



United States Department of the Interior



FISH AND WILDLIFE SERVICE
National Wildlife Refuge System
Branch of Air Quality
7333 W. Jefferson Ave., Suite 375
Lakewood, CO 80235-2017

IN REPLY REFER TO:

FWS/ANWS-AR-AQ

March 3, 2011

Elliott Bickerstaff, P.E., DEE
Chief, Air Support Branch
Mississippi Department of Environmental Quality
101 W. Capital Street
Jackson, MS 39201

Subject: Regional Haze State Implementation Plan Supplemental Information Comments

Dear Mr. Bickerstaff:

On February 1, 2011, the State of Mississippi submitted, for public comment, proposed revisions to the Mississippi State Implementation Plan (SIP) for Air Pollution Control as adopted on August 28, 2008, describing its proposal to improve air quality regional haze impacts at mandatory Class I areas across your region.

We appreciate the opportunity to work closely with the State through the initial evaluation, development, and, now, subsequent review of this plan. Cooperative efforts such as these ensure that, together, we continue to make progress toward the Clean Air Act's goal of natural visibility conditions at all of our most pristine National Parks and Wilderness Areas for future generations.

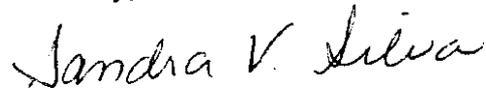
The U. S. Fish and Wildlife Service (FWS) is providing comments on the Best Available Retrofit Technology (BART) Supplemental Information for Mississippi Phosphates Corporation and the DuPont DeLisle Plant as they relate to the Mississippi Regional Haze State Implementation Plan (SIP). The FWS provided comments to the Mississippi Department of Environmental Quality (MDEQ) on an earlier BART analyses in June 2008. In addition, FWS is restating comment previously made on the Chevron Products Company Pascagoula Refinery BART determination.

We are providing these comments to the State and ask that these be included in the official public record. We look forward to continuing to work with the Mississippi Department of Environmental Quality (MDEQ) staff towards resolving any of the issues discussed below. For further information, please contact Tim Allen with FWS at (303) 914-3802.

**TAKE PRIDE
IN AMERICA** 

Again, we appreciate the opportunity to work closely with the State of Mississippi and compliment you on your hard work and dedication to significant improvement in our nation's air quality values and visibility.

Sincerely,



Sandra V. Silva, Chief
FWS Branch of Air Quality

Enclosure

cc:

Kay Prince, Chief Air Planning Branch
US EPA Region 4
61 Forsyth Street, S.W.
Atlanta, Georgia 30303-8960

Kenneth Litzenberger
Project Manager
Southeast Louisiana Refuges
61389 Hwy. 434
Lacombe, Louisiana 70445

Michele Notarianni
US EPA Region 4
61 Forsyth Street, S.W.
Atlanta, Georgia 30303-8960

James Burnett
Refuge Manager
St. Marks National Wildlife Refuge
P.O. Box 68
St. Marks, Florida 32355

Annette Sharp, Executive Director
CENRAP
10005 S. Pennsylvania, Ste. C
Oklahoma City, Oklahoma 73159

John Hornbeck
VISTAS Executive Director
2526 Forest Parkway, Suite F
Forest Park, GA 30297-6146

Brian McManus, Deputy Chief Branch of
Fire Management
National Interagency Fire Center
3833 South Development Ave.
Boise, Idaho 83705

Chief, Southeast Region
National Wildlife Refuge System
1875 Century Center
Atlanta, Georgia 30345

**U.S. Fish and Wildlife Service Comments Regarding
Mississippi Regional Haze Rule State Implementation Plan
Supplemental Information**

March 3, 2011

Best Available Retrofit Technology

The following are comments regarding the Best Available Retrofit Technology (BART) determinations for two facilities.

Mississippi Phosphates Corporation – Pascagoula Facility

Mississippi Phosphates Corporation and Mississippi Department of Environmental Quality (MDEQ) agreed to replace the absorption towers, install new economizers and new superheaters, replace duct work and refurbish acid coolers, repair the cooling tower and replace the vanadium catalyst with a cesium catalyst in the third and fourth converter passes. This will result in a permitted sulfur dioxide limit (SO₂) of 3.0 lb of SO₂ per ton of sulfuric acid produced, not to exceed 225 lb/hr and 1700 tons/year. This is consistent with the recommendation made by the FWS in previous comments on the initial BART determinations.

EPA, Region 4 requested MDEQ justify why the proposed configuration cannot reach a greater control efficiency than 3.0 lb of SO₂ per ton of sulfuric acid produced. The current explanation is not as robust as it should be and does not provide documented comparative control levels or vendor guarantees; however, it does attempt to qualitatively justify the 3.0 lb control level.

FWS previously provided the following comment on the on nitrogen oxides (NO_x) emission limit. The current SIP revision does not discuss enforceable limits for NO_x, particulates or sulfuric acid mist. Other phosphate facilities have reasonably meet a NO_x limit of 0.11 – 0.12 lb/ton of H₂SO₄ product. Likewise, a 10% particulate matter opacity limit often is achievable. The sulfuric acid mist limit for diammonium phosphate/ monoammonium phosphate (DAP/MAP) units should be about 0.18 lb/ton of H₂SO₄. These limits can usually be attained without installation of additional pollution control equipment. Emission limits should be enforced using continuous emission monitoring systems. Such limits should be addressed in the facility's permit.

DuPont DeLisle Plant -- Titanium Dioxide Pigment Plant

The DuPont DeLisle Plant has two coal-fired boilers that have been shown to contribute 1.2% of the visibility impairment at the Breton National Wildlife Refuge (Breton), which is about 45 km from the plant. Of all Mississippi industrial facilities, the DuPont DeLisle Plant's air emissions result in the second-highest visibility impact at Breton. The location of the Breton Wilderness

Area suggests that several States and Gulf emissions sources are likely to contribute the visibility impairment. It is for this reason that a review of DuPont DeLisle Plant's control measures is being performed. This plant is not BART-eligible so the analysis is based on the "Reasonable Progress" four-factors outlined in the Regional Haze Rule (40 CFR 51.308(d)(1)(i)(A)), rather than the five-factor BART determination protocol.

In the supplemental information submittal, MDEQ announced its decision to not require controls at the DuPont DeLisle Plant, because Louisiana Department of Environmental Quality did not request such controls from Mississippi in its Regional Haze SIP. However, FWS expressed significant concerns with Louisiana's SIP, specifically with the lack of area of influence analyses and discussion of attribution of haze impacts from sources outside of Louisiana.¹ Thus, even though the Louisiana Regional Haze SIP did not specifically cite DuPont DeLisle in the control strategy for Breton, FWS continues to encourage MDEQ to consider some level of emission control. In the previous FWS comments sent to MDEQ,² several reasonably priced control options were identified. These options included: fuel switching and/or a spray dry absorber for SO₂ control and low NO_x burners for NO_x control. FWS bases this recommendation on the emission contributions of DuPont DeLisle Plant and the proximity to Breton. These emission controls will help to minimize haze causing pollutants, reach reasonable progress goals and assist in the long-term strategy implementation and thereby reduce the visibility impairment at Breton.

The supplemental information only covered MPC and DuPont DeLisle, however FWS had previously commented on Chevron. The following comment remains to be addressed.

Chevron Products Company – Pascagoula Refinery

The original MDEQ BART determination for the Chevron Products Company lacked rigorous cost analysis of control alternatives. MDEQ believed that significant visibility improvement could not be gained at reasonable cost over the improvements already attained through the refinery consent decree. A more robust cost analysis continues to be lacking in the SIP.

¹ See Department of the Interior comments sent to Louisiana Department of Environmental Quality on January 22, 2008, available at http://www.fws.gov/refuges/AirQuality/SIP_Review_Comments_Page.html

² See Department of the Interior comments sent to MDEQ on June 30, 2008, available at http://www.fws.gov/refuges/AirQuality/SIP_Review_Comments_Page.html