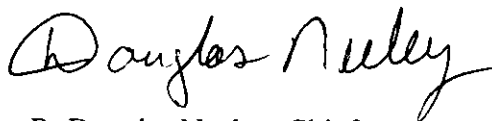
- Subpart H - Standards of Performance for Sulfuric Acid Plants,
- Subpart T - Standards of Performance for the Phosphate Fertilizer Industry:
Wet-Process Phosphoric Acid Plants,
- Subpart U - Standards of Performance for the Phosphate Fertilizer Industry:
Superphosphoric Acid Plants, and
- Subpart V - Standards of Performance for the Phosphate Fertilizer Industry:
Diammonium Phosphate Plants

All four of these regulations contain excess emission monitoring, recordkeeping, and reporting requirements, and Koogler requested approval to use data expressed in English units, rather than metric units, to satisfy these requirements. Based upon our review of these rules, we determined that approval to use English units is not required under Subpart H, since the emission monitoring provisions promulgated at 40 C.F.R. §60.84 do not specifically require that

monitoring results be expressed in metric units. Since monitoring provisions in Subparts T, U, and V require that the feed rate data used to calculate results in units of the applicable standards be expressed in megagrams per hour (Mg/hr), approval to use results expressed in English units (ton/hour) is required. Because the fluoride emission standards in Subparts T, U, and V are expressed in English units (pounds per ton of feed) in addition to metric units (grams per megagram of feed), compliance can be determined as easily with feed rate data expressed in ton/hour as it can be with feed rate data expressed in Mg/hr. Therefore, the Koogler proposal to use data expressed in English units for the excess emission monitoring, recordkeeping, and reporting required under Subparts T, U, and V is acceptable to Region 4.

If you have any questions about the determination provided in this letter, please contact Mr. David McNeal of the EPA Region 4 staff at (404) 562-9102.

Sincerely,



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

Enclosure

(1) May 23, 2002, alternative monitoring proposal from Koogler & Associates
Environmental Services



KOOGLER & ASSOCIATES
ENVIRONMENTAL SERVICES

4014 NW THIRTEENTH STREET
GAINESVILLE, FLORIDA 32609
352/377-5822 ■ FAX/377-7158

KA 173-01-01

May 23, 2002

David
Coordinate w/ APB
response - 6/27

Mr. Doug Neeley
Air, Pesticides and Toxics Management Division
USEPA Region IV
61 Forsyth Street, SW
Atlanta, GA 30303-8960

Subject: Request for Change of Monitoring and Recordkeeping Units
U.S. Agri-Chemicals Corporation, Polk County, Florida
Permit Nos. 1050050-002-AV and 1050051-003-AV

Dear Mr. Neeley:

This request is submitted to EPA to allow monitoring and recordkeeping of data in English units, to be consistent with permit limits, rather than the metric units stated in the federal rules, for all the USAC emission units that are subject to federal standards (e.g. 40 CFR 60, Subparts H, T, U and V).

It is our understanding from discussions with Florida Department of Environmental Protection (FDEP) staff that such requests may be submitted for your approval.

If you have any questions, please call Pradeep Raval or me.

Very truly yours,

KOOGLER & ASSOCIATES

John B. Koogler, Ph.D., P.E.

JBK:par

c: J. Girardin, USAC
R. Brunk, USAC
S. Arif, FDEP

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ATLANTA, GA