Florida Department of Environmental Protection

Bob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Rick Scott
Governor

Jennifer Carroll
Lt. Governor

Herschel T. Vinyard Jr.
Secretary

Electronically Sent – Received Receipt Requested

Mr. Ronald D. Bishop, Director
Tampa Electric Company (TECO)
Big Bend Station
P.O. Box 111
Tampa, FL 33801-0111

RE: Project No. 0570039-051-AC
Current Title V Permit Number 0570039-045-AV
Tampa Electric Company – Big Bend Station
Backup Emergency Limestone Conveyance System
Letter of Authorization

Dear Mr. Bishop:

The Department acknowledges receipt of your November 1, 2011 request to construct and operate a backup emergency limestone conveying system consisting of a fully enclosed bucket elevator mounted to the side of Silo C and a portable hopper/conveyor system used to deliver limestone into the bucket elevator. This system will serve as a backup conveyance system to maintain the supply of limestone into silo C and to the flue gas desulfurization (FGD) system should the existing conveyance system between the limestone storage building and Silo C fail. The existing Silo C conveyance system is designed to transfer limestone at the rate of 200 tons per hour. The proposed back-up emergency bucket elevator is designed to transfer up to 100 tons of limestone per hour.

Potential fugitive emissions of particulate matter from filling the hopper that will feed the enclosed conveyance system are less than 1 ton per year, making this unit potentially exempt from the requirement to obtain an air construction permit. However, because the facility is subject to 40 CFR 60 Subpart OOO, as a non-metallic mineral processing plant, the bucket elevator is considered an affected facility subject to regulation even though there are no points of emissions from it. The only potential sources of emissions related to the operation of the bucket elevator are from the transporting of the limestone between the limestone storage area and the portable hopper/conveyor, which can be accomplished either by dump trucks or by front-end loaders. The dump trucks would dump the limestone into a temporary designated area near the portable hopper. The front end loaders will either load the hopper from this temporary pile or directly from the limestone storage building. The hopper is designed to be movable so that it will not interfere with normal vehicle traffic in this area when it is not needed.

Except for the hopper, the conveyance system shall be fully enclosed to minimize dust emissions during operation. The filling of the hopper and temporary limestone pile are subject to a general 5% opacity standard pursuant to Rule 1-3.52 of the Environmental Protection Commission of Hillsborough County (EPC). EPC and DEP regulations limit emissions of fugitive particulate matter from vehicular traffic and storage piles through a general standard of 20% opacity. While the bucket elevator is by definition an affected facility subject to 40 CFR 60 Subpart OOO, the enclosed conveyance system does not create any new emission points that require additional controls. During backup emergency operation, the existing baghouse on Silo C will control emissions from the bucket elevator and Silo C feeders as currently regulated in the Title V air operation permit pursuant to the requirements of 40 CFR 60 Subpart OOO, Rule 62-296.711, F.A.C., and Rule 1-3.52, EPC. The facility will apply the current best management practices to suppress fugitive limestone emissions during transfers and dust emissions from vehicular travel through reasonable precautions to prevent emissions of unconfined particulate matter.

Determination: TEC proposes install this redundant backup emergency conveyance system to ensure that the flue gas desulfurization (FGD) system will continue to operate should a failure of the primary limestone conveyance system happen to occur. TEC does not intend to operate this backup emergency system while the main conveyance system is operational. Based on the facts provided, the Department authorizes the construction and operation of the proposed backup emergency limestone conveyance system. The Title V air operation permit shall be updated at the next opportunity to incorporate the proposed changes in the description of the authorized limestone handling equipment and methods of operation.

Final Action and Mediation: The Department will consider this action final unless a timely petition for an administrative hearing is filed pursuant to Sections 120.569 and 120.57, of the Florida Statutes (F.S.). Mediation under Section 120.573, F.S., will not be available for this proposed action.

Petitions: A person whose substantial interests are affected by this permitting action may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed (received) in the Department's Office of General Counsel, MS #35, 3900 Commonwealth Boulevard, Tallahassee, Florida 32399-3000. Petitions filed by the applicant or any of the parties listed below must be filed within 14 days of receipt of this notice. Petitions filed by any other person must be filed within 14 days of receipt of this proposed action. A petitioner must 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 Department'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; the name, address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of how and when each petitioner received notice of the agency action or proposed 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, as well as the rules and statutes which entitle the petitioner to relief; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and, (g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the agency to take with respect to the agency's proposed action.

A petition that does not dispute the material facts upon which the permitting authority'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 Department's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any such final decision of the permitting authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Appeals: Any party to this order has the right to seek judicial review of it under Section 120.68, F.S., by the filing of a Notice of Appeal, under Rule 9.110 of the Florida Rules of Appellate Procedure, with the Clerk of the Department in the Office of General Counsel, 3900 Commonwealth Boulevard, Mail Station #35, 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 of Appeal must be filed within 30 days from the date this notice is filed with the Clerk of the permitting authority.

Executed in Tallahassee, Florida
Electronic Signature

Office of Permitting and Compliance
Division of Air Resource Management
Department of Environmental Protection
Tallahassee, Florida

Jeffery F. Koerner
2011.12.22 09:54:50 -05'00'

JFK/jh

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this authorization was sent by electronic mail (or a link to these documents made available electronically on a publicly accessible server) with received receipt requested before the close of business on the date indicated below to the following persons.

Mr. Ronald Bishop, Director, TECO (rdbishop@tecoenergy.com)
Mr. Byron Burrows, P.E., TECO (btburrows@tecoenergy.com)
Mr. Rob Velasco, P.E., TECO (ravelasco@tecoenergy.com)
Ms. Cindy Zhang-Torres, SWD Office (cindy.zhang-torres@dep.state.fl.us)
Ms. Diana Lee, Hillsborough County EPC (lee@epchc.org)
Ms. Cindy Mulkey, DEP Siting Office (cindy.mulkey@dep.state.fl.us)
Ms. Kathleen Forney, EPA Region 4 (forney.kathleen@epa.gov)
Ms. Heather Ceron, EPA Region 4 (ceron.heather@epa.gov)
Ms. Anne Harvey, Earthjustice (aharvey@earthjustice.org)
Ms. Lynn Scearce, DEP OPC Reading File (lynn.scearce@dep.state.fl.us)

Clerk Stamp

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

Elizabeth Walker
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