

# RIDGE GENERATING STATION, L. P.

General Partners



DECKER ENERGY-RIDGE, INC.



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RECEIVED

March 27, 1992

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Division of Air  
Resources Management

Florida Department of Environmental Regulation  
Division of Air Resources Management  
Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

Attention: C. H. Fancy, P.E.  
Chief, Bureau of Air Regulation

Re: Permit Application AC 53-206244, PSD-FL-183  
Ridge Generating Station

Dear Mr. Fancy:

The letter from your office dated January 17, 1992, raised six questions regarding the air emissions permit application for the Ridge Generating Station project. Our letter to you dated March 19, 1992, provided responses to the first five of these questions. A summary response to the sixth question is provided below (along with a repetition of the question for your convenience). We have scheduled a meeting on April 1, 1992, with Tom Rogers and Cleve Holladay of the Air Modeling and Assessment Section to discuss our response in detail. A written detailed response will also be provided.

6. The predicted maximum SO<sub>2</sub> 24-hour and 3-hour concentrations in the Chassahowitzka PSD Class I area due to the Ridge Generating Station boiler emissions are greater than the National Park Service proposed 24-hour and 3-hour significant impact levels of 0.07 and 0.48 µg/m<sup>3</sup>, respectively. Please perform a cumulative 24-hour and 3-hour SO<sub>2</sub> Class I increment analysis as required by the National Park Service. An air quality related values (AQRVs) analysis should also be done since there are presently no significant impact levels that exempt a proposed PSD project from performing this analysis. The AQRVs analysis includes impacts to soils, vegetation, and wildlife.

## ADDITIONAL AIR QUALITY MODELING ANALYSIS

An additional analysis of SO<sub>2</sub> impacts at the Chassahowitzka PSD Class I area has been developed. This additional impact analysis is based on the use of the standard ISCST model and a long-range transport model, the MESOPUFF II model. The following

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Mr. C. H. Fancy  
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conclusions result from this additional analysis: (1) Predicted maximum 3-hour SO<sub>2</sub> concentrations at the Chassahowitzka PSD Class I area due to Ridge Generating Station (RGS) emissions are less than the proposed National Park Service significant impact level of 0.48 µg/m<sup>3</sup>. (2) Predicted maximum 24-hour SO<sub>2</sub> concentrations due to RGS emissions exceed the proposed National Park Service significant impact level of 0.07 µg/m<sup>3</sup>, but only on a very infrequent basis. Furthermore, during the meteorological conditions when RGS emissions result in concentrations above the proposed significant impact level, the cumulative predicted maximum 24-hour concentrations due to all PSD sources identified by DER are less than the PSD Class I increment. Therefore, RGS emissions neither cause nor contribute to a violation of the PSD Class I increment at the Chassahowitzka PSD Class I area.

#### AIR QUALITY RELATED VALUES ANALYSIS

An air quality related values analysis has also been developed. The conclusions reached from this analysis are that the RGS project (1) will not diminish the national significance of the Chassahowitzka National Wilderness Area (which comprises the PSD Class I area), (2) will not impair the quality of the visitor experience at this area, and (3) will not impair the structure and functioning of the ecosystems within the area.

Please contact Matt Killeen at 1-800-682-0026 if you have any questions or comments.

Sincerely,



Richard C. Stone  
Project Manager

MPK118:cjb

cc: John Reynolds - FDER  
Cleve Holladay - FDER  
Matt Killeen - WESI  
Macauley Whiting - Decker  
*B. Thomas, SW Dist*  
*G. Harper, EPA*  
*C. Shauer, NPS*