

Holladay, Cleve

From: Meredith_Bond@fws.gov
Sent: Tuesday, June 19, 2007 3:58 PM
To: Holladay, Cleve
Cc: Catherine_Collins%FWS@fws.gov; Tim_Allen@fws.gov; Sandra_V_Silva@fws.gov; James_Burnett@fws.gov
Subject: Comments on application package - Taylor Energy Center

Cleve,

This e-mail is being written and sent by Catherine Collins, using Meredith's e-mail during our temporary computer outage.

As a follow-up to our conversation a few weeks ago, and this morning's conference call with Taylor Energy, FDEP, and us, FWS is providing the following comments regarding the completeness of the Prevention of Significant Deterioration permit application package received from Taylor Energy on May 25, 2007.

On June 6th and 19, we discussed four areas which we have comments: engineering Best Available Control Technology (BACT) limits, Air Quality modeling analysis, sulfur and nitrogen deposition, and mercury impacts.

1. Engineering BACT limits

The Sulfur Dioxide limit of 0.055 Lb/MMBtu is not as conservative as the Glades project limit of 0.046 lb/MMBtu. The limit could be lower. The company explained the justification for the higher short-term limit and agreed to provide documentation. In addition the company agreed to providing explanation for the 24-hour block limits found on page 5-65 and 5-67 in the permit application.

2. Air Quality Modeling

We are unable to consider the use of the "VISTAS" version of the CALMET solution. Taylor could proceed with the modeling using one of the following methods:

- a. Reproduce the entire CALMET (3 years) data set using the regulatory version. Presently, the regulatory version is CALMET 5.53a, CALPUFF 5.711a, POSTUTIL 1.4 and CALPOST 5.51. Our preference would be for the company to continue to use the modern (2001 to 2003) years of MM5 as utilized by VISTAS.
- b. Taylor can wait and use the new regulatory version of the CALMET/CALPUFF model suite when it is released. The company will need to check with EPA and the State of Florida to determine if this model is acceptable.

The company should use either a Rayleigh value of 10 with the old IMPROVE equation, or site specific data with the new IMPROVE equation. VISTAS offers a spreadsheet for utilizing the new equation option.

Because there may be near field impacts, the company needs to provide a VISCREEN/PLUVUE plume blight analysis.

3. Sulfur & Nitrogen Deposition

In reviewing the modeled deposition results submitted with the May 2007 application, the predicted sulfur and nitrogen deposition were each lower than what we typically see for a facility of this size and distance from a Class I area. Please check into the results and provide any explanation.

4. Mercury

On June 6th, we discussed that the PSD permit application had little information regarding mercury emissions. On June 18th, the company provided additional information regarding mercury issues. At the present time, we are reviewing the additional information. We have been in contact with the Refuge Manager at St. Marks NWR,

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and we are working with him to ensure that mercury issues related to the Taylor Energy Center project are adequately addressed.

We are encourage that we are having discussions about the air quality impact to St. Marks Wilderness Area and look forward to continuing our dialogue. Please contact either Tim Allen or me if you have further questions.

Catherine

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