

United States Department of the Interior



FISH AND WILDLIFE SERVICE 75 Spring Street, S.W. Atlanta, Georgia 30303

February 4, 1992



Mr. C. H. Fancy Chief, Bureau of Air Regulation Florida Department of Environmental Regulation Twin Towers Office Building 2600 Blair Stone Road Tallahassee, Florida 32399-2400

Dear Mr. Fancy:

We are in the process of reviewing the material you sent us regarding Agrico Chemical Company's (Agrico) PSD application to modify their South Pierce sulfuric acid production facility. The modification would allow Agrico to increase the production rate at the plant. As you know, the South Pierce facility is located 126 km northwest of Chassahowitzka Wilderness Area, a class I air quality area, administered by the Fish and Wildlife Service. Based on the concerns we expressed in comment letters for previous projects regarding potential impacts on the wilderness area, at the Florida Department of Environmental Regulation's (FDER) request, Agrico has been consulting with us regarding the class I analysis. Agrico has agreed to run MESOPUFF to evaluate increment consumption in the Chassahowitzka Wilderness Area.

We were recently contacted by Mr. Pradeep Raval, Agrico's consultant, who asked that we inform you that we are not opposed to Agrico's commencing construction on the heat recovery project associated with the PSD application. We understand that this phase of the project will not cause an increase in emissions or involve the installation of any process equipment. This letter is to notify you that we are not opposed to Agrico's request; however, we wish to make it clear that our approval of this phase of the project in no way implies that we are approving the entire project. We assume that Agrico is willing to take the risk that their application for increased production may eventually be denied. We expect that Agrico will continue to consult with us on their class I analysis, and after we have reviewed the results of their MESOPUFF modeling, we will provide further comments to you on the potential impacts of this facility on the Chassahowitzka Wilderness Area.

For your information, signatory authority for letters regarding air quality issues has recently been changed from the Assistant Regional Director for Refuges and Wildlife in Denver, Colorado, to the Regional Director of the Region in which the refuge in question is located. Future correspondence to the FDER will, therefore, come from the Atlanta Regional Office. You can continue to direct questions to our Air Quality Branch in Denver at 303/969-2071. Further questions regarding the Agrico application can be directed to Tonnie Maniero at that number.

Sincerely yours,

James W. Pulliam, Jr.
Regional Director