



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4
ATLANTA FEDERAL CENTER
100 ALABAMA STREET, S.W.
ATLANTA, GEORGIA 30303-3104



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BUREAU OF
AIR REGULATION

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Mr. A. A. Linero
Bureau of Air Regulation
Florida Department of Environmental
Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

SUBJ: Kissimmee Utility Authority (PSD-FL-182)

Dear Mr. Linero:

This is to acknowledge receipt of your proposed amendments to the above referenced Prevention of Significant Deterioration (PSD) permit by letter dated September 30, 1996. The proposed amendments relate to the emissions testing requirements which currently exist in the PSD permit. We have reviewed the package as requested and have the following comments on the draft air construction permit for the Kissimmee Utilities Cane Island facility:

1. Based upon Condition No. 8, it appears that an initial test for sulfuric acid mist is not required. Since the permit contains an emission limit for sulfuric acid mist, it is recommended that the Department of Environmental Protection review Condition No. 8 to determine if they actually intended to exempt Kissimmee Utilities from the requirement to conduct an initial compliance test for sulfuric acid mist.
2. It is recommended that the language addressing annual testing provisions in Condition No. 8 be simplified. This condition lists five pollutants for which annual testing is not required. Based upon its understanding of the proposed revision, it appears to Region 4 that the only pollutants for which annual testing will be required are SO₂ and CO. Therefore, Region 4 believes that it would be simpler and less confusing if Condition No. 8 were revised to identify the pollutants for which testing is required, rather than the ones for which testing is not required.

Thank you for the opportunity to review and comment on this package. If you have any questions on these comments, please contact David McNeal or Gregg Worley of my staff at (404) 562-4300.

Sincerely yours,

Paul Stagner for

R. Douglas Neeley

Chief

Air and Radiation Technology Branch

Air, Pesticides and Toxics

Management Division