



Florida Department of Environmental Protection

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3900 Commonwealth Boulevard
Tallahassee, Florida 32399-3000

Rick Scott
Governor

Jennifer Carroll
Lt. Governor

Herschel T. Vinyard Jr.
Secretary

November 28, 2011

Via Electronic Mail

Ms. Gwendolyn Keyes Fleming
Regional Administrator
U. S. Environmental Protection Agency - Region 4
61 Forsyth Street, SW
Atlanta, Georgia 30303-8909

Dear Ms. Keyes Fleming:

On June 13, 2011, the Florida Department of Environmental Protection submitted recommendations for the designation of "nonattainment" area boundaries in Florida with respect to the 2010 revised national ambient air quality standard (NAAQS) for sulfur dioxide (SO₂). Specifically, the Department recommended that a portion of Hillsborough County be designated nonattainment for SO₂, and the rest of the state, as a whole, be designated "unclassifiable" or "unclassifiable/attainment" in accordance with the U.S. Environmental Protection Agency's proposed implementation strategy. Since the June submittal, the Department has further analyzed SO₂ monitoring data in Nassau County and now recommends that a portion of Nassau County also be designated "nonattainment."¹ Outside of the referenced portions of Hillsborough and Nassau counties, the Department continues to recommend that the rest of the state be designated "unclassifiable" or "unclassifiable/attainment."

The recommended nonattainment area boundary for the non-complying monitoring site in Nassau County is described in the enclosed appendix. Information available at this time suggests that emissions from a single facility are primarily responsible for the SO₂ violation at the Department's monitor; therefore, the boundary encompasses the area that, based upon air dispersion modeling, may be experiencing violations of the standard caused by the facility. The Department believes it is important for the public to understand that violations of the 1-hour SO₂ standard are localized events not

¹ The Department reviewed data from an independently-operated monitor, which is located within a few meters of the Department's monitor in Nassau County, and which indicates significantly lower concentrations of SO₂ than the Department's monitor. The Department has concluded that the Department's monitoring data should be used for air quality planning purposes.

Ms. Gwendolyn Keyes Fleming

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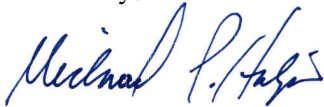
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reflective of county-wide air quality, and that the only area for which we currently have reasonable evidence of high levels of SO₂ is the recommended nonattainment area.

Please note that the Department and the aforementioned Nassau County facility have discussed potential SO₂ mitigation measures and are mutually interested in a resolution. The Department expects that the facility will propose within the next 30 days a federally-enforceable solution that provides for attainment and maintenance of the SO₂ standard in the affected area, and that the Department will complete its review prior to EPA's deadline for publishing area designations. If so, the Department will withdraw its recommendation that the area be designated nonattainment.

Thank you for your continued support of our efforts to fully implement the Clean Air Act in Florida. If you have any questions about this recommendation, please contact Mr. Larry George, at (850) 717-9000 or by e-mail at Larry.George@dep.state.fl.us.

Sincerely,

A handwritten signature in blue ink, appearing to read "Michael P. Halpin".

Michael P. Halpin, P.E.

Director, Division of Air Resource Management

Enclosures: Appendix

cc: Jeff Littlejohn, P.E., Deputy Secretary for Regulatory Programs, FDEP
R. Scott Davis, Chief, Air Planning Branch, EPA Region 4