



Florida Department of Environmental Protection

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2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Rick Scott
Governor

Carlos Lopez-Cantera
Lt. Governor

Noah Valenstein
Secretary

Via U.S. Mail and Electronic Mail

October 20, 2017

Mr. Trey Glenn
Regional Administrator
U. S. Environmental Protection Agency (EPA) – Region 4
61 Forsyth Street, SW – Mail Code: 9T25
Atlanta, GA 30303-8909

Re: Air Program Pre-Hearing Submittal: Proposed Revision to Florida's State
Implementation Plan – Incorporation of SO₂ Emission Limits for Two
Facilities in Polk County, Florida

Dear Mr. Glenn:

The Florida Department of Environmental Protection (Department) is proposing a revision to Florida's State Implementation Plan (SIP) under the federal Clean Air Act (CAA). On August 21, 2015, the U.S. Environmental Protection Agency (EPA) promulgated the "Data Requirements Rule" (DRR) (80 Fed. Reg. 51,052; codified at 40 CFR Part 51, Subpart BB), which requires states to evaluate compliance with the 2010 revised 1-hour sulfur dioxide (SO₂) National Ambient Air Quality Standard (NAAQS) in areas surrounding certain large SO₂ sources. Pursuant to the DRR, states could choose to perform area characterizations around the specified sources using either air quality monitoring or air dispersion modeling.

The Department chose to characterize the area around Mosaic Fertilizer LLC's New Wales facility (Mosaic New Wales) in Polk County using air dispersion modeling. On January 13, 2017, the Department submitted a report to EPA characterizing the area around Mosaic New Wales with respect to the 2010 SO₂ NAAQS. This submittal indicated that the area immediately surrounding the New Wales facility was likely in violation of the 2010 SO₂ NAAQS for the period of 2012 through 2014.

The Department submitted a supplemental DRR modeling report to EPA on June 23, 2017 detailing a set of lower emission limits for both the New Wales facility and the nearby Mosaic Bartow facility and a new fence line for the New Wales facility that, when achieved, provide for modeled attainment of the 2010 SO₂ NAAQS. As detailed in the complete SIP submittal package, specified sulfuric acid plants at the Mosaic New Wales

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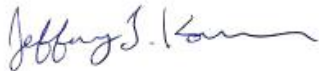
and Mosaic Bartow facilities have already be upgraded with new catalyst beds, and additional upgrades will continue through 2018 into the first part of 2019. Through the combined effect of these catalyst upgrades, operating conditions reflecting actual sulfuric acid production levels (which are lower than permitted allowable capacities), and permanent reductions in SO₂ emissions from other sources in the area, ambient air quality in the vicinity of the Mosaic New Wales facility has improved significantly relative to the time period characterized through the Department's DRR analyses. The Department is confident that any issues related to compliance with the 2010 SO₂ NAAQS in the vicinity to the Mosaic New Wales facility have been fully resolved as the result of the scheduled catalyst upgrades and emission limits contained within this proposed SIP revision.

Florida hereby submits its proposed SIP to ensure the attainment and maintenance of the 2010 revised SO₂ NAAQS in the area around Mosaic New Wales in Hillsborough and Polk counties. Florida's area plan consists of specific conditions from two air construction permits for two facilities in Polk County – Mosaic's New Wales and Bartow facilities – as they pertain to emissions of SO₂.

The complete SIP submittal package (hard copy and electronic copy) has been sent directly to the Air Planning Branch. The electronic copy is in a searchable format and is an exact duplicate of the hard copy. The notice of opportunity to submit comments, request a public hearing, or participate in a public hearing on November 22, 2017, if requested, regarding this proposed SIP revision was published in the Florida Administrative Register on October 20, 2017.

The public notice and pre-hearing SIP submittal are enclosed and a CD containing the supporting modeling and data files has been sent directly to the Air Planning Branch for EPA Region 4. The Department respectfully requests that EPA provide any comments on this submittal by November 20, 2017. If you have any questions about this proposed SIP revision, please contact Hastings Read at (850) 717-9017 or by email at Hastings.Read@dep.state.fl.us.

Sincerely,



Jeffery F. Koerner, Director
Division of Air Resource Management

JFK/tl

cc (with Pre-Hearing SIP package): R. Scott Davis, Chief, Air Planning Branch, EPA Region 4