

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6

1201 ELM STREET, SUITE 500
DALLAS, TEXAS 75270-2102

October 14, 2021

Steve Chatelain
Mosaic Fertilizer, LLC – Faustina Plant
9959 Highway 18,
St. James, LA 70086

Email: Steven.Chatelain@mosaicco.com

RE: Request for Alternative Procedure to Site Specific Monitoring Plan (SSMP) – 40 Code of Federal Regulations (CFR) Part 63 Subpart BB – Changing Time Frame for Performance Evaluation prior to Performance Test – Mosaic Fertilizer, LLC – Faustina Facility Located in St. James, LA

Dear Mr. Chatelain:

This letter is in response to your Alternative Monitoring Plan (AMP) request dated August 9, 2021, for scrubbers in the three independent granular ammonium phosphate trains, the A Train, the B Train, and the C Train, that are subject to requirements of National Emission Standards for Hazardous Air Pollutants (NESHAP) Subpart BB and located at the Faustina Plant in St. James Parish near St. James, Louisiana. The AMP request included a proposed change to the annual performance evaluation procedure described in the SSMP in order to provide flexibility for actual plant operations and trained employee scheduling of the required Continuous Monitoring System (CMS) performance evaluations. Based upon review of information provided, the United States Environmental Protection Agency (“EPA”) conditionally approves your request, as delineated in the enclosure to this letter.

This conditional approval is based upon prior consultation with our Office of Air Quality Planning and Standards and our Office of Enforcement and Compliance Assurance, and is consistent with similar approvals issued by other regions. If you have any questions concerning this response, please contact Kevin Kim of my staff at (214) 665-8554 or kim.kevin@epa.gov.

Sincerely,

STEVEN
THOMPSON

Digitally signed by STEVEN THOMPSON
DN: cn=US, o=U.S. Government,
ou=Environmental Protection Agency,
cn=STEVEN THOMPSON,
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Date: 2021.10.14 08:17:43 -05'00

Steve Thompson
Chief
Air Enforcement Branch

Enclosure

Ecc: John Feather, EPA OAQPS, feather.john@epa.gov
Keith Barnett, EPA OECA, barnett.keith@epa.gov
Brian Tusa, LDEQ, Surveillance Division Administrator, brian.tusa@la.gov

ENCLOSURE

Mosaic Fertilizer, LLC – Faustina Plant, St. James, Louisiana
Alternative Monitoring Plan (AMP) For Site Specific Monitoring Plan (SSMP)
NESHAP Subpart BB

Mosaic Fertilizer, LLC (“Mosaic”) submitted information pertaining to their current performance evaluation of a required CMS during any performance test. The AMP includes a proposed change to the annual performance evaluation for parametric monitoring of the scrubbers associated with granular ammonium phosphate trains (the A Train, the B Train, and the C Train) listed in the SSMP in order to provide flexibility for actual plant operations and trained employee scheduling of the required performance evaluations.

The General Provisions of 40 CFR Part 63 Subpart A provide for approval of minor modifications to monitoring requirements at 40 CFR § 63.8(b)(1)(i), if the modification does not decrease the stringency of the relevant regulation, or is site-specific, and is made to reflect or accommodate the operational characteristics, physical constraints, or safety concerns of the facility.

Under the provisions of 40 CFR § 63.8(e)(4), a performance evaluation of a required CMS is to be conducted “*during any performance test*” required under § 63.7 in accordance with the applicable performance specification as outlined in the relevant standards (40 CFR 63, Subpart BB). Mosaic specifically proposes a change to the time frame by which performance evaluation must be conducted prior to any performance test. Mosaic explained in its email response dated September 17, 2021, that historically, CMS performance evaluations have taken an average of thirty (30) hours per emission unit to be completed. Also, due to the man-hours needed to complete the performance evaluations, the actual performance tests start later in the day, which increases the chance of encountering afternoon rain and extending the performance tests to the following day. Therefore, Mosaic has proposed that required performance evaluations occur within a five-day range prior to a performance test.

Mosaic’s proposal to conduct performance evaluations within a five-day range will allow more flexibility, without impact on the stringency of the requirements of the standard. Therefore, for each applicable monitoring requirement specified in the SSMP, EPA approves Mosaic’s request to conduct performance evaluations within a five-day range, rather than on the same day prior to the start of a performance test.

This approval is subject to the following conditions:

- 1) The Mosaic Faustina facility shall provide EPA with a copy of the revised site-specific monitoring plan at least 30 days before changing from the current regulatory monitoring requirements of 40 CFR §§ 63.8(e)(4) and 63.626(h). The revised plan will incorporate the approved alternative monitoring provisions outlined in this response. Please submit this information electronically to Kevin Kim at kim.kevin@epa.gov; and,
- 2) The Mosaic Faustina facility shall continue to satisfy all other applicable monitoring requirements outlined in the SSMP.

Finally, as provided at 40 CFR § 63.8(f)(3), EPA may require the use of another specified monitoring method, requirement, or procedure if EPA finds reasonable grounds to dispute the justification provided

for any exemption or any results obtained under this approved alternative monitoring method. If performance testing conditions change such that the evaluations cannot be completed within the approved alternate time frame, or the rule changes in a manner that conflicts with this conditional approval, then Mosaic must submit a request to revise the AMP, or comply with the modified rule as written.