TECHNICAL EVALUATION

AND

PRELIMINARY DETERMINATION

FOR

City of Tampa – Wastewater Department (Howard F. Curren AWT Plant)

Hillsborough County

Air Construction Permit

Application Number

0570373-020-AC

Environmental Protection Commission of

Hillsborough County

Tampa, FL

December 18, 2013

I. Project Description

A. Applicant: Anthony Kasper, P.E.
Director
City of Tampa – Wastewater Department
306 East Jackson Street
Tampa, FL 33602

B. Engineer: Tom T. John, P.E.
Thompson Global Partners, Inc.
405 N. Reo Street STE 300
Tampa, FL 33609

P.E. No.: 33157

C. Project and Location:

Attached is DRAFT Permit No. 0570373-020-AC to install oxidation catalysts on each of the four (4) existing diesel-fired emergency generators (EU 012). These control devices are being installed in order to demonstrate compliance with the 70% CO reduction requirement under 40 CFR 63 Subpart ZZZZ, National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Stationary Reciprocating Internal Combustion Engines (RICE). Once the catalysts are installed, these engines will be classified as non-emergency engines and will be permitted to operate in non-emergency situations.

The project has been assigned NEDS Source Classification Code No. 2-03-001-01, Internal Combustion Engines, Commercial/Institutional, Distillate Oil (Diesel), Reciprocating. The Standard Industrial Code for the facility is No. 4952, Sewer Systems. The project is located at 2700 Maritime Boulevard, Tampa, FL 33605. UTM Coordinates of the facility are 17-364.00 E and 3089.50 N.

D. Process and Controls:

The regulated emissions units at this wastewater treatment plant consist of two sludge dryer trains, five sludge storage silos, two truck loading stations with three truck loading spouts, four emergency diesel generators, two natural gas fired generators, five digester gas fired generators, and a methanol storage tank.

Electricity for the facility is normally supplied by Tampa Electric Company and the five digester gas generators. However, the facility has four (4) existing diesel-fired emergency generators on-site which can produce standby emergency power in the event of a power outage, or provide supplemental power generation to the electric power grid for Tampa Electric Company (non-emergency operation). The four (4) generators are equipped with Caterpillar 3516 DITA engines, compression ignition, rated at 2,847 bhp,

and are fired on No. 2 diesel fuel at a maximum rate of 137.5 gallons/hr. These generators were installed between 1993 and 1994 and the facility is required to retrofit oxidation catalysts on the stationary engine exhausts in order to comply with the NESHAP regulations for non-emergency operation.

The City of Tampa plans to increase the hours of operation of the diesel generators, as part of TECO's demand response program, which will render them non-emergency RICE. Therefore, as a result of this operational change, the City of Tampa will be required to install an oxidation catalyst on these generators. The catalyst, manufactured by Johnson Matthey, will be installed on each of the four (4) diesel-fired standby generators (EU 012), in order to demonstrate compliance with the 70% CO reduction requirement under 40 CFR 63 Subpart ZZZZ. By reducing CO emissions, the oxidation catalysts will also reduce HAP emissions from the engines. Initial compliance testing for CO emissions will be required to demonstrate compliance with the 70% reduction requirement, and every 3 years thereafter. Once the oxidation catalysts are installed, these engines will no longer be considered "emergency stationary RICE" under the NESHAP definition. In addition to the catalyst installation, the facility will also install crankcase ventilation kits to capture any non-exhaust emissions from the engines. The facility will also be required to monitor and record the catalyst inlet temperature and pressure drop, in order to demonstrate compliance with the regulations.

E. Application Information:

Received on: November 14, 2013
Additional Information Requested: n/a
Application Complete: November 14, 2013

II. Rule Applicability

This project is subject to the preconstruction review requirements of Chapter 403, Florida Statutes, Chapters, 62-204, 62-210, 62-212, 62-296, and 62-297, Florida Administrative Code (F.A.C.) and Chapter 1-3 of the Rules of the Environmental Protection Commission of Hillsborough County.

This project is not subject to the requirements of Rule 62-212.400, Prevention of Significant Deterioration, F.A.C. or Rule 62-212.500, New Source Review for Nonattainment Areas, F.A.C., since this project is minor by state definition.

This project is subject to the requirements of Rule 62-212.300, General Preconstruction Review Requirements, F.A.C., since it is a source of air pollution requiring a permit under this rule.

This project is subject to the requirements of Rule 62-213, Operation Permits for Major Sources of Air Pollution, F.A.C., since the facility is a Title V Source by State definition.

This project is subject to the requirements of Rule 62-296.320, General Pollutant Emission Limiting Standards, F.A.C., since the project is a source of particulate matter, VOC, and a potential source of odors.

This project is not subject to the requirements of Rule 62-296.401 through 62-296.417, Specific Emission Limiting and Performance Standards, F.A.C., since there is no applicable source specific category in this rule.

This project is not subject to the requirements of Rule 62-296.500, Reasonably Available Control Technology for VOC and NOX Emitting Facilities, F.A.C., since there is no applicable source specific category in this rule.

This project is not subject to the requirements of Rule 62-296.600, Reasonably Available Control Technology - Lead, F.A.C., since there is no applicable source category in this rule.

This project is not subject to the requirements of Rule 62-296.700, Reasonably Available Control Technology Particulate Matter, F.A.C., since the potential particulate matter emissions are less than one ton per year.

This project is subject to the requirements of Rule 62-204.800, Federal Regulations Adopted by Reference, F.A.C., since the internal combustion engines are subject to 40 CFR 63 Subpart ZZZZ, (National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Stationary Reciprocating Internal Combustion Engines (RICE)).

This project is subject to the requirements of Chapter 84-446, Laws of Florida and Chapter 1-3, Rules of the Environmental Protection Commission of Hillsborough County.

III. Summary of Emissions

EU 012 – Four Standby Generator Engines

Regulated Pollutants	Actual Emissions* ton/yr	Potential Emissions** ton/yr	Emissions Increase ton/yr	Allowable Emissions
NO_x	2.2	25.2	23.0	n/a
CO	0.5	2.0	1.5	70% reduction***
SO_2	0.14	0.40	0.26	n/a
VOC	0.18	0.71	0.53	n/a
PM	0.05	0.79	0.74	n/a
HAPS	9E-4	0.03	0.029	n/a

*Actual Emissions based the average of the 2011 and 2012 Annual Operating Reports.
** Potential Emissions based on the combustion of 115,000 gallons per year of No. 2 diesel fuel, AP-42 Table 3.4-1 emission factors, and a heat content of 137,000 Btu/gallon for No. 2 diesel fuel. While installing the oxidation catalyst will reduce CO emissions, actual emissions may increase due to increased utilization. Potential emissions for CO are shown as controlled.
***70% CO reduction required by 40 CFR 63, Subpart ZZZZ.

Inventory of Title III pollutants is estimated to be less than 10 TPY individually and less than 25 TPY collectively.

IV. Conclusions:

The emission limits proposed by the applicant will meet all of the requirements of Chapters 62-204, 62-210, 62-212, 62-296, and 62-297, F.A.C., and Chapter 1-3, Rules of the Commission.

The General and Specific Conditions listed in the proposed permit (attached) will assure compliance with all the applicable requirements of Chapters 62-204, 62-210, 62-212, 62-296, and 62-297, F.A.C.

V. Proposed Agency Action:

Pursuant to Section 403.087, Florida Statutes and Rule 62-4.070, Florida Administrative Code the Environmental Protection Commission of Hillsborough County hereby gives notice of its intent to issue a permit to construct/modify the aforementioned air pollution source in accordance with the draft permit and its conditions as stipulated (see attached).

In the Matter of an
Application for Permit by:

File No.: 0570373-020-AC
County: Hillsborough

Anthony Kasper, P.E.
Director
City of Tampa – Wastewater Department
306 East Jackson Street
Tampa, FL 33602
_____/

INTENT TO ISSUE

The Environmental Protection Commission of Hillsborough County (EPC), as delegated by the Florida Department of Environmental Protection (DEP) gives notice of its intent to issue an Air Construction Permit for the Title V source detailed in the application specified above, for the reasons stated below.

The applicant, City of Tampa Wastewater Department, applied on November 14, 2013 to the permitting authority for an air construction permit to install oxidation catalysts on their four (4) emergency diesel generators located at the Howard F. Curren Advanced Wastewater Treatment Plant at 2700 Maritime Boulevard, Tampa, Hillsborough County. These catalysts are being installed in order to demonstrate compliance with the emissions standards under 40 CFR 63, Subpart ZZZZ NESHAP for Stationary Reciprocating Internal Combustion Engines (RICE).

The EPC has permitting jurisdiction under Chapter 403 Florida Statutes (F.S.) and Florida Administrative Code (F.A.C.) Chapters 62-4 and 62-210. The project is not exempt from permitting procedures. The EPC has determined that an air pollution construction permit is required to commence or continue operations at the described facility. The EPC intends to issue this permit based on the belief that reasonable assurances have been provided to indicate that operation of the source will comply with the appropriate provisions of Florida Administrative Code (F.A.C.) Chapters 62-204 through 62-297 and 62-4.

Pursuant to Section 403.815 and 403.0872, F.S. and Rules 62-103.150 and 62-210.350(3), F.A.C., you (the applicant) are required to publish at your own expense the enclosed Notice of Intent to Issue Permit. The notice shall be published one time as soon as possible, in the legal

advertisement section of a newspaper of general circulation in the area affected. For the purpose of this rule, "publication in a newspaper of general circulation in the area affected" means publication in a newspaper meeting the requirements of Sections 50.011 and 50.031, F.S., in the county where the activity is to take place. Where there is more than one newspaper of general circulation in the county, the newspaper used must be one with significant circulation in the area that may be affected by the permit. If you are uncertain that a newspaper meets these requirements, please contact the EPC at the address or telephone number listed below. **The applicant shall provide proof of publication to the EPC, Air Permitting Section, at 3629 Queen Palm Dr., Tampa, Florida 33619 (Phone 813-627-2600 - FAX 813-627-2660) within 7 (seven) days of publication.** Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permit pursuant to Rule 62-103.150(6), F.A.C.

The EPC will issue the final permit with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to Section 120.569 and 120.57 F.S. before the deadline for filing a petition. The procedures for petitioning for a hearing are set forth below.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed (received) in the Legal Department of the EPC at 3629 Queen Palm Dr., Tampa, Florida 33619, Phone 813-627-2600, Fax 813-627-2602. Petitions filed by the permit applicant or any of the parties listed below must be filed within 14 (fourteen) days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S. must be filed within 14 (fourteen) days of publication of the public notice or within 14 (fourteen) days of receipt of this notice of intent, whichever occurs first. Under Section 120.60(3), however, any person who asked the EPC for notice of agency action may file a petition within 14 (fourteen) days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S.; or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the EPC's action is based must contain the following information:

(a) The name and address of each agency affected and each agency's file or identification number if known;
(b) The name, address, and telephone number of the petitioner and the name, address, and telephone number of each petitioner's representative, if any, which shall be the address for service purposes during the course of the proceedings; and an explanation of how the petitioner's substantial interests will be affected by the EPC's determination;
(c) A statement of how and when the petitioner received notice of the EPC action;

(d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate;
(e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the EPC's proposed action;
(f) A statement of specific rules or statutes that the petitioner contends requires reversal or modification of the EPC's proposed action, including an explanation of how the alleged facts relate to the specific rules or statutes; and
(g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the EPC to take with respect to the EPC's proposed action.

A petition that does not dispute the material facts upon which the EPC's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the EPC's final action may be different from the position taken by it in this notice of intent. Persons whose substantial interests will be affected by any such final decision of the EPC on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation under section 120.573, F.S. is not available in this proceeding.

This action is final and effective on the date filed with the Clerk of the EPC unless a petition is filed in accordance with above. Upon the timely filing of a petition, this order will not be effective until further order of the EPC.

In addition to the above, a person subject to regulation has a right to apply to the Department of Environmental Protection for a variance from or waiver of the requirements of particular rules, on certain conditions, under Section 120.542, F.S. The relief provided by this state statute applies only to state rules, not statutes, and not to any federal regulatory requirements. Applying for a variance or waiver does not substitute or extend the time for filing a petition for an administrative hearing or exercising any other right that a person may have in relation to the action proposed in this notice of intent.

The application for a variance or waiver is made by filing a petition with the Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, FL 32399-3000. The petition must specify the following information:

(a) The name, address, and telephone number of the petitioner,
(b) The name, address, and telephone number of the attorney or qualified representative of the petitioner, if any,
(c) Each rule or portion of a rule from which a variance or waiver is requested,
(d) The citation to the statute underlying (implemented by) the rule identified in (c) above,

(e) The type of action requested,
(f) The specific facts that would justify a variance or waiver for the petitioner,
(g) The reason by the variance or waiver would serve the purposes of the underlying statute (implemented by the rule), and
(h) A statement whether the variance or waiver is permanent or temporary and, if temporary, a statement of the dates showing the duration of the variance or waiver requested.

The Department will grant a variance or waiver when the petition demonstrates both that the application of the rule would create a substantial hardship or violate principles of fairness, as each of the those terms is defined in Section 120.542(2), F.S., and that the purpose of the underlying statute will be or has been achieved by other means by the petitioner.

Persons subject to regulation pursuant to any federally delegated or approved air program should be aware that Florida is specifically not authorized to issue variances or waivers from any requirements of any such federally delegated or approved program. The requirements of the program remain fully enforceable by the Administrator of United States Environmental Protection Agency and by any person under the Clean Air Act unless and until the Administrator separately approves any variance or waiver in accordance with the procedures of the federal program.

Any person listed below may request to obtain additional information, a copy of the application (except for information entitled to confidential treatment pursuant to Section 403.111, F.S.), all relevant supporting materials, and all other materials available to the EPC that are relevant to the permit decision. Interested persons may contact Diana M. Lee, P.E., at the above address or call (813) 627-2600, for additional information.

Any party to this order has the right to seek judicial review of it under Section 120.68 of the Florida Statues, by filing a notice of appeal under rule 9.110 of the Florida rules of Appellate Procedure with the EPC's Legal Office at 3629 Queen Palm Dr., Tampa, Florida 33619 and with the clerk of the Department of Environmental Protection in the Office of General Counsel, Mail Station 35, 3900 Commonwealth Boulevard, Tallahassee, Florida 32399-3000, and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate district court of appeal. The notice must be filed within thirty days after this order is filed with the clerk of the Department.

Executed in Tampa, Florida

ENVIRONMENTAL PROTECTION COMMISSION
OF HILLSBOROUGH COUNTY

_____

Richard D. Garrity, Ph.D.
Executive Director

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this INTENT TO ISSUE AN AIR CONSTRUCTION PERMIT (including the PUBLIC NOTICE and the DRAFT permit package) and all copies were sent by certified mail or electronically (with read receipt) before the close of business on _____ to the person(s) listed:

Anthony Kasper, P.E. / City of Tampa - Wastewater Department
Dan VanderSchuur / City of Tampa - Howard F. Curren AWT Plant

In addition, the undersigned duly designated deputy agency clerk hereby certifies that copies of this INTENT TO ISSUE AN AIR CONSTRUCTION PERMIT (including the PUBLIC NOTICE and the DRAFT permit package) were sent by U.S. mail or electronically (with Read Receipt) on the same date to the person(s) listed or as otherwise noted:

Tom T. John, P.E. – Thompson Global Partners, Inc.

Clerk Stamp

FILING AND ACKNOWLEDGEMENT
FILED, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated clerk, receipt of which is hereby acknowledged.

_____ _____
Clerk Date

ENVIRONMENTAL PROTECTION COMMMISSION
OF HILLSBOROUGH COUNTY
PUBLIC NOTICE OF INTENT TO ISSUE PERMIT

DRAFT Air Construction Permit No: 0570373-020-AC
City of Tampa, Wastewater Department
Howard F. Curren AWT Plant
Hillsborough County

The Environmental Protection Commission of Hillsborough County (EPC), as delegated by the Florida Department of Environmental Protection (DEP) gives notice of its intent to issue an Air Construction Permit to the City of Tampa, Howard F. Curren AWT Plant to install oxidation catalysts on their four (4) diesel emergency generators located at 2700 Maritime Boulevard, Tampa, Hillsborough County. The Howard F. Current AWT Plant is a Title V source of criteria pollutants and an area source of HAPs. These catalysts are being installed in order to demonstrate compliance with the emissions standards under 40 CFR 63, Subpart ZZZZ NESHAP for Stationary Reciprocating Internal Combustion Engines (RICE).

A Best Available Control Technology (BACT) determination was not required.

The EPC will issue the FINAL permit with the conditions of the DRAFT permit unless a timely petition for an administrative hearing is filed pursuant to Sections 120.569 and 120.57, F.S. before the deadline for filing a petition. The procedures for petitioning for hearing are set forth below.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed (received) in the Legal Department of the EPC at 3629 Queen Palm Dr., Tampa, Florida 33619, Phone 813-627-2600, Fax 813-627-2602. Petitions filed by the permit applicant or any of the parties listed below must be filed within 14 (fourteen) days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S. must be filed within 14 (fourteen) days of publication of the public notice or within 14 (fourteen) days of receipt of this notice of intent, whichever occurs first. Under Section 120.60(3), however, any person who asked the EPC for notice of agency action may file a petition within 14 (fourteen) days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205 of the F.A.C.

A petition that disputes the material facts on which the EPC's action is based is required to

contain the following information:

(a) The name and address of each agency affected and each agency's file or identification number if known;

(b) The name, address, and telephone number of the petitioner, and the name, address, and telephone number of each petitioner's representative, if any, which shall be the address for service purposes during the course of the proceedings; and an explanation of how the petitioner's substantial interests will be affected by the agency determination;

(c) A statement of how and when petitioner received notice of the EPC action;

(d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate;

(e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the EPC proposed action;

(f) A statement of specific rules or statutes the petitioner contends requires reversal or modification of the EPC's proposed action; and

(g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the EPC to take with respect to the EPC's proposed action.

A petition that does not dispute the material facts upon which the EPC's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above as required by Rule 28-106.301.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the EPC's final action may be different from the position taken by it in this notice of intent. Persons whose substantial interests will be affected by any such final decision of the EPC on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above. Mediation under section 120.573, F.S. is not available in this proceeding.

This action is final and effective on the date filed with the Clerk of the EPC unless a petition is filed in accordance with above. Upon the timely filing of a petition this order will not be effective until further order of the EPC.

Any party to this order has the right to seek judicial review of it under Section 120.68 of the Florida Statues, by filing a notice of appeal under rule 9.110 of the Florida rules of Appellate Procedure with the EPC's Legal Office at 3629 Queen Palm Dr., Tampa, Florida 33619 and with the clerk of the Department of Environmental Protection in the Office of General Counsel, Mail Station 35, 3900 Commonwealth Boulevard, Tallahassee, Florida 32399-3000, and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate district court of appeal. The notice must be filed within thirty days after this order is filed with the clerk of the Department.

The complete project file is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at the Environmental

Protection Commission of Hillsborough County, 3629 Queen Palm Dr., Tampa, FL 33619. The complete project file includes the proposed Permit, the application, and the information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact Diana M. Lee, P.E.**,** at the above address, or call 813-627-2600, for additional information. Any written comments filed shall be available for public inspection. If written comments received result in a significant change in the proposed agency action, the EPC shall revise the draft permit and require, if applicable, another Public Notice.

ENVIRONMENTAL PROTECTION COMMISSION OF
HILLSBOROUGH COUNTY, as Delegated by

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

NOTICE OF PERMIT

Anthony Kasper, P.E.
Director
City of Tampa – Wastewater Department
306 East Jackson Street, #6E
Tampa, FL 33602

Dear Mr. Kasper: Re: Hillsborough County - AP

Enclosed is Permit Number No. 0570373-020-AC to install oxidation catalysts on the four (4) diesel emergency generators at the Howard F. Curren Advanced Wastewater Treatment Plant, issued pursuant to Section 403.087, Florida Statutes.

Any party to this order (permit) has the right to seek judicial review of the permit pursuant to Section 120.68, Florida Statutes, by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the EPC in the Legal Department at 3629 Queen Palm Drive, Tampa, FL 33619; and by filing a copy of the Notice of Appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The Notice of Appeal must be filed within 30 days from the date this Notice is filed with the clerk of the EPC.

Executed in Tampa, Florida.

Sincerely,

Richard D. Garrity, Ph.D.
Executive Director

cc: Florida Department of Environmental Protection, Southwest District (via e-mail)
Dan VanderSchuur, City of Tampa – Howard F. Curren AWT Plant
Tom T. John, P.E, Thompson Global Partners, Inc.

CERTIFICATE OF SERVICE

This is to certify that this NOTICE OF PERMIT and all copies were mailed before the close of business on _____ to the listed persons.

Clerk Stamp
FILED, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated clerk, receipt of which is hereby acknowledged.

_____ _____
Clerk Date

PERMITTEE:	PERMIT/CERTIFICATION
Anthony Kasper, P.E.	Permit No.: 0570373-020-AC
City of Tampa – Wastewater Department	County: Hillsborough
306 East Jackson Street, #6E	Expiration Date: June 30, 2015
Tampa, FL 33602	Project: Install Oxidation Catalysts on Diesel Generators

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Rules 62-204, 62-210, 62-212, 62-296, 62-297, and 62-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents, attached hereto or on file with the EPC and made a part hereof and specifically described as follows:

For the installation of oxidation catalysts on the four (4) diesel generators located at the Howard F. Curren AWT Plant in order to demonstrate compliance with 40 CFR 63 Subpart ZZZZ, National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Stationary Reciprocating Internal Combustion Engines (RICE). The regulated emissions units at this wastewater treatment plant consist of two sludge dryer trains, building fugitive emissions, five sludge storage silos, two truck loading stations with three truck loading spouts, four diesel generators, two natural gas fired generators, five digester gas fired generators, and a methanol storage tank. The only emission unit affected by this permit is the four (4) existing diesel generators (EU012).

Electricity for the facility is normally supplied by Tampa Electric Company and the five digester gas generators. However, the facility has four (4) existing diesel-fired emergency generators on-site which can produce standby emergency power in the event of a power outage, or provide supplemental power generation to the electric power grid for Tampa Electric Company (non-emergency operation). The four (4) 2 MW generators are equipped with Caterpillar 3516 DITA engines, compression ignition, rated at 2,847 bhp, and are fired on No. 2 diesel fuel at a maximum rate of 137.5 gallons/hr. These generators were installed between 1993 and 1994 and the facility is required to retrofit oxidation catalysts on the stationary engine exhausts in order to comply with the NESHAP regulations for non-emergency operation.

The City of Tampa plans to increase the hours of operation of the diesel generators, as part of TECO's demand response program, which will render them non-emergency RICE. Therefore, as a result of this operational change, the City of Tampa will be required to install an oxidation catalyst on these generators. The catalyst, manufactured by Johnson Matthey, will be installed on each of the four (4) diesel-fired standby generators (EU 012), in order to demonstrate compliance with the 70% CO reduction requirement under 40 CFR 63 Subpart ZZZZ. By reducing CO emissions, the oxidation catalysts will also reduce HAP emissions from the engines. Initial compliance testing for

CO emissions will be required to demonstrate compliance with the 70% reduction requirement, and every 3 years thereafter. Once the oxidation catalysts are installed, these engines will no longer be considered "emergency stationary RICE" under the NESHAP definition. In addition to the catalyst installation, the facility will also install crankcase ventilation kits to capture any non-exhaust emissions from the engines. The facility will also be required to monitor and record the catalyst inlet temperature and pressure drop, in order to demonstrate compliance with the regulations.

This emission unit is not subject to the RICE NSPS, 40 CFR 60, Subpart IIII since the engines were installed prior to April 2006.

Location: 2700 Maritime Boulevard, Tampa

UTM: 17-364.00E 3089.50N. NEDS NO: 0373

EU ID No.: 012 - Four Diesel Non-Emergency Generators controlled by Oxidation Catalysts

Replaces Permit No.: N/A

References Permit No.: 0570373-006-AC

SPECIFIC CONDITIONS:

1. A part of this permit is the attached General Conditions. [Rule 62-4.160, F.A.C.]

2. All applicable rules of the Environmental Protection Commission of Hillsborough County including design discharge limitations specified in the application shall be adhered to. The permit holder may also need to comply with county, municipal, federal, or other state regulations prior to construction. [Rule 62-4.070(7), F.A.C.]

3. Issuance of this permit does not relieve the permittee from complying with applicable emission limiting standards or other requirements of Chapters 62-204, 62-210, 62-212, 62-296 and 62-297, F.A.C., or any other requirements under federal, state, or local law. [Rule 62-210.300, F.A.C.]

4. The permittee shall not cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor. [Rule 62-296.320(2), F.A.C.]

5. Permitted Capacity. The maximum allowable fuel usage rate is as follows:

A)

EU No.	Gallons/12-Consecutive Month Period	Fuel Type
-012	115,000	No. 2 Diesel Fuel

B) Fuel Requirements:

i) Sulfur Content: The sulfur content of the No. 2 diesel fuel shall not exceed 0.05% by weight.

ii) Beginning January 1, 2015, the sulfur content of the No. 2 diesel fuel burned shall not exceed 15 ppm by weight (Ultra Low Sulfur Diesel), except that higher sulfur content fuel that has already been purchased prior to January 1, 2015 may be used until depleted.

iii) Cetane or Aromatic Content: A minimum cetane index of 40, or a maximum aromatic content of 35 volume percent.

iv) Compliance with the fuel requirements shall be demonstrated by the Certificate of Fuel Analysis from the fuel supplier.

[40 CFR 63.6604, Rules 62-4.160(2), 62-204.800, 62-210.200(PTE), Permit No(s). 0570373-006-AC, and Construction Permit Application received November 14, 2013]

6. Hours of Operation. This emission unit may operate as needed to off-set power shortages during the year and provide supplemental power to the external power grid without restrictions on hours, but must abide by the maximum fuel usage limit from Specific Condition No. 5. [Rule 62-210.200(PTE), F.A.C., Permit No. 0570373-006-AC, and Construction Permit Application received November 14, 2013]

SPECIFIC CONDITIONS:

Emission Limitations and Standards

7. CO Emissions. The facility shall install, operate, and maintain oxidation catalysts on the four (4) diesel generators in order to achieve a minimum of 70% reduction in CO emissions. Alternatively, the facility may limit the concentration of CO in the diesel generator exhausts to 23 ppmvd at 15 percent oxygen. [40 CFR 63.6603(a), and Construction Permit Application received November 14, 2013]

8. HAP Emissions. In order to establish the facility as an area source of Hazardous Air Pollutants (HAP), the HAP, as defined in Rule 62-210.200, F.A.C., emissions shall be less than 10 tons in any 12 consecutive month period for any individual HAP, and less than 25 tons in any 12 consecutive month period for any combination of HAPs. [Rule 62-210.200, F.A.C., Definitions-Potential to Emit (PTE), Major Source of Air Pollution]

9. Visible Emissions. Visible emissions from the four (4) diesel generators shall not exceed 20% opacity. [Rule 62-296.320(4)(b)1., F.A.C., Construction Permit 0570373-006-AC, and Construction Permit Application received November 14, 2013]

10. [RESERVED]

Excess Emissions

Rule 62-210.700 (Excess Emissions), F.A.C. cannot vary any requirement of an NSPS, NESHAP or Acid Rain program provision.

11. Excess Emissions Allowed. Excess emissions resulting from malfunction shall be permitted provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration. [Rule 62-210.700(1), F.A.C.]

12. Excess Emissions Allowed. Excess emissions resulting from startup or shutdown shall be permitted provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions shall be minimized. [Rule 62-210.700(2), F.A.C.]

13. Excess Emissions Prohibited. Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during startup, shutdown or malfunction shall be prohibited. [Rule 62-210.700(4), F.A.C.]

14. You must be in compliance with the emission limitations, operating limitations, and other requirements under 40 CFR 63, Subpart ZZZZ that apply to you at all times. At all times you

must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require you to make any further efforts to reduce emissions if levels required by this standard have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.

[40 CFR 63.6605]

Test Methods and Procedures

15. Initial CO Compliance Testing. Within 90 days of completion of installation of the oxidation catalysts and continuous parameter monitoring system (catalyst inlet temperature and pressure drop) on the diesel generators, conduct an initial compliance test for CO emissions on at least one of the diesel generators, using the following procedures:

A) Provide to the EPCHC a minimum of 60 calendar days prior written notice of the permittee's intent to conduct initial CO performance testing;
B) If you are complying with the requirement to reduce CO emissions by 70% or more, you shall:

	Using . . .	According to the following requirements . . .
i. Measure the O_2 at the inlet and outlet of the control device; and	(1) Method 3 or 3A or 3B of 40 CFR Part 60, Appendix A	(a) Measurements to determine O_2 must be made at the same time as the measurements for CO concentration.
ii. Measure the CO concentration at the inlet and the outlet of the control device	(1) Method 10 of 40 CFR Part 60, Appendix A	(a) The CO concentration must be at 15 percent O_2, dry basis.

SPECIFIC CONDITIONS:

C) If you are complying with the requirement to limit the concentration CO in the stationary RICE exhaust to 23 ppmvd at 15 percent oxygen, you shall:

	Using . . .	According to the following requirements . . .
i. Select the sampling port location and the number of traverse points; and	(1) Method 1 or 1A of 40 CFR Part 60, Appendix A	The sampling site must be located at the outlet of the control device.
ii. Determine the O_2 concentration of the stationary RICE exhaust at the sampling port location; and	(1) Method 3 or 3A or 3B of 40 CFR Part 60, Appendix A	(a) Measurements to determine O_2 concentration must be made at the same time and location as the measurements for CO concentration.
iii. Measure moisture content of the stationary RICE exhaust at the sampling port location; and	(1) Method 4 of 40 CFR part 60, Appendix A	(a) Measurements to determine moisture content must be made at the same time and location as the measurements for CO concentration.
iv. Measure CO concentration at the exhaust of the stationary RICE.	(1) Method 10 of 40 CFR Part 60, Appendix A	(a) CO concentration must be at 15 percent O_2, dry basis. Results of this test consist of the average of the three 1-hour runs.

D) Measure and record the catalyst inlet temperature and pressure drop during the initial performance test, in accordance with Specific Condition No. 18.

E) Submit the results of the performance test to the EPCHC within 45 days of completion of testing. If initial compliance with the CO percent reduction or exhaust concentration is demonstrated for one of the diesel generators, then the initial compliance test requirement may be waived for the remaining three generators upon request, subject to the approval of the EPCHC.

F) Conduct subsequent CO performance tests every 3 years.

G) Required Stack Sampling Facilities. Sampling facilities include sampling ports, work platforms, access to work platforms, electrical power, and sampling equipment support. All stack sampling facilities must meet any Occupational Safety and Health Administration (OSHA) Safety and Health Standards described in 29 CFR Part 1910, Subparts D and E.

SPECIFIC CONDITIONS:

[40 CFR 63.6612 and 63.6615; and Rule 62-297.310, F.A.C.]

16. Testing of emissions shall be conducted with the source operating at capacity. Capacity is defined as 90-100% of the rated capacity of 137.5 gal/hr per generator. If it is impracticable to test at capacity, then the source may be tested at less than capacity; in this case subsequent source operation is limited to 110% of the test load until a new test is conducted. Once the unit is so limited, then operation at higher capacities is allowed for no more than fifteen days for purposes of additional compliance testing to regain the rated capacity in the permit, with prior notification to the Environmental Protection Commission of Hillsborough County. Failure to submit the input rates, load levels, monitored parameters (catalyst inlet temperature and pressure drop), and actual operating conditions may invalidate the test. [Rule 62-297.310(2), F.A.C.]

Monitoring, Recordkeeping, and Reporting Requirements

17. Oxidation Catalyst Parameter Monitoring. The permittee shall comply will the following catalyst parameter monitoring requirements:

A) Maintain the catalyst so that the pressure drop across the catalyst does not change by more than 2 inches of water from the pressure drop across the catalyst that was measured during the initial performance test; and
B) Maintain the temperature of your stationary RICE exhaust so that the catalyst inlet temperature is greater than or equal to 450 °F and less than or equal to 1,350 °F.

[40 CFR 63.6603(a)]

18. Monitoring Procedures: The catalyst parameter monitoring shall be conducted according to the following procedures:
A) Collect the catalyst inlet temperature data according to 40 CFR 63.6625(b);
B) Reduce the data to 4-hour rolling averages;
C) Maintain the 4-hour rolling averages within the operating limitations for the catalyst inlet temperature; and
D) Measure the pressure drop across the catalyst once per month and demonstrating that the pressure drop across the catalyst is within the operating limitation established during the performance test.

[40 CFR 63.6640 and 63.6625(b)]

19. The permittee shall maintain monthly records and 12-month rolling totals of the hours of operation and the fuel usage for the diesel generators.
[Rule 62-213.440(1)(b)1.b., F.A.C.]

SPECIFIC CONDITIONS:

20. Fuel Oil Analysis. A certificate of fuel oil analysis from the fuel supplier shall be maintained for each shipment of diesel fuel. [Construction Permit 0570373-006-AC]

21. Notification of Compliance Status. Within 60 days of completion of the initial CO compliance test specified in Specific Condition No. 15, the permittee shall submit a notification of compliance status to the Air Compliance Section of the EPCHC. The notification shall be signed by the responsible official who shall certify its accuracy, attesting to whether the source has complied with the relevant standard. The notification shall include:

(A) The methods that were used to determine compliance;

(B) The results of any performance tests, continuous monitoring system (CMS) performance evaluations, and/or other monitoring procedures or methods that were conducted;

(C) The methods that will be used for determining continuing compliance, including a description of monitoring and reporting requirements and test methods;

(D) The quantity of CO emitted by the source, reported in units and averaging times and in accordance with the test methods specified in the relevant standard;

(E) A description of the air pollution control equipment for each emission point, including each control device for each pollutant and the control efficiency (percent) for each control device; and

(F) A statement by the owner or operator of the affected existing source as to whether the source has complied with the relevant standard or other requirements.

[40 CFR 63.6630 and 63.9(h)]

22. Semiannual Compliance Reports. The permittee shall submit semiannual compliance reports by January 31 or July 31, whichever date is the date following the end of the semiannual reporting period. The reports shall contain, if there were no deviations from any emission limitations or operating limitations that apply, a statement that there were no deviations from the emission limitations or operating limitations during the reporting period. If there were no periods during which the CPMS was out-of-control, as specified in §63.8(c)(7), a statement that there were not periods during which the CPMS was out-of-control during the reporting period; or if you had a deviation from any emission limitation or operating limitation during the reporting period, the information in §63.6650(d). If there were periods during which the CPMS was out-of-control, as specified in §63.8(c)(7), the information in §63.6650(e); or if you had a malfunction during the reporting period, the information in §63.6650(c)(4).

[40 CFR 63.6650]

SPECIFIC CONDITIONS:

23. Recordkeeping. The permittee shall keep the following records in readily accessible hard copy or electronic form for at least 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record:

A) A copy of each notification and report that you submitted to comply with 40 CFR 63, Subpart ZZZZ, including all documentation supporting any Initial Notification or Notification of Compliance Status;
B) Records of the occurrence and duration of each malfunction of operation (i.e., process equipment) or the air pollution control and monitoring equipment;
C) Records of performance tests and CMS performance evaluations;
D) Records of all required maintenance performed on the air pollution control and monitoring equipment;
E) Records of actions taken during periods of malfunction to minimize emissions, including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation.
F) Each period during which a CMS is malfunctioning or inoperative (including out-of-control periods);
G) All required measurements needed to demonstrate compliance with a relevant standard (including, but not limited to, 15-minute averages of CMS data, raw performance testing measurements, and raw performance evaluation measurements, that support data that the source is required to report);
H) All results of performance tests and CMS performance evaluations;
I) All measurements as may be necessary to determine the conditions of performance tests and performance evaluations;
J) All CMS calibration checks;
K) All adjustments and maintenance performed on CMS; and,
L) Records of all monitoring data required to be recorded under Specific Condition No. 18.

[40 CFR 63.6645 and 63.6660]

24. Federal 40 CFR 63 NESHAP Subpart ZZZZ Requirements. In addition to the specific conditions in this permit, the existing stationary engines in EU ID No. 012 are required to comply with all of the applicable requirements of NESHAP 40 CFR 63 Subpart ZZZZ (National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Stationary Reciprocating Internal Combustion Engines (RICE)), which is attached to this permit. [40 CFR 63 Subpart ZZZZ, Rule 62-204.800, F.A.C., and Rule 62-4.070(3), F.A.C.]

25. Federal 40 CFR 63 NESHAP Subpart A - General Provisions. The permittee shall comply with all of the applicable requirements of 40 CFR 63 Subpart A, General Provisions, which is attached to this permit. [40 CFR 63, Subpart A]

SPECIFIC CONDITIONS:

26. Annual Operating Report. The permittee must submit to the Environmental Protection Commission of Hillsborough County each calendar year, a completed DEP Form 62-210.900(5), "Annual Operating Report (AOR) for Air Pollutant Emitting Facility", for the preceding calendar year. The AOR shall be submitted by April 1st of the following year. [Rule 62-210.370(3), F.A.C.]

27. The use of property, facilities, equipment, processes, products, or compounds, or the commission of paint overspraying or any other act, that causes or materially contributes to a public nuisance is prohibited. [Hillsborough County Environmental Protection Act, Section 16, Chapter 84-446, Laws of Florida, as Amended.]

28. When the Environmental Protection Commission of Hillsborough County (EPC) after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable requirement or permit condition is being violated, it may require the owner or operator of the source to conduct compliance tests which identify the nature and quantity of pollutant emissions from the source and to provide a report on the results of said tests to the EPC. For the purpose of confirming compliance with the emission limitations in this permit, the EPC may require the use of EPA Method 9 or other approved methods, as deemed necessary.
[Rules 62-297.310(7)(b) and 62-4.070(3), F.A.C.]

29. The permittee shall provide timely notification to the Environmental Protection Commission of Hillsborough County prior to implementing any changes that may result in a modification to this permit pursuant to Rule 62-210.200, F.A.C., Modification. The changes do not include normal maintenance, but may include, and are not limited to, the following, and may also require prior authorization before implementation: [Rules 62-210.300 and 62-4.070(3), F.A.C.]

A) Alteration or replacement of any equipment* or major component of such equipment.
B) Installation or addition of any equipment* which is a source of air pollution.

*Not applicable to routine maintenance, repair, or replacement of component parts of an air emissions unit.

30. If the permittee wishes to transfer this permit to another owner, an "Application for Transfer of Permit" (DEP Form 62-210.900(7)) shall be submitted, in duplicate, to the Environmental Protection Commission of Hillsborough County within 30 days after the sale or legal transfer of the permitted facility. [Rule 62-4.120, F.A.C.]

31. Title V Permit Application. A minimum of two copies of an application to revise the current Title V Operation Permit shall be submitted to the Environmental Protection Commission of Hillsborough County within 60 days of completion of the initial CO emissions compliance testing required by this permit. The application shall also include a copy of the required compliance test(s)

SPECIFIC CONDITIONS:

and monitoring records required by this permit. [Rules 62-4.050(2), 62-210.300(2), and 62-213.400(2), F.A.C.]

ENVIRONMENTAL PROTECTION COMMISSION
OF HILLSBOROUGH COUNTY

_____
Richard D. Garrity, Ph.D.
Executive Director