



# United States Department of the Interior

FISH AND WILDLIFE SERVICE  
1875 Century Boulevard  
Atlanta, Georgia 30345

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December 30, 1993

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Bureau of  
Air Regulation

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

Dear Mr. Fancy:

We have reviewed the air quality impact analysis in the Prevention of Significant Deterioration Application for the proposed sulfuric acid ( $H_2SO_4$ ) plant expansion at Cargill Fertilizer, Inc., Riverview, Florida. The facility is located approximately 85 km southeast of the Chassahowitzka Wilderness Area (WA), a Class I air quality area administered by the Fish and Wildlife Service (FWS).

### Air Quality Impact Analysis

The air quality impact analysis performed by Cargill is complete. The applicant's modeling predicts that the proposed expansion of the No. 9 sulfuric acid plant will not significantly contribute to the numerous sulfur dioxide ( $SO_2$ ) Class I increment violations modeled in the cumulative analysis. However, the proposed expansion does impact Chassahowitzka WA significantly during 3-hour and 24-hour averaging periods when the cumulative analysis does not indicate increment violations.

Maximum predicted impacts at Chassahowitzka WA from the expansion exceed FWS recommended  $SO_2$  Class I significant impact levels for the 3-hour and 24-hour time periods. The maximum predicted 3-hour  $SO_2$  impact is  $1.31 \mu g/m^3$ ; the recommended Class I 3-hour  $SO_2$  significance level is  $0.48 \mu g/m^3$ . The maximum predicted 24-hour  $SO_2$  impact is  $0.27 \mu g/m^3$ ; the recommended Class I 24-hour  $SO_2$  significance level is  $0.07 \mu g/m^3$ . Cargill's modeling analysis predicted 58 violations of the Class I 3-hour  $SO_2$  increment and 158 violations of the Class I 24-hour  $SO_2$  increment.

We are concerned about these predicted increment violations. In order to identify sources that are major contributors to these violations, a cumulative  $SO_2$  increment analysis must be performed

in the near future with a more appropriate long range transport model such as recommended in the EPA document, Interagency Workgroup on Air Quality Modeling (IWAQM) Phase 1 Modeling Report: Interim Recommendation for Modeling Long Range Transport and Impacts on Regional Visibility. Once these major impacting sources are identified, FDER should develop a strategy to better control them, so that Class I increments are not violated.

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. Please note that the above comments address the completeness of the Cargill application, and we may submit additional comments during the formal 30-day comment period for this project. If you have questions, please contact Ms. Ellen Porter of our Air Quality Branch in Denver at 303/969-2071.

Sincerely yours,



James W. Pulliam, Jr.  
Regional Director

cc:

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