



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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ATLANTA, GEORGIA 30303-8960

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BUREAU OF AIR REGULATION

4 APT-ARB

Mr. A. A. Linero, P.E.  
Administrator  
New Source Review Section  
Florida Department of Environmental Protection  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

SUBJ: Prevention of Significant Deterioration (PSD) Permit Application for United Technologies Corporation (UTC) - Pratt & Whitney located in Jupiter (Palm Beach County), Florida  
PSD-FL-294

Dear Mr. Linero:

Thank you for submitting the above referenced PSD permit application (dated June 21, 2000) to the U.S. Environmental Protection Agency (EPA) for comments. The proposed project involves the construction and operation of a test cell for liquid oxygen (LOX)/kerosene-propelled rocket engines at the E-5 rocket test area of the existing West Palm Beach facility. The new test cell will consist of the following systems: LOX and kerosene supply tanks (64,000 and 36,000-gallon capacities, respectively), engine containment can, water-cooled silencer, exhaust gas deflector, lined cooling water retention pond, and elevated water supply tank (1 million-gallon capacity). The total emissions increase of carbon monoxide (CO) from the proposed project is above the significance threshold requiring PSD review.

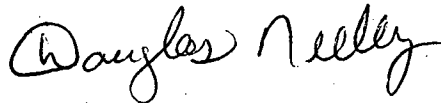
Based on a review of the permit application, EPA has the following comments:

1. It appears that the permit application (see Section 3.4.1) has incorrectly exempted the 36,000-gallon kerosene storage tank from being subject to 40 C.F.R. Part 60, Subpart Kb. Pursuant to §60.110b(c), the tank will be subject only to the recordkeeping requirements of §60.116b(a) and (b) because the capacity is between 75 and 151 cubic meters (approximately 19,813 and 39,890 gallons, respectively) and the maximum true vapor pressure of kerosene is less than 15 kilopascals (approximately 2.18 pounds per square inch).

2. Compliance with the CO national ambient air quality standard (NAAQS) has been demonstrated on the basis that there will only be 12 tests per year with a duration of 240 seconds each. Therefore, EPA highly recommends that enforceable limits regarding the number and duration of tests be incorporated into the PSD permit to avoid any potential exceedance of the NAAQS. Also, without inherent or expressed limitations, other pollutants may become subject to PSD review as a result of their potential emissions increases being greater than the respective significance thresholds.

Thank you for the opportunity to comment on the UTC - Pratt & Whitney permit application. If you have any questions regarding these comments, please direct them to either Art Hofmeister at (404) 562-9115 or Jim Little at (404) 562-9118. EPA will inform the Florida Department of Environmental Protection by separate correspondence should there be any comments or suggestions regarding the applicant's ambient air quality impact analysis.

Sincerely,



R. Douglas Neeley  
Chief

Air and Radiation Technology Branch  
Air, Pesticides and Toxics  
Management Division

cc: G. Reynolds  
C. Halladay  
B. Susi, Rolden  
D. Brojicani, PBC RD  
SED  
NPS