



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET
ATLANTA, GEORGIA 30365

MAR 18 1981



REF: 4AH-AF

Mr. Steve Smallwood, Chief
Bureau of Air Quality Management
FL Dept. of Environmental Regulation
2600 Blair Stone Road
Tallahassee, FL 32301

Dear Mr. Smallwood:

We have reviewed your Prevention of Significant Deterioration Preliminary Determination dated February 25, 1981 regarding the proposed construction of two slow-speed diesel generating units by Sebring Utilities in Sebring, Florida. We offer the following comments:

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.
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.
3. A condition should be added to the permit limiting the fuel throughput rate (lbs/hr).
4. Table IV lists the NAAQS Analysis Results. The total projected air quality equals the NAAQS for CO and NO_x, this should be corrected or clarified.
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."

- ✓ 6. A copy of all review materials should be made available for public inspection in the closest town hall to the proposed site.
7. GEP calculations should be shown in the Preliminary Determination.
- ✓ 8. The BACT economic analysis should be expanded for the SO₂ demonstration. This analysis should compare on a \$/ton basis, the additional costs that would be realized if a lower sulfur oil were to be required.

If you have any questions concerning this matter, please contact Bill Wagner of my staff at 404/881-4552.

Sincerely yours,

Tommie A. Gibbs

Tommie A. Gibbs
Chief
Air Facilities Branch

cc: Howard Short
Sebring Utilities Commission
P. O. Box 971
Sebring, FL 33870