



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

MAY 15 2003

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Mr. A. A. Linero, P.E.
Florida Department of Environmental Protection
Mail Station 5500
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

BUREAU OF AIR REGULATION

Dear Mr. Linero:

Thank you for sending the prevention of significant deterioration (PSD) preliminary determination and draft PSD permit for a proposed modification of the Lee County Resource Recovery Facility. The proposed modification consists primarily of adding a third municipal waste combustor.

We have the following comments on the preliminary determination and draft permit:

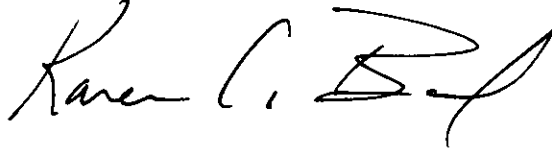
1. We generally support the conclusions reached by the Florida Department of Environmental Protection (FDEP) and the draft permit conditions reflecting these conclusions.
2. Regarding FDEP's assessment of selective catalytic reduction (SCR) for control of nitrogen oxides (NO_x) emissions, the preliminary determination does not contain a definitive conclusion that SCR is inappropriate for the proposed municipal waste combustor. SCR technology has improved dramatically in recent years, as has the robustness of the technology when used in harsh combustion environments. Commensurate with the improvement in SCR technology and its more widespread use, costs have also tended to decline. Furthermore, as FDEP has researched, use of SCR with municipal waste combustors is widespread in Europe. We further understand that the NO_x emissions rates achieved by operators of SCR-equipped municipal waste combustors in Europe are generally lower than the NO_x emissions limits proposed for the Lee County project. Therefore, we would have supported FDEP had FDEP proposed emissions limits based on use of SCR. Furthermore, we encourage additional consideration of SCR should continuing discussions between FDEP and Lee County move in the direction of raising the NO_x emissions limits in the draft permit based on the possibility that use of selective non-catalytic reduction (SNCR) technology may not be able to achieve the draft permit limits.
3. With regard to SNCR technology, we believe that the SNCR NO_x control efficiency assumed by FDEP in developing the draft permit NO_x emissions limits is consistent with information in U.S. Environmental Protection Agency (EPA) documentation on

control of NO_x emissions. Advances in SNCR design and in the design of combustor features and operating practices to minimize initial NO_x formation support the practicability of achieving the limits in the draft permit at reasonable cost. If concern remains about the ability to achieve the limits in the draft permit, added consideration could be given to use of flue gas recirculation and/or water-cooled grates coupled with SNCR.

4. The draft PSD construction permit for the proposed new Lee County municipal waste combustor is currently in a 30-day public comment period. Should less stringent NO_x emissions limits than those currently under review become a possibility, our position is that the public comment period will have to be re-opened before less stringent limits can be made final. EPA would also be eligible to provide additional comments if the public comment period is re-opened.

If you have any questions concerning the comments in this letter, please call Jim Little at 404-562-9118.

Sincerely,

A handwritten signature in black ink, appearing to read "Karen C. Borel". The signature is fluid and cursive, with a large initial "K" and "B".

Karen C. Borel
Acting Chief
Air Permits Section