



Jeb Bush
Governor

Department of Environmental Protection

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

David B. Struhs
Secretary

May 2, 2002

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Ms. Dru Latchman, Associate Engineer
Environmental Affairs
Tampa Electric Company
P.O. Box 111
Tampa, Florida 33601-0111

Re: Request for Additional Information
DEP File No. 0570038-004-AC
Hookers Point Station – Temporary Mobile Generation Project

Dear Ms. Latchman:

On April 3, 2002, the Department received your letter for a modification to the air construction permit for the existing Hookers Point Facility. This modification is intended to extend the operational period of the thirty internal combustion engines beyond June 2003. The application is incomplete. In order to continue processing your application, the Department will need the additional information requested below. Should your response to any of the below items require new calculations, please submit the new calculations, assumptions, reference material and appropriate pages of the application form.

- 1) Enclosed are comments submitted by Hillsborough County Environmental Protection Commission (HCEPC) in regards to the completeness issues for this project. Please submit the information as requested by HCEPC to the Department's Bureau of Air Regulation.

The Department will resume processing this application after receipt of the requested information. Rule 62-4.050(3), F.A.C. requires that all applications for a Department permit must be certified by a professional engineer registered in the State of Florida. This requirement also applies to responses to Department requests for additional information of an engineering nature. A new certification statement by the authorized representative or responsible official must accompany any material changes to the application. Rule 62-4.055(1), F.A.C. now requires applicants to respond to requests for information within 90 days.

If you have any questions regarding this matter, please call Mr. Syed Arif, P.E. at 850/921-9528 or Mr. Rob Kalch, of HCEPC at 813/272-5530. Ext. 1288

Sincerely,

Syed Arif, P.E. II
New Source Review Section

SA/sa

Enclosure

cc: J. Kissel, DEP SWD
R. Kalch, HCEPC

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1410 N. 21ST STREET - TAMPA, FLORIDA 33605

May 2, 2002

Syed Arif

Department of Environmental Protection, Bureau of Air Regulation
2600 Blair Stone Road
Mail Station 5505
Tallahassee, FL 32399-2400

Re: Comments on TEC, Hookers Point
Permit No.: 0570038-004-AC

Dear Mr. Arif:

The Environmental Protection Commission (EPC) of Hillsborough County has reviewed the TEC request to remove the June 2003 deadline for the discontinuation of the internal combustion generators at Hookers Point. After reviewing the proposed project, EPC staff has the following comments for your consideration:

1. Based on the prior permitting action with the TEC's, Hookers Point facility, EPC staff would like to ensure that all the applicable sources (IC Generators) are included in this project. The project was originally considered in the absence of the temporary IC generators located within 5 miles of Hookers Point.

EPC staff believe these should have been included. In a memo dated November 16, 1994, from the Office of Air Quality Planning and Standards, it is stated, "...it is the EPA's policy that temporary and contractor operated units be included in part of the source with which they operate or support." Additionally in a phone conversation with Mr. Jim Little, May 3, 2001, he felt at least two of the IC generators at neighboring substations (Maritime Blvd and 11th Avenue) should have been included and possibly an additional two from the Clearview and State Road 60 sites.

At the present time it is unclear if the IC generators are still located at the respective sites. EPC staff will visit each of the four sites to verify the presence or absence of the generators. If the IC generators are still present, EPC

www.epchc.org

E-Mail: epcinfo@epchc.org

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Mr. Syed Arif
May 2, 2002

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staff requests these be considered in the construction permit application.

2. EPC staff is concerned about the duration of the construction permit and the future type of operation permit the facility will be issued. In the letter dated April 1, 2002, TEC personnel state the existing emissions units at Hooker's Point will be permanently retired January 1, 2003. Are the emission units the boilers, the IC generators, or some combination of the two? If the boilers are shut down the facility may no longer be a Title V facility and only require a minor source operation permit. Although no complaints have been received, EPC staff wish to ensure that the IC generators are properly permitted to operate in the future should TEC personnel request authorization to do so. Please request TEC personnel to clarify the statement about retiring the emission units in the April 1st letter.
3. Please have TEC submit a complete construction application package. The letter dated April 1, 2002, does not have the required signatures and has not been sealed by a professional engineer. [Rule 62-4.050(3), F.A.C.]

EPC staff appreciates the opportunity to comment on this project and wish to thank you for your consideration of these items. If you have any questions, please contact Rob Kalch or Alice Harman at (813) 272-5530.

Sincerely,



Jerry Campbell, P.E.
Director
Air Management Division

rsk

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PS Form 3800, January 2001

See Reverse for Instructions

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