TECHNICAL EVALUATION
&
PRELIMINARY DETERMINATION

APPLICANT

Tampa Electric Company
13031 Wyandotte Road
Gibsonton, Florida 33534-5833

Big Bend Station
Facility ID No. 0570039

PROJECT

Project No. 0570039-140-AC
Application for Minor Source Air Construction Permit
Unit 4 Water Wall Tube Rework Project

COUNTY

Hillsborough County, Florida

PERMITTING AUTHORITY

Florida Department of Environmental Protection
Division of Air Resource Management
Permit Review Section
2600 Blair Stone Road, MS#5505
Tallahassee, Florida 32399-2400

April 8, 2022

1. GENERAL PROJECT INFORMATION

1.1. Air Pollution Regulations

Projects at stationary sources with the potential to emit air pollution are subject to the applicable environmental laws specified in Section 403 of the Florida Statutes (F.S.). The statutes authorize the Department of Environmental Protection (Department) to establish regulations regarding air quality as part of the Florida Administrative Code (F.A.C.), which includes the following applicable chapters: 62-4 (Permits); 62-204 (Air Pollution Control – General Provisions); 62-210 (Stationary Sources – General Requirements); 62-212 (Stationary Sources – Preconstruction Review); 62-213 (Operation Permits for Major Sources of Air Pollution); 62-296 (Stationary Sources – Emission Standards); and 62-297 (Stationary Sources – Emissions Monitoring). Specifically, air construction permits are required pursuant to Chapters 62-4, 62-210, and 62-212, F.A.C.

In addition, the U. S. Environmental Protection Agency (EPA) establishes air quality regulations in Title 40 of the Code of Federal Regulations (CFR). Part 60 specifies New Source Performance Standards (NSPS) for numerous industrial categories. Part 61 specifies National Emission Standards for Hazardous Air Pollutants (NESHAP) based on specific pollutants. Part 63 specifies NESHAP based on the Maximum Achievable Control Technology (MACT) for numerous industrial categories. The Department adopts these federal regulations in Rule 62-204.800, F.A.C.

1.2. Glossary of Common Terms

Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of this permit.

1.3. Facility Description and Location

The Big Bend Station is an existing electric power plant categorized under Standard Industrial Classification Code No. 4911. The existing facility is in Hillsborough County (**Figure 1**) at 13031 Wyandotte Road in Gibsonton, Florida (**Figure 2**). The UTM coordinates of the existing facility are Zone 17, 363.15 kilometers (km) East, and 3,074.91 km North. This site is in an area that is in attainment (or designated as unclassifiable) for all air pollutants subject to Ambient Air Quality Standards (AAQS).

Figure 1. Location of Hillsborough County in Florida.

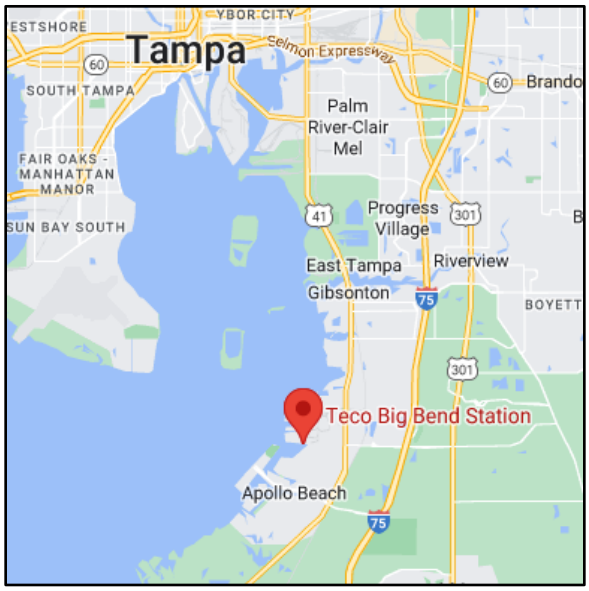

Figure 2. Map Location of Big Bend Station.

The Tampa Electric Company (TEC) Big Bend Station (**Figure 3**) is a nominal 2,083 megawatt (MW) electric generation facility, which is classified under Standard Industrial Classification Code No. 4911. The facility consists of two fossil fuel fired utility boilers (Units 3 and 4); four steam turbines; a simple cycle combustion

turbine (SCCT)-generator peaking unit set consisting of 2 SCCTs (SCCT Units 4A and 4B); a combined cycle combustion turbine (CCCT)-generator set consisting of two SCCTs (CTs 5 and 6) and heat recovery steam generators (HRSGs) connected to a single steam turbine generator that can operate in simple cycle and combined cycle modes; solid fuels, fly ash, limestone, gypsum, slag, and bottom ash storage and handling facilities; and fuel oil storage tanks. Units 3 and 4 are fired with varying combinations of natural gas, coal, petroleum coke, and coal residual from the TEC Polk Power Station. SCCT Units 4A and 4B are fired with natural gas and ultra-low sulfur diesel (ULSD). CTs 5 and 6 are fired with natural gas. The natural gas distribution system at the facility is supported by 2 natural gas-fired process heaters. The facility is also supported by 3 diesel engine driven emergency generators and a surface coating operation for miscellaneous metal parts used by the facility.

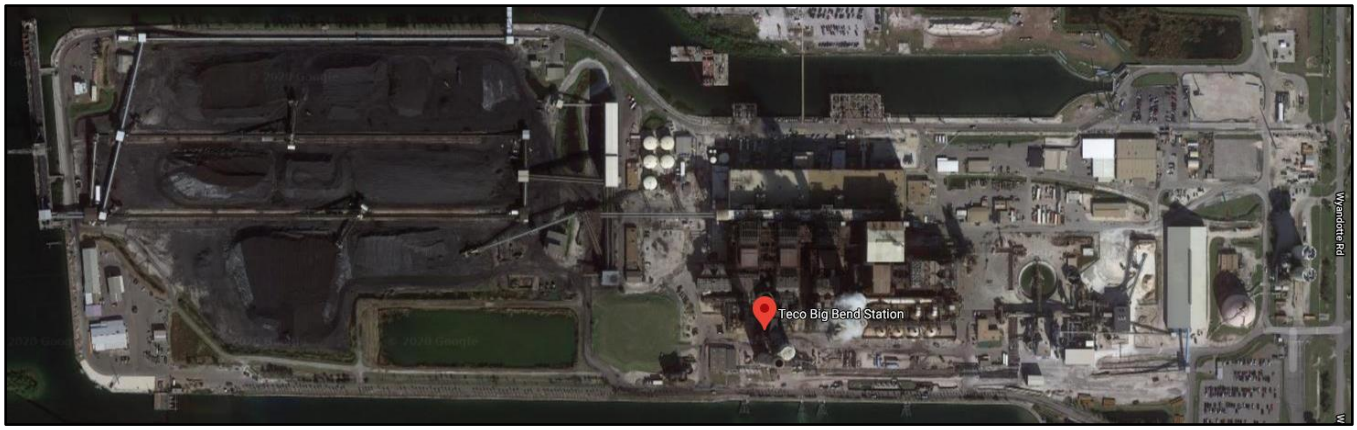

Figure 3. Satellite Image of Big Bend Station.

1.4. Facility Regulatory Categories

- The facility is a major source of hazardous air pollutants (HAP).
- The facility operates units subject to the acid rain provisions of the Clean Air Act.
- The facility is a Title V major source of air pollution in accordance with Chapter 62-213, F.A.C.
- The facility is a major stationary source in accordance with Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.
- The facility operates units subject to the New Source Performance Standards (NSPS) of Title 40 Part 60 of the Code of Federal Regulations (40 CFR 60).
- The facility operates units subject to the National Emissions Standards of Hazardous Air Pollutants (NESHAP) of 40 CFR 63.

1.5. Project Description

Tampa Electric Company (TEC) submitted an application[1] requesting authorization to rework selected north, east, and west water wall tube panels and to upgrade selected northeast, northwest, southeast, and southwest corner panels for Big Bend Unit 4. The purpose of the project is to address welding cracks on newly installed tubes and other tube integrity issues in order to return Unit 4 to its normal rated capacity. This project will also compile and revise applicable requirements from Permit Nos. 0570039-122-AC, 129-AC, 131-AC, and 133-AC, for improved clarity.

TABLE 1 list the existing emissions unit (EU) will be affected by this project.

TABLE 1 – EUS AFFECTED BY THE PROPOSED PROJECT.

EU No.	Description

[1] Application No. 0570039-140-AC. Documents available at this link. Please choose "Public Oculus Login."

EU No.	Description
004	Fossil Fuel Fired Steam Generator Unit No. 4

1.6. Processing Schedule

February 28, 2022 Department received the application for an air pollution construction permit.

April 8, 2022 Department issued draft permit package.

2. PSD APPLICABILITY

2.1. General PSD Applicability

For areas currently in attainment with the AAQS or areas otherwise designated as unclassifiable, the Department regulates major stationary sources of air pollution in accordance with Florida's PSD preconstruction review program as defined in Rule 62-212.400, F.A.C. Under preconstruction review, the Department first must determine if a project is subject to the PSD requirements ("PSD applicability review") and, if so, must conduct a PSD preconstruction review. A PSD applicability review is required for projects at new and existing major stationary sources. In addition, proposed projects at existing minor sources are subject to a PSD applicability review to determine whether potential emissions *from the proposed project itself* will exceed the PSD major stationary source thresholds. A facility is considered a major stationary source with respect to PSD if it emits or has the potential to emit:

- 250 tons per year or more of any regulated air pollutant; or
- 100 tons per year or more of any regulated air pollutant and the facility belongs to one of the following 28 PSD-major facility categories: fossil fuel-fired steam electric plants of more than 250 million British thermal units per hour heat input, coal cleaning plants (with thermal dryers), Kraft pulp mills, Portland cement plants, primary zinc smelters, iron and steel mill plants, primary aluminum ore reduction plants, primary copper smelters, municipal incinerators capable of charging more than 250 tons of refuse per day, hydrofluoric, sulfuric, and nitric acid plants, petroleum refineries, lime plants, phosphate rock processing plants, coke oven batteries, sulfur recovery plants, carbon black plants (furnace process), primary lead smelters, fuel conversion plants, sintering plants, secondary metal production plants, chemical process plants, fossil fuel boilers (or combinations thereof) totaling more than 250 million British thermal units per hour heat input, petroleum storage and transfer units with a total storage capacity exceeding 300,000 barrels, taconite ore processing plants, glass fiber processing plants and charcoal production plants.

Once it is determined that a project is subject to PSD preconstruction review, the project emissions are compared to the "significant emission rates" defined in Rule 62-210.200, F.A.C. for the following pollutants: carbon monoxide (CO); nitrogen oxides (NO_X); sulfur dioxide (SO_2); particulate matter (PM); particulate matter with a mean particle diameter of 10 microns or less (PM_{10}); $PM_{2.5}$; volatile organic compounds (VOC); lead (Pb); fluorides (F); sulfuric acid mist (SAM); hydrogen sulfide (H_2S); total reduced sulfur (TRS), including H_2S; reduced sulfur compounds, including H_2S; municipal waste combustor organics measured as total tetra- through octa-chlorinated dibenzo-p-dioxins and dibenzofurans; municipal waste combustor metals measured as particulate matter; municipal waste combustor acid gases measured as SO_2 and hydrogen chloride (HCl); municipal solid waste landfills emissions measured as non-methane organic compounds (NMOC); and mercury (Hg). In addition, significant emissions rate also means any emissions rate or any net emissions increase associated with a major stationary source or major modification which would construct within 10 kilometers of a Class I area and have an impact on such area equal to or greater than 1 micro grams per cubic meter ($\mu g/m^3$), 24-hour average.

If the potential emission equals or exceeds the defined significant emissions rate (see **TABLE 2**) of a PSD pollutant, the project is considered "significant" for the pollutant and the applicant must employ the Best Available Control Technology (BACT) to minimize the emissions and evaluate the air quality impacts. Although a facility or project may be *major* with respect to PSD for only one regulated pollutant, it may be required to install BACT controls for several "significant" regulated pollutants.

TABLE 2. LIST OF SER BY PSD-POLLUTANT.

Pollutant	SER (TPY)	Pollutant	SER (TPY)
CO	100	NO_X	40
$PM/PM_{10}/PM_{2.5}$	25/15/10	Ozone (VOC) [2]	40
$PM_{2.5}$ (NO_X)	40	$PM_{2.5}$ (SO_2)	40
Ozone (NO_X) [2]	40	SAM	7
SO_2	40	Pb	0.6
Hg	0.1	GHG (CO_2e)	> 75,000

a. Excluding fluoride and those pollutants defined for Pulp and Paper, MWC, MSW landfills.
b. Ozone (O_3) is regulated by its precursors (VOC and NO_X). PSD for $PM_{2.5}$ can be triggered by its precursors (NO_X and SO_2).
c. Pursuant to 40 CFR 52.21(b)(23)(ii), pollutants with no SER listed at 40 CFR 52.21(b)(23)(i) have a SER of zero tons/year.
d. Carbon dioxide equivalent (CO_2e).

According to guidance[2] issued by the EPA in July 2014, a source that triggers PSD review for a traditional PSD pollutant (listed above) would also trigger PSD review for greenhouse gases (GHG) if the source would emit or have the potential to emit 75,000 TPY of GHG on a CO_2e basis. Under this framework, a source cannot become subject to PSD review solely on the basis of GHG emissions.

2.2. PSD Applicability for Project

As provided in the application, **TABLE 3** summarizes potential emissions and PSD applicability for the project.

TABLE 3 – APPLICANT'S PSD APPLICABILITY ANALYSIS FOR THE PROPOSED PROJECT.

Pollutant	Annual Emissions, Tons/Year				Subject to PSD?
	Baseline Actual	Projected Actual	Increase	SER	
CO	1,699.2	1,351.9	-	100	No
NO_X	1,223.7	1,066.1	-	40	No
PM (f)	62.0	40.3	-	25	No
PM_{10} (f+c)	252.5	166.3	-	15	No
$PM_{2.5}$ (f+c)	231.2	155.2	-	10	No
SO_2	3,109.3	1,659.7	-	40	No
VOC	194.4	179.2	-	40	No
SAM	16.0	8.8	-	7	No
CO_2e	3,319,034	2,652,581	-	75,000	No
Note: f = filterable, c = condensable					

The baseline actual emissions (BAE) for NO_X, SO_2, CO, and PM were calculated using EPA Clean Air Markets Division Data and available continuous emission monitoring system (CEMS) data. The Department confirmed this data in the facility's annual operating reports (AORs). The emission rates were calculated using the highest 24-month consecutive period from the 5-year period of July 2013 to June 2018 (see **Section 3.3.1**). Each emission rate was calculated as the product of heat input-weighted emissions in terms of pounds per million British thermal units (lb/MMBtu) for each fuel type.

The BAE for non-CEMS pollutants (condensable PM, SAM, VOC, and CO_2e) were calculated using site-specific testing data or emission factors (lb/MMBtu) from EPA's AP-42 combined with annual heat input (MMBtu/year).

[2] U.S. Supreme Court opinion dated June 23, 2014. Link to Supreme Court Opinion EPA guidance dated July 24, 2014. Link to EPA Guidance

The highest annual heat input was calculated using the highest 24-month consecutive period from the 5-year period of July 2013 to June 2018.

The projected actual emissions (PAE) were calculated with the same emission factors as the BAE combined with projections for coal and natural gas usage by Unit 4.

As shown in **TABLE 3**, total project emissions will not exceed the PSD significant emissions rates; therefore, the project is not subject to PSD preconstruction review. See **Section 3.3** for the Department's position of TEC's emission calculations, methodologies, and justifications.

3. DEPARTMENT REVIEW

3.1. Background Information

Big Bend Unit 4 is a dry-bottom tangentially fired utility boiler nominally rated at 4,330 million British thermal units per hour (MMBtu/hour) manufactured by Combustion Engineering. Unit 4 fires natural gas only, solid fuels only, or co-fires natural gas and solid fuels. Solid fuels consist of a combination of coal, petroleum coke, and coal residual generating from TEC's Polk Power Station. NO_X emissions are controlled by low-NO_X burners, a separate over fire air system (SOFA), and dedicated selective catalytic reduction (SCR) system. PM emissions are controlled by a dry electrostatic precipitator (ESP) rated at a control efficiency of 99.7%. SO_2 emissions are controlled by a wet flue gas desulfurization (FGD) system rated at a control efficiency of 96%. Big Bend Unit 4 began commercial operation in 1985, producing electricity from a fossil fuel fired steam generator.

3.2. Discussion of Project

3.2.1. Current Request

On February 5, 2019, the Department issued Permit No. 0570039-122-AC to authorize the replacement of approximately 13,750 square feet (sq. ft.) of east and west side water wall tube panels and the front and rear water wall tube panels on Big Bend Unit 4. After the implementation of this project, TEC discovered welding cracks on the newly installed tubes (and other tube integrity issues) that caused Unit 4 to be derated from 450 megawatts (MW) to approximately 300 – 380 MW to maintain unit availability.

Permit No. 0570039-122-AC was revised and replaced by Permit No. 0570039-129-AC, issued on August 11, 2020. Permit No. 129-AC extended the expiration date of 122-AC and revised certain conditions to include all applicable requirements for the boiler tube replacement project.

Due to the integrity issues with the new tubes, TEC is requesting a rework of selected tubes and upgrades to selected corner panels. The specific tube sections and corner panels are listed in Section 3.2 of TEC's application. Any replacement tubes or repairs will be made with like-kind parts. The total tube area to be replaced is approximately 5,151 sq. ft., which is less than half of what was authorized to be replaced by Permit No. 122-AC. Technical drawings of the proposed tube replacements are provided in Attachment A of TEC's application.

The Department will grant TEC's request for rework of tube panels and upgrade of corner panels. The Department acknowledges that this request is to alleviate issues discovered after the initial tube replacement and is not expected to increase the utilization of Unit 4 above what was originally expected with Permit Nos. 122-AC and 129-AC.

3.2.2. Associated Projects

Restoration of Unit 4 to its original capacity may result in an increase in hourly emissions of PM, SO_2, and NO_X. An increase in the maximum hourly emissions of any of these pollutants would meet the definition of "modification" under 40 CFR 60, Subpart A, and would result in those pollutants becoming subject to new emission limits under 40 CFR 60, Subpart Da. Permit Nos. 122-AC, 129-AC, and 131-AC required TEC to conduct performance testing (student's t-test) to determine if the tube replacement project resulted in an increase in the maximum hourly emissions from Unit 4. In addition to this, Permit No. 133-AC authorized TEC to replace the natural gas igniters for Unit 4, which may result in an increase in hourly NO_X emissions. Permit No. 133-AC required TEC to conduct NO_X performance testing (student's t-test) to determine if the natural gas igniters project resulted in an increase in the maximum hourly NO_X emissions from Unit 4.

As part of the current application (*i.e.*, Permit No. 140-AC), TEC has requested to consolidate these testing requirements (and associated PSD monitoring requirements). The Department acknowledges this request, and the following two conditions will supersede any similar conditions contained in the above mentioned permits.

1. NSPS Subpart Da Applicability Determination: The permittee shall conduct PM, SO_2, and NO_X emissions tests on Unit No. 4 in accordance with Appendix C of 40 CFR 60 – Determination of Emission Rate Change (see Appendix E) once Unit No. 4 is capable of achieving 90% of design capacity. The permittee shall record continuous PM, SO_2, and NO_X CEMS emission rates (in pounds per hour) while firing solid fuels for 2 time periods. The first time period shall use data representative of the highest achievable capacity prior to conducting the authorized work necessary to achieve 90% of design capacity, and the second period shall use data gathered at testing capacity (*i.e.*, at least 90% of design capacity). The number (n) of runs shall be between 20 and 29 for each time period. Each data set shall be used to conduct a Student's t-test with a 95% confidence interval (Student's t-test Table in Appendix F). If the Student's t-test data shows PM, SO_2, and/or NO_X emissions increases, Unit No. 4 shall become subject to the PM standards in 40 CFR 60.42Da(e), the SO_2 standards in 40 CFR 60.43Da(l), and/or the NO_X standards in 40 CFR 60.44Da(g), respectively, and the permittee shall immediately begin complying with all of the provisions applicable to Unit No. 4. In such case(s), the applicable provisions of 40 CFR 60, Subpart Da will be incorporated into the facility's Title V air operation permit during the next revision.

2. Actual Emissions Reporting: This permit is based on an analysis that compared baseline actual emissions with projected actual emissions and avoided the requirements of subsection 62-212.400(4) through (12), F.A.C., for several pollutants. Therefore, pursuant to Rule 62-212.300(1)(e), F.A.C., the permittee is subject to the following monitoring, reporting, and recordkeeping provisions.
   a. The permittee shall monitor the emissions of any PSD pollutant that the Department identifies could increase as a result of the construction or modification and that is emitted by any emissions unit that could be affected; and, using the most reliable information available, calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of 5 years following resumption of regular operations after the change. Emissions shall be computed in accordance with the provisions in Rule 62-210.370, F.A.C., which are provided in Appendix C of this permit.
   b. The permittee shall report to the Department's permitting and compliance authority within 60 days after the end of each calendar year during the 5-year period setting out the unit's annual emissions during the calendar year that preceded submission of the report. The report shall contain the following:
      (1) The name, address, and telephone number of the owner or operator of the major stationary source;
      (2) The annual emissions calculations pursuant to the provisions of 62-210.370, F.A.C., which are provided in Appendix C of this permit;
      (3) If the emissions differ from the preconstruction projection, an explanation as to why there is a difference; and
      (4) Any other information that the owner or operator wishes to include in the report.
   c. The information required to be documented and maintained pursuant to subparagraphs 62-212.300(1)(e)1 and 2, F.A.C., shall be submitted to the Department, which shall make it available for review to the general public.
   d. The permittee shall compute and report annual emissions in accordance with Rule 62-210.370(2), F.A.C. as provided by Appendix C of this permit. For this project, the permittee shall use the following methods in reporting the actual annual NO_X, SO_2, PM, and CO emissions for Unit No. 4:
      (1) The permittee shall use data collected from the CEMS to determine and report the actual annual emissions of NO_X, SO_2, PM, and CO.
      (2) As defined in Rule 62-210.370(2), F.A.C., the permittee shall use a more accurate methodology if it becomes available.

[Rules 62-212.300(1)(e) and 62-210.370, F.A.C.; and Application 0570039-140-AC]

{Permitting Note: Baseline emissions of NO_X, SO_2, PM, and CO were determined to be 1,224 TPY, 3,109 TPY, 62 TPY, and 1,699 TPY, respectively. No could have accommodated (CHA) emissions were used in the applicant's PSD applicability analysis. The reporting period shall begin with the first full calendar year following the completion of construction authorized by this permit and Permit No. 0570039-133-AC.}

3.3. Discussion of Emissions

3.3.1. Baseline Periods

TEC has chosen to utilize the provisions of Rule 62-210.200(30)(a), F.A.C., that allow the use of a time period outside of the 5 years immediately preceding the permit application submittal date to calculate the baseline emissions for the proposed project because those time periods are more representative of normal operation for Unit 4. **TABLE 4** shows the selected baseline periods for each pollutant.

TABLE 4 – APPLICANT'S SELECTED BASELINE PERIODS FOR THE PROPOSED PROJECT.

Pollutant	Baseline Period
NO_X	November 2014 – October 2016
SO_2	July 2013 – June 2015
CO	October 2014 – September 2016
VOC	November 2014 – October 2016
$PM/PM_{10}/PM_{2.5}$	
SAM	
GHG (CO_2e)	

Under Rule 62-2100.200(30), F.A.C., the normal 5-year period from which baseline periods are selected would be February 2017 to January 2022. However, as described in **Section 3.2.1**, TEC derated Unit 4 due to tube integrity issues discovered after the implementation of the work originally authorized by Permit No. 0570039-122-AC. Therefore, TEC has claimed that the operation of Unit 4 during the normal 5-year period is not representative of normal operation of Unit 4, and TEC has instead selected baseline periods from the 5-year period of July 2013 to June 2018 as shown in **TABLE 4**.

The Department confirmed through TEC's annual operating reports (AORs) that the heat input to Unit 4 (primarily bituminous coal) was depressed beginning in calendar year 2019. The Department finds TEC's use of a different 5-year period to determine baseline periods to be acceptable. The proposed project is intended to restore Unit 4's capacity to a similar level as was achieved prior to the original water wall tube work originally authorized under Permit No. 0570039-122-AC and is not projected to increase the utilization of Unit 4.

3.3.2. Requested Tons/Year Emission Limits

As part of this application, TEC requested "voluntary" tons/year emission limits for all pollutants in **TABLE 3** equivalent to each pollutant's baseline actual emissions in **TABLE 3**. The Department will not establish these "voluntary" emission limits in this permitting action because the limits proposed by TEC are not necessary. It is at TEC's discretion on how to calculate baseline actual and projected actual emissions for future projects for Unit 4 as long as they meet the requirements of the F.A.C. TEC intended to establish these limits in order to avoid PSD requirements for future projects concerning Unit 4, but they could potentially have no value in future PSD applicability analyses.

For example, under a normal PSD applicability analysis (*i.e.*, without the proposed PTE limits), TEC would calculate baseline actual emissions based on previous operation of Unit 4 and compare those baseline actual emissions with projected actual emissions based on the following factors: historical operational data, the company's projections, expected business activity, etc. (see Rule 62-210.200 ("Projected Actual Emissions"), F.A.C). If instead, as TEC has proposed, the PSD applicability analysis uses the PTE limits instead of projected actual emissions when compared to baseline actual emissions, a potential future project for Unit 4 may appear to

trigger the PSD requirements if the proposed PTE limits are higher than the calculated projected actual emissions. In that case, TEC would most likely use the calculated projected actual emissions in lieu of the PTE limits in the analysis so that PSD requirements are not triggered, which would make the proposed PTE limits superfluous.

3.4. State Requirements

Unit 4 is subject to the applicable requirements of Rules 62-296.405(1), 62-296.700(6), and 62-296.702, F.A.C. The proposed project will not affect the applicability of these rules for Unit 4.

The proposed project is not considered to be routine maintenance, repair, or replacement of boiler components since it is related to the originally authorized work to replace Unit 4's boiler tubes, which replaced a significant portion of the total tubes. Therefore, this project will require an air construction permit to authorize the requested changes. As described in **Section 3.2.2**, the permit will also consolidate and replace previous permit conditions related to the changes at Unit 4 from Permit Nos. 0570039-122-AC, 129-AC, 131-AC, and 133-AC.

3.5. Federal NSPS Provisions

Unit 4 is subject to the applicable requirements of 40 CFR 60, Subpart Da, Standards of Performance for Electric Utility Steam Generating Units. The proposed project does not meet the definition of reconstruction under 40 CFR 60.15. However, there is a possibility that the proposed project will meet the definition of modification under 40 CFR 60.14. The permit will require TEC to perform testing in order to determine if the proposed project will result in a modification under 40 CFR 60.14, as described in the Condition 1 under **Section 3.2.2**. If the proposed project results in a modification for an NSPS-regulated pollutant, TEC must comply with any new applicable requirements under 40 CFR 60, Subpart Da.

3.6. Federal NESHAP Provisions

Unit 4 is subject to the applicable requirements of 40 CFR 63, Subpart UUUUU, NESHAP: Coal- and Oil-Fired Electric Utility Steam Generating Units. The proposed project will not meet the definition of reconstruction under 40 CFR 63.2. The proposed project will not affect the applicable requirements for Unit 4 under Subpart UUUUU.

4. PRELIMINARY DETERMINATION

The Department makes a preliminary determination that the proposed project will comply with all applicable state and federal air pollution regulations as conditioned by the draft permit. This determination is based on a technical review of the complete application, reasonable assurances provided by the applicant, and the conditions specified in the draft permit. No air quality modeling analysis is required because the project does not result in a significant increase in emissions. Eric Dunkelberger is the project engineer responsible for reviewing the application and drafting the permit. Additional details of this analysis may be obtained by contacting the project engineer at the Department's Permit Review Section at Mail Station #5505, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400 at 850/717-9078 or by email Eric.Dunkelberger@FloridaDEP.gov.