TECHNICAL EVALUATION
&
PRELIMINARY DETERMINATION

APPLICANT

Tampa Electric Company
Post Office Box 111
Tampa, Florida 33601-0111

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

PROJECT

Project No. 0570040-034-AC
Application for Minor Source Air Construction Permit
Minor Air Permit Revisions

COUNTY

Hillsborough County, 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 18, 2014

1. GENERAL PROJECT INFORMATION

1.1. Facility Description and Location

The Tampa Electric Company (TEC), 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 megawatt (MW), which consists of three gas turbines (169 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 1,090 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 and 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, with NO_X emissions controlled with water injection and CO emissions with catalytic oxidation. Emissions of CO and NO_X are monitored with CEMS.

This facility also includes four compression ignition (CI) internal combustion engines (ICE) consisting of: two diesel fired emergency generators (one generator produces 385 brake-horsepower (bhp) while the other produces 755 bhp); a diesel fired black start engine (1,495 bhp); and an emergency fire pump engine (188 bhp).

The location of the Bayside Power Station is shown **Figure 1**, while **Figure 2** shows a picture of the Bayside Power Station. This facility is categorized under Standard Industrial Classification Code No. 4911. The 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 kilometers (km) East, and 3087.5 km North.

Figure 1. Location of TEC H. L. Culbreath Bayside Power Station.

Figure 2. TEC H. L. Culbreath Bayside Power Station.

This facility is located in an area (Hillsborough County) designated "unclassifiable" for sulfur dioxide (SO_2), "maintenance" for Ozone (O_3), and lead (Pb), in the "area of influence" of the particulate matter (PM) maintenance area, and "attainment" for all the other criteria pollutants pursuant to Rule 62-204.340, F.A.C.

1.2. Project Description

This project revises several conditions in underlying air construction permits. TEC applied for concurrent revisions in multiple air construction permits that will be addressed in Permit No. 0570040-034-AC (PSD-FL-301F) and incorporated in the Title V Air Operation Renewal Permit No. 0570040-035-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	CT-3A - Simple Cycle Combustion Turbine
032	CT-3B - Simple Cycle Combustion Turbine
Bayside Unit 4 – Simple Cycle Peaking Unit with Two Combustion Turbines and One Electrical Generator Set (62 MW)	
033	CT-4A - Simple Cycle Combustion Turbine
034	CT-4B - Simple Cycle Combustion Turbine
Bayside Unit 5 – Simple Cycle Peaking Unit with Two Combustion Turbines and One Electrical Generator Set (62 MW)	
035	CT-5A - Simple Cycle Combustion Turbine
036	CT-5B - Simple Cycle Combustion Turbine
Bayside Unit 6 – Simple Cycle Peaking Unit with Two Combustion Turbines and One Electrical Generator Set (62 MW)	
037	CT-6A - Simple Cycle Combustion Turbine
038	CT-6B - Simple Cycle Combustion Turbine

1.3. 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, 1999, and with the EPA/TEC Consent Decree signed in February, 2000.
- In 2001, Permit No. 0570040-013-AC (PSD-FL-301) was issued authorizing the construction of seven new combined cycle gas turbines, Bayside Units 1 and 2 (EU 020 – EU 026), with heat recovery steam generators (HRSG) to re-power the existing steam-electric turbines of Gannon Units 5 and 6 (EU 005 – EU 006) increasing the nominal electrical production capacity to 1,742 MW. All existing coal-fired boilers of Gannon Units 1 – 6 were shutdown.
- In 2002, Permit 0570040-015-AC (PSD-FL-301A) was issued revising the original permit to include four additional new combined cycle gas turbines, Bayside Units 3 - 4 (EU 027 – EU 030), with HRSG to re-power

the existing steam-electric turbines of Gannon Units 3 and 4 (EU 003 – EU 006) increasing the nominal electrical production capacity to 2,845 MW.

- In 2004, Permit No. 0570040-021-AC (PSD-FL-301B) was issued revising Units 1 and 2 (EU 020 – EU 026) startups, shutdowns, malfunctions, low load operation, dry low-NO_X (DLN) tuning, compressor blade drying, and over speed trip testing requirements.
- In 2005, Permit No. 0570040-019-AC (PSD-FL-301C) was issued revising Permit No. 0570040-015-AC (PSD-FL-301A) by 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, Permit No. 0570040-024-AC was issued authorizing the construction of eight simple cycle combustion turbine (SCCT) peaking units with four associated electrical generators (EU 031 – EU 034) and two emergency diesel engine/generator sets (EU 035 and EU 036).
- In 2009, Permit No. 0570040-026-AC was issued authorizing the following changes to Permit No. 0570040-024-AC which affected the simple cycle peaking Units 3 – 6 (EU 031 – EU 038):
  - Removed the existing 14 MW SCCT, 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.
  - Increase the maximum total ultra low sulfur diesel fuel oil usage from 11,440 to 12,700 gallons/year from the project description.
  - Emissions Unit ARMS ID and Description: Re-assigned the eight SCCT peaking units and four associated electrical generators (EU 031 – EU 034) individual emission unit numbers (EU 031 – EU 038); deleted the emission unit numbers for the two emergency diesel engine/generator sets (EU 035 – EU 036); and assigned the single emergency diesel engine/generator set a new emission unit number (EU 039).
  - Revised the emission and compliance standards table for PM, SO_2 and sulfuric acid mist (SAM) and remove the initial demonstration of compliance requirements for PM and SO_2.
  - 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, Permit No. 0570040-028-AC (PSD-FL-301D) authorized the following changes to Permit Nos. 0570040-019-AC (PSD-FL-301C) and 0570040-026-AC.
  - Permit No. 0570040-019-AC (PSD-FL-301C) revisions affected combined cycle Units 1 and 2 (EU 020 – EU 026) and consisted of the following revisions.
    - 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.
    - Revised the monitor availability condition to include the quarterly Data Assessment Report (DAR) to be reported with the Semiannual CEMS Report.
  - Permit No. 0570040-026-AC revisions affected the simple cycle peaking Units 3 – 6 (EU 031 – EU 038) and consisted of the following revisions.
    - Clarified that separate compliance stack tests for CO and NO_X emissions are not required. Compliance with the mass-based emissions standards (pound (lb)/hour) shall be done with data collected during the annual Relative Accuracy Test Audit (RATA) and submitted with the semiannual report.
    - Revised the SO_2 standard in the emissions table from “6 lb/MW-hour/SCCT” to 0.06 lb/million British thermal units (MMBtu), which is consistent with the NSPS Subpart KKKK requirement.

    - Appendix E: 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; and for emissions in excess of the standard, revised the language to one working day of discovery notification.

- In 2011, Permit No. 0570040-031-AC was an administrative correction to Permit No. 0570040-028-AC to eliminate the numerical decimal figure of the permit limits for CO and NO_X.

- In 2013, Permit No. 0570040-032-AC (PSD-FL-301E) authorized the following revisions to various emissions units in Permit Nos. 0570040-015-AC (PSD-FL-301A), 0570040-019-AC (PSD-FL-301C), 0570040-028-AC (PSD-FL-301D), 0570040-024-AC, 0570040-026-AC, and 0570040-006-AC.
  - Permit Nos. 0570040-015-AC (PSD-FL-301A), 0570040-019-AC (PSD-FL-301C) and 0570040-028-AC (PSD-FL-301D) affected combined cycle Units 1 and 2 (EU 020 – EU 026) and consisted of the following revisions:
    - Replaced the word "permitted" to "design" capacity for the heat input rate to identify for when unit is operating at 90 to 100% during annual compliance testing.
    - Revised the compliance requirements for the fuel sulfur limit to be based on monthly data obtained from the vendor.
    - Added new language regarding the meaning of "other" tuning since 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.
    - Revised excess emissions reporting requirements from quarterly to semiannually.
    - Updated and combined the NO_X and carbon dioxide (CO_2) requirements.
    - Revised language to clarify that the "data assessment report" is applicable for CO only.
    - Deleted the ammonia requirements since annual testing and the additional ammonia slip (and corresponding NO_X CEMS readings) are sufficient to provide an indication of catalyst viability as well as maintain a correlation between the ammonia injection rate and actual NO_X emissions.
  - Project Nos. 0570040-024-AC and 0570040-028-AC affected simple cycle Units 3 and 6 (EU 031 – EU 038) and consisted of the following revisions:
    - Revised the NO_X limit from 25.0 to 25 parts per million (ppm).
    - Appendix E: revised the startup period of the SCCT from 10 to 15 minutes and allowed the exclusion of excess emissions of up to 8 hours from the CEMS data.
    - Removed the 40 CFR 60, Appendix F, DAR language requirements.
  - Permit No. 0570040-006-AC affected the fuel yard (EU 008) and consisted of the following revisions:
    - Deleting obsolete activities in the description that were no longer utilized.
    - Removed the visible emission requirement for the clamshell and railcar to the hopper since these activities no longer exist.
    - Deleted the requirement for an operation and maintenance plan for PM since it was no longer applicable.

1.4. Primary Regulatory Categories

- The facility is not a major source of hazardous air pollutants (HAP).

- The facility is a Title V major source of air pollution in accordance with Chapter 62-213, F.A.C.

- The facility is a major stationary source (PSD-major source) in accordance with Rule 62-212.400, F.A.C.

- The facility operates units subject to the New Source Performance Standards (NSPS) of 40 Code of Federal Regulations (CFR) Part 60.

- The facility operates units subject to the National Emissions Standards for Hazardous Air Pollutants (NESHAP) of 40 CFR Part 63.

- The facility operates units subject to the Acid Rain provisions of the Clean Air Act.

- The facility operates units subject to the Federal Clean Air Interstate Rule (CAIR) in accordance with Rule 62-296.470, F.A.C.

1.5. Processing Schedule

01/20/2014 Department received the application for an air pollution construction permit; application complete.

2. APPLICABLE REGULATIONS

2.1. State Regulations

This project is subject to the applicable environmental laws specified in Section 403 of the Florida Statutes (F.S.). The Florida Statutes authorize the Department of Environmental Protection to establish rules and regulations regarding air quality as part of the Florida Administrative Code (F.A.C.). This project is subject to the applicable rules and regulations defined in the following Chapters of the F.A.C.: 62-4 (Permitting Requirements); 62-204 (Ambient Air Quality Requirements, PSD Increments, and Federal Regulations Adopted by Reference); 62-210 (Permits Required, Public Notice, Reports, Stack Height Policy, Circumvention, Excess Emissions, and Forms); 62-212 (Preconstruction Review, PSD Review and Best Available Control Technology (BACT), and Non-attainment Area Review); 62-213 (Title V Air Operation Permits for Major Sources of Air Pollution); 62-296 (Emission Limiting Standards); and 62-297 (Test Methods and Procedures, Continuous Monitoring Specifications, and Alternate Sampling Procedures). PSD applicability and the preconstruction review requirements of Rule 62-212.400, F.A.C. are discussed in Section 2 of this report. Additional details of the other state regulations are provided in Section 3 of this report.

2.2. Federal Regulations

The Environmental Protection Agency (EPA) establishes air quality regulations in Title 40 of the Code of Federal Regulations. Part 60 identifies NSPS for a variety of industrial activities. Part 61 specifies NESHAP based on specific pollutants. Part 63 specifies NESHAP provisions based on the Maximum Achievable Control Technology (MACT) for given source categories. Federal regulations are adopted in Rule 62-204.800, F.A.C. Additional details of the applicable federal regulations are provided in Section 3 of this report.

2.3. 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. DEPARTMENT REVIEWVISIBLE

The applicant is requesting the following revisions to various emissions units and multiple air construction permits. 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 being processed simultaneously with the Title V Air Operation Renewal Permit No. 0570040-035-AV.

3.1. Requested Revisions

<u>Emission sources associated with the following revisions include the Fuel Yard (EU 008). Permits affected by these revisions include Permit Nos. 0570040-007-AC and 0570040-032-AC.</u>

1. *Request:* The applicant requests to delete the obsolete EU 008 (Fuel Yard) since the Combined Cycle Units 1 and 2 and Simple Cycle Units 3 – 6 fire only natural gas the fuel yard no longer exists.

   Department's Response: The Department acknowledges that the fuel yard no longer exists and will delete EU 008 in its entirety.

Emission sources associated with the following revisions include combined cycle Unit 1 (EU-020 through 022) and Unit 2 (EU-023 through 026). Permits affected by these revisions include Permit Nos. 0570040-015-AC (PSD-FL-301A), 0570040-028-AC (PSD-FL-301D) and 0570040-032-AC (PSD-FL-301E).

2. *Section III, Specific Condition 14.d. and f. (Emission Standards Based on Performance Tests); and Specific Condition 21. (Annual Compliance Tests).*

   Request: The applicant is requesting to remove the requirement to do a visible emissions test, which was established as BACT for PM. The applicant requests that the firing of natural gas in conjunction with meeting the CO and NO_X emission limits in the permit to be determined as PM BACT for Units 1 and 2. Units 1 and 2 are equipped with a CO and NO_X CEMS to ensure compliance. The applicant provided the Department with the last seven years of visible emissions tests and the last two years of quarterly reports for CO and NO_X emissions to provide further assurance that no visible emissions are released from the units. The applicant states that a visible emissions test results in excessive costs, unnecessary reporting, and plant resources being misused. Additionally, two facilities that are not required to do an annual compliance test for PM emissions when firing liquid or solid fuel for less than 400 hours/year: GRU J.R. Kelly Generating Station Permit No. 0010005-009-AV; and Oleander Power Permit No. PSD-FL-377.

   Department's Response: Emissions of particulate matter will result from the combustion of natural gas. Particulate matter emissions increase with incomplete fuel combustion as well as with higher concentrations of ash, sulfur, and trace elements in a given fuel. However, natural gas is a clean fuel containing little ash, sulfur, or other contaminants. The Department acknowledges that these combined cycle units fire only clean natural gas. Additionally, the Department has reviewed 7 years (2007 – 2013) of visible emission tests done on these units and found that the reports show 0% opacity during this time period. The CO CEMS standard will serve a continuous indication of efficient combustion practices to minimize emissions of particulate matter. Therefore, the Department will remove the required annual visible emission test (10% opacity).

3. *Section III, Specific Condition 23.f. (CEMS Monitoring Availability).*

   Request: The applicant is requesting that the quarterly excess emissions report be required only if the units operate more than 760 hours. The excess emissions report identifies the monitor availability when the CEMS are not achieving 95% availability. The reason for this request is due to the fact that these units typically do not have a lot of run hours. When hours need to be marked as bad (such as failed or expired calibrations) and are unable to be counted towards the monitoring availability the unit may not be able to meet the 95% monitor availability. When this occurs additional hours are needed to obtain the 95% availability threshold; therefore, the unit is forced to run in order to obtain more operating hours to meet the monitor availability of 95% of actual run time. This puts unnecessary wear and tear on the units and also results in emitting unnecessary emissions. The applicant is seeking relief from having to meet the 95% monitor availability based upon operating hours so that these units are not forced to run. Gainesville Renewable Energy Center, LLC, Permit No. 0010131-001-AC was referenced as having to submit a quarterly excess emissions report if their units did not achieve 95% monitoring availability if operated more than 760 hours.

   Department's Response: The monitoring availability requirement was established for PSD projects for the purposes of determining compliance with the CEMS emission standards. However, the Department agrees that these units should not operate additional hours causing the units to emit unnecessary emissions. Therefore, the Department will revise the condition as requested.

4. *Appendix CEMS, Condition 7.*

   Request: The applicant is requesting to follow the quality assurance procedures in 40 CFR 75 instead of 40 CFR 60 for the CO CEMS. Secondly, for clarification purposes, the applicant is requesting that the permit state that the Data Assessment Report is only required for Combined Cycle Units 1 and 2 (EU 020 – EU 026).

   Department's Response: The purpose of 40 CFR 75 is to establish requirements for the monitoring, recordkeeping, and reporting of SO_2, NO_X, and CO_2 emissions, volumetric flow, and opacity data from affected units under the Acid Rain Program which are more stringent than 40 CFR 60 requirements.

Therefore, the Department will make the requested revision for the CO CEMS to follow the quality assurance procedures in 40 CFR 75 as well as make the requested changes for clarity.

5. *Appendix CEMS, Condition 14.*

Request: Based on the request that the quarterly excess emissions report be required only if the units operate more than 760 hours (see No. 3 request above), the applicant is requesting that the appendix be modified to reflect this change.

Department's Response: The Department will revise this condition.

Emission sources associated with the following revisions include Bayside Simple Cycle Unit 3 (EU 031 and EU 032), Unit 4 (EU 033 and EU 034), Unit 5 (EU 035 and EU 036), and Unit 6 (EU 037 and EU 038). Permits affected by these revisions include Permit Nos. 0570040-024-AC, 0570040-026-AC, 0570040-028-AC and 0570040-032-AC.

Permit No. 0570040-024-AC and revised in Permit Nos. 0570040-026-AC, 0570040-028-AC, and 0570040-032-AC

6. *Section III, Specific Condition 9 (Emission Standards).*

Request: The applicant requests to include the NO_X emission standard of 96 parts per million by volume, dry (ppmvd) at 15% oxygen for turbines operating at less than 75% of peak load in accordance with Table 1 of NSPS Subpart KKKK of 40 CFR 60. The applicant also requests to delete reference to annual RATA to avoid misinterpretation of the compliance requirement since RATA is based on qualifying QA quarters, not an annual requirement.

Department's Response: The Department acknowledges this emission standard is applicable to the Simple Cycle Units 3 through 6 and will include it in the emission standards for these units. These simple cycle units are only subject to the NSPS Subpart KKKK of 40 CFR 60 emission limits. Additionally, for clarity the word "annual" will be removed when referencing a RATA test.

Permit No. 0570040-024-AC

7. *Section III, Specific Condition 17 (Annual Compliance Testing).*

Request: The applicant is requesting to remove the requirement to do an annual visible emissions test (20% opacity) on the Simple Cycle Units 3 through 6. Rule 62-296.310(4)(b)1., F.A.C. is not a unit specific applicable requirement. Units only fire natural gas and a visible emissions test is not needed.

Department's Response: The Department acknowledges that these units fire only natural gas. Additionally, the Department has reviewed 5 years (2009 – 2013) of visible emission tests done on these units and found that the reports show 0% opacity during this time period. Therefore, the Department will remove the required annual visible emission test.

Permit No. 0570040-024-AC and revised in Permit No. 0570040-028-AC

8. *Section III, Specific Condition 13 (Testing Requirements).*

Request: The applicant is requesting to revise the testing requirements to remove the requirement for emission of CO to be recorded by the CEMS during the visible emissions test since the annual visible emission test will not be done and CO CEMS data will be reported annually.

Department's Response: The annual visible emission test will be removed; therefore, the Department will also revise this condition.

The following requests require "new" specific conditions to be established in this air construction permit:

9. *Combustion Turbine Replacement.*

Request: The applicant is requesting the flexibility to replace the CT in response to maintenance and business

demands. Replacing with "like-kind" CT will enable the permittee to satisfy their agreement with the manufacturer in maintaining the units. Instead of performing the maintenance activities on the ground at the station these smaller units can be more affordably transported to the manufacturer. The manufacturer would perform the maintenance and a "like kind" temporary replacement will be put in its place until the original unit is returned and put in service. This allows maintenance to be performed without significant unit downtime in order to support the reliability of the grid. Therefore, the applicant has requested authorization to replace a CT without acquiring a permit.

Department's Response: The Department understands that in this industry equipment maintenance and outages are common and that there exists a critical need to be able to replace the equipment quickly. The simple cycle combustion turbines operates only in simple cycle mode and are only used as peaking units. The Department agrees that the replacement of a CT with equivalent "like kind" overhauled or new temporary CT will not require an application for an air construction permit provided the following requirements are met:

a. The CT shall be replaced with equivalent "like-kind" overhauled or new temporary CT while the existing CT is undergoing routine maintenance. Replacement CT shall not increase the maximum heat input rate, capacity or actual emissions. Replacement CT shall be designed and constructed to comply with the emissions standards specified in this permit.

b. The temporary CT shall only be used for a maximum of 3-months. The permittee shall notify the Department within one day prior to replacing the CT with a temporary CT and when the original CT is back in operation. The permittee shall notify the Department if additional time is needed for the replacement CT.

c. The permittee shall maintain a log on-site to record the date of any CT replacement, the manufacturer, model number, and serial number of the CT that is replaced during the term of this permit, and the manufacturer, model number, serial number, and the installation and removal date of the replacement CT. All records related to any testing shall be maintained on-site for five years and made available to the Department upon request.

d. The permittee shall comply with the requirements for notification, test methods, test procedures, and reporting required by this permit.

e. If it is determined that the CTs actual emissions, heat input or capacity increased as a result of the maintenance performed, the applicant shall submit an application for an air construction permit within 30 days to evaluate PSD applicability resulting from the modification.

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. Tammy McWade 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 Office of Permitting and Compliance at Mail Station #5505, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400.