Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

February 13, 1997

Mr. Stanley J. Martin
General Manager, Big Bend Station
Tampa Electric Company
P.O. Box 111
Tampa, FL 33601-0111

RE: Request for Additional Information Regarding Initial Title V Permit Application
File No. 0570039-002-AV
Big Bend Station, Hillsborough County

Dear Mr. Martin:

Your initial Title V permit application for the Big Bend Station was "timely and complete" for purposes of the initial Title V application submission (see Rule 62-213.420(1)(a)1. and (b)2., F.A.C.).

However, in order to continue processing your permit application, the Department will need the additional information below pursuant to Rule 62-213.420(1)(b)3., F.A.C. and Rule 62-4.070(1), F.A.C. The additional information requested is organized by topic.

Should your response to any of the below items require new calculations, please submit the new calculations, assumptions, reference material and appropriate revised pages of the application form.

Combustion Sources

1. On the Segment (Process/Fuel) Information part of the application for Steam Generator Units Nos. 1-4, The Segment Comment field states that the "Btu per SCC unit value (Field 9) based on average fuel heat content of 11,000 Btu/lb." Is this the average heat input of all the coal fired, or the average heat input of all the coal and petcoke/coal blend combined? Why is this heat content lower than the minimum heat content shown in fuel analyses submitted? Please submit a separate Segment (Process/Fuel) Information form for each type of solid fuel as required by DEP Form No. 62-210.900(1)-Instructions.

2. a) Where in the process is the coal sampled for analysis? b) Where in the process is the petroleum coke/coal blend sampled for analysis? c) What is the frequency of sampling and analysis? d) Please explain why the petcoke/coal blend fuel analyses parameters list Sulfur in coal, and BTU in coal, etc., but make no mention of the petroleum coke or a blend.

3. Although the application states that No. 2 fuel oil is used for ignition during start-up for Steam Generator Units No. 1, No. 2, No. 3 and No. 4, the firing of No. 2 fuel oil is not addressed in current operation permits for these units. Please submit the Segment (Process/Fuel) Information for fuel oil for these emission units as required by DEP Form No. 62-210.900(1)-Instructions.

4. Although the application states that solid fuels may be supplemented with used oil for Steam Generator Units No. 1, No. 2, No. 3 and No. 4, the firing of used oil is not addressed in current operation permits for these units. a) Is this "on-spec" used oil? b) Please submit the Segment (Process/Fuel) Information for used oil for these emission units as required by DEP Form No. 62-210.900(1)-Instructions

5. Due to the fact that the Segment (Process/Fuel) Information for Steam Generation Units Nos. 1-4 was not submitted for any liquid fuel/waste fired, and there was no differentiation made between coal and the petroleum coke/coal blend, please confirm that all pollutant emissions are at their maximum when coal is fired and that is the data which has been submitted in the application. If this is not true, please change the pollutant emission data to reflect the worst-case scenario fuel/fuel combination.

6. In the application, TEC's requested Methods of Compliance for SO_2 emissions limitations from the Steam Generators are as follows:

Unit No. 1, 2, or 3:	weekly composite fuel sampling and fuel analysis or continuous emission monitoring; deletion of current requirement for annual stack testing
Units No. 1, 2, and 3, total group:	daily composite fuel sampling and analysis; deletion of current requirement for annual stack testing

In order to determine if an Alternate Sampling Procedure review is required, please answer the following questions. a) Is the fuel to be sampled and analyzed for calorific value? b) Is fuel sampling only to be used when the continuous monitor is not functional? c) Why is TEC not requesting to determine compliance with the total group emission limits by means of continuous emission monitoring? d) Is the monitoring equipment and procedure consistent with the requirements of 40 CFR 60 Appendix A Method 6C? e) Is TEC proposing **continuous compliance** while using the continuous SO_2 monitor?

7. Though not listed as such in the application, Rule 1-3.63(c), Rules of the Environmental Protection Commission of Hillsborough County, may be an applicable requirement for Units No. 1-4. This rule limits emissions from fossil fuel steam generators to 1.1 pounds SO_2 per million Btu heat input when liquid fuel is burned. Please provide assurance as to how this limit will be met in each unit if it applies to the facility. If it does not apply, please explain why.

8. Please clarify the following stack information provided in the application: a) For the nonintegrated mode, where is the SO_2 emissions sampling port for Steam Generator Unit No. 3.? b) Why does Stack #3 include a recirculation duct and why is this not shown on the DOCUMENT II.D.3.G., OVERALL BOILER PROCESS FLOW DIAGRAM, and the BOILER NO. 4 TEST LOCATION - FIGURE 1? c) Why does the BOILER NO. 3 TEST LOCATION - FIGURE 1 show two ESP outlets to the stack and no FGD outlet? d) Based on DOCUMENT II.D.2.C., COMBUSTION EMISSION SOURCES, and DOCUMENT II.D.2.A., BIG BEND STATION EMISSION SOURCE IDENTIFICATION KEY SHEET, Combustion Sources CS-003 and CS-

004 have separate and distinct emission points (stacks). How can this be true for the integrated mode? Please revise these documents with notations about the integrated mode. e) Please provide a diagram of the Unit No. 3 integrated mode particulate emissions stack (duct) sampling location. f) Is the particulate sampling location shown in BOILER NO. 4 TEST LOCATION - FIGURE 1 the sampling location for the Boiler No. 4 in the integrated mode as well as the non-integrated mode?

9. Deletion of current annual visible emissions testing using EPA or FDEP Reference Method 9 was requested for Steam Generator Units 3 and 4 in the application. Is TEC proposing **continuous compliance** while using the continuous opacity monitors? Is **continuous compliance** being proposed for Unit 3 while it is operating in the non-integrated mode?

10. The Big Bend Station is located in an area of influence of a particulate matter air quality maintenance area. Therefore, the fossil fuel steam generators which have not received a PSD or New Source Review permit must comply with section 62-296.700, Reasonably Available Control Technology (RACT) Particulate Matter, F.A.C. Please provide the following information for Steam Generator Unit Nos. 1, 2, and 3: maximum dry standard volumetric flow rate, moisture content of gas stream that is emitted, and an operation and maintenance plan as described in Rule 62-296.700(6), F.A.C.

11. Recent information, provided in EPA's final interim report on HAP emissions from fossil fuel-fired electric utility steam generating units, indicates that a large amount of hydrogen fluoride (and, therefore, total fluorides) may be emitted from the Big Bend Station. By not listing total fluorides as a pollutant in the Facility Pollutant Information section of the application, as required by 62-213.420(3)(c), F.A.C., is TEC stating that the Big Bend Station emits or has the potential to emit less than 100 tons of total fluorides per year? What is the basis of this assumption?

12. a) By not listing total hazardous air pollutants (HAPS) as a pollutant in the Facility Pollutant Information section of the application, is TEC stating that the Big Bend Station emits or has the potential to emit less than 25 tons of HAPS per year? What is the basis for this assumption? b) Based on reported lead emissions alone, the facility emits or has the potential to emit more than 25 tons per year of HAPS and each of the four steam generator units emits more than 2500 pounds per year. Why are HAPS not identified as a pollutant for the facility and each of the steam generator units? c) Were the amounts of HAP emissions generated from the burning of petcoke considered when the potential HAP emissions were identified for the steam generator units and total facility? d) Is the petcoke received from only one source? What reasonable assurance can be given that the petcoke is analyzed to the extent to verify that no major amounts of individual HAPs will be emitted from the facility, other than those already listed in the application?

13. Rule 62-213.420(3)(c), F.A.C., states that each Title V source that emits or has the potential to emit any hazardous air pollutant or total hazardous air pollutants in a major amount (5 tons per year for lead, 10 tons per year for any other hazardous air pollutant, 25 tons per year for total hazardous air pollutants) must identify, for each emissions unit, each such pollutant which the applicant knows or has reason to believe would be emitted in an amount equal to or greater than 1,000 pounds per year for each individual hazardous air pollutant (HAP) or 2,500 pounds per year for total hazardous air pollutants (HAPS). a) By not listing lead as a pollutant in the Facility Pollutant Information section of the application, is TEC stating that the Big Bend Station emits or

has the potential to emit less than 5 tons of lead per year? What is the basis of this assumption? b) If the facility does not exceed this major source threshold for lead, why are the lead emissions for each unit identified in the emissions units Pollutant Information sections? {Note: In the Annual Operating Report for 1995, TEC reported annual lead emissions of 32.5 tons for the facility.} c) By not listing arsenic compounds, chromium compounds, or manganese compounds as a pollutant in the Facility Pollutant Information section of the application, is TEC stating that the Big Bend Station emits or has the potential to emit less than 10 tons each of arsenic compounds, chromium compounds, and manganese compounds per year? What is the basis for this assumption? d) Based on emission factors from AP-42 Table 1.1-13 (1/95), the facility emits or has the potential to emit as much arsenic compounds, chromium compounds, or manganese compounds as it does lead. Why are arsenic, chromium, and manganese compounds not identified as pollutants for the facility and each of the steam generator units?

14. The following hazardous air pollutants are listed in the application as being emitted from:
Steam Generator Units No. 1 and 2 - Pb, HCl, HF, Ni, and Se;
Steam Generator Unit No. 3 - Pb, HCl, HF, Mn, Ni, and Se;
Steam Generator Unit No. 4 - Pb, HCl, and HF;
Combustion Turbine No. 1 - HCl ;
Combustion Turbine No. 2 - HCl, HF, and Ni;
Combustion Turbine No. 3 - HCl, and Mn.

a) Why does Steam Generator Unit No. 4 not emit 1,000 pounds or more per year each of Se and Ni, when Units 1, 2 and 3 do?
b) Why does Combustion Turbine No. 2 emit 1,000 pounds or more per year each of HF and Ni, when Combustion Turbines No. 1 and No. 3 do not?
c) Why does Combustion Turbine No. 3 emit 1,000 pounds or more per year of Mn, when Combustion Turbines No. 1 and No. 2 do not?
d) Why does Steam Generator No. 3 emit 1,000 pounds or more per year of Mn, when Steam Generators Nos. 1, 2 and 4 do not?

15. Please provide the following additional information about control devices/methods: a) If TEC is adding ammonia to the flue gas from Unit No. 4, ammonia injection should be listed as a control device/method and a detailed description of the process should be submitted. b) If Stack #3 includes a recirculation duct to return exhaust gas to the inlet of the FGD scrubber, Flue Gas Recirculation should be listed as a control device/method and a detailed description of the process should be submitted. c) Please explain why, and in what quantities, TEC is adding SO_3 to the flue gases from Units Nos. 1-3, and quantify the effect on emissions. d) Is the SO_3 purchased or is it created on-site?

16. In the Emission Inventory Worksheet for Unit No. 3 on page CS-003 of Appendix C, how was the NO_x potential emission rate calculated to be 3154.1 tpy? Should this not be 12,616.6 tpy as shown on the Appendix B Emission Rate Summary sheet?

17. In the Emission Inventory Worksheet for Unit No. 4 on page CS-004 of Appendix C, and on the Appendix B Emission Rate Summary sheet, the CO potential emission rates are listed as 125.6 lb/hr and 550 tpy. However, Permit No. PSD-FL-040 (October 9, 1985 Modification) limits the CO emissions to 124 lb/hr, which equates to 543 tpy. Please correct these emissions numbers.

18. Is Steam Generator Unit No. 4 a tangentially fired boiler or a dry bottom wall-fired boiler? The Source Classification Code (SCC) listed in the application for Steam Generator Unit No. 4 is 1-01-002-02 which designates an Electric Generation External Combustion Boiler, Pulverized Coal: Dry Bottom (Bituminous Coal). However, if Unit No. 4 is tangentially fired (as stated elsewhere in the application and in the monitoring plan for Unit No. 4, the more appropriate SCC would be 1-01-002-12 which designates an Electric Generation External Combustion Boiler, Pulverized Coal: Dry Bottom (Tangential)(Bituminous Coal). Also, if it is tangentially fired, why is Unit No. 4 not listed in "Table 1 - Phase I Tangentially Fired Units," 40 CFR 76 Appendix A? Is this due to the fact that Unit No. 4 was not originally a Phase I Unit?

19. Though referenced in the Emissions Unit Supplemental Information sections for Steam Generator Units No. 2, 3, and 4, supplemental information section III.I.11, Alternative Modes of Operation (Emissions Trading), was not included with the application. Please explain.

20. Facility Pollutant Detail Information was not provided. Please submit this section of the application to identify the multi-unit emissions caps. For example, there are multi-unit emissions caps for sulfur dioxide emissions from Steam Generator Units 1-3.

Solid Fuel Handling

21. Please submit a separate Segment(Process/Fuel) Information form for each type of solid fuel as required by DEP Form No. 62-210.900(1)-Instructions. Please submit revisions to drawings and diagrams as needed. For example, if specific storage piles or conveyors are used for petroleum coke/coal blend fuel only, please indicate this on the drawings and diagrams.

22. Particulate emissions estimates should be based on the solid fuel which has the potential to emit the most particulate matter. Which solid fuel has the potential to emit the most particulate matter when handled? Please submit documentation to support your conclusion.

23. The Condition I.A.3. of the PA 79-12 Conditions of Certification (revised 6-2-81 and modified 9-13-95) states that particulate emissions from the coal handling facilities shall be controlled by use of control devices. Within ten (10) working days after it became available, TEC was required to submit technical data pertaining to the selected particulate emissions control for the coal handling facility. This information was to include, but not be limited to, guaranteed efficiency and emission rates, and major design parameters such as air/cloth ratio and flow rate. However, there is no mention of any control devices for the conveyors and transfer points in the Title V application. Please clarify what types of particulate controls are used for each of the solid fuel handling and storage sources FH-001 through FH-031, FH-036 through FH-047, FH-050 through FH-058, and FH-063 through FH-073.

24. Specific Condition No. 5.a. of Permit No. PSD-FL-040 for Steam Generator Unit No. 4 requires that all conveyors and conveyor transfer points (except the coal handling stacker reclaimer, the tail end conveyor feeding tripper and the barge unloading belt) be enclosed to minimize fugitive emissions of particulate matter. a) Are there any vents or stacks associated with the enclosures? b) Which identification numbers in the application Document II.D.2.A. correspond to the coal handling stacker reclaimer and the tail end conveyor feeding tripper? c) Is conveyor belt

CB-A1 moved to line up with a barge, or does the barge line up with CB-A1 to unload? Is conveyor belt CB-B1 moved to line up with CB-A1, or does CB-B1 stay in one place?

25. The modified Conditions of Certification limit the maximum **annual** transloading of solid fuel to 4000 tons in Condition No. I.A.3.d. **and** 1,428,030 tons in Condition No. I.A.3e. We believe this is an error. Please contact Mr. Buck Oven in the Department's Power Plant Siting Office to arrange to have this condition revised in the Conditions of Certification.

26. The Conditions of Certification require that the annual quantity of solid fuel loaded by each transloading source/emission point be submitted to the EPCHC in an annual operating report. Please provide the required process rate information for each transloading source/emissions point by completing the appropriate application sections. At Big Bend Station, what annual quantities of fuels is TEC receiving, handling, blending, and/or shipping for the TEC Polk Power Generating Station?

27. The Big Bend Station is located in an area of influence of a particulate matter air quality maintenance area. Therefore, unless exempted by rule, materials handling, sizing, screening, crushing, and grinding operations are regulated by the particulate matter RACT requirements in Rule 62-296.711, F.A.C. In the application Table A-2, TEC states that RACT only applies to the conveyors to the blending bins [CH-032 through CH-035], and to the conveyors to the coal bunkers [CH-059 through CH-062], assuming that CH = FH in Document II.D.2.A. Is TEC requesting that the other solid fuel handling equipment (other than the storage piles) be exempted from RACT? If so, on what basis?

28. How many blending bins are there? Please describe how the petcoke/coal blend and the (approximately) 3.5% sulfur coal that are fired in Steam Generator Unit No. 4 kept segregated from the lower-sulfur coal that is fed to Steam Generator Units No. 1-3?

29. In the application, Table A-1 "Summary of Federal EPA Regulatory Applicability and Corresponding Requirements for Big Bend Station," states that 40 CFR 60 Subpart Y "Standards of Performance for Coal Preparation Plants", only applies to emission units CH-048 through CH-052 (CH = FH in Document II.D.2.A?), CH-055 and CH-056. Please explain why TEC believes that Subpart Y does not apply to the other solid fuel handling sources (excluding storage piles) listed in Document II.D.2.A.

30. a) The Pollutant Information section for estimated particulate matter emissions lists an emissions factor of 0.01. In what section of AP-42 was the emissions factor of 0.01 obtained? The calculations of emissions were not included in Appendix C. b) Tampa Electric Company reported total particulate matter emissions from the coal yard to be 641 tons for calendar year 1995. Please explain why your application states that the particulate matter emissions are estimated to be 25 to 100 tons per year?

31. Please explain why TEC believes that the process weight table found in Rule 62-296.320(4)2., F.A.C., does not apply to any of the coal processing equipment.

32. The following information is requested in order to determine if there are additional sources of particulate matter emissions from solid fuel handling/processing that were not included in the

application. a) In the application, DOCUMENT II.D.2.A., "BIG BEND STATION EMISSION SOURCE IDENTIFICATION KEY SHEET", lists a Source ID, FH-067, as the Transloading Storage Pile to Loadout Conveyor. Is there actually a separate "Transloading" storage pile, or is this merely a reference to the north, south, or middle storage pile, whichever is being used as the transloading loadout storage pile at a given time? b) In the application, DOCUMENT II.D.3.D., "FUEL HANDLING PROCESS FLOW DIAGRAM, SOUTH FUEL YARD", shows dozer operations on the Long Term Fuel Storage Pile. From what location(s) in the fuel handling process does the dozer bring the fuel to the pile, and to which location(s) is the fuel from the pile returned to the process? c) Application DOCUMENT II.D.3.F., "FUEL HANDLING PROCESS FLOW DIAGRAM, CRUSHER TOWER AND BUNKERS", shows emission points (FH-050 and FH-051) where the crushers discharge onto conveyor belts CB-W1 and CB-W2. Why is there not a corresponding emission point shown for where the crushers discharge onto conveyor belt CB-U?

Limestone Handling

33. a) Application DOCUMENT II.D.2.A., "BIG BEND STATION EMISSION SOURCE IDENTIFICATION KEY SHEET", lists two emission points (LSH-004 and LSH-005) from Conveyor LE to the South Storage Silo. Are these two emission points the exhausts from the two baghouses DC-4 & DC-5? Are each of these baghouses a Flex Kleen Model No. 58-BVBC-36-IIG? Is one of the baghouses controlling dust from conveyor belt LE, or are both baghouses collecting dust from the south storage silo? b) Similarly, two emission points (LSH-006 and LSH-007) are listed for Conveyor LE to the North Storage Silo. Are these two emission points the exhausts from the two baghouses DC-6 & DC-7? Are each of these baghouses a Flex Kleen Model No. 58-BVBC-36-IIG? Is one of the baghouses controlling dust from conveyor belt LE, or are both baghouses collecting dust from the north storage silo?

34. Application DOCUMENT II.D.3.J., "LIMESTONE HANDLING PROCESS FLOW DIAGRAM", shows unidentified conveyors from the storage silos to the ball mills. Please identify these conveyors and any emission points from them.

35. No emissions are indicated from the ball mills. Please explain how emissions are controlled. Also, please explain where the limestone goes after it is ground, the method of conveying the ground limestone, and any associated emission points.

36. No emissions are indicated from the limestone storage building. Please explain how fugitive emissions are controlled at the entrance and exit from the building.

37. All of the limestone handling and storage sources are grouped together as one emission unit with one Standard Classification Code (SCC), 30510105 (Bulk Materials Conveyors-Limestone), with a maximum process rate of 168 tons/hr and requested hours of operation of 8760 hours per year. Please break this one emission unit down into several segments with the appropriate application sections completed. When creating segments consider operating characteristics. For example, is a maximum process rate of 168 tons/hr a realistic rate for truck unloading? Is conveyor belt CB-LC always operating when CB-LB is? When CB-LD is? Here are some suggested segments with corresponding SCCs:

Emission Unit	SCC
Limestone Railcar/Truck Unloading	30510405
Limestone Transfer Tower LL1	30510105
Enclosed Limestone Storage Structure (fugitive emissions?)	30510205
Limestone Transfer Tower LL2	30510205
South Limestone Storage Tower	30510205
North Limestone Storage Tower	30510205
South Limestone Ball Mill	30501601
North Limestone Ball Mill	30501601

38. Why are the requested hours of operation 8760 hours per year when the potential emissions, on the Emission Inventory Worksheets LSH-001 through LSH-007, are calculated on the basis of 1460 hours per year? How were the potential emissions of 6.07 lb/hr and 4.45 tons/year calculated?

39. The potential PM emissions shown on Emission Inventory Worksheet LSH-001 are 0.65 lb/hr and 0.47 tpy. However, based on the equation, operating hours, exhaust flow rate, and exit grain loading given, the potential PM emission rates appear to be 0.58 lb/hr and 0.42 tpy. Please recalculate and verify your numbers.

Fly Ash Handling and Storage Sources

40. a) How is the fly ash, dry and wet, transferred to the silos? b) What is the maximum loading rate to Silo #2? c) Why are there particulate emissions (FA-003 and FA-008) associated with the "wet" transfers? Does Silo #2 handle any wet (pug mill) transfer fly ash? d) How will the future connection between Silo #1 and Silo #2 (as indicated on DOCUMENT II.D.3.K.) impact particulate emissions?

41. In the application, DOCUMENT II.D.2.A., "BIG BEND STATION EMISSION SOURCE IDENTIFICATION KEY SHEET", describes trucks unloading fly ash into Silo #1 but does not describe trucks unloading into Silo #2 or #3. However, DOCUMENT II.D.3.K., "FLYASH HANDLING PROCESS FLOW DIAGRAM", does show trucks unloading fly ash into Silo #2 and Silo #3. Do trucks unload fly ash into Silo #2 and Silo #3 or not? Is fly ash from off-site actually trucked into the facility and unloaded into the fly ash silos, or is the truck unloading process simply a way of transferring fly ash from one on-site fly ash silo to another?

Gypsum Handling and Storage Emission Sources

42. How is the actual sludge dewatering performed? Are there any fugitive particulate emissions associated with this process?

Slag and Bottom Ash Handling

43. How long does the slag and the bottom ash typically stay in the stackout piles before it is loaded into trucks? Is it still wet when loaded? Are there any fugitive particulate emissions associated with this process?

Fuel Oil Storage and Handling

44. Please provide a list of the contents and capacities of the storage tanks STR-001 through STR-009. Please also list the construction dates and any modification or reconstruction dates.(STR-001 and STR-002 contain No. 2 only per Table A-1.) Do the storage tank emit any VOCs or HAPs?

45. The No. 2 Fuel Oil Analysis submitted in the application lists the heat content units as "Btu/lb". Is this correct?

Abrasive Blast Media Storage

46. What type of abrasive blast media is used? Where does the blasting occur? Please provide information for this source so that it may be included in the Title V permit per Rule 210.300(3)(b).

Ship Repair Facility

47. Based on comments received from EPCHC, during an EPCHC inspection on June 6, 1994, a ship repair facility (GC Services, a TEC Transport Company) was found operating along side the Big Bend Station coal yard. TEC provided information regarding this operation following an inspection performed on December 6, 1994. During that inspection, EPCHC was informed that the operations would be included in the Title V application for the power plant. Please provide this information for an after-the-fact construction application and submit a compliance plan, or indicate why this source does not need to be included in the Title V permit.

List of Proposed Exempt Activities

48. Currently, in order for an emissions unit and/activity to be "exempt" in the Title V permit, the emissions unit and/or activity cannot exceed one or more of the emissions thresholds or have a unit-specific requirement (see Rule 62-213.430(6), F.A.C.). Also, the Department has issued guidance on emission units and/or activities that are considered "trivial" (see enclosed DARM-PER/V-15, revised March 15, 1996). These emissions units and/or activities no longer need to be included in Title V permit applications. "Trivial" emission units and /or activities will not be included in the Title V permit. Please update your attachment "List of Proposed Exempt Activities" and provide sufficient information to classify the emissions units and/or activities into two new categories - those that are "exempt" and those that are "unregulated".

To properly update the "List of Proposed Exempt Activities" you need to consider the requirements of Rule 62-213.430(6), F.A.C. If the answer to any of the following questions is yes, an emissions unit and/or activity cannot be "exempt".

(1) Does any unit or activity have a unit-specific applicable requirement?

(2) Does any unit or activity emit, or have the potential to emit, equal to or greater than:

- 1,000 pounds/year of any hazardous air pollutant (HAP);
- 2,500 pounds/year of total HAPs; and/or
- 5 TPY of any other regulated air pollutant, i.e, volatile organic compound (VOC)?

49. The National Emission Standards for Halogenated Solvent Cleaning (40 CFR 63, Subpart T) apply if you own or operate a solvent cleaning machine that uses a solvent that contains 5 percent or more by weight of any one of any combination of the following halogenated solvents: Carbon Tetrachloride; Chloroform; Perchloroethylene; 1,1,1-Trichloroethane; Trichloroethylene; or Methylene chloride. a) Are any of these six solvents being used at this facility? b) If yes, what is the amount of solvent (in gallons) used annually at parts-cleaning and degreasing stations? c) Are buckets, pails, and beakers with capacities greater than 7.6 liters (2 gallons) being used?

50. Do the vehicle refueling operations dispense 20,000 gallons/month or more of gasoline? If so, Stage I vapor control applies per Rule 62-252.300(1), F.A.C.

Miscellaneous

51. Please submit a copy of all the approved emissions Alternate Sampling Procedures (ASPs) and all approved fuel sampling and/or washing procedures that are currently being utilized for the Big Bend Station.

52. A "once-through cooling water system" is mentioned in the introduction to the application. Is this a cooling tower?

Responsible Official (R.O.) Certification Statement: **Rule 62-213.420, F.A.C., requires that all Title V permit applications must be certified by a responsible official. Due to the nature of the information requested above, your response should be certified by the responsible official. Please complete and submit a new R.O. certification statement page from the new long application form, DEP Form No. 62-210.900, effective March 21, 1996 (enclosed).**

Professional Engineer (P.E.) Certification Statement: **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. As a result, you response above should be certified by a professional engineer registered in the State of Florida. Please complete and submit a new P.E. certification statement page from the new long application form, DEP Form No. 62-210.900, effective March 21, 1996 (enclosed).**

The Department must receive a response from you within 90 (ninety) days of receipt of this letter, unless you (the applicant) request additional time under Rule 62-213.420(1)(b)6., F.A.C. A copy of your response should be sent to Mr. Richard Kirby at the Environmental Protection Commission of Hillsborough County, Air Management Division, 1410 North 21 Street, Tampa, Florida, 33605.

For Information Purposes (no response required)

1. The visible emissions subtype codes VE, VES are no longer used. The visible emissions subtype code is now simply the letters "VE" followed immediately by two digits representing the opacity standard; for example, VE20 is the appropriate visible emissions subtype code for an opacity limitation of 20%. There is no VE100 subtype for periods of excess emissions because

best operational practices, including shutdown, should be utilized to prevent an hour's worth of 100% percent opacity.

2. Your Title V application requested that a petcoke/coal blend be burned in Steam Generator Units No. 1 and No. 2. Approval to burn this fuel must be obtained through preconstruction review (i.e., applying for and receiving an air construction permit). Subsequently, the Title V permit application or permit revision application can be submitted.

3. Though requested in the application, non-hazardous boiler chemical cleaning waste will not be listed as a permitted fuel in the Title V permit.

If you should have any questions, please call Ms. Cindy L. Phillips, P.E., or Mr. Scott M. Sheplak, P.E., at (904)488-1344. If you prefer, you may also send email to Ms. Phillips at the following address: PHILLIPS_C@DEP.STATE.FL.US.

Sincerely,

John C. Brown, Jr., P.E.
Administrator
Title V Section

JCB/SMS/CLP

Enclosures

cc: Janice Taylor, TEC ✓
Thomas W. Davis, P.E., ECT ✓
Richard Kirby, P.E., EPCHC ✓
Jerry Kissel, P.E., SWD ✓
Thomas W. Reese, Esq. ✓

Sent letter to all cc's with check mark by them. 2-14-97 Sgk

original sent to addressee by Certified Mail. 2-14-97

Owner/Authorized Representative or Responsible Official

1. Name and Title of Owner/Authorized Representative or Responsible Official:

2. Owner/Authorized Representative or Responsible Official Mailing Address:

   Organization/Firm:
   Street Address:
   City: State: Zip Code:

3. Owner/Authorized Representative or Responsible Official Telephone Numbers:
   Telephone: ( ) - Fax: ( ) -

4. Owner/Authorized Representative or Responsible Official Statement:

   I, the undersigned, am the owner or authorized representative of the non-Title V source addressed in this Application for Air Permit or the responsible official, as defined in Rule 62-210.200, F.A.C., of the Title V source addressed in this application, whichever is applicable. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof. I understand that a permit, if granted by the Department, cannot be transferred without authorization from the Department, and I will promptly notify the Department upon sale or legal transfer of any permitted emissions unit.*

   Signature Date

* Attach letter of authorization if not currently on file.

4. Professional Engineer Statement:

I, the undersigned, hereby certify, except as particularly noted herein, that:*

(1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this Application for Air Permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; and

(2) To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application.

If the purpose of this application is to obtain a Title V source air operation permit (check here [ ] if so), I further certify that each emissions unit described in this Application for Air Permit, when properly operated and maintained, will comply with the applicable requirements identified in this application to which the unit is subject, except those emissions units for which a compliance schedule is submitted with this application.

If the purpose of this application is to obtain an air construction permit for one or more proposed new or modified emissions units (check here [ ] if so), I further certify that the engineering features of each such emissions unit described in this application have been designed or examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application.

If the purpose of this application is to obtain an initial air operation permit or operation permit revision for one or more newly constructed or modified emissions units (check here [ ] if so), I further certify that, with the exception of any changes detailed as part of this application, each such emissions unit has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with all provisions contained in such permit.

_____ _____

Signature Date

(seal)

* Attach any exception to certification statement.

Florida Department of
Environmental Protection

Memorandum

DARM-PER/V-15
REVISED

TO: District Air Program Administrators
County Air Program Administrators
Bureau of Air Regulation Engineers

FROM: Howard L. Rhodes, Director
Division of Air Resources Management

DATE: March 15, 1996

SUBJECT: Revision to Trivial List of Activities at a Title V Facility

This guidance replaces the February 12, 1996 Guidance, DARM-PER/V-15. The only change is the rule siting in text of document.

Attachment A of a July 3, 1995 Environmental Protection Agency (EPA) memorandum, "Initial Operating Permit Application Compliance Certification Policy," commonly called the White Paper, attached, comprises a listing of trivial activities.

With one exception, Title V permits will not require that these activities be listed in the Title V permit applications or the Title V permits. These activities are treated as if they emit no air pollutants.

The EPA listing conditionally includes painting under the category of plant maintenance and upkeep activities (page 1) as a trivial activity. If painting activities at a Title V source in Florida result in emissions that are below the thresholds for exemption in Rule 62-213.430(6)(b), F.A.C., they may be included in the application as exemptible activities. Otherwise, they should be listed, but not quantified, as unregulated activities, provided the painting activities are not subject to an applicable requirement. If the painting activities result in emissions that trigger applicable requirements, they must be reported and quantified.

HLR/jb/k

Attachment

knows or has reason to believe would be emitted in an amount equal to or greater than:

a. 5.0 tons per year for carbon monoxide, nitrogen oxides, particulate matter, sulfur dioxide, and volatile organic compounds; or

b. 500 pounds per year for lead and lead compounds expressed as lead.

4. Each Title V source that emits or has the potential to emit any hazardous air pollutant or total hazardous air pollutants in a major amount as set forth in Rule 62-213.(3)(c)1., F.A.C., shall identify, for each emissions unit, each such pollutant which the applicant knows or has reason to believe would be emitted in an amount equal to or greater than:

a. 1,000 pounds per year for each hazardous air pollutant.

b. 2,500 pounds per year for total hazardous air pollutants.

5. Title V sources which are also subject to the Federal Acid Rain Program shall report all emissions of sulfur dioxide and nitrogen oxides from any acid rain unit in accordance with this subsection or the reporting requirements of the Federal Acid Rain Program, whichever are more stringent.

(d) Process and operating information;

(e) Control equipment information;

(f) Calculations;

(g) Identification of all applicable requirements and test methods;

(h) Limitations on source operation affecting emissions;

(i) Proposed alternate methods of operation;

(j) Compliance statement;

(k) Compliance schedule and methodology, if applicable;

(l) Reporting and recordkeeping requirements;

(m) A list of emissions units or activities for which exemption is requested because of size or production rate and any information needed to demonstrate that the units or activities qualify for exemption under the provisions of Rule 62-213.430(6), F.A.C.

(4) Certification by Responsible Official. In addition to the professional engineering certification required for applications by Rule 62-4.050(3), F.A.C., any application form, report, compliance statement, compliance plan and compliance schedule submitted pursuant to this chapter shall contain a certification signed by a responsible official that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Specific Authority: 403.061, 403.087, F.S.
Law Implemented: 403.061, 403.0872, F.S.
History: New 11-28-93; Amended 4-17-94; Formerly 17-213.420; Amended 11-23-94, 4-2-95, 10-11-95, 3-13-96, 3-20-96.

62-213.430 Permit Issuance, Renewal, and Revision.

(1) Action on Application. Except for those applications submitted pursuant to Rule 62-213.420(1)(a)1., F.A.C., the Department shall issue a draft permit or a determination that the requested permit be denied within 90 days after receipt of the latest of: the application; the last item of information requested pursuant to Rule 62-213.420(1)(b), F.A.C.; or, a written request to process the application without the requested information. The Department shall issue a permit, permit revision or renewal only after all of the following conditions have been met:

(a) The applicant has submitted a complete application, properly certified by a responsible official as required by Rule 62-213.420(4), F.A.C., and either all corrected and supplemental information requested or a written request to process the application without such information pursuant to Rule 62-213.420(1)(b)3. and 4., F.A.C.;

(b) The Department and the applicant have complied with the requirements for notice and public participation described in Rules 62-103.150 and 62-210.350, F.A.C.;

(c) The Department has complied with the requirements for notifying and responding to affected states and approved local air programs pursuant to Rule 62-213.450(2) and (3), F.A.C.;

(d) The Department has provided EPA with a copy of the draft permit, proposed permit and any notices required under Rule 62-213.450(1) and (2), F.A.C., and has not received written EPA objection to issuance of the permit within the time period specified in Rule 62-213.450(4). If the Department receives timely EPA objection, the Department shall not take final action until the Department receives written notice that the objection is resolved or withdrawn;

(e) The Department has provided a statement to EPA setting forth the basis for the draft permit conditions, including references to the applicable statutory or regulatory provisions.

(2) Permit Denial. If the Department proposes to deny the permit application, the Department shall provide the applicant an explanation of the denial in accordance with Rule 62-4.070(6), F.A.C.

(3) Permit Renewal and Expiration. Permits being renewed are subject to the same requirements that apply to permit issuance at the time of application for renewal. Permit renewal applications shall contain that information identified in Rules 62-210.900(1) and 62-213.420(3), F.A.C. Unless a Title V source submits a timely application for permit renewal in accordance with the requirements of Rule 62-4.090(1), F.A.C., the existing permit shall expire and the source's right to operate shall terminate.

(4) Permit Revision Procedures. Permit revisions shall meet all requirements of this chapter, including those for content of applications, public participation, review by approved local air programs and affected States, and review by EPA, as they apply to permit issuance and permit renewal, except that permit revisions for those activities implemented pursuant to Rule 62-213.412, F.A.C., need not meet the requirements of Rule 62-213.430(1)(b), F.A.C. The Department shall require permit revision in accordance with the provisions of Rule 62-4.080, F.A.C., and 40 CFR 70.7(f), whenever any source becomes subject to any condition listed at 40 CFR 70.7(f)(1), hereby adopted and incorporated by reference.

(5) EPA Recommended Actions. Within 90 days after receipt of notification from EPA that cause exists to modify, suspend, or revoke a permit, the Department shall investigate and determine whether cause exists pursuant to 40 CFR 70.7(f)(1), hereby adopted and incorporated by reference, and shall forward the determination to EPA. If cause exists, the Department shall proceed according to the requirements of Rule 62-4.080 or 62-4.100, F.A.C., and 40 CFR 70.7(f) to modify, suspend, or revoke the permit.

(6) Exemption of Emissions Units or Pollutant-Emitting Activities.

(a) All requests for exemption of emissions 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 this chapter. Exemptions shall be approved by the Department consistent with the provisions of Rule 62-4.040(1)(b), F.A.C. Emissions units or activities which are added to a Title V source after issuance of a permit under this chapter 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 this rule.

(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 and 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.

Specific Authority: 403.061, 403.087, F.S.
Law Implemented: 403.031, 403.061, 403.087, 403.0872, F.S.
History: New 11-28-93, Formerly 17-213.430; Amended 11-23-94, 3-13-96, 3-20-96.

62-213.440 Permit Content.

(1) Standard Permit Requirements. Each permit issued under this chapter shall incorporate all applicable requirements for the Title V source and for each method of operation proposed by the applicant and approved by the Department. Each such permit shall include all emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements, with citation to the Department's rule authority for each term or condition, and identification of any difference in form from the applicable requirement upon which the term or condition is based. Emissions units or pollutant-emitting activities within a Title V source exempted by Rule 62-210.300(3), F.A.C., or by specific exemption granted by the Department consistent with Rule 62-4.040(1)(b), F.A.C., shall be identified.

(a) Permit Duration. ~~Permits for sources subject to the Federal Acid Rain Program shall be issued for~~ terms of five years. Operation permits for Title V sources may not be extended as provided in Rule 62-4.080(3), F.A.C., if such extension will result in a permit term greater than five years.

(b) Monitoring and Related Recordkeeping and Reporting Requirements.

1. Each permit shall specify the following requirements with respect to monitoring:

a. Emissions monitoring and analysis procedures or test methods specified by applicable requirements;

b. Where the applicable requirement does not specify a method for periodic testing or instrumental or noninstrumental monitoring, periodic monitoring sufficient to yield reliable data and demonstrate compliance with the permit. Such monitoring requirements shall assure use of recordkeeping terms, test methods, units, averaging periods, and other statistical conventions consistent with the applicable requirement; and

c. Requirements concerning the use, maintenance, and installation of monitoring equipment or methods.

2. The permit shall incorporate all applicable recordkeeping requirements including:

a. Records of monitoring information that specify the date, place, and time of sampling or measurement and the operating conditions at the time of sampling or measurement, the date(s) analyses were performed, the company or entity that performed the analyses, the analytical techniques or methods used, and the results of such analyses;

b. Retention of records of all monitoring data and support information for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original

ATTACHMENT A

LIST OF ACTIVITIES THAT MAY BE TREATED AS "TRIVIAL"

The following types of activities and emissions units may be presumptively omitted from part 70 permit applications. Certain of these listed activities include qualifying statements intended to exclude many similar activities.

Combustion emissions from propulsion of mobile sources, except for vessel emissions from Outer Continental Shelf sources.

Air-conditioning units used for human comfort that do not have applicable requirements under title VI of the Act.

Ventilating units used for human comfort that do not exhaust air pollutants into the ambient air from any manufacturing/industrial or commercial process.

Non-commercial food preparation.

Consumer use of office equipment and products, not including printers or businesses primarily involved in photographic reproduction.

Janitorial services and consumer use of janitorial products.

Internal combustion engines used for landscaping purposes.

Laundry activities, except for dry-cleaning and steam boilers.

Bathroom/toilet vent emissions.

Emergency (backup) electrical generators at residential locations.

Tobacco smoking rooms and areas.

Blacksmith forges.

Plant maintenance and upkeep activities (e.g., grounds-keeping, general repairs, cleaning, painting, welding, plumbing, re-tarring roofs, installing insulation, and paving parking lots) provided these activities are not conducted as part of a manufacturing process, are not related to the source's primary business activity, and not otherwise triggering a permit modification.[1]

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[1]Cleaning and painting activities qualify if they are not subject to VOC or HAP control requirements. Asphalt batch plant owners/operators must still get a permit if otherwise required.

Repair or maintenance shop activities not related to the source's primary business activity, not including emissions from surface coating or de-greasing (solvent metal cleaning) activities, and not otherwise triggering a permit modification.

Portable electrical generators that can be moved by hand from one location to another[2].

Hand-held equipment for buffing, polishing, cutting, drilling, sawing, grinding, turning or machining wood, metal or plastic.

Brazing, soldering and welding equipment, and cutting torches related to manufacturing and construction activities that do not result in emission of HAP metals.[3]

Air compressors and pneumatically operated equipment, including hand tools.

Batteries and battery charging stations, except at battery manufacturing plants.

Storage tanks, vessels, and containers holding or storing liquid substances that will not emit any VOC or HAP.[4]

Storage tanks, reservoirs, and pumping and handling equipment of any size containing soaps, vegetable oil, grease, animal fat, and nonvolatile aqueous salt solutions, provided appropriate lids and covers are utilized.

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[2]"Moved by hand" means that it can be moved without the assistance of any motorized or non-motorized vehicle, conveyance, or device.

[3]Brazing, soldering and welding equipment, and cutting torches related to manufacturing and construction activities that emit HAP metals are more appropriate for treatment as insignificant activities based on size or production level thresholds. Brazing, soldering, welding and cutting torches directly related to plant maintenance and upkeep and repair or maintenance shop activities that emit HAP metals are treated as trivial and listed separately in this appendix.

[4]Exemptions for storage tanks containing petroleum liquids or other volatile organic liquids should be based on size limits such as storage tank capacity and vapor pressure of liquids stored and are not appropriate for this list.

Equipment used to mix and package, soaps, vegetable oil, grease, animal fat, and nonvolatile aqueous salt solutions, provided appropriate lids and covers are utilized.

Drop hammers or hydraulic presses for forging or metalworking.

Equipment used exclusively to slaughter animals, but not including other equipment at slaughterhouses, such as rendering cookers, boilers, heating plants, incinerators, and electrical power generating equipment.

Vents from continuous emissions monitors and other analyzers.

Natural gas pressure regulator vents, excluding venting at oil and gas production facilities.

Hand-held applicator equipment for hot melt adhesives with no VOC in the adhesive formulation.

Equipment used for surface coating, painting, dipping or spraying operations, except those that will emit VOC or HAP.

CO_2 lasers, used only on metals and other materials which do not emit HAP in the process.

Consumer use of paper trimmers/binders.

Electric or steam-heated drying ovens and autoclaves, but not the emissions from the articles or substances being processed in the ovens or autoclaves or the boilers delivering the steam.

Salt baths using nonvolatile salts that do not result in emissions of any regulated air pollutants.

Laser trimmers using dust collection to prevent fugitive emissions.

Bench-scale laboratory equipment used for physical or chemical analysis, but not lab fume hoods or vents.[5]

Routine calibration and maintenance of laboratory equipment or other analytical instruments.

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[5]Many lab fume hoods or vents might qualify for treatment as insignificant (depending on the applicable SIP) or be grouped together for purposes of description.

Equipment used for quality control/assurance or inspection purposes, including sampling equipment used to withdraw materials for analysis.

Hydraulic and hydrostatic testing equipment.

Environmental chambers not using hazardous air pollutant (HAP) gasses.

Shock chambers.

Humidity chambers.

Solar simulators.

Fugitive emission related to movement of passenger vehicles, provided the emissions are not counted for applicability purposes and any required fugitive dust control plan or its equivalent is submitted.

Process water filtration systems and demineralizes.

Demineralized water tanks and demineralizer vents.

Boiler water treatment operations, not including cooling towers.

Oxygen scavenging (de-aeration) of water.

Ozone generators.

Fire suppression systems.

Emergency road flares.

Steam vents and safety relief valves.

Steam leaks.

Steam cleaning operations.

Steam sterilizers.

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