FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

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(Sent by Electronic Mail – Return Receipt Requested)

Mr. Ronald D. Bishop, Director
Tampa Electric Company
Post Office Box 111
Tampa, Florida 33601-0111

Re: Renewed Title V Air Operation Permit
Proposed Permit No. 0570039-072-AV
Big Bend Station

Dear Mr. Bishop:

One copy of the proposed permit determination for the renewed Title V air operation permit for Big Bend Station is enclosed. This existing facility is located in Hillsborough County, Florida, at 13031 Wyandotte Road, Apollo Beach, Florida. This letter is only a courtesy to inform you that the draft permit has become a proposed permit.

An electronic version of this determination has been posted on the Division of Air Resource Management's World Wide Web site for the United States Environmental Protection Agency (USEPA) Region 4 office's review. The web site address is (enter proposed permit number to access the files): http://appprod.dep.state.fl.us/air/emission/apds/default.asp.

Pursuant to Section 403.0872(6), Florida Statutes, if no objection to the proposed Title V air operation permit is made by the USEPA within 45 days, the proposed permit will become a final permit no later than 55 days after the date on which the proposed permit was mailed (posted) to the USEPA. If the USEPA has an objection to the proposed permit, the final permit will not be issued until the permitting authority receives written notice that the objection is resolved or withdrawn.

If you should have any questions, please contact Tammy McWade at 850/717-9086 or David Read, P.E. at 850/717-9075.

Executed in Tallahassee, Florida.

for Jeffery F. Koerner, Program Administrator
Office of Permitting and Compliance
Division of Air Resource Management

JFK/dlr/tm

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

I. PUBLIC NOTICE

The Intent to Issue Air Permit issued to Tampa Electric Company for the Big Bend Station was clerked on December 4, 2014. The Big Bend Station is located in Hillsborough County at 13031 Wyandotte Road in Apollo Beach, Florida. Link to Draft Permit Package

The Public Notice of Intent to Issue Air Permit was published in the La Gaceta newspaper on December 19, 2014. The draft Title V air operation permit was available for public inspection at the permitting authority's office in Tallahassee. Proof of publication of the Public Notice of Intent to Issue Air Permit was received on December 23, 2014. Link to Published Notice

II. PUBLIC COMMENTS

During the 30-day public comment period, comments were received from the Sierra Club, on behalf of its Florida members, and from the applicant, Tampa Electric Company (TEC). These comments, and the Florida Department of Environmental Protections (Department) response to them, are summarized below.

Comments from the Sierra Club

Comments were submitted by the Sierra Club, through their outside counsel, Kathryn M. Amirpashaie, PLC, as an 18 page letter dated January 20, 2015 together with an exhibit summarizing dispersion modeling performed by a Sierra Club contractor. The package included two other exhibits related to a Title V permitting action in Massachusetts. Links to Sierra Club Letter and Sierra Modeling

The key comments contained in the letter are condensed, repeated or paraphrased (in italics) below and followed by the Department's response.

1. *Sierra Club Comment (summarized): The proposed permit fails to prevent violations of Florida's prohibition on air pollution (Section 403.161, Florida Statutes) with regard to the plant's sulfur dioxide (SO_2) emissions.*

   Department Response: The draft Title V permit accurately reflects the SO_2 permit limits established in state and federal rules as well as by specific conditions in underlying air construction permits. The Clean Air Act requires the USEPA to establish national ambient air quality standards (NAAQS), such as the new 1-hour SO_2 NAAQS.[1] By itself, a NAAQS does not impose any obligation on individual existing sources. The Clean Air Act also provides that each state determines how best to attain and maintain the NAAQS within their boundaries.[2] Once determined, the measures are incorporated into the State Implementation Plan (SIP), which is approved by the USEPA. The specific measures required to attain and maintain compliance with a NAAQS can be imposed on specific sources via new rules, air construction permits, and/or administrative orders, which are later incorporated into the Title V air operation permit for affected sources.

   The general provisions of state law cited to in the comments by Sierra Club reflect the Department's general powers and duties and are not meant to enable the Department to impose different SO_2 emission limits in a facility's Title V air operating permit. The Title V air operating permit program generally does not impose new substantive requirements on a facility but instead is intended to contain all applicable requirements in one document.

   Emissions of SO_2 from the TEC, Big Bend Station, have decreased 90% since 1999: see **Figure 1**. Additionally, there are other methods by which SO_2 emissions from this facility are being reduced. Draft Permit No. 0570039-074-AC is an air construction permit for a SO_2 emission reduction project that imposes a cap on SO_2 emissions for the four units at the facility. See Department Response to Sierra Club Comment 3.

[1] 42 U.S.C. 7409 - National Primary and Secondary Ambient Air Quality Standards
http://www.gpo.gov/fdsys/pkg/USCODE-2011-title42/pdf/USCODE-2011-title42-chap85-subchapI-partA-sec7409.pdf

[2] 42 U.S.C. 7410 - State Implementation Plans for National Primary and Secondary Ambient Air Quality Standards
http://www.gpo.gov/fdsys/pkg/USCODE-2011-title42/pdf/USCODE-2011-title42-chap85-subchapI-partA-sec7410.pdf

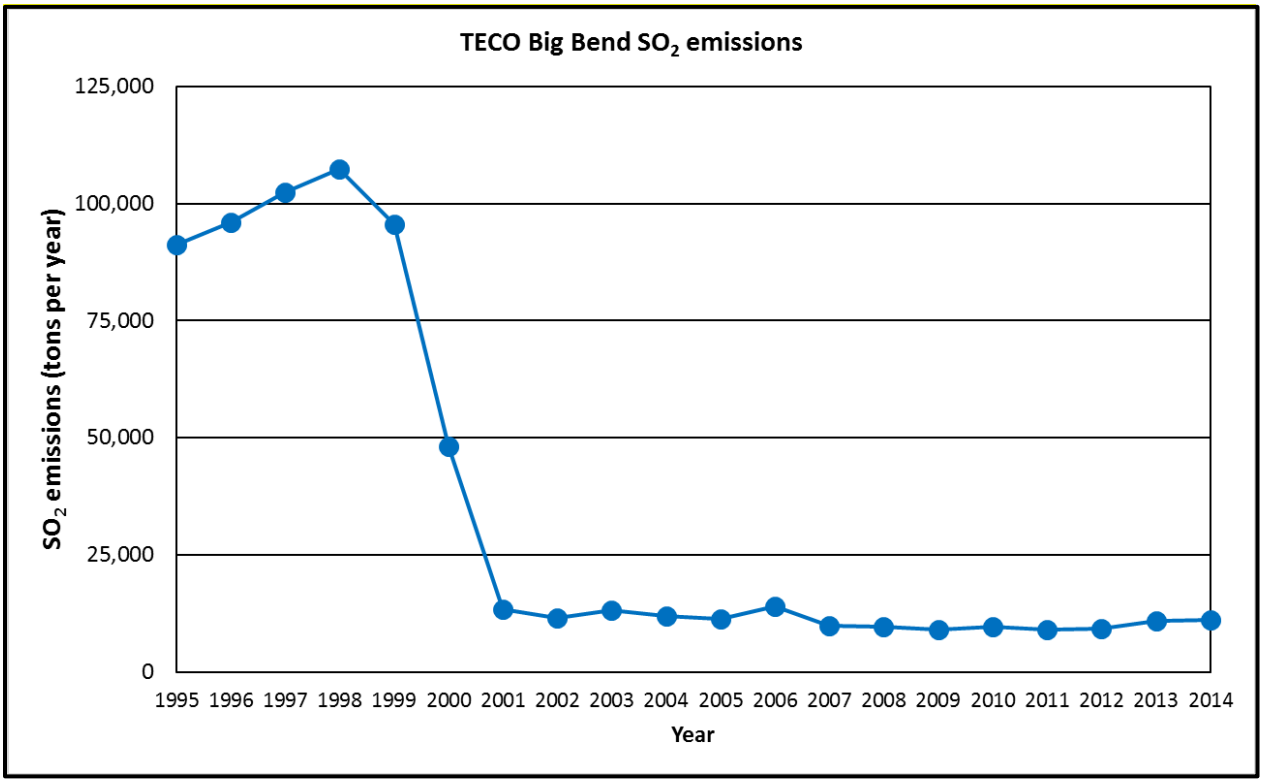

Figure 1. SO_2 Emission Trend for Big Bend Station.

2. *Sierra Club Comment: The proposed permit impermissibly allows compliance with one SO_2 emission limit to demonstrate compliance with other SO_2 emission limits.*

   Department Response: Pursuant to Rule 62-213.440, F.A.C. (Permit Content), the draft Title V permit accurately reflects all permit limits based on the applicable underlying state and federal rules and previously issued air construction permits. However, this rule also allows, "… when there are multiple, redundant, or conflicting applicable requirements, these provisions can be reduced to a single streamlined term or condition that is the most stringent of the multiple applicable requirements." Pursuant to that rule, the Department established a single streamlined SO_2 emissions standard that represents compliance with the multiple SO_2 emissions standards. The streamlined standard was based on several years of actual SO_2 data collected by the continuous emissions monitoring systems (CEMS) and USEPA guidance.[3]

3. *Sierra Club Comment: Appropriate SO_2 numerical emissions limits in the final permit should ameliorate Big Bend's contribution to the nearby (SO_2) nonattainment area.*

   Department Response: As previously discussed in the response to Comment No. 1, the Title V permit is not the appropriate regulatory mechanism for establishing SO_2 limits based on air dispersion modeling. The Department's draft Air Construction Permit No. 0570039-074-AC issued January 15, 2015, establishes the following new SO_2 emissions cap in Specific Condition 2 in Section 3, Subsection B of the permit, which is protective of the 1-hour SO_2 NAAQS and will be included in Florida's SIP revision submitted to the USEPA for approval.

   > The combined emissions of SO_2 from all four fossil fuel fired steam generating units (EU 001 – EU 004, combined) shall not exceed 3,162 pounds per hour (lb/hour) based on a 30-day rolling average. Compliance with this SO_2 emissions cap shall be demonstrated by data collected from the existing SO_2 CEMS. The new emissions cap applies at all times when these units are operating including periods of

[3] EPA's "Guidance for 1-Hour SO_2 Non-Attainment Area SIP Submissions", April 23, 2014; See following link. http://dnr.wi.gov/topic/AirQuality/documents/SO2NonattainmentEPAFinalSIPGuidance20140423.pdf

startup and shutdown. The effective date of this SO_2 emissions cap is within 180 days of completing construction of the last natural gas igniter authorized by Permit No. 0570039-065-AC, but no later than June 1, 2016. [Rules 62-4.070(1) and (3), and 62-4.080(1), F.A.C.; and SO_2 Attainment SIP]

{Permitting Note: This new emissions cap reduces SO_2 emissions and ambient impacts in and around the SO_2 non-attainment area in Hillsborough County.}

The cap is equivalent to a SO_2 emission rate of 0.193 lb SO_2/MMBtu at the max heat input rate of each unit. This cap is more stringent than the National Emission Standards of Hazardous Air Pollutants (NESHAP) limit of 0.20 lb SO_2/MMBtu (30-day rolling average) found in Subpart UUUUU in Title 40, Part 63 of the Code of Federal Regulations (CFR) for Mercury and Air Toxics Standards (MATS).

4. *Sierra Club Comment: The proposed permit must be revised to clarify that the emissions limitations and standards contained therein apply at all times, even during startup, shutdown, and malfunction.*

   Department Response: The draft Title V permit accurately reflects the permit limits and exceptions based on the applicable underlying state and federal rules and previously issued air construction permits. The Department's Rule 62-210.700 (Excess Emissions), F.A.C., is only applicable to emissions standards that result from state-only requirements. Section III, Subsections A (Units 1-3) and B (Unit 4) of the Title V permit specify that this state rule cannot vary any requirement of an New Source Performance Standards (NSPS), NESHAP or Acid Rain program provisions. Note that once the MATS rule becomes effective, the permittee is required to use clean fuels (e.g., natural gas) and additional operational protocols during startups and shutdowns, which will further minimize emissions and exceptional periods.

5. *Sierra Club Comment: "The proposed permit must be revised to allow for credible evidence to determine compliance. Big Bend's proposed permit lacks an affirmative statement that any credible evidence may be used to determine compliance with the permit. It is well-recognized that the USEPA supports the inclusion of credible evidence language in all Title V permits."*

   Department Response: 40 CFR 51.212, states, "For the purpose of submitting compliance certifications or establishing whether or not a person has violated or is in violation of any standard in this part, the plan *must not preclude the use*, including the exclusive use, *of any credible evidence* or information, relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed." The draft permit does not preclude the use of any credible evidence to determine compliance or non-compliance with the specific terms and conditions.

III. APPLICANT COMMENTS

Comments were submitted by the TEC via an email on January 6, 2015. After meeting with the Department on January 7, 2015, an additional email was sent on January 16, 2015 that clarified the comments submitted on January 6, 2015. The key comments contained in the emails are given (in italics) below and followed by the Department's response.

Subsection I, Subsection C

1. *TEC Comment: Emission Unit IDs -001 to -004 (Units 1 to 4) are subject to the NESHAP requirements. Therefore, these emission units should be listed in the regulation table under 40 CFR 63, Subpart A. Also, Emission Unit IDs -010, -029, -030, -046, -047 are subject to NSPS requirements. Therefore, these emission units should be listed in the regulation table under NSPS Subpart Y, 40 CFR 60.*

   Department Response: The Department agrees with this comment and the permit will be changed accordingly.

Subsection III, Subsection A

2. *TEC Comment:* ***Condition A.1*** *– The Title V permit 0570039-045-AV specified the heat input of Units 1 to 4 as "permitted capacities" and removed the permitting note. Title V Air Operation Permit No. 0570039-054-AV revised the heat input rates for Units 1 to 3 as "design capacities", which are not intended as operation*

restrictions. Therefore, the allowable heat rates should be revised to state "design capacity" consistent with the permitting action set forth in Title V Air Operation Permit No. 0570039-054-AV.

Department Response: The referenced condition states "*These design heat input rates are based on the original design of each unit for firing coal with a certain lower heating value (LHV) that was used to design each boiler*." Therefore, the Department will change this condition accordingly.

3. *TEC Comment:* ***Conditions A.10, A.11 and A.14*** *– These conditions should reference the emission rates for hydrogen chloride (HCl), SO_2 and particulate matter (PM) on a "30 day rolling average" pursuant to 40 CFR 63, Subpart UUUUU, MATS.*

   Department Response: The compliance methods (stack test, CEMS and PMS) to meet MATS emission limits is at the discretion of the permittee. **Condition A.43** states that the permittee must comply with all applicable requirements of 40 CFR 63, Subpart UUUUU, MATS. However, the Department will add the averaging times accordingly for clarity.

4. *TEC Comment:* ***Condition A.10.c*** *– This condition should be corrected to state "2.75 lb/MMBtu heat input" not "2.75 tons/heat input." In addition, this condition should include a permitting note to clarify that compliance with the 0.5% sulfur content or ultra-low sulfur diesel (ULSD) will demonstrate compliance with the 2.75 lb/MMBtu limit. TEC currently utilizes ULSD fuel under contract and analyzes each fuel shipment using ASTM 5453 Test Method to demonstrate compliance with the 0.5% sulfur content and ULSD. TEC clarified this comment as follow, the previous comment requested a permitting note to clarify that compliance with the 0.5% sulfur content will also demonstrate compliance with the 2.75 lb/MMBtu limit. Based on the permitting history, TEC requested a 0.5% sulfur permit limit in a previous permit application (0570039-039-AV, Conditions A.17 and A.18). TEC currently utilizes the alternative fuel sampling and analysis procedure specified in Rule 62-296.405(1)(e)3 F.A.C.*

   Department Response: The 2.75 lb/MMBtu SO_2 emission limit will be corrected to the correct units. Since Units 1 – 3 were constructed prior to April 23, 1985, Permit No. 0570039-039-AV established an alternate sampling procedure and a fuel oil sulfur content limit of 0.5% to demonstrate compliance with the 2.75 lb/MMBtu SO_2 emissions limit when burning liquid fuel pursuant to Rule 62-296.405(1)(e), F.A.C. The Department will make the correction and clarify the compliance requirements for Units 1 through 3 when firing ULSD fuel. However, ASTM D5453 test method is not identified in Condition A.33 as an applicable test method in the Title V permit. Therefore, TEC needs to apply to the Department for approval for alternative sampling procedures in accordance with Rule 62-297.620, F.A.C.

5. *TEC Comment:* ***Condition A.11*** *– TEC clarified comment, the Title V permit renewal (0570039-017-AV) revised PM limit 0.1 lb/MMBtu to 0.03 lb/MMBtu (BACT limit) pursuant to the former consent decree and approved BACT report, dated October 2002. Despite the more stringent limits, Rule 62-296.700(4)(b)1, F.A.C specifies the "…maximum allowable emission rate expressed in lb/hour, lb/day and tons/year (or other equivalent units) shall be determined for each emissions unit (for example, each drop transfer point, screening operation, kiln, or dryer) by applying the appropriate emission limitation contained in Rules 62-296.401 through 62-296.414, F.A.C., or Rules 62-296.701 through 62-296.712, F.A.C., to the maximum applicable emissions unit operation rate… ." PM allowable limit for Fossil Fuel Steam Generators with More Than 250 MMBtu/hour Heat Input is limited to 0.1 lb/MMBtu pursuant to Rule 62-296.405(1)(b) F.A.C. Therefore, the previous Title V permits (0570039-017-AV, 0570039-028-AV, 0570039-039-AV, 0570039-045-AV, 0570039-054-AV, 0570039-061-AV) including the current permit (0570039-067-AV) draft permit (0570039-072- AV) incorrectly specified the allowable mass emission rate based on the emission rate of 0.03 lb/MMBtu.*

   Department Response: Air Construction Permit No. 0570039-060-AC established the lb/hour PM emission limits corresponding to the PM BACT limit of 0.03 lb/MMBtu. This is a new request, further research and additional information may be needed to address this comment. Therefore, the Department will not make any changes to this condition at this time.

6. <u>TEC Comment</u>: ***Condition A.11.b*** *– This condition should reference Rule 62-210.700(3), F.A.C. as currently indicted in the current Title V Air Operation Permit No. 0570039-067-AV.*

   <u>Department Response</u>: Rule 62-210.700(3), F.A.C. is referenced under the condition. Therefore, no changes are being made.

7. <u>TEC Comment</u>: ***Condition A.14*** *– This condition should be revised to state "HCl or SO_2 Emissions" to clarify this condition applies to both HCl and SO_2 emission rates.*

   <u>Department Response</u>: The referenced condition indicates that either an HCl limit or a SO_2 limit may be met by the permittee to show compliance with the 40 CFR 63, Subpart UUUUU, MATS requirements. The heading of condition will be changed to indicate it addresses both HCl and SO_2 emission limits for clarity.

8. <u>TEC Comment</u>: ***Condition A.15*** *– This condition should be revised to clarify mercury emissions shall not exceed 1.0 pound per trillion British thermal units (lb/TBtu) or 0.011 pound per gigawatt hour (lb/GWh) (1.1E-2 lb/GWh) on a 90-day rolling average pursuant to 40 CFR 63, Subpart UUUUU, MATS. In addition, this condition should also specify the Low Emitting Electric Utility Steam Generating Units (LEE) or LEE Status requirements for mercury.*

   <u>Department Response</u>: The requested mercury limit and averaging time is based on if each emission unit (Units 1 – 3) qualifies as a LEE. As stated in **Condition A.43,** the permittee must comply with all applicable requirements of 40 CFR 63, Subpart UUUUU, MATS including demonstrating that each emission unit qualifies as a LEE. Therefore, no changes requested by TEC is necessary at this time.

9. <u>TEC Comment</u>: ***Condition A.22.a*** *– Rule 62-296.405 F.A.C. and Part 75 of the CFR specifically exempts continuous emission monitoring systems (COMS) if the system is equipped with a wet scrubber. However, the existing Compliance Assurance Monitoring (CAM) plan requires COMS for compliance. Thus, the condition should be revised to state the permittee shall calibrate and maintain a COMS in accordance with the CAM plan.*

   <u>Department Response</u>: The existing COMS must be operated to show compliance with the emission units CAM plan. The word operate will not be removed. However a reference to the CAM plan will be added to the condition.

10. <u>TEC Comment</u>: ***Conditions A.22.c.(1) and A.22.d*** *– The SO_2 and carbon dioxide (CO_2) CEMS were previously installed. These conditions should be revised to state the owner or operator shall operate, calibrate and maintain these CEMS units.*

    <u>Department Response</u>: The Department will make the requested changes.

11. <u>TEC Comment</u>: ***Condition A.22.e*** *– TEC clarified comment, TEC previously requested that compliance with the individual limits for NO_X and SO_2 can be achieved by simply monitoring each parameter in common stack CSW01, which would be similar to bubbling or facility-wide averaging. 40 CFR 75.16 and 40 CFR 75.16 specifies the recordkeeping of combined emissions is authorized in common stacks. Therefore, TEC requests that this condition should be revised to clarify combined NO_X and SO_2 emissions can be monitored and recorded from common stack CSW01.*

    <u>Department Response</u>: This comment has been addressed in previous permitting actions where the Department declined to make the change. The permittee shall meet the requirements of 40 CFR 75.16 for SO_2 emissions and 40 CFR 75.17 for NO_X emissions when a common stack is used for more than one affected emission unit.

12. <u>TEC Comment</u>: ***Condition A.25*** *– In addition to certified NO_X and SO_2 CEMS and annual relative accuracy test audit (RATA), this condition should state certified COMS shall satisfy the annual testing requirements for opacity.*

    <u>Department Response</u>: This is a new request, further research and additional information may be needed to address this comment. Therefore, the Department will not make any changes to this condition at this time.

13. *TEC Comment:* ***Condition A.27*** *– Although this is a SIP condition, this condition is technically incorrect. EPA Method 5 is limited to a temperature of 248°F. The EPA Test Method 5B may be used with filter temperature no more than 320°F.*

    Department Response: The referenced condition allows other EPA test methods to be utilized depending upon the stack temperature. No change is necessary.

14. *TEC Comment:* ***Condition A.28*** *– This condition should be revised to address the operation of Units 1 and 2 only. This condition should state more clearly that Units 1 and 2 can be individually stack tested or stacked tested while both units are in operation. Furthermore, PM and visible emissions determined in the common stack CS0W1 shall demonstrate compliance with the emission rates for each individual unit.*

    Department Response: This condition applies to Units 1 and 2 (CS0W1, common stack) and Unit 3 (BB-003). This condition addresses the compliance requirement for PM and VE for Units 1 and 2 common stack (CS-0W1) when both units are in operation or when individual units are in operation. No changes will be made to this condition.

Subsection III.B

15. *TEC Comment:* ***Condition B.1*** *– The Title V Air Operation Permit No. 0570039-045-AV specified the heat input for Unit 4 as a "permitted capacity." Title V Air Operation Permit No. 0570039-054-AV revised the heat input rate for Unit 4 as a "design capacity", which is not intended as an operation restriction. Therefore, the allowable heat rates should be revised to state "design capacity" consistent with the permitting action set forth in Title V Air Operation Permit No. 0570039-054-AV.*

    Department Response: The referenced condition states *"This design heat input rate is based on the original design of the unit for firing coal with a certain LHV that was used to design the boiler*." Therefore, the Department will change this condition accordingly.

16. *TEC Comment:* ***Condition B.4*** *Methods of Operation – This condition should be formatted and revised similar to* ***Condition A.4*** *Methods of Operation.*

    Department Response: The formats of the referenced conditions will be harmonized.

17. *TEC Comment:* ***Condition B.5*** *– The height of the exhaust stack on Unit 4 (BB-004) is established. This condition is no longer applicable and should be deleted.*

    Department Response: The Department will remove this condition.

18. *TEC Comment:* ***Condition B.15.c, B.16.d and B.19*** *– These conditions should reference the emission rates for HCl, SO_2 and PM on a "30 day rolling average" pursuant to 40 CFR 63, Subpart UUUUU, MATS.*

    Department Response: The compliance methods (stack test, CEMS and PMS) to meet MATS emission limits is at the discretion of the permittee. **Specific Condition B.44** states that the permittee most comply with all applicable requirements of 40 CFR 63, Subpart UUUUU, MATS. However, the Department will add the averaging times accordingly for clarity.

19. *TEC Comment:* ***Condition B.15.c*** *– This condition should include a permitting note to clarify that compliance with the 0.20 lb/MMBtu SO_2 limit will demonstrate compliance with the less stringent 0.82 lb/MMBtu and 1.20 lb/MMBtu SO_2 limits.*

    Department Response: Since the 0.82 and 1.2 lb/MMBtu SO_2 emission limits in the referenced condition also includes a requirement that 10% of the potential combustion concentration (90% reduction) be achieved, the requested permitting note will not be added.

20. *TEC Comment:* ***Condition B.16.c*** *– Title V permit renewal (0570039-017-AV) revised PM limit 0.03 lb/MMBtu (NSPS) to 0.01 lb/MMBtu (BACT limit) pursuant to the former consent decree and approved BACT report, dated October 2002. The PM mass emission rate was calculated as product of the heat input rate listed in* ***Condition B.1*** *and PM emission rate of 0.01 lb/MMBtu.*

The design heat input rate is based on the original design of Unit 4 when firing coal. The design capacity is not intended as an operational restriction and is not federally enforceable. This rate may exceed the design threshold as long the heat input rate is within ± 10%. Thus, TEC requests the PM mass emission rate should be included in ***Condition B.16.b*** *as a "permitting note" for informational purposes similar to the NO_X and SO_2 mass rates for Units 1 to 4.*

Department Response: Air Construction Permit No. 0570039-060-AC established the lb/hour PM emission limits corresponding to the 40 CFR 63, Subpart UUUUU PM emissions limit of 0.03 lb/MMBtu. This is a new request, further research and additional information may be needed to address this comment. Therefore, the Department will not make any changes to this condition at this time.

TEC also requested to exclude the firing of liquid fuels from the PM emission limit of 0.01 lb/MMBtu. Rule 62-296.405(1)(b), F.A.C. established the PM emission limit of 0.01 lb/MMBtu when firing all fuels. Therefore, the Department will not make any changes to this condition.

21. *TEC Comment:* ***Condition B.20*** *– This condition should be revised to clarify mercury emissions shall not exceed 1.0 lb/TBtu or 0.011 lb/GWh (1.1E-2 lb/GWh) on a 90-day rolling average pursuant to 40 CFR 63, Subpart UUUUU, MATS. In addition, this condition should also specify the Low Emitting Electric Utility Steam Generating Units or LEE Status requirements for mercury.*

    Department Response: The requested mercury limit and averaging time is based on if an emission unit (Unit 4) qualifies as a LEE. As stated in **Condition B.43,** the permittee must comply with all applicable requirements of 40 CFR 63, Subpart UUUUU, MATS including demonstrating that Unit 4 qualifies as a LEE. Therefore, no changes requested by TEC is necessary at this time.

22. *TEC Comment:* ***Condition B.31*** *– Although this is a SIP condition, this condition is technically incorrect. EPA Test Method 5 is limited to a temperature of 248°F. EPA Test Method 5B may be used with filter temperature no more than 320°F.*

    Department Response: The referenced condition allows other EPA test methods to be utilized depending upon the stack temperature. No change is necessary.

Subsection III, Subsection O

23. *TEC Comment:* ***Description of Emission Units (EU) 037 and 038*** *– This subsection should be revised to reflect the feeding of supplemental additives. This section should be revised as "Coal Residual and Supplemental Additive Storage and Transfer Facility." EU-037 should be revised to state "Coal Residual and Supplemental Additives Storage Facility." EU-038 should be revised to state "Coal Residual and Supplemental Additive Transfer System."*

    Department Response: The Department will revise the description of the emission units as requested.

Subsection III, Subsection Q

24. *TEC Comment:* ***Condition Q.8*** *– The engines are installed. The words "install, configure" should be deleted.*

    Department Response: This condition requires the engines to be installed, configured, operated and maintain according to the manufacturer's emission-related written instructions. This condition applies at all times including if the engines are relocated. No changes will be made.

25. *TEC Comment:* ***Condition Q.9*** *– Please include some language to clarify certified emergency diesel engines do not require any stack testing.*

    Department Response: It is clear from the referenced condition that stack testing only applies if the engines lose their certification. So long as engine certification is valid, no stack testing is required. No change will be made to the condition.

Subsection III.R

26. *TEC Comment: - **Condition R.8** – The engines are installed. The words "install, configure" should be deleted.*

    Department Response: This condition requires the engines to be installed, configured, operated and maintain according to the manufacturer's emission-related written instructions. This condition applies at all times including if the engines are relocated. No changes will be made.

27. *TEC Comment: **Condition R.9** – Please include some language to clarify certified emergency diesel engines do not require any stack testing.*

    Department Response: It is clear from the referenced condition that stack testing only applies if the engines lose their certification. So long as engine certification is valid no stack testing is required. No change will be made to the condition.

IV. CONCLUSION

The permitting authority will issue the proposed Title V Air Operation Permit No. 0570039-072-AV, with the changes noted above to be reviewed by the USEPA.