



Jeb Bush  
Governor

# Department of Environmental Protection

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2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

David B. Struhs  
Secretary

December 13, 1999

Mr. Sterlin Woodard, P.E.  
Air Management Division  
Environmental Protection Commission  
of Hillsborough County  
1410 North 21 Street  
Tampa, Florida 33605

Re: TECO Big Bend Unit #4's TSP and SO<sub>2</sub> Ambient Monitoring Program  
(PA79-12 and PSD-FL-040)

Dear Mr. Woodard:

Thank you for reviewing Tampa Electric Company's (TECO's) request to discontinue the TSP and SO<sub>2</sub> Ambient Monitoring Program for the Big Bend Unit #4. Your comments, dated November 15, 1999, are appreciated.

Ms. Dotty Diltz, Chief of the Bureau of Ambient Monitoring and Mobile Sources, has notified Mr. Buck Oven, P.E. Administrator of the Office of Siting Coordination, that she has agreed to the discontinuance of this monitoring. Mr. Oven is in the process of removing this requirement from the Conditions of Certification for Big Bend Unit #4 and hopes to have this accomplished during the first quarter of 2000. However, Mr. Oven is of the opinion that the Conditions of Certification currently allow the Department to discontinue the monitoring whenever we are satisfied it is no longer necessary. As Ms. Diltz has made this decision, TECO may discontinue the monitoring immediately.

We will not be requiring re-modeling using the new Units #1&2 common stack.

Sincerely,

C. H. Fancy, P.E.  
Chief  
Bureau of Air Regulation

CHF/clp

c: Dotty Diltz  
Buck Oven

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MEMORANDUM

DATE: November 15, 1999

BUREAU OF AIR REGULATION

TO: Clair Fancy, P.E.

FROM: Sterlin Woodard, P.E.

SUBJECT: TECO Big Bend Unit #4's TSP and SO<sub>2</sub> Ambient Monitoring Program  
(PA79-12 and PSD-FI-040)

We have reviewed TECO's request, which we received on August 27, 1999, and have no objections to the TSP and SO<sub>2</sub> Ambient Monitoring program being discontinued. Both the Conditions of Certification (Specific Condition No. I.B.2.), and PSD-FI-040 (Part I, Specific Condition No. 6) requires that the facility operate and maintain SO<sub>2</sub> monitors. However, the Conditions of Certification specifies that TECO operate two TSP monitors and two SO<sub>2</sub> monitors. They have maintained and operated these monitors since 1984. However, Specific Condition No. 6 of the PSD Permit only requires that the SO<sub>2</sub> monitors be operated for at least a year, and until the Administrator determines that the effects of the modification on air quality have been quantified. It appears that the whole intent of the ambient monitoring program was to quantify the effects of the modification, even though the pre-construction modeling showed there would be little impact.

We have reviewed TECO's proposal, and the ambient data that is referenced agrees with the information in our files. Except for the one exceedance of the 3-hour NAAQS for SO<sub>2</sub> in 1985, there have been no recorded exceedances at these monitoring sites. On the other hand, in 1995 and 1996, our own monitors recorded elevated SO<sub>2</sub> levels in the area that were near the 24-hour standard on two separate days. However, since that time, the trend has been downward, and the levels are well within the Standards. We agree that the Acid Rain regulations have resulted in significant reductions in SO<sub>2</sub> from the entire Big Bend facility (down by over 50,000 TPY from 1990 levels), and that the pending completion of construction of the Big Bend #1, 2 scrubber will result in even further reductions. Even though we were not able to verify the results of TECO's statistical analysis, the wealth of historical information supports their assertion that the SO<sub>2</sub> levels will more than likely continue to remain well below the NAAQS. It is, therefore, our opinion that the SO<sub>2</sub> ambient monitors may no longer be necessary, and have no objections to TECO discontinuing their use.

Clair Fancy  
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November 15, 1999  
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Because of the fact that the TSP NAAQS has been repealed, and replaced with newer Particulate Matter, PM10 and PM2.5 standards, we have no objections to TECO also discontinuing the use of the TSP Monitors. Their continued use is no longer warranted because the TSP Monitors, which over estimate the concentrations of these finer particulates, have shown continuous compliance with the new standards, and have served their initial purpose of quantifying the effects of the modification. With all the expected reductions at the plant, and the more than 14 years of ambient data that show no real overall change, we believe the effects of the modification have been quantified, and the air quality has not been significantly impacted.

Even though we support the discontinued use of the SO<sub>2</sub> and TSP Monitors, we recommend that the plant be re-modeled using the new Unit #1, 2 Common Stack to ensure that any possible reduced stack gas buoyancy (lower stack temperature and higher moisture content) does not increase the maximum SO<sub>2</sub> ground level impacts.

If you have any questions, please let me know.

cag

5. The following requirements will be met to minimize fugitive emissions of particulate from the coal storage and handling facilities, the limestone storage and handling facilities, haul roads and general plant operations:
  - a. All conveyors and conveyor transfer points will be enclosed to preclude PM emissions excepting the coal handling stacker reclaimer, the tail end conveyor feeding the tripper and the barge unloading belt which are exempted for feasibility considerations;
  - b. Coal storage piles will be shaped, compacted and oriented to minimize wind erosion;
  - c. Water sprays for storage piles, handling equipment etc., including the handling equipment exempted from the conveyor enclosure requirement, will be applied during dry periods and as necessary to all facilities to maintain opacity (determined with reference Method 9) below 20 percent;
  - d. The limestone handling receiving hopper, conveyor transfer points and day silos will be maintained at negative pressures with the exhaust vented to a control system(s); and
  - e. The flyash handling system (including transfer and silo storage) will be maintained at negative pressures and vented to a control system.
6. The applicant will perform post-construction continuous ambient monitoring of sulfur dioxide emissions in accordance with EPA Region IV policies and procedures and the guidance offered in "Ambient Monitoring Guidelines for Prevention of Significant Deterioration (PSD), EPA-450/2-78-019, May 1978 and the quality assurance procedures of 40 CFR 58 Appendix B. Such monitoring will be continued for a period of at least 1 year and until determined by the Administrator (or his representative) that the effects of the modification on ambient air quality have been quantified.
7. The applicant will comply with all requirements and provisions of the New Source Performance Standard for electric utility steam generating units (40 CFR 60 Part Da). In addition, the applicant must comply with the provisions and the requirements of the attached General Conditions.
8. While Tampa Electric Company has complied with the regulations entitling them to this PSD permit (40 CFR 52.21), this does not constitute an environmental endorsement of this permit nor does it in any way prejudice or predetermine the ongoing EIS review.
9. If it is determined through the NPDES permitting process or related EIS review, that cooling towers would be required for the construction and operation of the facility at this location, this permit would be revoked and a complete new application would be required addressing all new emissions and subsequent requirements for this new plant configuration.
10. The applicant must submit to EPA Region IV's Consolidated Permits Branch within five (5) working days after it becomes available, copies of all technical data pertaining to the selected control devices, including formal bids from vendors, guaranteed efficiencies or emission rates. Although the type of control equipment described in the application has been determined by EPA to be adequate, EPA may, upon review of the data, disapprove the application if EPA determines the selected devices to be inadequate to meet the emission limits specified in this conditional approval.
11. The applicant shall maintain records of all coal washing and preparation activities for any coal which is to be fired in Big Bend Unit No. 4. These reports shall be submitted to EPA on a quarterly basis.



# DOUBLETREE

12/23

Dotty

I just wanted to make certain  
that you were OK with this  
before we send out final  
claim

**RECEIVED**

DEC 28 1999

BUREAU OF AIR REGULATION

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DEC 23 1999

Bureau of Air Monitoring  
& Mobile Sources

Claim -  
OK w/ us  
Thanks for checking  
- Dotty