



# Florida Department of Environmental Protection

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## Via U.S. Mail and Electronic Mail

January 13, 2017

Mrs. Heather McTeer Toney  
Regional Administrator  
U.S. Environmental Protection Agency – Region 4  
61 Forsyth Street SW – Mail Code: 9T25  
Atlanta, GA 30303-8909

Re: Data Requirements Rule for the 2010 One-Hour Sulfur Dioxide Primary National Ambient Air Quality Standard – Air Dispersion Modeling Demonstrations

Dear Mrs. Toney:

In accordance with 40 C.F.R. 51.1203, and in response to the U.S. Environmental Protection Agency's (EPA) August 21, 2015 Data Requirements Rule (DRR) (80 Fed. Reg. 51,052), the Florida Department of Environmental Protection (Department) hereby submits a suite of reports addressing each of the twelve primary sources identified in the Department's January 15, 2016 submittal to EPA Region 4. This includes eleven area characterization reports (Appendices B through L) that address each of the active sources. The twelfth report addresses Gulf Power Company's Lansing Smith Electric Generating Plant, which ceased operations on March 30, 2016, in compliance with the facility's Title V operating permit. This submittal includes a technical report (Appendix A) addressing the enforceable permit conditions limiting Lansing Smith to less than 2,000 tons per year (tpy) of sulfur dioxide (SO<sub>2</sub>) emissions.

Each area characterization consists of an air dispersion modeling demonstration assessing the ambient air quality in the area around the primary source with respect to the 2010 one-hour SO<sub>2</sub> National Ambient Air Quality Standard (NAAQS). These modeling demonstrations were performed in accordance with the Department's June 30, 2016 technical modeling protocol submittal to EPA Region 4 and all applicable rules and guidance including *Appendix W to 40 CFR Part 51: The Guideline on Air Quality Models* and EPA's *SO<sub>2</sub> NAAQS Designations Modeling Technical Assistance Document*.

Ten of the eleven area characterizations provided through this submittal clearly reflect that historic and current operating conditions at the source are not contributing to a violation of the 2010 SO<sub>2</sub> NAAQS. With regard to the eleventh area characterization (Appendix K), which addresses the Mosaic New Wales phosphate fertilizer manufacturing plant in Mulberry,

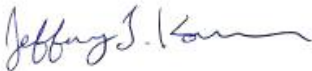
Mrs. Heather McTeer Toney  
January 13, 2017  
Page 2 of 2

Florida, the Department intends to supplement the attached modeling demonstration with another based on additional federally-enforceable permit limits and operational changes reflecting a range of SO<sub>2</sub> reduction projects currently underway pursuant to a pending consent decree between Mosaic and the U.S. EPA. The Department expects these projects to be completed in significant part prior to any final area designation determinations or nonattainment planning periods.

With the exception of the two existing nonattainment areas in Hillsborough and Nassau Counties, the Department recommends that the entire State of Florida be designated as “attainment” or “unclassifiable” for the 2010 SO<sub>2</sub> NAAQS. This recommendation is based on the required area-specific analyses under the DRR and current data from the state’s existing SO<sub>2</sub> ambient monitoring network.

The complete submittal package (hard copy and electronic copy) has been sent directly to the Air Planning Branch for EPA Region 4, together with the data files used in generating each air dispersion modeling report. The electronic copy is in a searchable format and is an exact duplicate of the hard copy. If you have any questions about this submittal, please contact me at (850) 717-9000 or by email at [Jeff.Koerner@dep.state.fl.us](mailto:Jeff.Koerner@dep.state.fl.us).

Sincerely,



Jeff Koerner, Director  
Division of Air Resource Management

JK/pm

cc (with package): R. Scott Davis, Chief, Air Planning Branch, EPA Region 4  
Tiereny Bell  
Lynorae Benjamin  
Twunjula Bradley  
Rick Gillam