

From: [Fred Morscheck](#)
To: [Guilfoil, Elena \(ECY\)](#)
Cc: [Jim Fitzgerald](#); [Alex McGregor](#)
Subject: Request to remove Ammonium Sulfate Fertilizer from TAP List in State of Washington
Date: Tuesday, January 08, 2019 2:23:27 PM

Dear Elena,

As the General Manager of Crop Nutrition for The McGregor Company, past president of the Far West Agrichemical Association, former board member of The Fertilizer Institute and a 43 year veteran of the crop input business here in Washington State I am requesting that after careful review of the information provided by fertilizer industry that Ecology remove ammonium sulfate as a toxic air pollutant regulated under Chapter 173-460 WAC.

The McGregor Company has been a supporter of the department of ecology's air quality program's responsible oversight of air pollutants and its effort to revisit the listing of ammonium sulfate on the TAP list. I think the information presented at the December 10, 2018 meeting in Kennewick, WA was new information that brought to light a whole new perspective on validity of ammonium sulfate being listed as a toxic air pollutant. In addition, comments from industry supported the safe handling and use of the product and the important role this fertilizer plays in the production of over hundred crops in our state.

In this age of Best Available Control Technology being used as a standard for controlling emissions I think the department should use a similar approach in its review of the toxic air pollutant list when it comes to evaluating whether ammonium sulfate should be listed as a toxic air pollutant. Ecology should take into consideration all of the Best Available Information, evaluate the credibility and applicability of that information and make an appropriate decision as to whether or not ammonium sulfate should be on the TAP list. If it does not meet the criteria you should not look to find a "work around" to fix the problem, you should address the issue head on either keep it on the list because the research and data support that decision or take it off the list for the same reason.

Elena, all of us here at The McGregor Company value the relationship we have with ecology and encourage you and your team to no longer consider ammonium sulfate as a toxic air pollutant regulated under Chapter 173-460 WAC

Regards,

Fred D. Morscheck

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