

Jeb Bush  
Governor

# Department of Environmental Protection

Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

David B. Struhs  
Secretary

July 21, 2000

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Phong T. Vo  
General Manager, E&TS  
U.S. Agri-Chemicals Corp.  
3225 State Road 630 West  
Fort Meade, Florida 33841

Re: DEP File No. 1050051-009-AC, PSD-FL-278  
Sulfuric and Phosphoric Acid Plant Production Increases

Dear Mr. Vo:

This letter addresses the modeling information sent with your June 23, 2000 response to the Department's March 3, 2000 incompleteness letter to you regarding an air construction permit for the above referenced project. In order to expedite the application, we need the additional information listed below:

1. The modeling information supplied does not give the Department reasonable assurance that the Ambient Air Quality Standard (AAQS) for the SO<sub>2</sub> 24-hour averaging time will not be violated. At least five of the 24-hour AAQS modeling output files sent with this letter (AQS87S24.OUT, AQS89S24.OUT, AQS89G.OUT, AQS90G24.OUT, and AQS91G24.OUT with highest values of 260, 276, 256, 295, and 246 ug/m<sup>3</sup>, respectively) show highest values, which, when combined with a background concentration, are greater than the 260 ug/m<sup>3</sup> standard. No high second high values (HSH) were calculated with these modeling runs. HSH values should have been calculated since the highest-first high values are projected to be greater than the AAQS. The Department has performed some additional modeling which predicts HSH values greater than 260 ug/m<sup>3</sup>. The project is not permissible with the requested emission limits if it is predicted to significantly contribute to any projected exceedances of the HSH. Please provide detailed and appropriate modeling information that will give the Department reasonable assurance the 24-hour SO<sub>2</sub> AAQS will not be violated. Any additional modeling should include emissions from FPC Bartow, FPC Bayboro and FPC Higgins. These are sources within 100 km of the project, which have allowable emissions much greater than the corresponding 20-D emissions.

The Department will resume processing this application after receipt of the requested information. Rule 62-4.050(3), F.A.C. requires that all applications for a Department permit must be certified by a professional engineer registered in the State of Florida. This requirement also applies to responses to Department requests for additional information of an engineering nature.

*"More Protection, Less Process"*

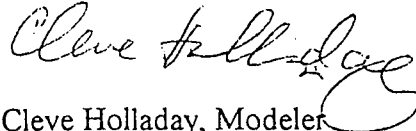
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A new certification statement by the authorized representative or responsible official must accompany any material changes to the application. Rule 62-4.055(1), F.A.C. now requires applicants to respond to requests for information within 90 days.

We will be happy to meet and discuss the details with you and your staff. You may discuss the modeling requirements with me at 850/921-8689.

Sincerely,

A handwritten signature in cursive script that reads "Cleve Holladay". The signature is written in dark ink and is positioned above the printed name.

Cleve Holladay, Modeler  
Bureau of Air Regulation

CGH/ch

cc: John B. Koogler, P.E., K & A  
Bill Thomas, DEP SWD  
Gregg Worley, EPA Region IV  
John Bunyak, NPS