



Lawton Chiles
Governor

Florida Department of Environmental Protection

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

Virginia B. Wetherell
Secretary

January 6, 1994

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. David A. Buff
KBN Engineering & Applied Sciences, Inc.
1034 N.W. 57th Street
Gainesville, Florida 32605

Re: Cargill Fertilizer, Inc., No. 9 Sulfuric Acid Plant Expansion, PSD-FL-209

Dear Mr. Buff:

The Department has reviewed the modeling data received on December 10, 1993. Based on our initial review of this data and on comments received from the U.S. Fish and Wildlife Service, we have determined that additional information is needed in order to continue processing this application:

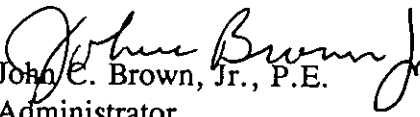
1. Please extend the PSD Class I impact analysis to include an air quality related values (AQRV) analysis for all PSD significant pollutants. The AQRV analysis evaluates potential effects of the project on vegetation, wildlife, soils, and aquatic resources. This analysis must be performed regardless of whether the project's impacts are less than the National Park Service's recommended significance levels. For determining impacts on PSD Class I areas, the department follows the recommendations of the Interagency Workgroup on Air Quality Modeling (IWAQM) Phase I Report: "Interim Recommendation for Modeling Long Range Transport and Impacts on Regional Visibility" (EPA-454/R-93-0150).
2. Cargill's modeling analysis predicts that the proposed expansion of the No. 9 sulfuric acid plant will not significantly contribute to the numerous sulfur dioxide (SO₂) Class I increment violations modeled in the cumulative Class I area analysis for the Chassahowitzka Wilderness Area. The proposed expansion, however, is predicted to impact this Class I area significantly during 3-hour and 24-hour averaging periods when the cumulative analysis does not indicate increment violations. Since there is a predicted significant impact to SO₂ increment consumption, the U.S. Fish and Wildlife Service has additionally requested Cargill to investigate, in cooperation with them, the sensitivity of upland organic soils to acidity in the wilderness area. They request that

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soils should be analyzed for pH, sulfur content, oxidation/reduction potential, and soil depth and color (see attached letter). The U.S. Fish and Wildlife Service has indicated to the Department that they will do the actual sampling; however, they request that Cargill pay for the cost of the analysis. They estimate the cost to be \$500 to \$2000. Please coordinate this request with Ellen Porter in Denver, Colorado at 303-969-2071 and inform us when it is completed.

Please advise us if problems arise that could result in an abnormally long processing time. If you have questions about this letter, please contact Cleve Holladay at 904-488-1344.

Sincerely,


John C. Brown, Jr., P.E.
Administrator
Air Permitting and Standards

JB/ch

Attachment


cc: B. Thomas, SWD
J. Campbell, HCEPC
E. Curran, Cargill
J. Harper, EPA
J. Bunyak, NPS

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3. Article Addressed to: Mr. David A. Buff KBN Engineering & Applied Science 1034 N.W. 57th Street Gainesville, Florida 32605		4a. Article Number P 872 562 580	
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6. Signature (Agent) <i>David</i>			

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P 872 562 580



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PS Form 3800, JUNE 1991