



# FLORIDA DEPARTMENT OF Environmental Protection

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**Ron DeSantis**  
Governor

**Jeanette Nuñez**  
Lt. Governor

**Noah Valenstein**  
Secretary

## Via U.S. Mail and Electronic Mail

February 15, 2019

Ms. Mary Walker  
Acting 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 & Parallel Processing Request: Proposed  
Revision to Florida's State Implementation Plan – Redesignation Request  
and Maintenance Plan for the Hillsborough-Polk County Sulfur Dioxide  
(SO<sub>2</sub>) Nonattainment Area

Dear Ms. Walker:

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 revised SO<sub>2</sub> standard is the first one-hour primary standard promulgated by EPA for this air pollutant. 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.

On January 9, 2018, EPA designated a small portion of Polk and Hillsborough Counties as nonattainment (the "Hillsborough-Polk County Nonattainment Area [NAA]") and a portion of Hillsborough and Polk Counties as unclassifiable (the "Mulberry Unclassifiable Area"). The effective date of the nonattainment and unclassifiable area designations was April 9, 2018.

This SIP submittal requests that EPA redesignate the Hillsborough-Polk County NAA and the Mulberry Unclassifiable Area to attainment based on air dispersion modeling of new SO<sub>2</sub> emission limits for the Mosaic New Wales and Bartow fertilizer facilities. This SIP submittal also includes the CAA section 175A Maintenance Plan for the

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Hillsborough-Polk County NAA, the CAA section 172(c)(3) emission inventory, and certification of the existing SIP-approved Nonattainment New Source Review (NNSR) permitting program. This SIP submittal resubmits and updates the modeling demonstration previously included in our December 1, 2017 source-specific SIP submittal requesting that EPA adopt into the Florida SIP the SO<sub>2</sub> emission limits and compliance parameters for the Mosaic New Wales and Bartow facilities.

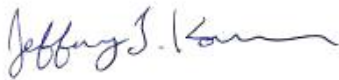
The Department is also requesting that EPA parallel process the redesignation and maintenance plan SIP submittals for the Hillsborough-Polk NAA and Mulberry Unclassifiable Area, respectively, including the air dispersion modeling revisions to Florida's December 1, 2017 source-specific SIP submission that provide modeled attainment to support the redesignation request. The Department's request for parallel process includes EPA approval of the following:

1. EPA's approval of Florida's Emissions Inventory pursuant to Clean Air Act Section 172(c)(3).
2. EPA's redesignation of the Polk County Nonattainment Area to Attainment.
3. EPA's approval of the Polk County Maintenance Plan.
4. EPA's redesignation of the Mulberry Area to Attainment.
5. The parallel processing of the air dispersion modeling revisions to the December 1, 2017, Hillsborough-Polk County source-specific SIP, as revised by this SIP submittal.
6. Certification of Florida's SIP-approved NNSR permitting program.

The Department intends to submit the final SIP requesting redesignation of the Hillsborough-Polk County NAA and Mulberry Unclassifiable Area and approval of the Maintenance plan on or after August 31, 2019, once the multi-unit emissions cap limits for the Mosaic New Wales and Bartow facilities become effective.

If you have any questions, please contact Hastings Read at (850) 717-9017 or by email at [Hastings.Read@floridadep.gov](mailto:Hastings.Read@floridadep.gov).

Sincerely,



Jeffery F. Koerner, Director  
Division of Air Resource Management

JFK/tl

cc (with Pre-Hearing SIP package):

Beverly Bannister, Division Director, Air, Pesticides and Toxics Management Division,  
EPA Region 4;

R. Scott Davis, Chief, Air Planning and Implementation Branch, EPA Region 4