MANATEE COUNTY GOVERNMENT

ENVIRONMENTAL MANAGEMENT DEPARTMENT

October 18, 2001

Mr. A. A. Linero, P. E.
Administrator
New Source Review Section
Department of Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Re: DEP File No. 0810l99-001-AC (PSD-FL-318)
El Paso Manatee Energy Center
600 Megawatt Power Project

Dear Mr. Linero:

After reviewing the Manatee Energy Center, Intent to Issue Air Construction Permit and related documentation, Manatee County Environmental Management Department (EMD) is providing the following comments:

1. The proposed facility has been determined to be a major source of air pollution, since emissions of at least one regulated air pollutant (particulate matter, sulfur dioxide, nitrogen oxides, carbon monoxide or volatile organic compounds) exceeds 100 tons per year (TPY). The Department's technical evaluation and preliminary determination is that "emissions from the facility will not cause or contribute to a violation of any state or federal ambient air quality standard".

   The new federal standard for ozone has been established at a level equivalent to 85 ppb averaged over any 8-hour period. An area will be considered non-attainment if the average of the annual fourth highest ozone readings at a monitoring site for any three year period equals or exceeds 85 ppb. Based on DEP's monitoring data, the three year running average for ozone within Manatee County has been steadily increasing. Considering that the County is marginally meeting the ozone standard and, that the neighboring counties of Sarasota and Hillsborough have already exceeded the standard for years 1999-2001, Manatee County does not concur with the Department's evaluation that the facility will not cause or contribute to violation of ambient air quality standards.

   Please provide any additional information that will confirm the Department's position that these air quality standards will not be exceeded.

2. The design for the proposed facility includes a steam turbine generator and an unfired heat recovery steam generator capable of a maximum of 120MW. According to Chapter 403.503, F.S., steam or solar electrical generating facilities of less than **75 megawatts** [emphasis added] is exempt from the criteria under the Florida Electrical Power Plant Siting Act. What control systems will be used to ensure that the 75 MW threshold is not exceeded?

3. The proposed facility will employ cooling towers for the purpose of cooling and condensing steam. Much of this cooling water is evaporated and must be replaced. According to the Southwest Florida Water Management District (SWFWMD), the proposed location of the facility is within the Most Impacted Area (MIA) which prohibits the permitting of new groundwater withdrawals. Please provide details as to the source and quality of water to be used at the facility.

4. How will this new supplier of electrical energy interact with the current regional suppliers? Will this facility displace energy being supplied these existing facilities? Does this facility have a local client base or will the energy be transmitted outside the region? Will a "needs determination" evaluation be conducted? Due to the fact that Manatee County is marginally meeting the current ozone standard, we would support an offset or pollutant trading so that the development of this facility would not cause a net increase in air emissions.

5. The Tampa Bay Estuary Program (TBEP) is charged with ensuring that Bay conditions are protected and in some instances improved. The TBEP determined that excessive nitrogen loading to the Bay is of special concern. This nutrient causes algal blooms, decreased water clarity and generally degrades water quality, resulting in habitat and fisheries losses. Recent studies indicate that at least 29 percent of the Bay's total nitrogen load is from atmospheric deposition. Due to the proximity to the Bay and Terra Ceia Aquatic Preserve, it is essential that the applicant provide detailed information on expected depositional impacts from nitrogen components (NO_X and ammonia) and other pollutants, along with their plans to offset these impacts in order to meet the TBEP's goal of "holding the line" on pollutant inputs to the Bay. Why couldn't Best Available Control Technology (BACT) be replaced with Maximum Available Control Technology (MACT) in this sensitive area. For example, $SCONO_X$ is considered to be a better control device and does not contribute bio-available ammonia through "ammonia slip". Can the Department require MACT for facilities located in sensitive areas?

6. Although the proposal is for a predominantly gas- fired power plant, the permit would allow combustion of diesel fuel in a 2600 HP diesel-fired electric generator and a 250HP diesel water pump. The hourly emissions of criteria pollutants would be significantly greater. We question whether these increased emissions from the use of diesel fuel is acceptable in terms of cumulative effects of other regional and in-County sources?

7. In several sections, the permit requires that reports and notifications be submitted to the Department of Environmental Protection. We would ask that the Manatee County Environmental Management Department also is listed as a recipient of such reports, documents, and notifications, according to the same time frames required for submittal the Department.

We appreciate the opportunity to comment on this important project.

Sincerely,

Karen Collins-Flemming
Director

KCF:RCB

cc: County Commission members
Ernie Padgett, County Administrator
Jeff Stiensnyder, County Attorneys'
Office Rob Brown, Water Quality Administrator