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BUREAU OF AIR REGULATION

August 29, 2002

Mr. Syed Arif, 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. 0570038-004-AC

Dear Mr. Arif:

Thank you for forwarding a copy of the Draft Construction Permit (Permit No.: 0570038-004-AC) for TEC Hookers Point to EPC staff for review. After reviewing the application, EPC staff offers the following comments for your consideration:

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 and 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 may be subject to enforcement action by the Department for penalties or for revocation of this permit."

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 NOx and opacity limits for the IC Diesel Generators pursuant to Rule 62-213.440(1)(b)1.b., F.A.C.



Mr. Syed Arif, P.E.
August 29, 2002

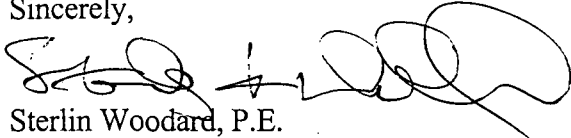
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The draft construction permit requires less than annual testing. Since the combustion temperature and exhaust gas temperature affect the level of NO_x emissions, EPC staff recommends that TEC should consider monitoring the temperature of the exhaust 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.

2. 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. In addition, 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, Associate Engineer, TEC, Air Programs, Environmental Planning
Thomas W. Davis, P.E., ECT