



TAMPA ELECTRIC

July 3, 1997

Mr. Scott Sheplak, Jr., P.E.
Administrator - Title V Section
Florida Department of Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Via FedEx
Airbill No. 3793593392

Re: Tampa Electric Company
Hookers Point Station
Draft Title V Air Operation Permit
FDEP File No. 0570038-001-AV

Dear Mr. Sheplak:

Tampa Electric Company (TEC) published the Public Notice of Intent to Issue Title V Air Operation Permit for TEC's Hookers Point Station on June 4, 1997. TEC is submitting to the Florida Department of Environmental Protection (FDEP) the enclosed written comments regarding the cited draft permit. TEC looks forward to discussing these comments with FDEP to resolve the issues, if any, that may continue to exist.

Please feel free to telephone me at (813) 641-5039, if you have any questions or require any clarification. Thank you.

Sincerely,

A handwritten signature in cursive script that reads "Janice K. Taylor".

Janice K. Taylor
Senior Engineer
Environmental Planning

EPgmVKT808

Enclosure

c/enc: Mr. Steve Welsh, FDEP-Tallahassee
Mr. Jerry Kissel, FDEP-SW District
Mr. Richard Kirby, EPCHC

RECEIVED

JUL 07 1997

**BUREAU OF
AIR REGULATION**

TAMPA ELECTRIC COMPANY

P.O. BOX 111

TAMPA, FL 33601-0111

HILLSBOROUGH COUNTY 223-0800

OUTSIDE OF HILLSBOROUGH COUNTY 1-888-223-0800

HTTP://WWW.TECOENERGY.COM

AN EQUAL OPPORTUNITY COMPANY

**TAMPA ELECTRIC COMPANY
COMMENTS REGARDING THE TITLE V AIR OPERATION PERMIT FOR
HOOKERS POINT STATION
FDEP FILE NO. 0570038-001-AV**

Section II. Facility-wide Conditions

TEC Comment 1:

TEC requests the deletion of Facility-wide Condition 4. Hookers Point Station processes do not have any regulated substances above the threshold amounts specified in 40 Code of Federal Regulation (CFR) 68.130. The facility is not subject to the Clean Air Act §112(r) accidental release regulatory program.

TEC Comment 2:

TEC requests that the first sentence in Facility-wide Condition 7. be revised to read:

Reasonable precautions to prevent emissions of unconfined particulate matter at this facility may include the following on an as-needed basis:

Section III. Emissions Units and Conditions

TEC Comment 3:

Specific Condition A.3. limits the fuels to be burned at the Hookers Point Station to No. 6 fuel oil during normal operations and No.2 fuel oil or propane during startup operations. The Segment (Process/Fuel) Information sheet for Emissions Units 1 through 6 in the Hookers Point Station Title V Air Operation Permit application each cited used oil as a supplemental fuel. In the past, used oil has been burned at the Hookers Point Station with the Florida Department of Environmental Protection's (FDEP's) verbal approval and without FDEP objection. Based on this history, TEC and FDEP have agreed to incorporate used oil into the Title V Air Operation Permit as an approved fuel. Consistent with this agreement and the permit application, TEC requests Specific Condition A.3.b. be amended to read:

- b. Normal: The only fuels allowed to be burned is are No. 6 fuel oil and used oil.
- c. The injection of nonhazardous boiler chemical cleaning waste is allowed.

TEC Comment 4:

Specific Condition A.5. states “visible emissions shall not exceed 20 percent opacity, except for one two-minute period per hour during which opacity shall not exceed 40 percent.” Under Rule 62-296.405(1)(a), Florida Administrative Code (F.A.C.) , the exception may be either one six-minute period per hour during which the opacity shall not exceed 27 percent or one two-minute period per hour during which opacity shall not exceed 40 percent. Given these two options, TEC requests this condition be changed to:

Visible emissions shall not exceed 20 percent opacity, except for one ~~two-minute~~ ~~six-minute~~ period per hour during which opacity will not exceed ~~40~~ 27 percent.

This preference is consistent with the information presented on the Visible Emissions Information sheets for Emissions Units 1 through 6 in the Hookers Point Station Title V Air Operation Permit application.

TEC Comment 5:

Specific Condition A.13. states that the permittee elected to demonstrate sulfur dioxide (SO₂) emission compliance using fuel sampling and analysis. Since submittal of the Title V Air Operation Permit application for Hookers Point Station, TEC has further evaluated the technical feasibility of demonstrating SO₂ emission compliance using fuel sampling and analysis. Based on this analysis, TEC has decided not to use fuel sampling and analysis to demonstrate SO₂ emission compliance. Therefore, TEC requests that this condition be eliminated or changed to require EPA test methods be used annually to demonstrate SO₂ emission compliance.

Consistent with this compliance method, TEC requests the following changes to other specific permit conditions:

- Delete the second sentence in Specific Condition A.9.
- Amend Specific Condition A.18. to eliminate any reference to an alternate sampling procedure.
- Delete Specific Condition A.19.
- Add a new specific condition that eliminates the requirement for an annual SO₂ compliance test for these emissions units while burning only liquid fuels for less than 400 hours per year.

TEC Comment 6:

Specific Condition A.15. mandates DEP Method 9 as the visible emissions test method. TEC included EPA Method 9 as the visible emissions test method in the Hookers Point Station Title V Air Operation Permit application. TEC requests EPA Method 9 be restored as the visible emissions compliance demonstration test method.

Consistent with the existing operation permits for Hookers Point Station, TEC requests the following statement be added to Specific Condition A.15.:

A test under sootblowing conditions which demonstrates compliance with a non-sootblowing limitation will be accepted as proof of compliance with that non-sootblowing limitation.

TEC Comment 7:

Consistent with the existing operation permits for Hookers Point Station, TEC requests the following statement be added to Specific Condition A.20.:

A test under sootblowing conditions which demonstrates compliance with a non-sootblowing limitation will be accepted as proof of compliance with that non-sootblowing limitation.

TEC Comment 8:

Specific Condition A.25. contains a numbering error. Specific Condition A.25.(a) includes subparagraphs 2. through 5., 9., and 10. Either these subparagraphs are misnumbered or some subparagraphs are missing. In addition, subparagraph 5. is a duplicate of Specific Condition A.27. and should be deleted.

TEC Comment 9:

TEC requests that Specific Condition A.29. be deleted. Specific Condition A.29. erroneously cites Rule 62-296.405(1)(g), F.A.C., as an applicable requirement. This rule requires quarterly excess emission reporting for those emissions units required to install, calibrate, operate, and maintain continuous monitoring systems per Rule 62-296.405(f), F.A.C. The Hookers Point Station emissions units are oil-fired units which meet the applicable visible emission limiting standard without the use of control equipment. Therefore, these emission units are exempt from the continuous opacity monitoring requirement under Rule 62-296.405(f)1.a.(i), F.A.C. The quarterly reporting requirement of Rule 62-296.405(1)(g), F.A.C., is not applicable because because continuous opacity monitoring is not required.

TEC notes that opacity monitors have been installed and are calibrated, operated, and maintained per the Title IV Acid Rain rules. TEC will continue to submitted quarterly excess emission reports for the Hookers Point Station emissions units as a courtesy.

Appendix E, List of Exempt Emissions Units and/or Activities

TEC Comment 10:

Consistent with the Hookers Point Title V Air Operation Permit application and Chapter 63-213.430(6), F.A.C., TEC requests that the following activities be added to the list of Exempt Emissions Units and/or Activities:

- Parts cleaning and degreasing stations.
- Architectural (equipment) maintenance painting.
- No. 2, No.6, and used oil barge and truck unloading.

Appendix TV-1, Title V Conditions (version dated 02/27/97)

TEC Comment 11:

TEC notes that Appendix TV-1 Condition 17. is a duplicate of Appendix TV-1 Condition 55. and should be deleted.

TEC Comment 12:

To remove any potential ambiguity regarding applicability of the permit shield to Hookers Point Station, TEC requests that the first sentence of TV-1 Condition 52. be revised as follows:

Except as provided in Chapter 62-213, F.A.C., compliance with the terms and conditions of ~~a permit issued pursuant to Chapter 62-213, F.A.C., Permit No. 0570038-001-AV~~ shall be deemed compliance with any applicable requirements in effect as of the date of permit issuance, ~~provided that the source included such applicable requirements in the permit application.~~

TEC Comment 13:

TEC requests the Appendix TV-1 Condition 56. be deleted. Hookers Point Station has no refrigeration equipment subject to 40 CFR 82 requirements.

TEC Comment 14:

TEC requests that Appendix TV-1 Condition 58. be deleted. This condition is unnecessary and potentially confusing because Facility-wide Condition 7. is applicable to the same activities.

TEC Comment 15:

TEC requests that the following condition be added to TV-1 to allow for the addition of insignificant activities consistent with Rule 62-213.430(6), F.A.C.

55 Exemption for Emission Units or Pollutant-Emitting Activities

- (a) All requests for exemption of emission units or activities made pursuant to Rule 62-213.420(3)(m), F.A.C., shall be processed in conjunction with the permit, permit renewal, or permit revision application submitted pursuant to Chapter 62-213, F.A.C. Exemptions shall be approved by the Department consistent with the provisions of Rule 62-4.040(1)(b), F.A.C. Emission units or activities which are added to a Title V source after issuance of a permit under Chapter 62-213 shall be incorporated into the permit at its next renewal, provided such emissions units or activities have been exempted from the requirement to obtain an air construction permit and also qualify for exemption from permitting pursuant to Chapter 62-213, F.A.C.
- (b) No exemption shall be granted to any emissions unit or activity if:
 - 1. Such unit or activity would be subject to any unit-specific applicable requirement;
 - 2. Such unit or activity, in combination with other units and activities proposed for exemption, would cause the facility to exceed any major source threshold(s) as defined in Rule 62-213.420(3)(c)1., F.A.C., unless it is acknowledged in the permit application that such units or activities would cause the facility to exceed such threshold(s); or
 - 3. Such unit or activity would emit or have the potential to emit:
 - a. 500 pounds per year or more of lead or lead compounds expressed as lead;
 - b. 1,000 pounds per year or more of any hazardous air pollutant;
 - c. 2,500 pounds per year or more of total hazardous air pollutants; or
 - d. 5.0 tons per year or more of any other regulated pollutant.

[Rule 62-231.430(6), F.A.C.]

Table 1-1, Summary of Air Pollutant Standards and Terms

TEC Comment 16:

TEC understands that Table 1-1 is not a part of Permit No. 0570038-001-AV. However, TEC requests that Table 1-1 be updated to reflect TEC's comments and any other changes made to the final permit.

Table 2-1, Summary of Compliance Requirements

TEC Comment 17:

TEC understands that Table 2-1 is not a part of Permit No. 0570038-001-AV. However, TEC requests that Table 2-1 be updated to reflect TEC's comments and any other changes made to the final permit. In addition, TEC requests that the Frequency Base Date for SO₂, PM, and VE be changed to August 8. Because the Hookers Point Emissions Units are peaking units that operate most frequently during the summer months, an August 8 Frequency Base Date provides greater flexibility in scheduling the annual compliance tests.

Date: 10/20/97 10:24:19 AM
From: Elizabeth Walker TAL
Subject: New and Updated postings
To: See Below

There are some new postings available on the Florida Website.

UTILITY BOARD OF THE CITY OF KEY WEST
Stock Island 0870003001AV Draft

FLORIDA POWER & LIGHT 0250003001AV(Fossil) Draft
Turkey Point 0250003002AV(Nuclear) Draft

INDIAN RIVER PLANT
ORLANDO UTILITY COMMISSION 0090008001AV Draft

Also, there were some updates to the following information on our website:

TECO
HOOKERS POINT STATION 0570038001AV Draft

If you have any questions, please let me know

Thanks
Elizabeth

To: adams yolanda
To: pierce carla
To: Barbara Boutwell TAL
To: Scott Sheplak TAL
To: Terry Knowles TAL
To: gates kim
CC: Steve Welsh TAL

transmitted to
Terry Knowles

FLORIDA's Electronic Notification Cover Memorandum

TO: Gracy R. Danois, U.S. EPA Region 4
THRU: Scott M. Sheplak, P.E., Tallahassee Title V Section *SM8 s/g*
FROM: Steve Welsh, Permit Engineer
DATE: 05/01/97
RE: U.S. EPA Region 4 Title V Operation Permit Review

Pursuant to the 1996 comprehensive Title V operation permit review strategy contained in the Florida/EPA Implementation Agreement, the following Title V operation permit(s) and associated documents are made available for your review/comment prior to issuance.

<u>Applicant Name</u>	<u>County</u>	<u>Method of Transmittal</u>	<u>Electronic File Name(s)</u>
Tampa Electric Co.- Hookers Point	Hillsborough	INTERNET	0570038.zip

This zipped file contains the following electronic files:

0570038s.doc
0570038i.doc
0570038d.doc
05700381.xls
05700382.xls
0570038e.doc
0570038h.doc
0570038m.doc

0570038d.epa

Permit Application Summary Form

State of Florida

General Facility Information

Facility name: Tampa Electric Company - Hookers Point Station

AIRS ID: 0570038

Facility address: P.O. Box 111

Tampa, FL 33601-0111

SIC code of major product: 49, 49

Date application received: June 15, 1996

Permit number: 0570038-001-AV

County: Hillsborough

Application Type/Permit Activity

☒ Initial issuance

☐ Permit modification

☐ Permit renewal

☐ General permit

☐ Conditional major

Facility Emissions Summary Table

Pollutant	Potential (tpy)
PM	1536
SO ₂	13519
NO _x	
CO	377
VOC	
LEAD	
HAP \geq 10 tpy (by CAS)	

Compliance Summary

☐ [N] Source is out of compliance (Y or N)

☒ [X] Compliance certification signed

☐ [] Compliance schedule included

Applicable Requirements list

☐ [] PSD

☒ [X] SIP

☐ [] NSPS

☐ [] NESHAPS

☒ [X] Other: RACT (PM)

Miscellaneous

☒ [X] Acid rain source

☒ [X] Facility subject to 112(r)

☐ [] Facility applied for federally enforceable emissions cap

☒ [X] Facility provided terms for alternative operating scenarios

☐ [] One or more emissions unit(s) subject to a MACT standard

☐ [] One or more emissions unit(s) requested case-by-case 112(g) or (j) determination

☐ [] Application proposes new control technology

☒ [X] Certified by responsible official

☒ [X] Diagrams or drawings included

☐ [] Confidential business information was received

Permit Review Strategy Checklist

State of Florida

Facility Name: Tampa Electric Company - Hookers Point Station PERMIT NO.: 0570038-001-AV
AIRS I.D.: 0570038 COUNTY: Hillsborough

Is this submittal being made in response to Section V of the Implementation Agreement? ☒ Yes ☐ No
If yes, complete the following:

EPA PERMIT REVIEW STRATEGY - check all categories that apply.

- ☐ 1. Any source specifically requested by the permit agency.
- ☐ 2. At least one VOC source, one PM source, and one NOx source with respective pollutant emissions in the 90th percentile or higher (ranked annually by permit agency).
- ☐ 3. All municipal waste combustors subject to permitting under section 129(e) of the Clean Air Act.
- ☐ 4. All sources proposing an alternative emission limitation, test method, monitoring requirement, or recordkeeping requirement.
- ☒ 5. The first two (2) sources subject to the Phase II requirements under the Title IV acid rain program.
- ☐ 6. The first (1st) source subject to each MACT standard. The permit agency does not need to submit source information for the same MACT standard in ensuing calendar years, unless specifically requested.
- ☐ 7. All sources subject to case-by-case MACT under 112(g); and, the first source in a source category subject to case-by-case MACT under 112(j).
- ☐ 8. All sources associated with the early reduction program (40 CFR part 63, subpart D).
- ☐ 9. Submitted in response to special request by EPA Region 4.

INFORMATION ATTACHED - paper copies of permit-related documents. Indicate all that apply.

- ☐ 1. Complete permit application (including attachments) and proposed permit.
- ☐ 2. Permit-related information (e.g., public notices, public comments) requested by EPA.
- ☐ 3. Initial permit application (including attachments) from source proposing an alternative emission limitation, test method, monitoring requirement, or recordkeeping requirement, will be submitted. The initial permit application must be submitted within 10 days of receipt from source.

STATE OF FLORIDA, DEP, BUREAU OF AIR REGULATION, TITLE V SECTION
TELEPHONE CONVERSATION RECORD

TO: FL

FROM: SCOTT SHEPLAK JMS

DATE: 05/24/97 TIME: ~3:15pm

WITH: Ms Janice Taylor

REPRESENTING: TEC - Hockers Point, DRAFT Title V Permit No. 0570038-001-AV

TELEPHONE NO.: _____

SUBJECT: _____

Int. to Issue, Public Notice

SUMMARY: Inadvertently, we left Janice Taylor
off of "cc" list. Janice Taylor asked that she be
added to those persons to receive copies by certified
mail. She advised that ~~she~~ she is person responsible
for trucking, etc., and the rest of the electric
utilities operate in a similar fashion w/ an
application contract.

She plans to publish the Public Notice on June 4.
I informed that I would accept receipt date for Int. to
w/ Public Notice is May 6.

6/10/97 - Steve Wobst copied & to update
ARMS.

STATE OF FLORIDA, DEP, BUREAU OF AIR REGULATION, TITLE V SECTION
TELEPHONE CONVERSATION RECORD

TO: File

FROM: SCOTT SHEPLAK gms

DATE: 05/24/97 TIME: ~3:15pm

WITH: Ms Janice Taylor

REPRESENTING: TEC - Hookas Point, DRAFT T-H.V. Permit No.:
0570038-001-AV

TELEPHONE NO.: _____

SUBJECT: _____

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