FINAL DETERMINATION

PERMITTEE

Karen Sheffield, Director Polk Power Station
Tampa Electric Company (TEC)
Post Office Box 111
Tampa, Florida 33600-0111

PERMITTING AUTHORITY

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

PROJECT

Title V Air Operation Permit Renewal
Permit No. 1050233-039-AV
Polk Power Station

The purpose of this permitting project is for the renewal of the existing Title V air operation permit for the above referenced facility.

NOTICE AND PUBLICATION

The Department distributed an Intent to Issue Air Permit package on August 12, 2014. The applicant published the Public Notice of Intent to Issue Air Permit in the Lakeland Ledger on August 25, 2014. The Department received the proof of publication on August 29, 2014. A proposed permit was issued for EPA review on August 25, 2014 in order to overlap the Public and EPA comment periods and shorten overall processing time.

COMMENTS

No comments were received from the EPA Region 4 office. However, the following minor comments were received from the applicant:

1. In condition A.9. all references to the National Emission Standards for Hazardous Air Pollutants: Coal – and Oil – Fired Electric Utility Steam Generating Units should be 40 CFR 63, Subpart UUUUU. Some areas in the condition have four or six "U"s.

   Response: The indicated corrections have been made.

2. TEC requests that the following language be replaced for the permitting note under condition G.28.

   Current Language:

   "{Permitting Note: "Initial" tests are to be repeated on both fuels following maintenance activities that result in the replacement of control equipment components, replacement of combustors or major tuning activities. Annual tests are only required for the fuels fired during a given year; however, at least one test shall be performed on each fuel prior to renewing this permit.}"

   Requested Language:

   {Permitting Note: "Initial tests" are to be repeated on the fuel of the system that was worked on following major maintenance activities that could affect actual emissions and do not include regular maintenance activities. These regular maintenance activities include but not limited to seasonal tuning or combustion inspections. Annual tests are only required for the fuels fired during a given year; however at least one test shall be performed on each fuel prior to renewing this permit.}

TEC requests this change in language to better represent the TEC facility. If TEC were required to perform an initial test it may not necessarily need to be on both fuels since some of the control system components of the fuel oil and natural gas system are separate. Additionally, TEC does not want the permitting note to restrict the regular maintenance activities that are currently performed. The current proposed/draft language, such as replacement of equipment components, could refer to something as small as a pressure transmitter replacement. TEC feels that the above permitting note better represents the referenced emission units and the facility.

Response: The Department has reviewed the applicant's comment and agrees in theory with the requested change, although not entirely with the requested wording. In response to this comment, the permitting note after Specific Condition G.28. has been administratively replaced with the following language:

{Permitting Note: Pursuant to Specific Condition 28. of permit No. PSD-FL-263, "Initial" tests for all pollutants limited by this permit are to be repeated following maintenance activities that result in the replacement of control equipment components, replacement of combustors or major tuning activities. For clarification, these tests are required to be performed only with the fuel or fuels for which emissions from the combustion turbines could have been affected by the change or activity. Annual tests are only required for the fuels fired during a given year; however, at least one test shall be performed on each fuel prior to renewing this permit.}

3. Statement of Basis. TEC requests that #1 of the "changes were requested by applicant, but were not granted as part of this permit renewal" on page 3 of 4 be changed to reflect the current situation. This should be changed to say that the request was granted.

   Response: Subsequent to the preliminary drafting of the renewed permit, excess emissions due to fuel switching were authorized by permit No. 1050233-040-AC/PSD-FL-194L and a new Specific Condition A.11. was added to the Draft permit prior to issuance. This change is reflected in the Statement of Basis in No. 5 of the listing of items that were changed as part of this renewal. No. 1 of the listing of changes that were not granted was inadvertently not deleted prior to issuance of the draft. This item has been removed from the Statement of Basis for issuance as part of the final permit documents.

CONCLUSION

The final action of the Department is to issue the permit with the minor changes listed above.