



HARDEE POWER PARTNERS

RECEIVED

DEC 11 1998

BUREAU OF
AIR REGULATION

Via Federal Express

December 10, 1998

Mr. Scott M. Sheplak, P.E.
Bureau of Air Regulation
Florida Department of Environmental Protection
111 South Magnolia Drive, Suite 4
Tallahassee, FL 32301

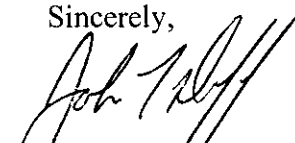
RE: Hardee Power Partners, Ltd.
Hardee Power Station
Draft Title V Permit No. 0490015-001-AV

Dear Mr. Sheplak:

Hardee Power Partners, Ltd. (HPP), a wholly owned subsidiary of TECO Power Services (TPS), has reviewed a copy of the referenced draft permit for Hardee Power Station. We offer for your consideration our comments on this draft permit. A copy of the draft permit is enclosed with the proposed language changes marked on the applicable text. Additions to the existing text of the draft permit are identified with underlining, while deletions are represented with a strikeout marking. In addition, several notes have been added to clarify the rationale for the proposed language changes.

We appreciate the opportunity to provide you with these comments. If you should have any questions regarding this permit, please call me at (813) 228-1381 or Paul Carpinone at (813) 228-4858.

Sincerely,



John T. Duff
Director Operations

PLC/gdb
Enclosures

cc: L. N. Curtin, Holland & Knight - TAL
H. S. Oven, Jr. - DEP - TAL

I N T E R O F F I C E M E M O R A N D U M

Date: 17-Nov-1998 02:04pm EST
From: Steve Welsh TAL
WELSH S
Dept: Air Resources Management
Tel No: 850/921-9585
SUNCOM: 291-9585

TO: Joe Cox TPA (COX_J @ A1 @ TPA1)
CC: Scott Sheplak TAL (SHEPLAK_S)
CC: Cindy Phillips TAL (PHILLIPS_C)

Subject: Hardee Power Partners Title V Comments

Joe: thanks for your recent comments on my Draft Title V Permit for the subject facility. I incorporated all of them except the one requesting a change of the ambient air temperature from 32 degrees (III. A.1.). Since this condition was reproduced from the PSD, it will have to be studied further.

I especially appreciated your detailed review for grammar & punctuation; I like a product that is as close to perfect as possible. After looking at the document so many times, its very easy to "glance" over blocks of text.

Thanks again - Steve Welsh

**SWD Comments on DRAFT Title V Permit for
Hardee Power Partners — 0490015-001-AV**

The SWD Air Program was asked to review and comment on the subject document, dated October 1988. Questions about the following comments may be addressed to Joe Cox at SC 512-1042, extension 129 or by email to cox_j.

Section II. Facility-wide Conditions

Condition 8: This condition is not a complete sentence.

Section III. Emissions Units and Conditions

a. First paragraph after list of EUs, line 2: “Wauchula” is spelled incorrectly.

b. Same paragraph and third paragraph: There are two references to the type and model of combustion turbines installed at this facility. One says they are “General Electric 7EA combustion turbines” and the other refers to them as “General Electric model PG-7111EA units.” This is either a conflict or the use of two different (possibly both correct) ways of referring to the turbines. Suggest the wording be changed to be consistent.

c. Condition A.1.: The maximum heat input is specified at a temperature of 32 °F. If possible, request a change to some temperature closer to the expected operating conditions. This would facilitate efforts of compliance personnel to ascertain whether the units are operating within limits.

d. Condition A.2., second sentence: Suggest changing “average annual” to “annual average.”

e. Condition A.19., second line: The mathematical sign used is non-standard (+-). Suggest using the more common symbol ± instead in the interest of avoiding confusion. If you are using MicroSoft Word, this symbol is available in most fonts by holding down the “Alt” key and entering “0177” on the numerical keypad.

f. Condition A.21: The formula presented here is hard to read because of the use of subscripts and superscripts which are the same font size as the basic typing. Additionally, there are four letters in the formula which should have been typed as subscripts, but were entered as basic text. I would suggest using MS Word’s Equation Editor or some similar tool designed to format complex mathematical formulas. You may be able to copy the following formula and paste it into your document:

$$NO_x = (NO_{x0}) \left(\frac{P_r}{P_o} \right)^{0.5e^{19(H_o - 0.00633)}} \left(\frac{288^\circ K}{T_a} \right)^{1.53}$$

g. Condition A.23., second line: The comma between “1996” and “version” should be deleted.

h. Condition A.25., second line: There is a space missing between “40” and “CFR” approximately in the middle of the line.

i. Condition E.2., second line: The parenthetical note refers the reader to “specific condition C.24., but there is no such condition in this permit. Should this refer to general provisions G.2. through G.4. (appearing two pages later) which pertain to the same reports?”

j. Condition R.1., second and third lines: The results should be submitted to the Southwest District office in Tampa, not the South District office in Ft. Myers.

- k. **Condition G.5., fifth line:** The comma following the second word in this line should be deleted.
- l. **Condition G.8., eleventh line:** The comma following the third word in this line should be deleted.
- m. **Condition G.10., seventh line:** The comma following the first word in this line should be deleted.
- n. **Condition G.13., fourth line:** The comma following the first word in this line should be deleted.
- o. **Condition G.15., fourth line:** Delete the blank space (probably a hard return) following the last word in this line.
- p. **Condition G.15, subparagraph (d)(1):**
 - 1. Delete the apostrophe in the first word.
 - 2. In the sixth line, add "40 CFR 60" between the words "in" and "appendix" to clarify which appendix B you are talking about.
 - 3. The last two sentences in this paragraph should be just one sentence. What now appears as the last sentence is a continuation of the last part of the next-to-last sentence.
- q. **Condition G.15, subparagraph (d)(3):** This should be renumbered (d)(2).
- r. **Condition G.15, subparagraph (h):**
 - 1. In the sixth line, change the word "recorder" to "recorded."
 - 2. In the ninth line, the hyphen is missing in "non-reduced."
 - 3. In the tenth line, suggest using a subscript to write "O₂" instead of "O2."
- s. **Condition G.16:**
 - 1. In subparagraph (1), line 3, delete the apostrophe.
 - 2. In subparagraph (8), line 2, add "40 CFR 60" immediately prior to "appendix B."
- t. **Condition G.17, fifth line:** Delete the extraneous space (probably a hard return) after the last word in this line.

Appendix I-1, List of Insignificant Emissions Units and Activities

It seems this appendix should list the insignificant emissions units and activities at this facility, but it appears to only give definitions and examples of the kinds of things that might be deemed insignificant.

All comments incorporated except for change of A.1.

Stw 11/17/98

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Application Processing Fee

Attached - Amount : _____ NA

Construction/Modification Information

1. Description of Proposed Project or Alterations : N/A
2. Projected or Actual Date of Commencement of Construction :
3. Projected Date of Completion of Construction :

Professional Engineer Certification

1. Professional Engineer Name : Thomas W. Davis Registration Number : 36777	
2. Professional Engineer Mailing Address : Organization/Firm : ECT, Inc. Street Address : 3701 NW 98th Street City : Gainesville State : FL Zip Code : 32606-5004	
3. Professional Engineer Telephone Numbers : Telephone : (352)332-0444 Fax : (352)332-6722	
4. Professional Engineer Statement : <i>I, the undersigned, hereby certified, except as particularly noted herein*, that :</i> <i>(1) To the best of my knowledge, there is reasonable assurance (a) that the air pollutant emissions unit(s) and the air pollutant control equipment described in this Application for Air Permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions in the Florida Statutes and rules of the Department of Environmental Protection; or (b) for any application for a TitleV source air operation permit, that each emissions unit described in this Application for Air Permit, when properly operated and maintained, will comply with the applicable requirements identified in the application to which the unit is subject, except those emissions units for which a compliance schedule is submitted with this application;</i> <i>(2) To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application; and</i> <i>(3) For any application for an air construction permit for one or more proposed new or modified emissions units, the engineering features of each such emissions unit described in this application have been designed or examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application.</i>	
_____ Signature	_____ Date

* Attach any exception to certification statement.

Application Contact

1. Name and Title of Application Contact :

Name : Paul L. Carpinone
Title : Manager, Environmental Services

2. Application Contact Mailing Address :

Organization/Firm : TECO Power Services Corporation
Street Address : 702 North Franklin Street
City : Tampa
State : FL Zip Code : 33602-____

3. Application Contact Telephone Numbers :

Telephone : (813)228-4858 Fax : (813)228-1308

Application Comment

N/A

II. FACILITY INFORMATION

A. GENERAL FACILITY INFORMATION

Facility Name, Location, and Type

1. Facility Owner or Operator : Hardee Power Partners, Ltd.			
2. Facility Name : Hardee Power Station			
3. Facility Identification Number : 0490015			
4. Facility Location Information : Hardee Power Station 3.5 mi. north of State Road 62 on County Road 663, Fort Green Springs, Hardee County <div style="display: flex; justify-content: space-between;"> Facility Address : County Road 663 City : Fort Green Springs County : Hardee Zip Code : 33834- </div>			
5. Facility UTM Coordinates :			
Zone : 17	East (km) : 404.80	North (km) : 3,057.40	
6. Facility Latitude/Longitude :			
Latitude (DD/MM/SS) :		Longitude (DD/MM/SS) :	
7. Governmental Facility Code : 0	8. Facility Status Code : A	9. Relocatable Facility? N	10. Facility Major Group SIC Code : 49
11. Applicant Comment :			
DEP Facility Comment :			

Facility SIC Codes

Facility SIC Codes :

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**STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF AIR RESOURCES MANAGEMENT
APPLICATION FOR AIR PERMIT - LONG FORM**

I. APPLICATION INFORMATION

Identification of Facility Addressed in This Application

Hardee Power Station

3.5 mi. north of State Road 62 on County Road 663, Fort Green Springs, Hardee County

Owner/Authorized Representative or Responsible Official

1. Name and Title of Owner/Authorized Representative or Responsible Official : Name : Mr. George D. Jennings Title : V.P. of Engineering and Operations
2. Owner or Authorized Representative or Responsible Official Mailing Address : Organization/Firm : Hardee Power Partners, Ltd. Street Address : P.O. Box 111 City : Tampa State : FL Zip Code : 33601-0111
3. Owner/Authorized Representative or Responsible Official Telephone Numbers : Telephone : (813)228-1300 Fax : (813)228-1308
4. Owner/Authorized Representative or Responsible Official Statement : <i>I, the undersigned, am the owner or authorized representative* of the facility (non-Title V source) addressed in this Application for Air Permit or the responsible official, as defined in Chapter 62-213, F.A.C., of the Title V source addressed in this application, whichever is applicable. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. Further, I agree to operate and maintain the air pollutant emissions units and air pollution control equipment described in this application so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof. If the purpose of this application is to obtain an air operation permit or operation permit revision for one or more emissions units which have undergone construction or modification, I certify that, with the exception of any changes detailed as part of this application, each such emissions unit has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with all provisions contained in such permit. I understand that a permit, if granted by the Department, cannot be transferred without authorization from the Department, and I will promptly notify the Department upon sale or legal transfer of any permitted emissions unit.</i> _____ Signature _____ Date

* Attach letter of authorization if not currently on file.

Scope of Application

Emissions Unit ID	Description of Emissions Unit
001	Combustion Turbine 1A
002	Combustion Turbine 1B
003	Combustion Turbine 2A

Purpose of Application and Category

Category I : All Air Operation Permit Applications Subject to Processing Under Chapter 62-213, F.A.C.

This Application for Air Permit is submitted to obtain :

Initial air operation permit under Chapter 62-213, F.A.C., for an existing facility which is classified as a Title V source.

Initial air operation permit under Chapter 62-213, F.A.C., for a facility which, upon start up of one or more newly constructed or modified emissions units addressed in this application, would become classified as a Title V source.

Current construction permit number :

Air operation permit renewal under Chapter 62-213, F.A.C., for a Title V source.

Operation permit to be renewed :

Air operation permit revision for a Title V source to address one or more newly constructed or modified emissions units addressed in this application.

Current construction permit number :

Operation permit to be revised :

Air operation permit revision or administrative correction for a Title V source to address one or more proposed new or modified emissions units and to be processed concurrently with the air construction permit application.

Operation permit to be revised/corrected :

Air operation permit revision for a Title V source for reasons other than construction or modification of an emissions unit.

Operation permit to be revised :

Reason for revision :

Category II : All Air Operation Permit Applications Subject to Processing Under Rule 62-210.300(2)(b), F.A.C.

This Application for Air Permit is submitted to obtain :

- Initial air operation permit under Rule 62-210.300(2)(b), F.A.C., for an existing facility seeking classification as a synthetic non-Title V source.

Current operation/construction permit number(s) :

- Renewal air operation permit under Rule 62-210.300(2)(b), F.A.C., for a synthetic non-Title V source.

Operation permit to be renewed :

- Air operation permit revision for a synthetic non-Title V source.

Operation permit to be revised :

Reason for revision :

Category III : All Air Construction Permit Applications for All Facilities and Emissions Units

This Application for Air Permit is submitted to obtain :

- Air construction permit to construct or modify one or more emissions units within a facility (including any facility classified as a Title V source).

Current operation permit number(s), if any :

-] Air construction permit to make federally enforceable an assumed restriction on the potential emissions of one or more existing, permitted emissions units.

Current operation permit number(s) :

-] Air construction permit for one or more existing, but unpermitted, emissions units.

Application Processing Fee

Attached - Amount : _____ NA

Construction/Modification Information

1. Description of Proposed Project or Alterations : N/A
2. Projected or Actual Date of Commencement of Construction :
3. Projected Date of Completion of Construction :

Application Worksheet

Owner :	Mr. George D. Jennings		
City :	Tampa		
County :	Hardee		
Status :	A	Major Group SIC :	49
AOR Required?		Ozone SIP Facility?	
Title V?	Y		
NSPS?	Y		
NESHAP?	N		

Date: 9/23/98 4:31:26 PM
From: Jim McDonald TPA
Subject: Re: Hardee Power Plant near Wachula #0490015
To: Steve Welsh TAL

Tom Ellison and I are not aware of any violations or compliance issues at this plant.



ER PARTNERS LIMITED

12/13/95

Copy made &
placed in file.

[Handwritten signature]

December 7, 1995

Mr. John C. Brown (MS 5505)
Florida Department of
Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 34399-2400

RE: Hardee Power Station
PA89-25, PSD-FL-140
Acid Rain Program

RECEIVED

DEC 11 1995

**BUREAU OF
AIR REGULATION**

Dear Mr. Brown:

In response to your letter dated November 30, 1995, please be advised that the Hardee Power Station is not subject to the Acid Rain Program pursuant to the exemption contained in § 72.6(b)(5). Specifically, the Hardee Power Station meets the following requirements of a "qualifying facility" as specified in § 72.6(b)(5):

- (i) Has, as of November 15, 1990, one or more qualifying power purchase commitments to sell at least 15 percent of its total planned net output capacity; and
- (ii) Consists of one or more units designated by the owner or operator with total installed net output capacity not exceeding 130 percent of its total planned net output capacity.

Please contact me at (813) 228-4493 or Paul Carpinone at (813) 228-4858 if you have any questions concerning this response.

Sincerely,

M. R. Schuyler

Michael R. Schuyler
Director, Project Services

PLC/gdb

702 N FRANKLIN ST. (33602)
P.O. Box 111
TAMPA, FL 33601
(813) 228-1330
(813) 228-1308 FAX



FAX

To: Steve W. FAX: 850-922-6979

To: _____ FAX: _____

FROM: PAUL CARPINONE PAGES (INCL. COVER): _____

PHONE: _____ DATE: _____

CC: _____

- URGENT
- FOR REVIEW
- PLEASE COMMENT
- PLEASE REPLY
- PLEASE RECYCLE

● COMMENTS:

Pages from T-V APP.

Paul

10/23/98

II.E.4

PRECAUTIONS TO PREVENT EMISSIONS OF UNCONFINED PARTICULATE MATTER

10/23/98

10/23/98

PRECAUTIONS TO PREVENT EMISSIONS OF UNCONFINED PARTICULATE MATTER

Unconfined particulate matter emissions that may result from operations include:

- Vehicular traffic on paved and unpaved roads.
- Wind-blown dust from yard areas.
- Periodic abrasive blasting.

The following techniques will be used to prevent unconfined particulate matter emissions on an as needed basis:

- Chemical or water application to:
 - Unpaved roads
 - Unpaved yard areas
- Paving and maintenance of roads, parking areas and yards.
- Landscaping or planting of vegetation.
- Confining abrasive blasting where possible.
- Other techniques, as necessary

10/23/98
TECO POWER SERVICES

II.E.7

LIST OF PROPOSED EXEMPT ACTIVITIES

10/23/98
TECO POWER SERVICES

10/23/98
TECO POWER SERVICES

IAS19

List of Proposed Exempt Activities for Hardee Power Station (Page 1 of 2)

Activity	Basis
Brazeing, soldering and welking	Rule 62-210.300(3)(a)16., F.A.C.
Parts cleaning and degreasing stations	All cleaning conducted at work stations with lids closed when not in use. Rule 62-213.430(6)(b)., F.A.C.
One or more emergency generators which are not subject to the Acid Rain Program and have total fuel consumption, in the aggregate, of 32,000 gallons per year or less of diesel fuel, 4,000 gallons per year or less of gasoline, and 4.4 million cubic feet per year or less of natural gas or propane, or an equivalent prorated amount if multiple fuels are used.	Rule 62-210.300(3)(a)20., F.A.C.
One or more heating units and general purpose internal combustion engines which are not subject to the Acid Rain Program and have total fuel consumption, in the aggregate, of 32,000 gallons per year or less of diesel fuel, 4,000 gallons per year or less of gasoline, and 4.4 million cubic feet per year or less of natural gas or propane, or an equivalent prorated amount if multiple fuels are used.	Rule 62-210.300(3)(a)21., F.A.C.
Storage tanks < 550 gallons	Prior consensus with FDEP: Item 40, Title V Insignificant Source Summary for Electric Power Plants Rule 62-213.430(6)(b)., F.A.C.
Inorganic substance storage tanks > 550 gallons	Prior consensus with FDEP: Item 41, Title V Insignificant Source Summary for Sugar Cane Growers Rule 62-213.430(6)(b)., F.A.C.
No. 2 fuel oil storage tanks > 550 gallons	Low volatility materials. Rule 62-213.430(6)(b)., F.A.C.
No. 2 fuel oil truck unloading equipment	Low volatility materials. Rule 62-213.430(6)(b)., F.A.C.
Laboratory equipment used exclusively for chemical or physical analyses	Rule 62-210.300(3)(a)15., F.A.C.
Fire and safety equipment	Rule 62-210.300(3)(a)22., F.A.C.
Turbine vapor extractor	Prior consensus with FDEP: Item 31, Title V Insignificant Source Summary for Electric Power Plants Rule 62-213.430(6)(b)., F.A.C.
Degasifiers/Deaerators	Prior consensus with FDEP: Item 18, Title V Insignificant Source Summary for Electric Power Plants Rule 62-213.430(6)(b)., F.A.C.

4/2/99
 List of Proposed Exempt Activities for Hardee Power Station (Page 2 of 2)

Activity	Basis
Sand blasting and abrasive grit blasting where temporary total enclosures are used to contain particulates	Prior consensus with FDEP: Item 39, Title V Insignificant Source Summary for Electric Power Plants Rule 62-213.430(6)(b), F.A.C.
Vehicular traffic on paved roads	Low traffic volumes. Rule 62-213.430(6)(b), F.A.C.
Architectural (equipment) maintenance painting	Intermittent maintenance painting of equipment. Rule 62-213.430(6)(b), F.A.C.
Equipment used for steam cleaning	Rule 62-210.300(3)(a)10., F.A.C.
Vacuum pumps in laboratory operations	Rule 62-210.300(3)(a)9., F.A.C.
Equipment used exclusively for space heating, other than boilers	Rule 62-210.300(3)(a)12., F.A.C.
Surface coating operations utilizing 6.0 gallons per day or less, averaged monthly, of coatings containing greater than 5.0 percent VOCs, by volume.	Rule 62-210.300(3)(a)23., F.A.C.
Surface coating operations utilizing only coatings containing 5.0 percent or less VOCs, by volume.	Rule 62-210.300(3)(a)24., F.A.C.
Degreasing units using heavier-than-air vapors exclusively, except any unit using or emitting any substance classified as a hazardous air pollutant	Rule 62-210.300(3)(a)26., F.A.C.

* Although emission rates have not been quantified for all of the activities listed above, professional judgement indicates that each listed source unit type will meet the following criteria pursuant to Rule 62-213.430(6)(b), F.A.C.:

- Are not subject to any unit specific applicable requirements; i.e., listed source unit types are only subject to general facility-wide applicable requirements;
- Potential emissions are expected to be less than 500 pounds per year of lead and lead compounds;
- Potential emissions are expected to be less than 1,000 pounds per year of any hazardous air pollutant;
- Potential emissions are expected to be less than 2,500 pounds per year of total hazardous air pollutants;
- Potential emissions are expected to be less than 5 tons per year of any other regulated pollutant.

Source: ECT, 1996.

455 10/23 '98
14:03 ID:TECO POWER SERVICES

455 10/23 '98
14:03 ID:TECO POWER SERVICES

II.E.8

**LIST OF EQUIPMENT/ACTIVITIES
REGULATED UNDER TITLE VI**

455 10/23 '98
14:03 ID:TECO POWER SERVICES

Equipment Regulated Under Title VI

Unit No.	Refrigerant	Charge (lb)
CSCC-ACU-1	R-22	82

4878 JV
10/23/98

4878 JV
10/23/98