



U.S. FISH & WILDLIFE SERVICE
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From: Ellen Porter

Subject: CPV Gulfcoast, Ltd. PSD-FL-300

0810194-002-

AC

We have reviewed the Prevention of Significant Deterioration Application for CPV Gulfcoast, Ltd. Proposed combined-cycle 250 MW power generation facility in Manatee County. The facility is located 97 km south of Chassahowitzka Wilderness, a Class I air quality area administered by the U.S. Fish and Wildlife Service. Emissions increases include 126 tons per year (tpy) of nitrogen oxides (NO_x), 76 tpy of sulfur dioxide, and 102 tpy of PM-10.

CPV is proposing to use selective catalytic reduction (SCR) to control NO_x emissions to 3.5 ppm while burning gas and 10 ppm while burning oil. We agree that this represents best available control technology.

CPV evaluated potential impacts to Class I increments. Predicted impacts were below the significant impact levels for nitrogen dioxide, sulfur dioxide, and PM-10. CPV also evaluated its potential contribution to haze at Chassahowitzka. Their analysis, using IWAQM Phase 2, predicted a 2% change in light extinction, less than the 5% screening level recommended by FWS. However, CPV located its receptors for the analysis incorrectly, placing all receptors within Chassahowitzka instead of using the circular ring of receptors described in the IWAQM Phase 2 document. Because CPV's emissions are relatively low and well-controlled with SCR, and the facility is 97 km from the Class I area, we believe that the project has low potential to

contribute significantly to haze at Chassahowitzka. Therefore, we will not require CPV to revise their analysis. However, future applicants should be advised to follow the IWAQM Phase 2 recommendations.

Thank you for giving us the opportunity to comment on this project.