

Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Bob Martinez, Governor Dale Twachtmann, Secretary John Shearer, Assistant Secretary

November 13, 1990

Mr. J. E. Parsons, General Manager CF Industries, Inc. P. O. Drawer L Plant City, Florida 33566

Dear Mr. Parsons:

Re: Sulfuric Acid Plants "C" and "D"
Permit Modification AC 29-186931, PSD-FL-155

We have reviewed the air quality analysis accompanying the permit application and the computer modeling printout and diskette we received on October 15, 1990 and have deemed this application incomplete with respect to the modeling analysis.

Computer modeling accompanying the application for the previous PSD project, PSD-FL-119, for the installation of the cogeneration facility and for increased production rates of the four sulfuric acid plants showed that predicted maximum SO_2 concentrations due to all sources in the area were quite high. Even though the air quality modeling submitted with this application demonstrates that the impact of the present proposed increase is less than significant, we still do not have reasonable assurance from the modeling information provided that ambient air quality standards for SO_2 are not going to be violated (F.A.C. 17-2.500(5)(d)). Please perform an ambient air quality standard analysis for all time periods for SO_2 using all SO_2 sources in the area (including any other new sources) and using the 1982-1986 meteorological data set.

If you have any questions concerning this request for additional information, please contact Cleve Holladay at 904-488-1344.

Sincerely,

Lany D. Ander L. H. Fancy, P.E.

Chief

Bureau of Air Regulation

CHF/CH/plm

C: C. Fred Deuel, C. Fred Deuel & Assoc. John B. Koogler, Koogler & Assoc. Jerry Campbell, EPCHC Harry Kerns, SW Dist. Jewell Harper, EPA Chris Shaver, EPA



P 256 396 234

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