



November 19, 1996

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BUREAU OF
AIR REGULATION

Mr. John C. Brown, P.E.
Administrator-Title V Programs
MS 5505
Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Via FedEx Airbill No. 7748636276

**Re: Tampa Electric Company
Polk Power Station
AIRS No. 0530233
Title V Permit Application**

Dear Mr. Brown:

Tampa Electric Company (TEC) is in receipt of the Polk Power Station Title V applications your office returned. We have reviewed these applications and believe the latest version of ELSA (1.3.b) has been used. Therefore, enclosed please find the four (4) previously submitted copies of the electronic Title V permit application signed and sealed for the above referenced facility in accordance with 62-4.050 and 62-213.420, F.A.C. Also enclosed for your use, is one (1) hard copy of the Title V application for this source.

In addition, we spoke with Mr. Ed Svec of your office and have agreed the best course of action is to re-submit these applications. This will enable the Department and TEC to concurrently view these electronic forms to resolve any issues regarding the electronic submittal.

Please address any comments or concerns to me, as follows:

Tampa Electric Company
Janice K. Taylor
Senior Engineer
P.O. Box 111
Tampa, FL 33601-0111

Phone No. (813) 641-5039
Fax No. (813) 641-5081

Mr. John C. Brown, P.E.
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Page 2 of 2

Thank you in advance for your consideration in this matter.

Sincerely,

A handwritten signature in black ink, appearing to read 'J. Taylor', written over the typed name.

Janice K. Taylor
Senior Engineer
Environmental Planning

Enclosures

c: Mr. Bruce Mitchell-FDEP
Mr. Ed Svec-FDEP

EPgmJKT777



Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

October 28, 1996

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Thomas W. Reese
Attorney at Law
2951 61st Avenue South
St. Petersburg, Florida 33712

Dear Mr. Reese:

RE: Request for Tampa Electric Company's Renewal Dates for Air Permits and Notification of Any Proposed Title V Air Operation Permitting Action

Thank you for your letter of October 8, which requested the renewal dates for Tampa Electric Company's Power Plants. A copy of a permitting history is enclosed for you for the Big Bend facility, the Gannon facility, and the Hookers Point facility. In each of these, you will find the current expiration date for the affected permits. In addition, Rule 62-210.300(2)(a)3.a., F.A.C., extended operation permits for Title V sources subject to Rule 62-213.420(1)(a)1., F.A.C., to 60 days after the due date. Specifically, the due date for these Acid Rain sources was June 15, 1996, pursuant to Rule 62-213.420(1)(a)1.a., F.A.C. The applications for these facilities were received on June 14, 1996. Because of the timely submittal of the initial applications and the initial sufficiency reviews were considered complete, the initial applications were allowed to default to complete 60 days after the June 14 submittal, which was September 12, and Rule 62-213.420(1)(b)2., F.A.C., extended any existing valid permit. The extension of the permits lasts until final agency action is taken on the applications. Copies of the rule citations are enclosed.

The Tampa Electric Company's Polk Power Station facility's construction permit, No. PSD-FL-194, has been extended by amendment (PSD-FL-194A) and expires on June 30, 2000. A copy of the permit extension is enclosed.

Since I specifically work for the Title V Section within the Bureau of Air Regulation, I am assuming that you only desire notification of any proposed agency action regarding the Title V operation permits for the facilities referenced in the preceding paragraph. If this is not accurate, please advise. We have already placed your name on the "to be copied" list in the three proposed Title V permits' Notice of Agency Action documents; and, we will do the same for the Polk Power Station project when it is processed. Therefore, the Department's notification will be mailed to you, the applicant, and others on the same day.

Thomas W. Reese Letter
October 28, 1996
Page 2 of 3

If you desire notification of any proposed air permitting action outside of the Title V Section's, then it is requested that you notify each air permitting authority that might receive and process such a request from the Tampa Electric Company. The following air permitting authorities that might also be involved with the Tampa Electric Company, now and in the future, are:

Department of Environmental Protection
Division of Air Resources Management
Bureau of Air Regulation
2600 Blair-Stone Road
Tallahassee, Florida 32399-2400

Telephone: 904/488-1344
Fax: 904/922-6979

Contacts: C. H. Fancy, Bureau Chief
A. A. Linero, P.E. Administrator, New Source Review Section

Department of Environmental Protection
Southwest District
Air Resources Management
3804 Coconut Palm Drive
Tampa, Florida 33619-821

Telephone: 813/744-6100
Fax: 813/744-6084

Contacts: W. C. Thomas, District Air Program Administrator
G. J. Kissel, P.E. III, Air Permitting Section

Hillsborough County Environmental Protection Commission
Air Management Division
1410 North 21st Street
Tampa, Florida 33605

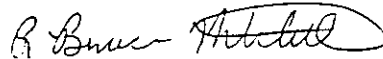
Telephone: 813/272-5530
Fax: 813/272-5605

Contacts: Iwan Choronenko, Director
Jerry Campbell, P.E., Assistant Director

Thomas W. Reese Letter
October 28, 1996
Page 3 of 3

I hope that your requests have been answered by this letter and enclosures. If not, please give me a call at 904/488-1344 or write to me at the above letterhead address.

Sincerely,



R. Bruce Mitchell
Environmental Administrator
Title V Section-Bureau of Air Regulation

RBM/m

Enclosures

cc: C. H. Fancy, BAR
A. A. Linero, BAR
Patricia Comer, Esq., DEP
W. C. Thomas, SWD
G. J. Kissel, SWD
I. Choronenko, HCEPC
J. Campbell, HCEPC

THOMAS W. REESE
ATTORNEY AT LAW
2951 61ST AVENUE SOUTH
ST. PETERSBURG, FLORIDA 33712.

(813) 867-8228
FAX (813) 867-2259

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OCT 11 1996

BUREAU OF
AIR REGULATION

October 8, 1996

Bruce Mitchell
Division of Air Resource Management
Permitting and Standards Section
Department of Environmental Regulation
2600 Blair Stone Road
Tallahassee, FL 32399-2400

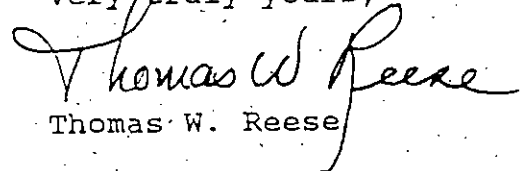
Re: TECO Power Plant Air Permit Renewal Dates

Dear Mr. Mitchell:

Would you please advise me of the air permit renewal dates for each of TECO's power plant plants, especially including each of the Big Bend and Gannon Units.

Also, would you please provide me with actually timely notice of any proposed DEP agency action on any TECO power plant air permits.

Very truly yours,


Thomas W. Reese

cc: Howard Rhodes, Div. Dir.
Bill Thomas, SW Dist. Off.
Jerry Campbell, HCEPC



Appendix H-1, Permit History/ID Number Changes

Tampa Electric Company
Big Bend

[DRAFT/PROPOSED/FINAL]Permit No.: 0570039-002-AV
Facility ID No.: 0570039

Permit History (for tracking purposes):

<u>E.U. ID No</u>	<u>Description</u>	<u>Permit No.</u>	<u>Issue Date</u>	<u>Expiration Date</u>	<u>Extended Date</u>	<u>Revised Date(s)</u>
-001	Unit 1 Coal Fired Boiler	AO29-219924	11/24/92	12/01/97		
-002	Unit 2 Coal Fired Boiler	AO29-179912	11/19/90	10/18/95	08/14/96	
-003	Unit 3 Coal Fired Boiler	AO29-179911	08/29/90	08/30/95	08/14/96	
-004	Unit 4 Coal Fired Boiler	PSD-FL-040	11/14/81			
-005	Combustion Turbine #2	AO29-174596	03/14/90	03/09/95	08/14/96	
-006	Gas Turbine #3	AO29-174611	05/08/90	04/27/95	08/14/96	
-007	Gas Turbine #1	AO29-160257	01/19/90	07/07/94		
-008	Unit #1 & #2 Flyash Silo	AO29-160255	01/19/90	12/22/94		
-009	Fly Ash Silo for Unit #3	AO29-161082	10/16/91	07/07/94		
-010	Big Bend Coal Yard	PSD-FL-040	11/14/81			
-011	Truck Unloading of Limestone	PSD-FL-040	11/14/81			
-012	Limestone Silo A w/2 baghouses	PSD-FL-040	11/14/81			
-013	Limestone Silo B w/2 baghouses	PSD-FL-040	11/14/81			
-014	Flyash Silo for Unit #4	PSD-FL-040	11/14/81			
-015	Unit 1 Coal Bunker w/Rotoclone	AO29-163788	10/06/89	06/30/94		
-016	Unit 2 Coal Bunker w/Rotoclone	AO29-163788	10/06/89	06/30/94		
-017	Unit 3 Coal Bunker w/Rotoclone	AO29-163788	10/06/89	06/30/94		
-018	Fly Ash Silo for Unit #3	AO29-161082	10/16/91	07/07/94		
-019	Big Bend Station Unit #1 & #2	AO29-160255	01/19/90	12/22/94		

(if applicable) ID Number Changes (for tracking purposes):

From: Facility ID No.: 40H11L290039

To: Facility ID No.: 0570039

Appendix H-1, Permit History/ID Number Changes

Tampa Electric Company
F. J. Gannon

[DRAFT/PROPOSED/FINAL] Permit No.: 0570040-002-AV
Facility ID No.: 0570040

Permit History (for tracking purposes):

<u>E.U. ID No</u>	<u>Description</u>	<u>Permit No.</u>	<u>Issue Date</u>	<u>Expiration Date</u>	<u>Extended Date</u>	<u>Revised Date(s)</u>
-001	Steam Generator	AO29-204434	1/31/92	1/31/97		10/11/94
-002	Boiler	AO29-189206	2/7/91	2/6/96	8/14/96	
-003	Coal Fired Boiler	AO29-172179	4/26/90	4/19/95	8/14/96	10/11/94
-004	Coal Fired Boiler	AO29-255208	12/2/94	10/14/99		
-005	Coal Fired Boiler	AO29-203511	1/1/92	1/1/97		
-006	Coal Fired Boiler	AO29-203512	2/15/92	2/15/97		
-007	Gas Turbine	AO29-252615	8/31/94	8/31/99		
-008	Boiler	AO29-216480	4/23/93	9/12/97		
-009	Economizer Ash Silo	AO29-218858	8/29/89	11/6/97		
-010	Fly Ash Silo	AO29-250137	7/20/94	7/12/99		2/6/95
-011	Fly Ash Silo	AO29-250140	7/20/94	7/12/99		2/6/95
-012	Pug Mill & Truck Loading	AO29-250137	7/20/94	7/12/99		2/6/95
-013	Unit 1 Coal Bunker w/Rotoclone	AO29-250139	7/20/94	7/12/99		2/6/95
-014	Unit 2 Coal Bunker w/Rotoclone	AO29-250139	7/20/94	7/12/99		2/6/95
-015	Unit 3 Coal Bunker w/Rotoclone	AO29-250139	7/20/94	7/12/99		2/6/95
-016	Unit 4 Coal Bunker w/Rotoclone	AO29-250139	7/20/94	7/12/99		2/6/95
-017	Unit 5 Coal Bunker w/Rotoclone	AO29-250139	7/20/94	7/12/99		2/6/95
-018	Unit 6 Coal Bunker w/Rotoclone	AO29-250139	7/20/94	7/12/99		2/6/95

(if applicable) ID Number Changes (for tracking purposes):

From: Facility ID No.: 40HIL290040

To: Facility ID No.: 0570040

Appendix H-1, Permit History/ID Number Changes

Tampa Electric Company
Hooker's Point

[DRAFT/PROPOSED/FINAL] Permit No.: 0570038-001-AV
Facility ID No.: 0570038

Permit History (for tracking purposes):

E.U.

<u>ID No.</u>	<u>Description</u>	<u>Permit No.</u>	<u>Issue Date</u>	<u>Expiration Date</u>	<u>Extended Date</u>	<u>Revised Date(s)</u>
-001	Oil-Fired Boiler #1	AO29-203001	12/19/91	12/01/96		
-002	Oil-Fired Boiler #2	AO29-203000	12/19/91	12/01/96		
-003	Oil-Fired Boiler #3	AO29-202999	12/19/91	12/01/96		
-004	Oil-Fired Boiler #4	AO29-202998	12/19/91	12/01/96		
-005	Oil-Fired Steam Generator #6	AO29-202997	12/19/91	12/01/96		

(if applicable) ID Number Changes (for tracking purposes):

From: Facility ID No.: 40HIL290038

To: Facility ID No.: 0570038

DEP 1996 STATIONARY SOURCES - GENERAL REQUIREMENTS 62-210

(v) Cyclic, branched, or linear completely methylated siloxanes

(w) Acetone

(x) Perfluorocarbon compounds which fall into these classes:

1. Cyclic, branched, or linear, completely fluorinated alkanes;
2. Cyclic, branched, or linear, completely fluorinated ethers with no

unsaturations;

3. Cyclic, branched, or linear, completely fluorinated tertiary amines with no unsaturations; and

4. Sulfur containing perfluorocarbons with no unsaturations and with sulfur bonds only to carbon and fluorine.

(310) "Waste-to-Energy Facility" - A facility that uses an enclosed device using controlled combustion to thermally break down solid, liquid or gaseous combustible solid waste to an ash residue that contains little or no combustible material, and that produces electricity, steam, or other energy as a result. The term does not include facilities that primarily burn fuels other than solid waste, even if the facilities also burn some solid waste as a fuel supplement. The term also does not include facilities that burn vegetative, agricultural, or silvicultural wastes, bagasse, clean dry wood, methane or other landfill gas, wood fuel derived from construction or demolition debris, or waste tires, alone or in combination with fossil fuel. For the purposes of Rule 62-296.416, F.A.C., the term does not include facilities that primarily burn biohazardous or hazardous waste and industrial boilers that burn pelletized paper waste as a supplemental fuel.

(311) "Waxy, Heavy Pour Crude Oil" - A crude oil with a pour point of 50 degrees or higher as determined by the American Society for Testing and Materials Standard D97-66, "Test for Pour Point of Petroleum Oils". A copy of the above referenced document is available from the American Society for Testing and Materials, 1916 Race Street, Philadelphia, PA 19103, and may be examined at the Department's Tallahassee office.

(312) "Yard Trash" - Vegetative matter resulting from landscaping and yard maintenance operations which includes materials such as tree and shrub trimmings, grass clippings, palm fronds, trees and tree stumps.
Specific Authority 403.061, FS.
Law Implemented 403.021, 403.031, 403.061, 403.087, FS.
History -- Formerly 17-2.100; Amended 2-9-93, 11-28-93, Formerly 17-210.200, Amended 11-23-94, 4-18-95, 1-2-96, 3-13-96, 3-21-96, 8-15-96.

62-210.300 Permits Required. The owner or operator of any emissions unit which emits or can reasonably be expected to emit any air pollutant shall obtain an appropriate permit from the Department prior to beginning construction, modification, or initial or continued operation of the emissions unit unless exempted pursuant to Department rule or statute. All emissions limitations, controls, and other requirements imposed by such permits shall be at least as stringent as any applicable limitations and requirements contained in or

Effective 8-15-96

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DEP 1996 STATIONARY SOURCES - GENERAL REQUIREMENTS 62-210

enforceable under the State Implementation Plan (SIP) or that are otherwise federally enforceable. Issuance of a permit does not relieve the owner or operator of any emissions unit from complying with applicable emission limiting standards or other requirements of the air pollution rules of the Department, or any other applicable requirements under federal, state, or local law.

(1) Air Construction Permits. An air construction permit shall be obtained by the owner or operator of any proposed new or modified facility or emissions unit prior to the beginning of construction or modification, in accordance with all applicable provisions of this chapter, Chapter 62-212 and Chapter 62-4, F.A.C. The construction permit shall be issued for a period of time sufficient to allow construction or modification of the facility or emissions unit and operation while the new or modified facility or emissions unit is conducting tests or otherwise demonstrating initial compliance with the conditions of the construction permit.

(2) Air Operation Permits. Upon expiration of the air operation permit for any existing facility or emissions unit, subsequent to construction or modification and demonstration of initial compliance with the conditions of the construction permit for any new or modified facility or emissions unit, or as otherwise provided in this chapter or Chapter 62-213, the owner or operator of such facility or emissions unit shall obtain a renewal air operation permit, an initial air operation permit, or an administrative correction or revision of an existing air operation permit, whichever is appropriate, in accordance with all applicable provisions of this chapter, Chapter 62-213 (if the facility is a Title V source), and Chapter 62-4, F.A.C.

(a) Minimum Requirements for All Air Operation Permits. At a minimum, a permit issued pursuant to this subsection shall:

1. Specify the manner, nature, volume and frequency of the emissions permitted, and the applicable emission limiting standards or performance standards, if any;

2. Require proper operation and maintenance of any pollution control equipment by qualified personnel, where applicable in accordance with the provisions of any operation and maintenance plan required by the air pollution rules of the Department.

3. Contain an effective date stated in the permit which shall not be earlier than the date final action is taken on the application and be issued for a period, beginning on the effective date, as provided below.

a. The operation permit for an emissions unit which is in compliance with all applicable rules and in operational condition, and which the owner or operator intends to continue operating, shall be issued or renewed for a five-year period, except that, for Title V sources subject to Rule 62-213.420(1)(a)1., F.A.C., operation permits shall be extended until 60 days after the due date for submittal of the facility's Title V permit application as specified in Rule 62-213.420(1)(a)1., F.A.C.

b. Except as provided in Rule 62-210.300(2)(a)3.d., F.A.C., the operation permit for an emissions unit which has been shut down for six months or more

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permit may include such emissions unit in the initial application, provided the requirements of Rule 62-213.420(3)(k), F.A.C., are met.

(b) Complete Application.

1. Any applicant for a Title V permit, permit revision or permit renewal must submit an application on form number 62-210.900(1), which must include all the information specified by Rule 62-213.420(3), F.A.C., except that an application for permit revision must contain only that information related to the proposed change. The applicant shall include information concerning fugitive emissions and stack emissions in the application. Each application for permit, permit revision or permit renewal shall be certified by a responsible official in accordance with Rule 62-213.420(4), F.A.C.

2. For those applicants submitting initial permit applications pursuant to Rule 62-213.420(1)(a)1., F.A.C., a complete application shall be an application that substantially addresses all the information required by the application form number 62-210.900(1), and such applications shall be deemed complete within sixty days of receipt of a signed and certified application unless the Department notifies the applicant of incompleteness within that time. For all other applicants, the applications shall be deemed complete sixty days after receipt, unless the Department, within sixty days after receipt of a signed application for permit, permit revision or permit renewal, requests additional documentation or information needed to process the application. An applicant making timely and complete application for permit, or timely application for permit renewal as described by Rule 62-4.090(1), F.A.C., shall continue to operate the source under the authority and provisions of any existing valid permit or Florida Electrical Power Plant Siting Certification, provided the applicant complies with all the provisions of Rule 62-213.420(1)(b)3. and 4., F.A.C. Failure of the Department to request additional information within sixty days of receipt of a properly signed application shall not impair the Department's ability to request additional information pursuant to Rule 62-213.420(1)(b)3. and 4., F.A.C.

3. For those permit applications submitted pursuant to the provisions of Rule 62-213.420(1)(a)1., F.A.C., the Department shall notify the applicant if the Department becomes aware at any time during processing of the application that the application contains incorrect or incomplete information. The applicant shall submit the corrected or supplementary information to the Department within ninety days unless the applicant has requested and been granted additional time to submit the information. Failure of an applicant to submit corrected or supplementary information requested by the Department within ninety days or such additional time as requested and granted shall render the application incomplete.

4. For all applications other than those addressed at Rule 62-213.420(1)(b)3., F.A.C., should the Department become aware, during processing of any application that the application contains incorrect information, or should the Department become aware, as a result of comment from an

affected State, an approved local air program, EPA, or the public that additional information is needed to evaluate the application, the Department shall notify the applicant within 30 days. When an applicant becomes aware that an application contains incorrect or incomplete information, the applicant shall submit the corrected or supplementary information to the Department. If the Department notifies an applicant that corrected or supplementary information is necessary to process the permit, and requests a response, the applicant shall provide the information to the Department within ninety days of the Department request unless the applicant has requested and been granted additional time to submit the information or, the applicant shall, within ninety days, submit a written request that the Department process the application without the information. Failure of an applicant to submit corrected or supplementary information requested by the Department within ninety days, or such additional time as requested and granted, or to demand in writing within ninety days that the application be processed without the information shall render the application incomplete. Nothing in this section shall limit any other remedies available to the Department.

5. All Department requests for additional information shall conform to the requirements of Rule 62-4.055(2), (3), and (4), F.A.C.

6. The Department shall grant requests for additional time to submit supplemental or corrected information as follows:

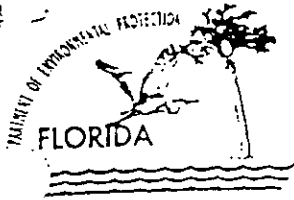
a. Each source requesting additional time must make a written request prior to the due date for receipt of the information and must specify the number of additional days requested;

b. The Department shall grant up to sixty additional days to any source operating in compliance with the terms and conditions of the source's existing valid permit without the need to show cause;

c. The Department shall grant additional time beyond sixty days or to sources not operating in compliance with existing valid permits only after the source demonstrates good cause. Good cause shall mean any unforeseen situation outside the control of the source such as labor strikes, acts of war, extraordinary or sudden and unexpected acts of nature or accidents beyond the control of the source. If the Department has required, in the request for additional or corrected information, that the source undertake specific testing or investigation, good cause shall also include the requirement to complete any required tests or investigation that cannot be completed within 150 days, so long as the source specifies the expected date of completion in its demonstration of good cause and so long as the estimated time requested is for the work required.

(2) Confidential Information. Whenever an applicant submits information under a claim of confidentiality pursuant to Section 403.111, F.S., the applicant shall also submit a copy of all such information and claim directly to EPA.

(3) Standard Application Form and Required Information. Applications shall be submitted under this chapter on forms provided by the Department and adopted by reference in Rule 62-210.900(1), F.A.C. The information as described in Rule 62-210.900(1), F.A.C., shall be included for the Title V source and each emissions



Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

February 28, 1995

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. G. F. Anderson
Tampa Electric Company
P. O. Box 111
Tampa, Florida 33601-0111

Dear Mr. Anderson:

RE: Amendment for a Modification to the Auxiliary Boiler
and Expiration Date Extension
PSD-FL-194(A)

The Department received your requests of May 12 and June 9, 1994, to modify the auxiliary boiler by increasing the heat input rate, which will require changing some existing specific conditions, and to extend the expiration date of the PSD permit referenced below. The permit is amended as shown:

Permit No. PA-92-32, PSD-FL-194, Tampa Electric Company.

Current Expiration Date: June 1, 1996

New Expiration Date: June 30, 2000

The Department is also modifying the specific conditions as follows:

E. Auxiliary Boiler

The maximum heat input to the auxiliary boiler shall not exceed ~~49.5~~ 120.0 MMBtu/hr when firing No. 2 fuel oil with 0.05 percent maximum sulfur content by weight. All fuel consumption must be continuously measured and recorded for the auxiliary boiler.

G. Fugitive Dust

Fugitive dust emissions during the construction period shall be minimized by covering or watering dust generation areas. Particulate matter emissions from the coal handling equipment shall be controlled by enclosing all coal storage, conveyors and conveyor

transfer points (except those directly associated with the coal stacker/reclaimer for which an enclosure is operationally infeasible). Fugitive emissions shall be tested as specified in Condition No. J. Inactive coal storage shall be shaped, compacted, and oriented to minimize wind erosion. Water sprays or chemical wetting agents and stabilizers shall be applied to uncovered storage piles, roads, handling equipment, etc. during dry periods and, as necessary, to all facilities to maintain an opacity of less than or equal to five percent. When adding, moving or removing coal from the coal pile, an opacity of 20 percent is allowed.

H. Emission Limits

1. The maximum allowable emissions from the IGCC combustion turbine, when firing syngas and low sulfur fuel oil, in accordance with the BACT determination, shall not exceed the following:

Pollutant	Fuel	Basis	Emissions Limitations	
			7F CT Postdemonstration Period lb/hr	tpv
NO _x	Oil	42 ppmvd	311	N/A
	Syngas	25 ppmvd	222.5 220.25	2,704.4 1,032.9

I. Auxiliary Boiler Operation

Normal operation of the auxiliary boiler shall be limited to a maximum of ~~2,700~~ 3,000 hours per year and only during periods of startup and shutdown of the IGCC unit, or when steam from the IGCC unit's heat recovery steam generator is unavailable. The auxiliary boiler may operate continuously (i.e. 8,760 hrs/vr) in the standby mode. The following emission limitations shall apply:

1. NO_x emissions shall not exceed ~~0.16~~ 0.10 lbs/MMBtu for oil firing.
2. Sulfur dioxide emissions shall be limited by firing low sulfur oil with a maximum sulfur content of 0.05 percent by weight.
3. Visible emissions shall not exceed 20 percent opacity (6-minute average) (except for one six-minute period per hour during which opacity shall not exceed 27 percent), while burning low sulfur fuel oil.

Mr. G. F. Anderson
February 28, 1995
Page 3 of 4

L. Monitoring Requirements

1. IGCC Combustion Turbine

A continuous emission monitoring system (CEMS) shall be installed, operated and maintained in accordance with 40 CFR 60, Appendix F, for the combined cycle unit to monitor nitrogen oxides and a diluent gas (CO₂ or O₂). The applicant shall request that this condition of certification be amended to reflect the Federal Acid Rain Program requirements of 40 CFR 75, if applicable, when those requirements become effective within the state.

1- a Each CEMS shall meet the performance specifications of 40 CFR 60, Appendix B.

2- b CEMS data shall be recorded and reported in accordance with Rule Chapter 62-297.500, F.A.C.; 40 CFR 60; and 40 CFR 75, if applicable. The record shall include periods of startup, shutdown, and malfunction.

3- c A malfunction means any sudden and unavoidable failure of air pollution control equipment or process equipment to operate in a normal or usual manner. Failures that are caused entirely or in part by poor maintenance, careless operation or any other preventable upset condition, or preventable equipment breakdown shall not be considered malfunctions.

4- d The procedures under 40 CFR 60.13 shall be followed for installation, evaluation, and operation of all CEMS.

5- e For purposes of the reports required under this permit, excess emissions are defined as any calculated average emission concentration, as determined pursuant to Condition No. H.4 herein, which exceeds the applicable emission limits in Condition No. H.1.

2. Auxiliary Boiler

A CEMS shall be installed, operated and maintained in accordance with 40 CFR 60, Appendix F, for the auxiliary boiler to monitor nitrogen oxides emissions and in accordance with 40 CFR 60.13 to monitor opacity.

a. The CEMS shall meet the performance specifications of 40 CFR 60, Appendix B.

Mr. G. F. Anderson
February 28, 1995
Page 4 of 4

b. CEMS data shall be recorded and reported in accordance with Rule 62-297.500, F.A.C., and 40 CFR 60. The record shall include periods of startup, shutdown and malfunction.

c. A malfunction means any sudden and unavoidable failure of air pollution control equipment or process equipment to operate in a normal or usual manner. Failures that are caused entirely or in part by poor maintenance, careless operation or any other preventable upset condition or preventable equipment breakdown shall not be considered malfunctions.

d. The procedures under 40 CFR 60.13 shall be followed for installation, evaluation, and operation of the CEMS.

N. Applicable Requirements

The project shall comply with all the applicable requirements of Chapters 62-212 and 62-4, F.A.C., and 40 CFR 60, Subparts A, Db and GG.

A copy of this letter shall be attached to the above mentioned permit, No. PSD-FL-194(A), and shall become a part of the permit.

Sincerely,



Howard L. Rhodes
Director
Division of Air Resources
Management

HLR/sa/b

cc: B. Thomas, SWD
J. Harper, EPA
J. Bunyak, NPS
H. Oven, PPS
T. Davis, P.E., ECT

COMMISSION
DOTTIE BERGER
PHYLLIS BUSANSKY
JOE CHILLURA
CHRIS HART
JIM NORMAN
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EXECUTIVE DIRECTOR
ROGER P. STEWART

ENVIRONMENTAL PROTECTION COMMISSION
OF HILLSBOROUGH COUNTY

FAX TRANSMITTAL SHEET

DATE: 9/10/96

TO: John Brown

FAX PHONE: (904) 922-6979 VOICE PHONE: _____

TOTAL NUMBER OF PAGES INCLUDING THIS COVER PAGE: 3

EPC FAX TRANSMISSION LINE: (813) 272-5605
FOR RETRANSMISSION OR ANY FAX PROBLEMS, CALL: (813) 272-5530

FROM: Rick Kirby

(CIRCLE APPLICABLE SECTION BELOW)

AIR DIVISION

- ENFORCEMENT
- ENGINEERING
- SUPPORT OPERATIONS

SPECIAL INSTRUCTIONS: _____

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WETLANDS MANAGEMENT DIVISION
 TELEPHONE (813) 272-7104

M E M O R A N D U M

DATE: September 10, 1996

TO: John Brown

FROM: Rick Kirby

THRU: Jerry Campbell
 Iwan Choronenko

SUBJECT: Title V Review of TECO Facilities in Hillsborough County

The EPC has received copies of Tampa Electric Company Title V applications. The packages were received August 14 and 21, 1996 with a request that comments be provided by September 9, 1996. The actual application and some supporting documentation were provided on computer disk.

I have begun my initial review of the Big Bend facility and have already turned up several issues which should be addressed. Some of these are as follows:

1. The State sulfur dioxide standards for the Big Bend and Gannon stations do not appear to meet any of the criteria for practical enforceability. Rules 62-296.405(1)(c)2.a. and b., F.A.C. are truly not comprehensible to anyone other than a doctorate of mathematics or statistics. While we are not suggesting the standard be tightened through the Title V process, we are stating that it should be simplified so it is meaningful. TECO now has CEMs in the stacks and we should look to establishing them as the reference method with a practically enforceable standard that will pass the EPA muster. We do not see how they can provide reasonable assurance that these standards are being met or that these limits protect the ambient air quality standards. You recall we have experienced a number of sulfur dioxide violations downwind of the Gannon Station and these have not been resolved. The EPC feels very strongly about this particular issue.
2. It appears that many sources have been grouped into one emissions unit, when they may not meet the state definition of similar sources. These include fuel and other material handling.

John Brown
September 10, 1996
Page 2

3. Many of these units have been presented as being fugitive emissions sources when they do not meet that definition.
4. There are fuels and chemicals listed for use in boilers which have no previous permitting approval. These include used oil and non-hazardous cleaning chemicals.
5. Some emission units are not listed. EPC had previously agreed to defer permitting of a marine vessel repair and painting operation to be included in the Title V process. It was not found in this package.

Based on the above issues, I feel it is necessary to have EPC permitting engineers perform an inspection of each facility, to include a thorough air pollution source audit, as well as an in depth application and file review. Additionally, EPC has been unable to generate or access the applications for the Hookers Point and F.J. Gannon facilities. As you may be aware, PDEP data personnel came to EPC recently. On the same day, a lightning strike took out a large part of our computer system. It is still not completely functional. Cindy Phillips has graciously agreed to generate hard copies of the two remaining facilities.

I would like to close by saying that these are very complex projects. In addition to the size of each facility, there are complicating factors such as the outstanding Chapter 120 F.S. hearing request by the citizens of Apollo Beach for the latest Big Bend modification and the application for modification at the F.J. Gannon facility which may well trigger PSD. This is the largest polluter in Hillsborough County and a thorough, complete review is called for. We respectfully request that the review time given us be extended for 30 days to insure that we can properly represent the interest of the citizens.

bm

COMMISSION

DOTTIE BERGER
PHYLLIS BUSANSKY
JOE CHILLURA
CHRIS HART
JIM NORMAN
ED TURANCHIK
SANDRA WILSON

EXECUTIVE DIRECTOR

ROGER P. STEWART



Ben 10-3-96
10/2/96

Copy FUI please return to J.B. ASAP

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SEP 2 1996

BUREAU OF
AIR REGULATION

MEMORANDUM

DATE: September 30, 1996

TO: John Brown, P.E., FDEP

FROM: *RK* Richard C. Kirby, IV, P.E. THRU: Jerry Campbell, P.E.

SUBJECT: Tampa Electric Company, Big Bend Station Title V

The referenced application has been reviewed by EPC engineering staff. A facility inspection was performed on September 16, 1996. Marty Costello of your office was present during most of the inspection. Based on our review and inspection offer the following comments:

1. The sulfur dioxide standards for Units #1, 2, and 3 in Rule 62-296.405(1)(c)2.b., F.A.C., are not practically enforceable. The multiple standards refer to a group limit of 31.5 TPH on a 3-hour average not to exceed a 6.5 pounds per MMBTU over two hours, and finally a 25 TPH limitation on all three units for a 24-hour average. There is no reasonable way for our inspectors to determine compliance with the convoluted standards, and consequently they would fail any PTE or practically enforceable test. We acknowledge these are in the SIP and did somehow get approved by the EPA over a decade ago. Criteria for standards was different then and we believe Title V anticipated this type of cleanup. We also understand that Title V is not a program for promulgating new standards. However, because these standards are unenforceable and can not be put in a Title V permit, we strongly recommend that they be converted (not strengthened or weakened) to an enforceable form. Since all these units have CEMs, perhaps we should look for a pound per MMBTU over a set averaging time as reported by their continuous instrumentation. TECO could drop the less effective annual stack testing and fuel sampling programs, and the public would be better protected.
2. On June 6, 1994, during an EPC inspection, a ship repair facility (GC Services, a TECO Transport Company) was found operating along side the Big Bend Station coal yard. TECO previously provided information regarding this operation

following an inspection done on December 6, 1994. During that inspection, EPC was informed that the operations would be included in the Title V application and permit for the power plant. That information is not included.

3. TECO should make a statement of the method(s) used for demonstration compliance for each applicable rule requirement per 40 CFR 70.5(c)(9)ii and Rule 62-213.420(3)(g).
4. 40 CFR 75 requires CEM data to be reported quarterly to the Administrator (EPA). Since EPC is the lead agency in determining compliance, we request that this same data be supplied to our office.
5. TECO has requested that compliance with emissions limits be demonstrated through CEM data or fuel analyses, and that this take the place of stack testing. EPC supports the use of CEMs for compliance demonstration. We do not have the same comfort level with fuel sampling. This is based on the variable nature of fuels, i.e., coal from multiple sources, and pet coke. In addition, we do not have a method for auditing fuel sampling, therefore we do not have assurance on fuel analysis testing.
6. TECO has classified fuel handling as one emission unit. They are currently trying several alternate fuels at their facilities. These will have different potential emissions. Because of this, it is important to differentiate between the different solid fuels. There should be a throughput limitation based on the type of fuel and supporting calculations. The coal headed for the Polk County facility should be included as well.
7. During our inspection, significant fugitive emissions were observed coming from Big Bend #2 furnace. TECO should explain corrective actions and provide a maintenance plan to address fugitives from this unit as well as the other three in the future.
8. TECO is currently adding ammonia and SO₂ to flue gases. These processes should be thoroughly explained and the effects on emissions quantified.
9. TECO uses molten sulfur to generate SO₂ for flue gas conditioning. They should fully describe the storage, process, and units, quantify emissions, and explain why no permit was obtained prior to installation of the system.
10. Multiple emission points are grouped as a single emission unit in the application for some operations (i.e., coal yard, gypsum handling, etc.). Since each emission point will require testing it is to our advantage and TECO's to list each

emission point separately as an emission unit. Our current record keeping system, ARMS, allows input of a certain test only once per emission unit. For example, we would only be able to enter one Method 9 for the coal yard when there are multiple drop points requiring testing. From TECO's standpoint a VE violation at one drop point would put the entire coal yard in violation if it is listed as one unit. It should also be noted that the emission units, as grouped by TECO in the application, do not match the units currently listed in ARMS.

11. Rule 1-3.63(c), Rules of the Environmental Protection Commission of Hillsborough County limits emissions from fossil fuel steam generators to 1.1 pound SO₂ per million Btu heat input when liquid fuel is burned. Since the application includes the burning of used oil and non-hazardous boiler chemical cleaning waste. TECO should provide assurance that the above standard will be met while burning these liquid fuels.

bm