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Under the "FACT SHEET"< reference is made to the escalating levels of adaptive management. It appears this would give the DOE unrestricted authority to interpret the regulations in any way they see fit.

One area of concern in the proposed changes, which could be needlessly costly to the chemical industry, with no thought regarding the cost-benefit ratio is on page 66, where reference is made to "construction of roofs over storage and working areas." For reasons of economics, storage areas in the fertilizer sector have always been under roofs. Reference herein is to roofs over the working areas. Placing roofs over all working areas could result in an extreme hardship in many of the smaller companies, forcing some out of business. In addition, it could result in giving the advantage to the ancient practice by farmers of injecting anhydrous ammonia directly into the ground. This practice allows up to 60% of the product to escape into the atmosphere. The more sophisticated method results in a product with a yield of nearly 100% utilization by the plants. The anhydrous ammonia process requires no roof, because no processing is required. The more sophisticated process requires considerable working area to produce a more efficient chemical mix. Thus, this element could encourage a polluting Management Practice to prevail over a Cleaner Management Practice. In high precipitation areas, open secondary containments are difficult to manage, while in low precipitation areas, they are quite practical.

There are several references to monthly vacuuming hard surfaces as a BMP. A more realistic Management Practice would be to vacuum hard surfaces anytime a spill has occurred. Vacuuming on a monthly schedule results in more opportunity for pollutants to enter the stormwater. In addition, the fertilizer business is seasonable and it would be ineffective to vacuum the surfaces when the plant has shut down, such as for winter.

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