



United States Department of the Interior



FISH AND WILDLIFE SERVICE
75 Spring Street, S.W.
Atlanta, Georgia
30303

June 12, 1992

RECEIVED

JUN 18 1992

Division of Air
Resources Management

Mr. C. H. Fancy
Chief, Bureau of Air Regulation
Florida Department of
Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Dear Mr. Fancy:

We have completed our review of the material that you sent us regarding Ridge Generating Station Limited Partnership's (RGSLP) proposal to construct and operate a 45-MW electric power generating station in Polk County. The Ridge Generating Station would be located near Lakeland, approximately 100 km southeast of the Chassahowitzka Wilderness Area (WA), a Class I air quality area administered by the Fish and Wildlife Service. The facility would consist of one boiler designed to burn a mixture of fuels including wood, tires, and landfill gas. This fuel mix would result in significant emissions of sulfur dioxide (SO₂), nitrogen oxides, volatile organic compounds, particulate matter, lead, and beryllium. Based on concerns we have expressed in previous letters to you regarding increment consumption at the Chassahowitzka WA, we are particularly concerned about SO₂ emissions from the proposed facility.

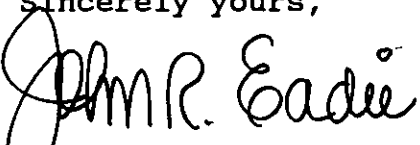
We were pleased to see that you required RGSLP to perform extensive SO₂ increment modeling analyses for the Chassahowitzka WA. Following consultations with us, RGSLP performed long range transport modeling using MESOPUFF II to evaluate their impact alone, plus their impact combined with other SO₂ increment-consuming sources, on the wilderness area. After reviewing the results of the modeling analyses, we are satisfied that the proposed Ridge Generating Station would not contribute significantly to an increment exceedance at the Chassahowitzka WA.

In addition, we agree that the proposed dry scrubber/baghouse and selective noncatalytic reduction systems represent best available control technology to minimize emissions from the boiler. Regarding the air quality related values analyses, RGSLP sufficiently addressed potential impacts to vegetation, soils and visibility in the wilderness area. However, RGSLP

failed to address potential impacts to freshwater creeks and related wildlife in the wilderness area from acid deposition. Nevertheless, based on the distance from the Chassahowitzka WA and the modeling results, we do not anticipate that resources will be adversely affected by emissions from the proposed facility.

We appreciate your continued cooperation in requiring applicants to adequately assess the impacts of new emissions on the resources in our Class I areas. If you have any further questions regarding our comments on the Ridge Generating Station application, please contact Ms. Tonnie Maniero of our Air Quality Office in Denver at 303/969-2071.

Sincerely yours,


for James W. Pulliam, Jr.
Regional Director

cc:
Ms. Jewell Harper, Chief
Air Enforcement Branch
Air, Pesticides and Toxic Management Division
U.S. EPA, Region 4
345 Courtland Street, NE
Atlanta, Georgia 30365

J. Reynolds
C. Holladay
B. Thomas, SW Dist.