



United States Department of the Interior

FISH AND WILDLIFE SERVICE

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Atlanta, Georgia 30345

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Bureau of
Air Regulation

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

Dear Mr. Fancy:

We have reviewed the Prevention of Significant Deterioration (PSD) applications for the Monoammonium Phosphate plant and the Diammonium Phosphate plant proposed by U.S. Agrichemicals Corporation (USAC). The new plants would be located at USAC's Ft. Meade Chemical facility, approximately 130 km southeast of Chassahowitzka Wilderness Area (WA), a Class I air quality area, administered by the Fish and Wildlife Service. We understand that USAC plans to build only one of the new plants, but wants to start the permit process for both. Our comments are as follows:

PSD Applicability

The application provides net emission increase calculations to determine which pollutants are subject to PSD review. The calculations use allowable permitted emissions to offset the proposed emission increases. As you know, net emission increase calculations must be based on actual, not allowable emissions. It is not clear if, in this case, allowable emissions are equal to actual. If actual emissions are less, the applicant should reevaluate PSD applicability based on actual emissions, and perform or revise impact and control analyses accordingly.

Best Available Control Technology (BACT)

The applicant proposes to meet a fluoride emission rate of .06 pounds per ton of P_2O_5 input at their DAP plant. A recent BACT determination for an IMC Agrico Diammonium Phosphate plant requires a BACT limit of .0417 pounds per ton of P_2O_5 input. BACT should be set at the lower level unless the applicant provides information demonstrating that .0417 is not an appropriate level for this particular plant.

Air Quality Modeling Analysis

The applicant incorrectly concludes that because the proposed facilities are more than 100 km from a Class I area, analyses of impacts at the Class I area are not necessary. The determination of whether a Class I area impact analysis is required is made on a case-by-case basis. The Environmental Protection Agency has stated that "large sources located at distances greater than 100 kilometers need to be considered when such impacts reasonably could affect the outcome of the Class I analysis." The need for a Class I impact analysis cannot be decided until the amounts of the proposed emissions increases are clarified.

No increment analysis or visibility impact analysis was performed for the Class I area. If the proposed project is PSD significant for particulate matter, these analyses must be done. In addition, fluoride concentrations at the Class I area should be modeled.

Air Quality Related Values (AQRV) Analysis

As noted above, USAC did not analyze impacts, including AQRV impacts, on the Class I area. We are particularly concerned with cumulative fluoride impacts to vegetation and wildlife at Chassahowitzka WA. We would like the applicant to discuss these impacts in an AQRV analysis.

Thank you for giving us the opportunity to comment on this permit application. We appreciate your cooperation in notifying us of proposed projects with the potential to impact the air quality and related resources of our Class I air quality areas. If you should require further information, please contact Ms. Ellen Porter of our Air Quality Branch in Denver at 303/969-2071.

Sincerely yours,



John T. Brown
Acting Regional Director

cc. J. Reynolds
K. Zhang
J. Kissel, SW Dist
L. Ross, Park Co.
J. Harper, EPA
U. Sa. Island Chem -