STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING 2600 BLAIR STONE ROAD TALLAHASSEE, FLORIDA 32301



BOB GRAHAM GOVERNOR VICTORIA J. TSCHINKEL SECRETARY

April 2, 1981

Mr. Kent Williams, Chief
New Source Review Section
Air Facilities Branch
U. S. Environmental Protection
Agency, Region IV
345 Courtland Street
Atlanta, Georgia 30365

RE: PSD Permit Application - Sebring Utilities Commission (PSD-FL-071)

Dear Kent:

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Enclosed please find a copy of the proof of publication of the public notice, the public comments and the Department's response to the public comments and Final Determination for the subject project. We recommend that the applicant be granted Authority to Construct, subject to the conditions in the Final Determination.

Sincerely,

Lawrence A. George

Environmental Administrator

cc: Mr. Howard E. Short

LAG: caa

The Sebring News

Published Weekly SEBRING, HIGHLANDS COUNTY, FLORIDA

STATE OF FLORIDA COUNTY OF HIGHLANDS:

Bonose By Lawyers allery Corp.

Before the undersigned authority personally appeared	***************************************
Richard A. Birt	
who on oath says that he is Controller of THE SEBRING paper published at Sebring in Highlands County, Florida of advertisement, being a Proof of Publication	NEWS, a weekly news- that the attached copy
in the matter ofPublic Notice	
in the	
was published in said newspaper in the issues of2-	57-81
Affiant further says that the SEBRING NEWS is a newspa in Highlands County, Florida, and that the said newspa continuously published in said Highlands County, Florida been entered as second class mail matter at the post of county, Florida, for a period of one year next preceding the attached copy of advertisement; and affiant further says nor promised any person, firm or corporation any discou- refund for the purpose of securing this advertisement for newspaper.	tper has heretofore been, each Thursday and has office in Sebting, in said he first publication of the that he has neither paid nt, rebate, commission or publication in the said
Sworn to and subscribed before me this 25th day of February	10/27
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PUBLIC NOTICE

A new air pollution source is proposed for construction by the Sebring Utilities Commission near the town of Sebring, in Highlands County, Florida. The source consists of two slow-speed diesel electric consists of two slow-speed deset electric generating units. It will increase emissions of air pollutants by the foslowing amounts in toos per year: PM 142; SO: 1,864; NOx 4,804; CO 832; HC 378; Other Negl.

By authority of the U.S. Environmental Protection Agency, the Florida Department of Environmental Regulation (FDER) has reviewed the proposed construction under Federal Prevention of Significant Descriptation Regulations (40 CFR \$2.21). The FDER has made a preliminary determination that the construction can be approved provided certain conditions are met. A summary of the basis for this determination and the application for a permit submitted by the Sebring Unlittes Commission are available for public review in the following FDER offices:

South Florida District 2269 Bay Street Fort Myers, Florida

Bureau of Air Quality Management 2600 Bizir Stone Road

Tallahassee, Florida 32301 The maximum percentage of allowable increment consumed by the proposed construction is as follows: Class II

24-Hour 3-Hour PM 5% SO: 13% N/A 22% 31% Any person may submit written comments to FDER regarding the preposed construction. All comments postmarked not later than 30 days from the date of this notice will be considered by FDER in making a final determination regarding approval for construction of this source. These comments will be made available for public review at the above locations. Furthermore, a public hereing can be requested by any promu-Bannets of the motion of while its mass of the arrest that define. Letters should be corrected to

Ms. Teresa Heron, Review Engineer Bureau of Air Quality Mangazoment Department of Environmental Regulation 2000 Biole Socient and

Taliahas me, Florica Gallia

Feb. 25, 1981

Response to Public Comment Sebring Utilities Commission (PSD-FL-071)

Comments were received from Tommie A. Gibbs, Chief, Air Facilities Branch, EPA Region IV. EPA questioned the Department's Preliminary Determination in several areas. The areas of question and DER's responses are as follows:

Comment 1

The 24-hour SO₂ background value should not be substituted for the 3-hour value. The 3-hour data should be directly obtainable from the continuous monitor. Bubbler data is presently not acceptable. If it can be shown that the source is isolated under the definition, background levels provided in the guidance document would then be acceptable over the monitored data.

Response 1

The SO₂ monitor near the Sebring site is of the bubbler type and 3-hour data is not obtainable. The 3-hour background concentration has thus been obtained using a multiplying factor derived from the Guidelines for Air Quality Maintenance Planning and Analysis, Volume 10 (Revised) which relates a maximum 3-hour average concentration to a maximum 24-hour average concentration. Multiplying the 24-hour background concentration (50 ug/m³) by this factor yields a 3-hour background value of 250 ug/m³.

Comment 2

The annual average background level for particulate matter was based on the average of the last three years. This is unacceptable, the highest second high value should be used as the background value.

Response 2

The particulate matter background concentrations for the annual and 24-hour periods have been changed to the values associated with the maximum annual and maximum secondhighest 24-hour concentrations at the representative monitoring station.

Comment 3

A condition should be added to the permit limiting the fuel throughput rate (lbs/hr).

Response 3

DER has added a condition limiting the fuel throughput rate to 9,199.5 pounds per hour per unit.

Comment 4

Table IV lists the NAAQS Analysis Results. The total projected air quality equals the NAAQS for CO and NO, this should be corrected or clarified.

Response 4

Table V (previously Table IV) has been corrected to reflect projected air quality pollution concentrations for CO and NO $_{\rm x}$ to be much less than the NAAQS.

Comment 5

In the BACT analysis, the last paragraph for each pollutant discussion says "EPA agrees". In future Preliminary Determinations this should be stricken because EPA will not endorse a permit until it is signed. The same applies for the conclusions found on page 24; the EPA proposal for approval should be replaced by "Florida Department of Environmental Regulation proposes a Preliminary Determination of approval."

Response 5

DER has made the changes as requested.

Comment 6

A copy of all review materials should be made available for public inspection in the closest town hall to the proposed site.

Reponse 6

The review materials were made available only at the places cited in the Public Notice. DER will consider the above request in processing future permit applications.

Comment 7

GEP calculations should be shown in the Preliminary Determination.

Response 7

The GEP stack height calculations have been added to the text of the Final Determination.

Comment 8

The BACT economic analysis should be expanded for the SO demonstration. This analysis should compare on a $\$/\tan^2$ basis, the additional costs that would be realized if a lower sulfur oil were to be required.

Response 8

The economic analysis has been expanded in the SO₂ BACT analysis section of the Final Determination. Table IV has been added to support this analysis.

Conclusion

The comments received were considered as indicated above in the development of the Department's Final Determination for the proposed construction of two slow-speed diesel engines by the Sebring Utilities Commission.