



Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

September 15, 1995

Scott Davis
EPA Region IV
345 Courtland Ave
Atlanta, GA

Dear Mr. Davis:

IMC-Agrico Company has requested to revisit PSD determinations, i.e. PSD applicability to projects which triggered PSD in the past, and has submitted an analysis of PSD applicability for two different facilities with sulfuric acid plants. I requested that the applicant conduct the EPA netting procedure from page A.44 of the NSR Workshop Manual. These and other recent requests are an attempt to "clean up" current permits before Title V applications are due. The company has not submitted test data nor justification that the average emission rates from historical test data is representative of the emissions at the time of the PSD determination. Emission rates prior to the projects which triggered PSD, i.e., previous actuals, is based on emission factors since no test data for NO_x emissions was available. Please review the enclosed analysis and send me your comments.

These determinations must be finalized by the end of September therefore please call me at (904) 488-1344 or send Internet mail to: COSTELLO_M@DEP.STATE.FL.US with your questions or comments.

Sincerely,

Martin Costello
Bureau of Air Regulation

Attachments