



REGION 4

ATLANTA, GA 30303

October 9, 2024

Jeffery F. Koerner, Director
Division of Air Resource Management
Florida Department of Environmental Protection
Bob Martinez Center
2600 Blair Martinez Center, MS 5500
Tallahassee, Florida 32399-2400

Dear Mr. Koerner:

Thank you for your letter dated June 12, 2024, containing the verification of continued attainment report for the Hillsborough-Polk 2010 1-hour sulfur dioxide (SO₂) primary national ambient air quality standards (NAAQS) maintenance area. This report provides an assessment of modeling inputs and assumptions and characterizes compliance with enforceable SO₂ emission limits for the Mosaic New Wales and Mosaic Bartow fertilizer facilities to verify continued attainment of the 1-hour standard in the Hillsborough-Polk area.

The U.S. Environmental Protection Agency designated the Hillsborough-Polk area nonattainment on December 21, 2017,¹ based on air dispersion modeling of actual emissions data for Mosaic New Wales and Mosaic Bartow facilities. The EPA redesignated the area on July 12, 2016,² based on air dispersion modeling of new, permanent, and enforceable SO₂ allowable emission limits for both facilities, which provided for modeled attainment of the 1-hour standard.³

For redesignating a nonattainment area to attainment, section 107(d)(3)(E)(iv) of the Clean Air Act (CAA) requires, among other criteria, the Administrator has fully approved a maintenance plan that meets the requirements of section 175A of the CAA. Section 175A sets forth the criteria of a maintenance plan which, among other requirements, must demonstrate continued attainment of the applicable NAAQS for at least 10 years after the Administrator approves a redesignation to attainment.

In lieu of an ambient air monitor in the Hillsborough-Polk area, air quality in the vicinity of the two Mosaic facilities was characterized based on air dispersion modeling, which was also the basis for the redesignation. Florida's 175A maintenance plan requires the state air agency to review emissions data and air dispersion modeling inputs and assumptions on an annual basis for the Mosaic New Wales and

¹ See 83 FR 1098, January 9, 2018.

² See 81 FR 45039, July 12, 2016.

³ See 85 FR 9666, February 20, 2020.

Mosaic Bartow facilities, in coordination with the EPA, to verify the area's continued attainment of the 1-hour standard.

Florida's June 12, 2024, verification report confirms the State's review of emissions data and air dispersion modeling inputs and assumptions, including compliance with the 24-hour block average SO₂ allowable emission limits for the two Mosaic facilities based on the criteria established in the maintenance plan. FDEP certifies the area's continued attainment of the 1-hour standard, concluding there are no changes in the modeling inputs and assumptions that could result in modeled violations, and presently no additional action or information is necessary to verify continued attainment. Currently, the EPA concurs with Florida's evaluation and agrees the annual review of emissions data and air dispersion modeling parameters for Mosaic New Wales and Mosaic Bartow verifies continued attainment of the 1-hour SO₂ standard for the Hillsborough-Polk maintenance area in accordance with section 175A of the CAA. The next verification report is due July 1, 2025.

Thank you for the work your agency does to support improved air quality. If you have any questions, please contact Joel Huey, Manager, Multi-Air Pollutant Coordination Section, at (404) 562-9104 or Pearlene Williams at (404) 562-9144.

Sincerely,

Kathleen Lusky
Acting Manager
Air Planning and Implementation Branch

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