TECHNICAL EVALUATION
&
PRELIMINARY DETERMINATION

APPLICANT

Tampa Electric Company
P.O. Box 111
Tampa, FL 33601

H.L. Culbreath Bayside Power Station
ARMS Facility ID No. 0570040

PROJECT

Project No. 0570040-032-AC (PSD-FL-310E)
Application for Air Construction Permit Revision
Miscellaneous Changes to Permit Specific Conditions

COUNTY

Hillsborough, Florida

PERMITTING AUTHORITY

Florida Department of Environmental Protection
Division of Air Resource Management
Office of Permitting and Compliance
2600 Blair Stone Road, MS#5505
Tallahassee, Florida 32399-2400

March 2013

1. GENERAL PROJECT INFORMATION

A. Facility Description and Location

The H. L. Culbreath Bayside Power Station is an electric power plant consisting of six primary electrical generating units. Unit 1 (EU 020 – 022) is a "3-on-1" combined cycle gas turbine system with a nominal generating capacity of 746 MW, which consists of three gas turbines (169 megawatt (MW) each) and one steam-electrical generator (239 MW). Unit 2 (EU 023 – 026) is a "4-on-1" combined cycle gas turbine system with a nominal generating capacity of 1090 MW, which consists of four gas turbines (169 MW each) and one steam-electrical generator (414 MW). These units fire natural gas as the exclusive fuel and employ selective catalytic reduction (SCR) to reduce emissions of nitrogen oxides (NO_X). Emissions of carbon monoxide (CO) and NO_X are monitored with continuous emissions monitoring systems (CEMS).

Units 3 through 6 (EU 031 - 038) consist of four Pratt & Whitney Model No. FT8-3 SwiftPac® aero-derivative simple cycle combustion turbine-electrical generator sets to operate in simple cycle mode. For each SwiftPac®, two combustion turbines are coupled to one common electrical generator set having a total nominal gross generation capacity of 62 MW. Each unit fires natural gas, NO_X emissions are controlled with water injection and CO emissions with catalytic oxidation. Emissions of CO and NO_X are monitored with continuous emissions monitoring systems (CEMS).

This facility is located in Hillsborough County at 3602 Port Sutton Road in Tampa, Florida. The UTM coordinates of the existing facility are Zone 17, 361.1 km East, and 3087.5 km North. This site is in an area that is in attainment (or designated as unclassifiable) for all air pollutants subject to state and federal Ambient Air Quality Standards (AAQS). This facility is categorized under Standard Industrial Classification Code No. 4911.

Figure 1. View Bayside Power Station

Figure 2. Location of Bayside Power Station (Tampa Area)

B. Facility Regulatory Categories

- The facility is not a major source of hazardous air pollutants (HAP).
- The facility has 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 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 a NESHAP in Part 63, Title 40, CFR.
- The facility operates units subject to a NSPS in Part 60, Title 40, CFR.

C. Project Description

This project revises several conditions in underlying air construction permits. TEC applied for concurrent revisions that will be addressed in permits PSD-FL-301 E (0570040-032-AC) and 0570040-033-AV affecting the emissions units listed below.

EU No.	*Brief Description*
Regulated Emissions Units	
008	F. J. Gannon Station Fuel Yard
Bayside Unit 1 - Combined Cycle Unit with Three Gas Turbines and One Steam-Electrical Generator (746 MW, total)	
020	CT-1A – Combined Cycle Gas Turbine
021	CT-1B – Combined Cycle Gas Turbine
022	CT-1C – Combined Cycle Gas Turbine
Bayside Unit 2 - Combined Cycle Unit with Four Gas Turbines and One Steam-Electrical Generator (1090 MW, total)	
023	CT-2A – Combined Cycle Gas Turbine
024	CT-2B – Combined Cycle Gas Turbine
025	CT-2C – Combined Cycle Gas Turbine
026	CT-2D – Combined Cycle Gas Turbine
Bayside Unit 3 – Simple Cycle Peaking Unit with Two Combustion Turbines and One Electrical Generator Set (62 MW)	
031	Unit 3A - Simple Cycle Combustion Turbine
032	Unit 3B - Simple Cycle Combustion Turbine
Bayside Unit 4 – Simple Cycle Peaking Unit with Two Combustion Turbines and One Electrical Generator Set (62 MW)	
033	Unit 4A - Simple Cycle Combustion Turbine
034	Unit 4B - Simple Cycle Combustion Turbine
Bayside Unit 5 – Simple Cycle Peaking Unit with Two Combustion Turbines and One Electrical Generator Set (62 MW)	
035	Unit 5A - Simple Cycle Combustion Turbine
036	Unit 5B - Simple Cycle Combustion Turbine
Bayside Unit 6 – Simple Cycle Peaking Unit with Two Combustion Turbines and One Electrical Generator Set (62 MW)	
037	Unit 6A - Simple Cycle Combustion Turbine
038	Unit 6B - Simple Cycle Combustion Turbine

D. Processing Schedule

- 1/04/13 Received revised application for a concurrent air construction permit revision and Title V permit. Application complete.
- 2/05/13 and 3/14/13 and 3/15/13 Received additional information by e-mail.

E. Background PSD Permit History

- In 2000, the Department received TEC application proposal to re-power the existing Gannon Station with seven new combined cycle gas turbines in accordance with the DEP/TEC Consent Final Judgment signed in December of 1999 and with the EPA/TEC Consent Decree signed in February of 2000.
- In 2001, the Department issued Permit No. PSD-FL-301 (Project 0570040-013-AC), authorizing the construction of seven new combined cycle gas turbines, Bayside Units 1 and 2 (EU 20 – 26), with heat recovery steam generators (HRSG) to re-power the existing steam-electric turbines of Gannon Units 5 and 6 (EU 005 – 006) increasing the nominal electrical production capacity to 1742 MW. All existing coal-fired boilers of Gannon Units 1 – 6 were shutdown.
- In 2002, Permit PSD-FL-301A (Project No. 0570040-015-AC) revised the original permit to include four additional new combined cycle gas turbines, Bayside Units 3 - 4 (EU 27 – 30), with HRSG to re-power the existing steam-electric turbines of Gannon Units 3 and 4 (EU 003 – 006) increasing the nominal electrical production capacity to 2845 MW.
- In 2004, Permit No. PSD-FL-301B (Project No. 0570040-021-AC) authorized revisions to Specific Condition 17 for the combined cycle engines Units 1 and 2 regarding startups, shutdowns, malfunctions, low load operation, DLN tuning, compressor blade drying, and over speed trip testing. This permit was processed simultaneously with the Title V renewal (Permit 0570040-023-AV), which included the incorporation of new Bayside Units 1 and 2 (PSD-FL-301) and revised conditions of this project (PSD-FL-301B).
- In 2005, Permit No. PSD-FL-301C (Project No. 0570040-019-AC) revised Permit PSD-FL-301A (Project No. 0570040-015-AC) authorizing a phase of simple cycle operations for Bayside Units 3A and 3B with distillate oil as a restricted alternate fuel during simple cycle operation and when converted to combine cycle operation as an emergency backup fuel.
- In 2008, Project No. 0570040-024-AC authorized construction of the following: eight simple cycle combustion turbine (SCCT) peaking units with four associated electrical generators (EU 031 – 034); and two emergency diesel engine/generator sets (EU 35 and 36). The project was a minor source air construction permit and was not subject to Prevention of Significant Deterioration (PSD) preconstruction review.
- In 2009, Project No. 0570040-026-AC authorized the following changes to Project No. 0570040-024-AC:
  - → Removed the existing 14 MW SCCT; and an eight million gallon distillate oil storage tank and the use of distillate fuel oil serving as the backup fuel from the facility description.
  - → Reduce the number of emergency diesel engines/generators from two 800 kilowatt (kW) emergency diesel engine/generator sets to one 1,000 kW emergency diesel engine/generator set and increase the maximum total ultra low sulfur diesel (ULSD) fuel oil usage from 11,440 to 12,700 gallon/year from the project description.
  - → *In Section III, Subsection* B. Emissions Unit ARMS ID and Description, Re-assigned the eight SCCT peaking units and four associated electrical generators (EU 031 – 034) individual emission unit numbers (EU 031 – 038), and deleted the emission unit numbers for the two emergency diesel engine/generator sets (EU 035 – 036) and assigned the single emergency diesel engine/generator set a new emission unit number (EU 039).
  - → *In Specific Conditions 9*, revised the emission and compliance standards table for particulate matter (PM), sulfur dioxide (SO_2) and sulfuric acid mist (SAM) and remove the initial demonstration of compliance requirements for PM and SO_2.

→ *In Specific Condition 12*, removed EPA Test Methods 5, 6 or 6C, and 8 and included EPA Test Method 18 to be used (optionally) concurrently with EPA Method 25A to deduct emissions of methane and ethane from the measured volatile organic compound VOC emissions.

- In 2010, Project No. PSD-FL-301D (0570040-028-AC) authorized the following changes to 0570040-019-AC (PSD-FL-301C) Section III, which affected combined cycle Units 1 (EU-020 through 022) and 2 (EU-023 through 026).

  → *In Condition 17,* clarified the alternative standard and CEMS data exclusion language regarding low load operation, definitions of startup, shutdown, malfunction, CEMS data exclusion during cold and warm startup and other limited use operations.

  → *In Condition 23(f),* revised the monitor availability condition to include the quarterly Data Assessment Report to be reported with the Semiannual CEMS Report.

  → *In Condition 25,* added the following sentence, "The data assessment report required by Condition 23e shall be submitted in conjunction with the Semiannual CEMS Report."

- Also in 2010, Project No. 0570040-028-AC, authorized the following revisions to Permit No. 0570040-026-AC, which affected simple cycle peaking Units 3 (EU-031 and 032), 4 (EU-033 and 034), 5 (EU-035 and 036) and 6 (EU-037 and 038).

  → *In Condition 9 and 13,* clarified that separate compliance stack tests for CO and NO_X emissions are not required. The permittee is to demonstrate compliance with the mass-based emissions standards (lb/hour) with data collected during the annual Relative Accuracy Test Audit (RATA), which is to be submitted with the semiannual report. The Department also revised the SO_2 standard in the emissions table from "6 lb/MWhr/SCCT" to 0.06 lb/MMBtu, which is consistent with the NSPS Subpart KKKK requirement.

  → *In Subsection IV, Appendix E, Condition 17,* the Department added tuning and rearranged some of the text language (to exclude from the compliance average CO emissions data collected when "tuning" the combustion turbine) to make the condition easier to understand. Also, for emissions in excess of the standard, the Department revised the language to one working day of discovery notification.

F. Completion of Consent Decree Requirements U.S. EPA vs. TEC (TEC e-mail dated 3/14/2013)

- Re-Powering Activities pursuant to Paragraphs 26 or 27.
  → Bayside Unit 1 became commercially operational on April 24, 2003. Bayside Unit 2 became commercially operational on January 15, 2004.

- Shutdown of Gannon Power Station pursuant to Paragraph 27.
  → Repowering activities are complete and the required deadlines have been satisfied. Gannon Units 5 and 6 were shutdown on January 30, 2003 and September 30, 2003, respectively. Gannon Units 1 and 2 were shutdown on April 16, 2003 and April 15, 2003, respectively. Gannon Units 3 and 4 were shutdown on November 1, 2003 and October 12, 2003 respectively.

- Coal or Fuel Usage following January 1, 2005.
  → No fuel other than natural gas has been burned at Gannon or Bayside Power Station after January 1, 2005.

2. AIR POLLUTION REGULATIONS

A. Department 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 air quality regulations as part of the Florida Administrative Code (F.A.C.), which includes the applicable chapters contained in Table 3.

Table 3 - Applicable Rules from the F.A.C.

Chapter	Description
62-4	Permits
62-17	Electrical Power Plant Siting
62-204	Air Pollution Control – General Provisions
62-210	Stationary Sources of Air Pollution – General Requirements
62-212	Stationary Sources – Preconstruction Review
62-213	Operation Permits for Major Sources (Title V) of Air Pollution
62-296	Stationary Sources – Emission Standards
62-297	Stationary Sources – Emissions Monitoring

B. Federal Rules

The U.S. Environmental Protection Agency (EPA) establishes air quality regulations in 40 CFR 60 that identify Standards of Performance for New Stationary Sources (NSPS) for a variety of industrial activities. 40 CFR 61 specifies NESHAP for certain pollutants. 40 CFR 63 specifies NESHAP provisions based on the Maximum Achievable Control Technology (MACT) for given industrial source categories.

Federal regulations adopted by reference are given in Rule 62-204.800, F.A.C. State regulations approved by EPA are given in 40 CFR 52, Subpart K – Florida; also known as the State Implementation Plan (SIP) for Florida.

C. Project Rule Applicability

The project is a revision/clean-up of several old permit conditions. The permit does not authorize any new construction, nor does it relax any previously established operational or emissions limitations. The Department determines that there will not be emissions increase that equals or exceeds a criteria pollutant significant emission rate (SER) as defined in Rule 62-210.200 F.A.C. (Definitions); therefore, the project is not subject to PSD preconstruction review pursuant to Rule 62-212.400 F.A.C. Consequently, no air modeling was submitted and a BACT determination was not required.

3. DEPARMENT PROJECT REVIEW

The applicant requested the following revisions to various emissions units of permits PSD-FL-301A (No. 0570040-015-AC); PSD-FL-301C (No. 0570040-019-AC); PSD-FL-301 D (No. 0570040-028-AC); No. 0570040-024-AC; 0570040-026-AC and, No. 0570040-006-AC. The proposed revisions to permit language do not affect emissions, production rates or any other significant change. Descriptions of these requests are stated below, followed by the Department's position on the requested changes. This permit is been processed simultaneously with the Title V revision Permit 0570040-033-AV.

A. Requested Changes to Specific Permit Conditions

Permit Nos: PSD-FL-301A (0570040-015-AC), PSD-FL-301C (0570040-019-AC) and PSD-FL-301D (0570040-028-AC)

1. *Comment - Condition 10 (Title V - No. A.1) - Permitted Capacity*. TEC requests to replace the word "maximum" for "design" for the heat input rate stating that the "maximum" heat input rates shall not be made federally enforceable; and, suggests that it should only be used to determine that the unit is operating at 90 to 100% during annual compliance testing. TEC adds that the NO_X and CO emissions data from the CEMS are sufficient to demonstrate compliance since each unit is fully controlled.

Response: The Department agrees with TEC that heat input is a rated design value and revises this condition to read "design" instead of "maximum". The heat input is mainly quantified as a "permitted capacity rating" in order to determine if the unit is at full load for stack testing. Since heat input is only required to be measured to within +/-10% of its true value pursuant to Rule 62-297.310, F.A.C., it is possible to measure heat inputs that exceed a design heat input rating during a stack test because of the allowable error of the measurement. Turbine heat input will vary with weather conditions and winter heat input ratings are higher than summertime ratings. The Department acknowledges that compliance with the NOx and CO standards (ppmvd) is demonstrated by CEMS.

2. *Comment - Condition 11 (Title V - No. A. 3. a.) Methods of Operation - Allowable Fuels*. TEC requests that compliance with the fuel sulfur limit should be based only on the monthly data obtained from the vendor. TEC states that the fuel sulfur records are obtained from the vendor reports showing the average sulfur content of the natural gas supplied from the pipeline during each month of operation.

   Response: The Department agrees with TEC and revises the condition as requested.

3. *Comment - Condition 14. (Title V – No. A.7.) Emission Limitations and Standards*. TEC requests that the reference to the USEPA Test Methods 10 and 7E and mass-based emissions standards (lb/hour) are not applicable and should be removed since NO_X and CO emissions are monitored with CEMS.

   Response: The Department acknowledges that NO_X and CO emissions are monitored with CEMS and that CEMS is the method of compliance, but will not remove the references to the BACT mass-based emissions standards (lb/hour) or the test methods since these are the guidelines used during the annual RATA. The Department is not requiring separate compliance stack tests for CO and NO_X emissions in addition to RATA. This was already clarified in a previous TEPD during the review of project 05700039-028-AC for the simple cycle units.

4. *Comment - Condition 17. (Title V - No. A.10.b) Alternative Standard and CEMS Data Exclusion*. TEC requests to remove the 10% visible emissions limit from gas turbines during startup and shutdown. TEC believes these operational modes have not caused excess emissions at the facility.

   Response: The Department believes this BACT standard shall be met at all times. This conditions remains.

5. *Comment - Condition 17.c.5 (Title V – No. A.10.d.(4) (a)) Alternative Standard and CEMS Data Exclusion.* TEC proposes to add new language regarding the meaning of "other" tuning. TEC believes the permit should allow "other" tuning to be conducted by the manufacturer or operators to ensure "good" maintenance of these units. These tunings may include adjusting the air to fuel ratios, post combustion adjustments or replacement of such components that requires the unit to be placed online for checks and final adjustments.

   Response: The Department will add the new proposed language to this condition as proposed by TEC.

6. *Comment - Condition A.11 (Title V) Excess Emissions – Notifications*. TEC requests to revise the reporting of excess emissions from quarterly to semiannually.

   Response: The Department agrees with TEC and would revise the sentence to read "semiannually" in accordance with 60.7 (c) Notification and Recordkeeping.

7. *Comment - Condition 23.d. through f. (Title V – No. A.14.d.through f.) Continuous Monitoring Systems*. TEC proposes to remove the 40 CFR Appendix F- Data Assessment Report (DAR) language requirements (in several conditions) stating it appears to be a redundant request. TEC believes the Relative Accuracy Test Audit (RATA) (Part 75) data that is submitted in the Data Assessment Report (DAR) is also submitted with the semi-annual report and through the ECMPS Client Tool. TEC asserts that Part 75 prevails over Part 60 and adds that Part 75 draft policy manual document, dated May 2012, also states that Part 75 requirements should prevail over the Part 60 requirements.

Response: The Department revises paragraphs 23.d. and 23.e. updating and moving the CO_2 requirements from paragraph 23.e. to paragraph 23.d. since NO_X and CO_2 are both pollutants with the same requirements. The Department also clarifies that the language in condition 23.e. referring to the " data assessment report" is applicable for CO only. In addition, to be consistent with the current Title V permit, the sentence about semiannual CEMS reporting was added at the end of Condition 23.f. of construction permit PSD-FL-301 E (0570040-032-AC).

8. *Comment – Condition 25 (Title V – No. A. 20.) Semiannual CEMS Report.* TEC requests to delete language reporting any "unusual" maintenance or repairs of the CEMS claiming that this would be reported and explained in the monitor downtime section. TEC also requests to delete language about the reporting of the "general range of ammonia flow rates required to meet NO_X emissions limitations over the range of gas load conditions" claiming that this is not relevant to the ammonia slip compliance testing. TEC believes these requirements have no good technical basis and provide no benefit to the environment. In addition, TEC also request to delete the sentence: "The data assessment report required by Condition 23.e (A.14.e. in Title V) shall be submitted in conjunction with the Semiannual CEMS Report".

   Response: The Department considers these requests and deletes these ammonia requirements. The Department believes that, after several years of units operation, the requirements to test the annual and the additional ammonia slip (and corresponding NO_X CEMS readings) in the permit are sufficient to provide an indication of catalyst viability and also serve to maintain a correlation between the ammonia injection rate and actual NO_X emissions. TEC should continue reporting monitor downtime as required by the condition. Regarding the sentence referring to the "data assessment report", the Department will not delete it since this is the quarterly report related to the CO monitor

9. *Comment – Removal of the references to the EPA vs TECO Consent Decree quotation in several conditions.* TEC believes the requirements stated in the Consent Decree for this facility have been satisfied.

   Response: The Department agrees and removes the references to the Consent Decree in the permits.

<u>Permit No. 0570040-024-AC and 0570040-028-AC</u>

10. *Comment - Condition 9 (Title V – No. D.8) Emission Standards*. TEC requests an administrative correction to revise the NO_X limit from 25.0 to 25 ppm to match the Subpart KKKK requirement.

    Response: The Department agrees and revises this condition as requested. The Administrative Correction (0570040-031-AC) issued in 2012 already allows deleting the decimal numerical figures for NO_X and CO.

11. *Comment - Condition 17 Appendix E (Title V – No. D.10a/b) Excess Emission Allowed*. TEC requests to revise the startup period for the SCCTs from 10 minutes to 15 minutes. TEC states that there have been several incidents where the SCCT units could not be started up in the allotted 10 minute period due to unforeseen conditions, which required the units to be shutdown and restarted one or more times. TEC believes this revision will minimize startup and shutdown periods and reduce unnecessary emissions to the environment.

    Response: The Department agrees and revises this condition as requested.

12. *Comment - Condition 17 Appendix E (Title V – No. Condition D.10.e) Excess Emission Allowed, Black Start Testing Provision for SCCTs*. TEC requests to insert a new provision to allow the exclusion of excess emissions up to 8 hours during black start testing. TEC states that the purpose of the test is to demonstrate TEC's ability to restart Bayside Power Station after a catastrophic event such as a hurricane, tornado, grid failure and other unforeseeable events; and, would like the ability to periodically simulate these emergency startup conditions in order to better define and streamline the necessary protocols required for bringing the facility back on-line, as well as to train their operators in following the established protocols for bringing the emissions units back on-line as safely and efficiently as possible. TEC explains that the operation of the SCCTs at low load prevents the use of the water injection for NO_X control and that it will likely result in

exceeding the allowable limits during the testing period. TEC adds that the black start emergency generator will be used to initially startup the SCCTs and that the SCCTs will supply a low load power (1 to 8 MW) to energize the auxiliary equipment and startup transformers during the test. TEC believes performing a black start test is consistent with adjusting the factors consistent with the public interest in accordance with Rule 62-210.700 (5) F.A.C.

Response: The Department agrees with the request to allow the exclusion of up to 8 hours of excess emissions from the CEMS data used to demonstrate compliance with the emissions limits. The Department understands TEC's desire to be able to simulate conditions such as those that could arise following a facility-wide shutdown from catastrophic events, such as hurricanes. During this required time of less than full-load operation, these units can experience extended periods of excess emissions. Episodes such as these related to catastrophic events are typically excused, so those excess emissions would typically not be considered a violation of the permit. This same request was also approved for TEC Big Bend Power Station.

13. *Comment - Condition 18 (Title V.- No. D.14 and D.26.) Continuous Monitoring Systems and Reporting Schedule*. TEC proposes to remove the 40 CFR Appendix F Data Assessment Report (DAR) language requirements.

    Response: Refer to Comment and Response in 7 and 8. In addition, to be consistent with the Title V permit, this condition was revised to read similar to Title V Condition D.14.

Permit No. 0570040-006-AC

14. *Comment - EU-008 Fuel Yard Description*. TEC states that the following activities are no longer utilized and are not expected to be used in the future.

    These fuel yard activities (Title V - Table B-1) should be deleted:

    - Barge to clamshell (FH-001/002)
    - Barge to continuous unloader (FH-003)
    - Clamshell to barge unloading hopper (FH-004/005)
    - Continuous unloader to conveyor A (FH-006)
    - Barge unloading hoppers to conveyor B (FH-008/009)
    - Railcar to rail unloading hopper (FH-013)
    - Rail unloading hopper to conveyor L (FH-014)

    Response: The Department agrees with the request and deletes these emission points.

15. *Comment - Conditions 7, 9 and 17 (Title V – No B.6, B.7 and B.8) Monitoring Operations.* TEC states that Conditions 7 and 17 are no longer applicable and should be deleted and/or revised.

    Response: The Department agrees with the request.

Current New Permit No. 0570040-032-AC

A new section is created in this new construction permit to cover the engines (E.U. 039) at this facility.

B. Previously Authorized Construction Project Related to the Current Request

The following link shows the relevant original PSD Permits, the original Technical Evaluations and Preliminary Determinations (TEPD) and all permits/projects modifications affected by this review.

http://appprod.dep.state.fl.us/air/emission/apds/listpermits.asp

C. Changes to Permits

This project is being processed as line-item changes to applicable specific conditions of the previously issued air construction (AC) permits. Through the conditions of this permit, where changes are made to the original conditions, additions are shown with underlined formatting and deletions are shown as ~~strikethrough~~. For ease of location, all changes are highlighted in yellow in the draft permit and are not repeated in this document.

In general, the Department finds the requested changes acceptable based on the applicant's assurance that these Units are in compliance with all the emissions limits. Where helpful, clarifications will be made to better define the language of the specific conditions. See draft permit for detailed changes.

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. Teresa Heron 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 Bureau of Air Regulation at Mail Station #5505, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400.