



# Florida Department of Environmental Protection

Bob Martinez Center  
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

April 26, 2018

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 – Redesignation Request and Maintenance Plan for the Hillsborough County Sulfur Dioxide (SO<sub>2</sub>) Nonattainment Area

Dear Mr. Glenn:

Pursuant to 40 C.F.R. 51.102, the Florida Department of Environmental Protection (Department) is submitting a pre-hearing State Implementation Plan (SIP) package to revise Florida's SIP under the federal Clean Air Act (CAA).

On June 22, 2010 (effective August 23, 2010), the U.S. Environmental Protection Agency (EPA) promulgated a revised NAAQS for the air pollutant SO<sub>2</sub>. 75 Fed. Reg. 35,520. The level of the revised standard is 75 parts per billion (ppb), based on a three-year average of the annual 99<sup>th</sup> percentile of one-hour daily maximum concentrations. The revised SO<sub>2</sub> standard is the first one-hour primary standard promulgated by EPA for this air pollutant.

On August 5, 2013 (effective October 4, 2013), EPA designated an area in Hillsborough County, Florida "nonattainment" for SO<sub>2</sub> based on ambient SO<sub>2</sub> monitoring data in the area showing violation of the revised NAAQS over the three-year period 2009-2011. 78 Fed. Reg. 47,191. The designated nonattainment area is described as follows:

*That portion of Hillsborough County encompassed by the polygon with the vertices using Universal Traverse Mercator (UTM) coordinates in UTM zone 17 with datum NAD83 as follows: (1) vertices – UTM Easting (m) 35881, UTM Northing 3076066; (2) vertices – UTM Easting (m) 355673,*

*UTM Northing 3079275; (3) UTM Easting (m) 360300, UTM Northing 3086380; (4) vertices – UTM Easting (m) 366850, UTM Northing 3086692; (5) vertices – UTM Easting (m) 368364, UTM Northing 3083760; and (6) vertices – UTM Easting (m) 365708, UTM Northing 3079121.*

78 Fed. Reg. 47,198. The Hillsborough County NAA contains within its boundaries one major point source for SO<sub>2</sub> emissions – Mosaic Fertilizer, LLC’s (Mosaic) Riverview facility. In addition, there are two much smaller point sources within the nonattainment area – Ajax Paving Industries, Inc.’s Plant No. 6 (Ajax) and Harsco Minerals (Harsco). An adjacent power plant, Tampa Electric Company’s (TECO) Big Bend Station, is located just outside of the NAA.

In 2015, Mosaic received an air construction permit from the Department requiring the facility to change the catalysts in the converters in sulfuric acid plants Nos. 7, 8 and 9, increase the stack height of each sulfuric acid plant, eliminate the use of fuel oil at the plant except during periods of natural gas curtailment or disruption, and to comply with specific SO<sub>2</sub> emissions caps based on a 24-hour average as determined by continuous emission monitoring system (CEMS) data.<sup>1</sup>

Also in 2015, TECO received an air construction permit from the Department requiring the facility to comply with an SO<sub>2</sub> emissions cap of 3,162 lbs/hour based on a 30-day rolling average for all fossil-fuel-fired electrical generating units as determined by CEMS data.<sup>2</sup>

These two permits formed the basis of the Department’s attainment demonstration for the Nonattainment Area SIP (NAA SIP) submitted to EPA on April 3, 2015. The NAA SIP was fully approved by EPA on July 3, 2017 (effective August 2, 2017). 82 Fed. Reg. 30,749. The NAA SIP was fully implemented with the completion of all construction, installation of controls, and compliance with the emission limits on November 17, 2017.

Florida hereby provides EPA with the pre-hearing SIP package requesting redesignation of this area to attainment and approval of an associated Maintenance SIP that is designed to ensure the continued attainment of the 2010 SO<sub>2</sub> NAAQS in the area around the Mosaic facility in Hillsborough County.

The Department has sent the complete pre-hearing SIP submittal package (hard copy and electronic copy) directly to the Air Planning Branch. The electronic copy is in a searchable format and is an exact duplicate of the hard copy. On April 26, 2018, the Department published in the Florida Administrative Register a notice of opportunity to

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<sup>1</sup> See Air Construction Permit 0570008-080-AC issued by the Florida Department of Environmental Protection on January 15, 2015.


<sup>2</sup> See Air Construction Permit 0570039-074-AC issued by the Florida Department of Environmental Protection on February 26, 2015.

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submit comments regarding this proposed SIP revision, request a public hearing, or participate in a public hearing on June 1, 2018, if requested.

The Department respectfully requests that EPA provide any comments on this submittal by May 29, 2017. If you have any questions, please contact Hastings Read at (850) 717-9017 or by email at [Hastings.Read@dep.state.fl.us](mailto:Hastings.Read@dep.state.fl.us).

Sincerely,

A handwritten signature in blue ink, appearing to read "Jeffery F. Koerner".

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