



TAMPA ELECTRIC

September 25, 2002

Mr. Al Linero, P.E.
Acting Bureau Chief
Florida Department of Environmental Protection
111 South Magnolia Drive, Suite 4
Tallahassee, FL 32301

RECEIVED

SEP 26 2002

BUREAU OF AIR REGULATION

**Via FedEx
Airbill No. 7919 4163 8730**

**Re: Tampa Electric Company
Hookers Point Station- Diesel Generators AC Permit
DEP File No. 0570038-004- AC
Response to Request for Additional Information**

Dear Mr. Linero:

Tampa Electric Company (TEC) has received the Environmental Protection Commission of Hillsborough County's (EPCHC) request for additional information dated August 29, 2002 addressing TEC's request for an Air Construction Permit. The Air Construction Permit Application submitted to the Florida Department of Environmental Protection (the Department) in June 2002 requested the following two revisions to Department Air Construction Permit No. 0570038-002-AC:

- (1) Deletion of Section III., Condition No. 15 to allow for continued operation of the 30 internal combustion engines after June 2003; and
- (2) An increase in the total annual fuel consumption for all 30 engines from 2,713,880 gallons per year to 2,828,00 gallons per year due to higher actual engine fuel consumption rates.

This correspondence is intended to provide a response to each specific issue raised by the Department per telephone conversation between Mr. Syed Arif with the Department and Dru Latchman with TEC. For your convenience, TEC has restated each point and provided a response below each specific issue.

EPCHC Comment 1

Rule 62-4.160(6) and (8) states, "The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed and used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules." And "If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information: A.) A description of the cause of noncompliance; and B.) The period of noncompliance, including dates and times; or, if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance. The permittee shall be responsible for any and all damages which may result and maybe subject to enforcement action by the Department for penalties or for revocation of this permit."

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Historically, facilities are only required to periodically demonstrate compliance with the standards and rules by conducting annual stack tests, maintaining daily or monthly records, etc. However, the rules require continuous compliance. Therefore, TEC needs to provide information as to how they plan to demonstrate continuous compliance with the NO_x and opacity limits for the IC Diesel Generators pursuant to Rule 62-213.440(1)(b)1.b., F.A.C.

The draft construction permit requires less than annual testing. Since the combustion temperature and exhaust gas temperature affect the level of NO_x emissions, EPC staff recommends that TEC should consider monitoring the temperature of the exhaust gasses from the IC Diesel Generators in addition to annual testing and fuel recordkeeping in order to ensure continuous compliance with the NO_x limits. Additionally, EPC Staff recommends TEC personnel be required to perform daily instantaneous visible emissions observations in order to meet the requirements of periodic monitoring for the IC diesel generators.

TEC Response

The EPC comments do not address either the removal of the end operating date, June 2003, or the increase in the annual fuel limit, but rather raise concerns involving engine stack testing requirements that were previously resolved with issuance of the initial Department construction permit in April 2001. The EPC comments indicates that continuous compliance with the NO_x and opacity limits must be demonstrated pursuant to Rule 62-213.440(1)(b)1.b., F.A.C. and suggests continuous stack exhaust temperature and daily visible emissions monitoring.

Rule 62-213.440(1)(b)1.b., F.A.C. is applicable to operation permits for major sources (i.e., Title V permits) and therefore is not relevant to Department construction permits. In addition, the Department rule cited by EPC pertains to Title V permit periodic monitoring requirements – such requirements do not mandate continuous monitoring.

The 30 IC engines are use to provide power during peak demand periods and therefore do not operate on a set schedule. On a weekly basis, TEC proposes to monitor and record the manifold exhaust temperature of each IC engine that is operating on a day during the week when the units are dispatched; the number of IC engines monitored each week will depend on the number of engines in operation. To the extent possible, TEC will monitor the engines each week with the objective of periodically monitoring the manifold exhaust temperatures of all 30 IC engines. Upon the occurrence of an abnormal temperature reading, the unit will be shut down and investigated. The incident time, date, cause, and corrective action will be recorded. During normal engine operation (e.g., excluding startup, shutdown, and malfunction), the IC engine manifold exhaust temperatures are not expected to vary significantly. In addition, the IC engines are only subject to a mass emission rate (i.e., lb/hr) permit limit for NO_x. Accordingly, abnormal engine manifold exhaust temperatures will not provide credible evidence of an exceedance of the NO_x permit limitation.

For visible emissions, on a weekly basis TEC proposes using EPA Reference Method 9 to evaluate visible emissions on a maximum of six (6) IC engines on a day during the week when the units are dispatched. The number of IC engines monitored each week will depend on the number of engines in operation. To the extent possible, TEC will monitor different engines each week with the objective of periodically monitoring visible emissions of all 30 IC engines. The IC engines are subject to a 20 percent opacity permit limitation. During normal engine operation (i.e., excluding startup, shutdown, and malfunction), visible emissions are expected to be five percent opacity or

less. Following three months of weekly visible emissions monitoring, TEC proposes to reduce the frequency of visible emissions monitoring to once per month in the event, monitored visible emissions from all IC engines are consistently 10 percent opacity or less. The frequency of visible emissions monitoring will revert to a weekly schedule in the event monitored visible emissions exceed 10 percent opacity for any IC engine.

EPCHC Comment 2

EPC staff noted the permit requires annual tests only for those generators that operate more than 3700 hours per year. EPC staff recommends the modification of the testing requirements to require the testing of at least six (6) different IC generators per year to ensure that all thirty (30) emissions units are tested prior to permit renewal in accordance with Rule 62-297.310(7)(a)3., F.A.C. In addition, Rule 62-297.310(7)(a)3., F.A.C. does allow for the exemption of those emissions units (generators) which operates less than 400 hrs/yr not 3700 hrs/yr.

TEC Response

As noted in the general comments, issues regarding engine stack testing requirements were resolved with issuance of the initial Department construction permit in April 2001. The current emissions performance testing requirements specified in Department Construction Permit No. 0570038-002-AC are considered adequate to confirm initial and on-going compliance with the applicable permit emission limitations for NO_x and opacity. However, TEC is amenable to EPCHC's request and is willing to test six (6) IC engines instead of five (5) engines.

If further questions or concerns arise pertaining to the additional information TEC has provided please contact Dru Latchman or me (813) 641-5034.

Sincerely,

Dru Latchman
for

Laura R. Crouch
Manager - Air Programs
Environmental Affairs

EA/bmr/DNL129

Enclosure

c/enc: Mr. Jerry Campbell, EPCHC
Mr. Syed Arif, FDEP
Mr. Jerry Kissel - FDEP SW



TAMPA ELECTRIC

August 27, 2002

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AUG 28 2002

BUREAU OF AIR REGULATION

Mr. Al. Linero, P.E.
Administrator New Source Review Section
Florida Department of Environmental Protection
111 South Magnolia Drive, Suite 4
Tallahassee, FL 32301

Via FedEx
Airbill No. 7905 9247 7200

**Re: Tampa Electric Company
Hookers Point Station
Permit No.: 0570038-002-AC
Mobile Generator Project**

Dear Mr. Linero:

Please find enclosed the Affidavit of Publication from the Tampa Tribune, as required by 62-110.106(5), F.A.C. This public notice was published in the legal section of the Tampa Tribune on Wednesday, August 21, 2002. If you have any questions, please feel free to telephone Dru Latchman or me at (813) 641-5034.

Sincerely,

*Dru Latchman
for*

Laura R. Crouch
Manager- Air Programs
Environmental Affairs

EA/bmr/DNL125

Enclosure

cc: Mr. Jerry Campbell, EPCHC
Mr. Clair Fancy, FDEP
Mr. Jerry Kissel - FDEP SW
S. King

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State of Florida)
County of Hillsborough } ss.

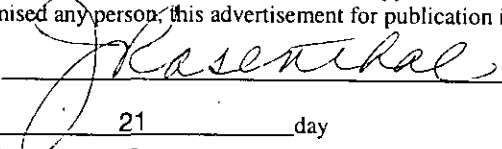
Before the undersigned authority personally appeared J. Rosenthal, who on oath says that she is Advertising Billing Manager of The Tampa Tribune, a daily newspaper published at Tampa in Hillsborough County, Florida; that the attached copy of advertisement being a

LEGAL NOTICE

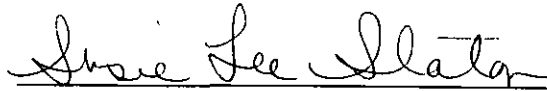
in the matter of PUBLIC NOTICE OF INTENT

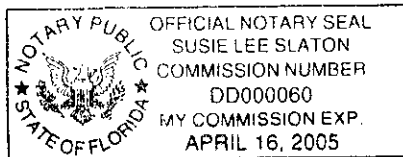
was published in said newspaper in the issues of AUGUST 21, 2002

Affiant further says that the said The Tampa Tribune is a newspaper published at Tampa in said Hillsborough County, Florida, and that the said newspaper has heretofore been continuously published in said Hillsborough County, Florida, each day and has been entered as second class mail matter at the post office in Tampa, in said Hillsborough County, Florida for a period of one year next preceding the first publication of the attached copy of advertisement; and affiant further says that she has neither paid nor promised any person, this advertisement for publication in the said newspaper.


Sworn to and subscribed by me, this 21 day
of AUGUST, A.D. 20 02

Personally Known ☒ or Produced Identification _____
Type of Identification Produced _____





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AUG 28 2002

BUREAU OF AIR REGULATION

**PUBLIC NOTICE OF INTENT
TO ISSUE AIR
CONSTRUCTION PERMIT
MODIFICATION**

STATE OF FLORIDA
DEPARTMENT OF
ENVIRONMENTAL
PROTECTION

DEP File No.
0570038-004-AC

Hookers Point Station
Tampa Electric Company
Hillsborough County

The Department of Environmental Protection (Department) gives notice of its intent to issue an air construction permit modification to Tampa Electric Company (TEC) for the Hookers Point Station located in Hillsborough County. An air construction permit was issued to TEC in April 2001 for installation of 30 (thirty) internal combustion (IC) diesel engines. This permit modification allows for continued operation of the 30 IC engines following June 2003 and permanent shutdown of Boilers 1 through 6 by January 1, 2003. A Best Available Control Technology (BACT) determination was not required pursuant to Rule 62-212.400, F.A.C. and 40 CFR 52.21. Prevention of Significant Deterioration (PSD). The applicant's mailing address is: Tampa Electric Company, Post Office Box 111, Tampa, Florida 33601-0111.

During the original permitting in 2001, the Department applied an emissions cap on the existing boilers 1-6 to insure permanent and enforceable reductions of actual emissions. This allowed the installation of IC engines to "net out" of PSD review. The reduction in emissions from Boilers 1-6 will be greater than previously estimated due to their permanent shutdown. The installation of the IC units will become permanent. Boilers 1-6 were fired on residual fuel oil. The IC engines are restricted to 0.05 percent sulfur diesel fuel.

The Department will issue the final permit modification with the attached conditions unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The Department will accept written comments concerning the proposed permit modification issuance action for a period of 14 (fourteen) days from the date of publication of this Public Notice of Intent to Issue PSD permit modification. Written comments should be provided to the Department's Bureau of Air Regulation at 2600 Blair Stone Road, Mail Station #5505, Tallahassee, FL 32399-2400. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in the proposed agency action, the Department shall revise the proposed permit modification and require, if applicable, another Public Notice.

The Department will issue the permit modification with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to sections 120.569 and 120.57 F.S., before the deadline for filing a petition. The procedures for petitioning for a hearing are set forth below. Mediation is not available in this proceeding.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under sections 120.569 and 120.57 of the Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida, 32399-3000. Petitions filed by the permit applicant or

any of the parties listed below must be filed within fourteen days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under section 120.60(3) of the Florida Statutes must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of this notice of intent, whichever occurs first. Under section 120.60(3), however, any person who asked the Department for notice of agency action may file a petition within fourteen days of receipt of that notice, regardless of the date of publication. A petitioner shall 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 of the Florida Administrative Code.

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 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, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (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 Department'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.

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 Department on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

A complete project file is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

Dept. of Environmental Protection Bureau of Air Regulation
Suite 4
111 S. Magnolia Drive
Tallahassee, Florida 32301
Telephone: 850/488-0114
Fax: 850/922-6979

Dept. of Environmental Protection Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619-8218
Telephone: 813/744-6100
Fax: 813/744-6084

Hillsborough County Environmental Protection Commission
1900 Ninth Avenue
Tampa, Florida 33605
Telephone: 813/272-5960
Fax: 813/272-5157

The complete project file includes the application, Draft permit modification, and the information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Administrator, New Source Review Section, at 111 South Magnolia Drive, Suite 4, Tallahassee, Florida 32301, or call 850/488-0114, for additional information.
3640 8/21/02