



BLACK & VEATCH

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Fort Pierce Utilities Authority
PSD Application for Unit 9
NOx Background Data

B&V Project 16589
B&V File 32.0000
July 19, 1990

FEDERAL EXPRESS

Florida Department of Environ. Regulation
Bureau of Air Quality
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Attention: Mr. Cleveland Holladay

Gentlemen:

Black & Veatch is assisting the Fort Pierce Utilities Authority in repermitting the H.D. King Unit 9 combined cycle combustion turbine. A Workplan and permit application which describes the project and the Ambient Air Quality Impact Analysis methodology is currently being developed.

Preliminary modeling has shown that the annual NOx impact from Unit 9 would exceed the 1 ug/m³ PSD ambient significance level but is less than the 14 ug/m³ PSD monitoring threshold. This modeling showed that the NOx significant impact area extends only 300 meters from the source which is located at UTM-E 566.8 km, UTM-N 3036.3 km. Black & Veatch requests that the FDER provide an inventory of interacting PSD and NAAQS NOx sources in St. Lucie county that may impact significantly on the modeled significant impact area. Please indicate which sources should be considered for the PSD increment analysis.

As you know, a NAAQS analysis requires that a representative background concentration be added to the modeled impacts. Black & Veatch is requesting that the FDER approve the use of the West Palm Beach monitoring data as representative background. Since West Palm Beach is the closest monitor and is significantly more urbanized than Fort Pierce, this station represents a conservatively high background for a Fort Pierce source. The Ambient Air Quality In Florida 1989 shows that the annual arithmetic mean at the West Palm Beach monitor was 24 ug/m³ in 1989. Black & Veatch requests that 24 ug/m³ be approved for use as the NOx background in the NAAQS analysis.

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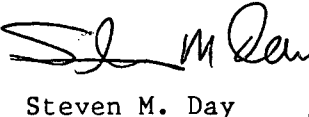
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Due to project time constraints, an expeditious response to these requests would be greatly appreciated. If you have any questions regarding these requests please contact Mr. Chris Wikle at (913) 339-2802 or me at (913) 339-2880.

Very truly yours,

BLACK & VEATCH



Steven M. Day

cc: Harry Schindehette - FPUA
Barry Andrews - FDER Tallahassee
Stephanie Brooks - FDER Southeast District