

Adams, Patty

From: Heron, Teresa
Sent: Thursday, February 02, 2006 4:11 PM
To: Adams, Patty
Subject: FW: TECO Transloading Comments
Attachments: TECO Transloading - 1-5-06.doc

FOR TECO FILES

From: Sims, Jeff [mailto:SimsJ@epchc.org]
Sent: Monday, January 09, 2006 10:59 AM
To: Heron, Teresa
Cc: Dennis, Ron
Subject: TECO Transloading Comments

Teresa,
I've attached a few comments regarding TECO's DRAFT Permit No. 0570039-018-AC for transloading of coal/petcoke/slag from their Big Bend facility. I commented on their initial proposal of this project last year. I glanced over it a few weeks ago and saw no major issues. After finally finding time recently to more thoroughly review, I do have a few minor comments for review. Sorry for the delay.

Let me know if you have any questions or comments.

Sincerely,

Jeff Sims
Environmental Protection Commission of Hillsborough County
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1/5/06

TECO Transloading

The following comments are in reference to DRAFT Permit No. 0570039-018-AC regarding the transloading of coal to an outside facility through use of the coal field at the Big Bend Power Plant:

The DRAFT appears to sufficiently address the project with conditions consistent with the initial application and subsequent Incompletion Letter response. The following comments are minor and for general consideration by FDEP before issuing FINAL:

1. DRAFT - Pg. 2 of 5 - Section 1.0 - Last Paragraph: Should the line read:
(a) the transfer of coal, petcoke or slag from a storage pile ...
2. DRAFT - Pg. 5 of 5 - Cond. 4.1: ... A VE test shall be performed ~~in~~ on each new emissions point.
3. Related to #2 above, are you requiring a VE test on the emission point defined as truck traffic (PET/COAL/SLAG-02a, 02b and 3a, 3b)? If so, some operational parameters defining test conditions would appear necessary to define how to test.

Regarding previous comments offered by EPC on this project:

4. Handling of "residual coal". Would have preferred to see a condition specifically stating that this product can't be transloaded; however, the last sentence from paragraph 3 of Section 1.0 regarding residual coal being conveyed to tripper room, and the wording of Subsection O of the current permit, may suffice. I know TECO probably has no intention of transloading this product, especially with its history with dust problems in dealing with it, but I don't want there to be any question in the future if they decided to move it to another location and cited the use of the general term "coal" to mean we would allow it.
5. Covering of trucks with tarps when not loading/unloading. Should we consider specifying this as a reasonable precaution (similar to Condition D.9.B) for this project? It could be assumed as part of Appendix C, Cond. 11.(1) (Unconfined Emissions of Particulate Matter), but then overridden by Appendix C, Cond. 11.(2).

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