

Interoffice Memorandum

TO: Hamilton S. Oven
THRU: Clair Fancy *CS*
FROM: Tom Rogers *TR*
DATE: February 9, 1987

FOR ROUTING TO OTHER THAN THE ADDRESSEE	
To: <i>Barry</i>	LOCTN: _____
To: _____	LOCTN: _____
To: _____	LOCTN: _____
FROM: _____	DATE: _____

SUBJECT: Pasco County Resource Recovery Facility-
Cooling Tower Particulate Emissions

At the January 28 meeting concerning the proposed Pasco County Resource Recovery Facility, I promised the county and its consultants that I would detail the procedures for modeling cooling towers. After having further discussions with EPA on this matter I have concluded that particulate emissions from the proposed cooling towers do not need to be modeled. EPA is primarily concerned with large salt water cooling towers. Given that the cooling water to be used at the proposed facility will be recycled water from the treatment plant and that the amount of water used in the cooling process will certainly be small compared to a large power plant, quantifiable particulate emissions, if any, should not be significant. A brief statement of this fact should be included by the county in their application.

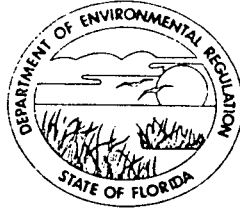
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STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32399-2400



BOB MARTINEZ
GOVERNOR
DALE TWACHTMANN
SECRETARY

March 23, 1987

Mr. Raymond C. Porter
Camp, Dresser & McKee, Inc.
One Center Plaza
Boston, Massachusetts 02108

Dear Mr. Porter:

Re: Pasco County Resource Recovery Project
Response to CDM Letter of March 11, 1987

The department has reviewed the results of your screening modeling and your subsequent request for exemption from the preconstruction monitoring requirements. Based on these modeling results, as presented in your March 11, 1987 letter, the department concurs with your request, and thus, will not require preconstruction ambient monitoring for any pollutant.

The conservative technique used to establish the background concentrations at the rural Pasco County project site is acceptable. Although these values do not reflect the actual background in the immediate vicinity of the proposed site, they are acceptable for the purpose of establishing reasonable assurance that ambient air quality standards will not be exceeded.

The department has also reviewed your proposed refined modeling protocol. We concur with that protocol with the following exceptions:

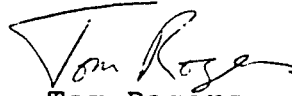
1. The points of maximum concentration for the 100 meter resolution refined modeling should include the days and receptors having (a) the highest concentration, (b) the high, second-highest concentration, (c) the second-highest concentration at the location of the highest concentration, and (d) the highest concentration at the location of the high, second-highest concentration. The purpose of this exercise is to account for the possibility that the highest and second-highest days may flip-flop.
2. If applicable, building wake downwash should be included in the modeling.

Mr. Raymond C. Porter
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3. Your use of the term "PSD significant level" is assumed to be referring to the definition of "significant impact" as written in Rule 17-2.100(170) of the Florida Administrative Code.

If you have any questions on the above comments please call me at (904)488-1344.

Sincerely,



Tom Rogers
Meteorologist
Bureau of Air Quality
Management

TR/ks

cc: Buck Oven
Don Elias
David Dee
Lew Nagler