



# UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 7  
901 NORTH 5TH STREET  
KANSAS CITY, KANSAS 66101

SEP 3 0 2009

W. Clark Smith  
Permitting Section Supervisor  
Air Quality Division  
Nebraska Department of Environmental Quality  
P.O. Box 98922  
Lincoln, NE 68509-8922

RE: Cargill Lactic Acid, Blair, Nebraska PSD construction permit amendment comments

Dear Mr. Smith:

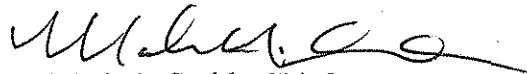
On August 26, 2009, the United States Environmental Protection Agency (EPA) Region 7 received notification of the Nebraska Department of Environmental Quality's (NDEQ) intent to amend the Prevention of Significant Deterioration (PSD) construction permit for Cargill Lactic Acid, Blair, Nebraska (CLA) that was issued on September 29, 2006 and amended on July 28, 2008. We appreciate the opportunity to review the draft permit and provide the following comment from Richard Daye of our modeling section. This comment is in addition to the comment letter dated April 27, 2009 regarding the draft permit that was placed on public notice March 31, 2009.

The addition of an additional cell (F) to the cooling tower (emission point EP35-91) will increase the 24-hour  $PM_{10}$  concentrations in the vicinity of the Cargill complex in Blair, NE, about 0.1 micrograms per cubic meter. The cumulative impact from all the sources is unknown because haul roads were not modeled. The absence of haul road in the modeling was commented in our evaluation in April 2009. "... review of the modeling for the Cargill Lactic Acid Increase PSD application indicates that haul road emissions at the Cargill complex were not modeled and those at the nearby Gerhold facility were only modeled for annual concentrations. The purpose of an air quality modeling analysis is to determine whether any air quality NAAQS and/or increment standards will be violated. All emissions must be considered. The modeling to demonstrate compliance with the 24-hour  $PM_{10}$  increment standard did not include emissions from any haul road...". The haul roads should be modeled to demonstrate that any air quality standard or increment standard will not be exceeded.

I believe that the decrease of about 70 percent in particulate matter from the cooling towers should have additional justification/explanation but I am not an emission authority.

As always, we appreciate the opportunity to provide what we hope you will find to be constructive comments. Please contact Patricia Scott at (913) 551-7312 if you have any questions or comments regarding this letter.

Sincerely,

A handwritten signature in black ink, appearing to read 'Mark A. Smith', with a long horizontal flourish extending to the right.

Mark A. Smith, Chief  
Air Permitting and Compliance Branch  
Air and Waste Management Division