

ATTACHMENT 6



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 2
290 BROADWAY
NEW YORK, NY 10007-1866

AUG 31 2010

Mr. Kevin Scott
Associate Project Manager II
Arcadis
801 Corporate Center Drive Suite 300
Raleigh NC 27607

Re: Air Quality Modeling Protocol for the Energy Answers International - Puerto Rico
Resource Recovery Power Plant Project

Dear Mr. Scott:

The U.S. Environmental Protection Agency, Region 2 Office, reviewed the April 2010 PSD Air Quality Modeling Protocol for the proposed Energy Answers Resource Recovery facility in Arecibo, Puerto Rico. At our request, the protocol contains an analysis to demonstrate that the one year of meteorological data collected in Arecibo by PREPA Cambalache in 1992 -1993 is representative of the proposed site. This was done by examining the spatial and temporal meteorological conditions between Arecibo and San Juan for the same time period and further showing consistency over time. However, the protocol proposes to use 5 years of recent meteorological data measured in San Juan. While we agree that the winds at the two sites are comparable we do not believe that the land use in San Juan is representative of that in Arecibo. This would result in differences in the turbulence parameters used in AERMOD. We believe that a better alternative in this case is to use the one year of site specific meteorological data collected in Arecibo. As allowed by the EPA Guideline on Air Quality Models, either one year of site specific data or 5 years of National Weather Service data is acceptable for demonstrating compliance with air quality standards.

Regarding the calculations of the surface characteristics, it seems that the values are based on the entire circular area rather than broken down by sector. In addition, while we agree that the sectors do not need to be evaluated by season in this case, they should at least be evaluated by 2 six month periods describing winter verses summer conditions.

A correction needs to be made to the wind roses. The wind roses provided are flow vectors depicting where the winds are blowing to. This is opposite to the typical convention used in modeling. For ease in review, please correct these graphics with the winds rotated 180 degrees to indicate where the wind is blowing from and ensure that the wind direction is properly characterized in the modeling analysis.

As a resource recovery facility the facility is cable of burning numerous fuels. This facility will burn primarily refuse derived fuel. It will also burn wood waste and tire derived fuel. Please ensure that impacts from all these scenarios are addressed.

Please ensure that impacts from supplement units such as emergency generators or cooling towers are included in the modeling analysis.

The protocol states that you will send us a preconstruction ambient air monitoring waiver request but you also note some existing monitoring sites for possible use. Please note that preconstruction monitoring is required for all PSD affected pollutants such as Fluorides where data may not exist. Therefore, a first step is to perform a modeling analysis that assesses the impacts from the facility relative to the significant monitoring concentrations found in 40 CFR Part 52.21. In this regard, Table 3-1 and 3-2 are incomplete. Further if existing data is used, there needs to be 3 years of current, representative data rather than the 1 year proposed.

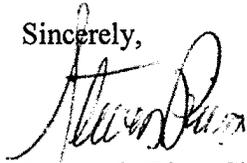
Table 4-1 references several footnotes but the footnotes are not present.

Although the protocol mentions that you will consult the FLM regarding the Endangered Species Act requirements, we want to clarify that these requirements are not limited to Class I areas.

As you now know the protocol also needs to address the new 1 hour NO₂ and 1 hour SO₂ NAAQS. Guidance for modeling these pollutants are provided on EPA's SCRAM website. In addition, guidance for modeling PM_{2.5} was issued by EPA last March 23, 2010. This guidance must be followed.

While many of these points have already been discussed with you on an August 25, 2010 conference call the protocol needs to include this information in order to be complete and approvable. If you have any questions regarding this letter please contact, Ms. Annamaria Coulter of my staff at (212) 637-4016.

Sincerely,



Steven C. Riva, Chief
Permitting Section,
Air Programs Branch

cc: Holly Herner, Arcadis