

Adams, Patty

From: Heron, Teresa
Sent: Thursday, February 02, 2006 4:12 PM
To: Adams, Patty
Subject: FW: TEC's Comments to the Transloading Project Modification ACP permit

FOR TECO FILES

From: Sims, Jeff [mailto:SimsJ@epchc.org]
Sent: Thursday, January 12, 2006 3:29 PM
To: Heron, Teresa
Cc: Harman, Alice; Dennis, Ron
Subject: RE: TEC's Comments to the Transloading Project Modification ACP permit

Teresa,

I've reviewed the comments you forwarded today and do have a problem with one of TECO's requested changes.

1. TECO requested to change the language to indicate 150,000 tons of each material (coal, slag, petcoke) can be transloaded per year, rather than 150,000 tons combined. All correspondence I've seen regarding this project has indicated a combined limit of 150,000 tons. The calculations submitted with the application assumed 150,000 tons of the combined materials when determining emissions from truck traffic at the site. In addition, page 16 of the application plainly states: "Maximum annual transloading rate is 150,000 tons for all three materials combined." Therefore, unless you have some correspondence authorizing this change, I do not believe it is appropriate to change Condition 1.1 from the DRAFT permit as requested.

Also, in regard to your other e-mail from my earlier comments about establishing test conditions for their visible emissions testing:

2. I don't think they should be required to test the emission point for "truck traffic" at all. I don't remember ever having heard of a formal visible emission test being performed on truck traffic. Assuming it's not required, Condition 4.1 needs to be amended to specify the 3 emission points to be tested. If it is formally required, some accounting for consistent truck traffic across the duration of the test period should be specified.
3. Related to #2, somewhere in the permit should be a reference to what "PET/COAL/SLAG-02a, 02b and 3a, 3b" defines. It was detailed in the Technical Evaluation, but never defined in the actual DRAFT. As someone coming from Compliance, it's far easier to understand emission points if they are clearly specified in the permit. I would suggest defining it either in the "Proposed Project" portion of the Facility Description or maybe as a Permit Note under the Brief Description in Section III.

Let me know if you have any other questions.

Sincerely,

Jeff Sims

2/3/2006

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From: Heron, Teresa [mailto:Teresa.Heron@dep.state.fl.us]
Sent: Thursday, January 12, 2006 9:07 AM
To: Sims, Jeff
Subject: FW: TEC's Comments to the Transloading Project Modification ACP permit
Importance: High

FYI

From: Shelly Castro [mailto:sscastro@tecoenergy.com]
Sent: Wednesday, January 11, 2006 3:37 PM
To: Heron, Teresa
Cc: Byron Burrows; Shelly Castro
Subject: TEC's Comments to the Transloading Project Modification ACP permit
Importance: High

Hi Teresa,
Attached are our comments to the transloading project modification ac permit. Please let me know if you have any further questions or need more information. Thank you.

Sincerely,
Shelly Castro
Environmental Engineer,
Environmental, Health & Safety
Tampa Electric Company
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Judy Pareya -
There are hundreds of languages in the world but a smile speaks them all.