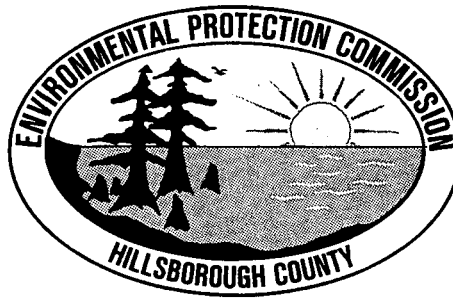


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BUREAU OF AIR REGULATION

August 26, 2002

Ms. Cindy Phillips, P.E.
Department of Environmental Protection, Bureau of Air Regulation
2600 Blair Stone Road
Mail Station 5505
Tallahassee, FL 32399-2400

Re: Hillsborough County - AP
DEP File No. 0570038-005-AV

Dear Ms. Phillips:

Thank you for forwarding a copy of the Draft Title V Air Operation Permit Renewal application for TEC Hookers Point to EPC staff for review. After reviewing the application, EPC staff offers the following comments for your consideration:

1. EPC staff noted on Pages 18, 43, 68, and 92, Section F, Emissions Unit Pollutants, Pollutant Regulatory Code, that NO_x was classified as "NS" (Pollutant not emissions-limited nor subject to any work practice standard). Due to the facility wide NO_x emissions cap (Specific Condition B.7. of Permit No.: 0570038-003-AV), EPC staff believes NO_x should be classified as "EL" (Emissions-limited pollutant). Please request TEC personnel to revise Section F accordingly. [DEP Form 62-210.900(1), F.A.C.]
2. EPC staff noted that the information required in Fields 1, 4, 6, and 7 (Process Flow Diagram, Description of Stack Sampling Facilities, Procedures for Startup and Shutdown, and Operation and Maintenance Plan), Section J, Emissions Unit Supplemental Information, on Page Nos. 34, 59, 84, and 108 were not included in the application, and a waiver was requested. EPC staff does not consider this information critical for the continued review of this application due to the retirement of Units 1 through 6 by January, 2003. However, if TECO later decides to operate Units 1 through 6 beyond January 2003, they may need to revise Section J accordingly. [DEP Form 62-210.900(1), F.A.C.]

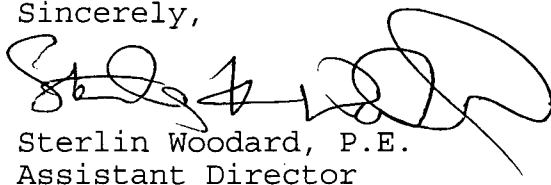
3. EPC staff compared the current List of Insignificant Emissions Units and/or Activities (Appendix I-1) with the one submitted in the Title V Renewal Application. Staff identified Item Nos. 17, 18, and 19 as items not previously listed in Appendix I-1, List of Insignificant Emissions Units and/or Activities. Please request that TEC personnel submit appropriate documentation for the Department and EPC staff to evaluate the potential emissions in accordance with Rule 62-213.430(6), F.A.C. Additionally, EPC staff recommends the exclusion of Item No. 19 because Department or EPC personnel should be involved in the evaluation of any potential increase or change in emissions.
4. EPC is requesting that the DRAFT permit specify a revised facility wide NO_x emissions limit prior to, and after, the permanent shutdown of Units 1 through 6. Specifically, EPC staff request the potential NO_x emissions be reduced by 100 tpy after Units 1 through 6 are shut down.
5. EPC staff has determined specific conditions should be added to the permit addressing the shutdown and future status of Units 1 through 6. EPC staff recommends the establishment of a date by which Units 1 through 6 will be permanently shutdown. In addition, a specific condition should be added to address any future reactivation of Units 1 through 6. Any reactivation of Units 1, 2, 3, 4, 5, or 6 would require that the unit(s) would be evaluated as new units and subject to any all applicable requirements.
6. Although the emissions calculations for Units 1 through 6 are not critical to continue processing the Title V Permit Renewal because of the shutdown of these units by January 2003, EPC staff noted the potential annual PM emissions were based on 0.3 lbs/MMBtu for Units 1 through 6, as if Units 1 through 6 were operating under soot blowing conditions at all times. The resulting annual emissions were 101.1 tpy. EPC staff calculated the potential emissions for the facility to be 39.9 tpy based the typical hours of operation of soot blowing (3 hrs/day) and non-soot blowing (21 hrs/day) listed in the application.
7. EPC staff noted that Appendix B, contained calculations for Acetaldehyde, Acrolein, and 1,3-Butadiene, but did not reference any emission factors. Please request that TEC personnel submit the emission factors and the reference of such factors.
8. EPC staff could not confirm the emissions factors given for PM₁₀, POM, and SAM for Emissions Units 1 through 6. Please request detailed calculations for these emission factors. In addition, EPC staff could not verify the emission factors for

addition, EPC staff could not verify the emission factors for H_2SO_4 and SO_2 for the diesel generators. Please request TEC personnel to review these emissions factors and provide the basis for them. [Rules 62-4.070 and 62-210.200(Potential to Emit), F.A.C.]

9. How does TEC plan to demonstrate continuous compliance with the NO_x and visible emissions requirements for the IC Diesel Generators, and provide for periodic monitoring in accordance with Rule 62-213.440(1)(b)1.b., F.A.C.? Since the combustion temperature and exhaust gas temperature affect the level of NO_x emissions, EPC staff recommends that TEC should monitor the temperature of the exhaust gasses from the IC Diesel Generators in addition to annual testing and fuel recordkeeping 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.
10. EPC staff noted the permit requires annual tests only for those generators which 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. Rule 62-297.310(7)(a)3., F.A.C. does allow for the exemption of those emissions units (generators) which operate less than 400 hrs/yr not 3700 hrs/yr.

If you have any questions, please feel free to contact Rob Kalch at (813) 272-5530.

Sincerely,



Sterlin Woodard, P.E.
Assistant Director

rsk

cc: Karen Sheffield, General Manager, TEC Hookers Point
Dru Latchman, TEC, Air Programs, Environmental Planning
Thomas W. Davis, P.E., ECT