

MANATEE COUNTY CITIZENS
AGAINST POLLUTION (MCAP)
P. O. BOX 660
PARRISH, FLORIDA 34219
November 9, 1999

RECEIVED

NOV 17 1999

RECEIVED

BUREAU OF AIR REGULATION

NOV 12 1999

DIVISION OF AIR
RESOURCES MANAGEMENT

Scott
Clair
Howard
11/17
Capeid
Scott
11/18
CJA

Mr. Howard L. Rhodes, Director
Division of Air Resources Management
Department of Environmental Protection
Mail Station #5505
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

RE: **Revised DRAFT Permits Numbered: 0570039-002-AV and
0570040-002-AV**

Dear Mr. Rhodes:


It is our contention that the above referenced permits for the operation of the Tampa Electric Company (TECO) Big Bend and Gannon Stations not be approved for the five year period (January 1, 2000 to December 31, 2004).

Since the United States Environmental Protection Agency (USEPA) has filed a Notice of Violation (NOV—EPA-CAA-2000-04-0007) relative to the operation of these plants, it is suggested that they should now continue to operate on a month to month basis until such time as the issues raised in the NOV are resolved.

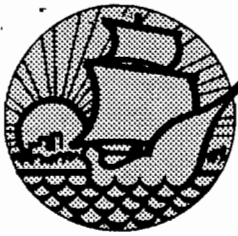
Anecdotal information, e.g. press releases, indicate that TECO currently intends to litigate this issue. Given this scenario, and should the courts find in favor of the USEPA, then the DEP would have approved the operation of these plants for another five years when in fact they may be operating illegally.

Thank you for your kind consideration of this matter.

Dr. Dan Kumarich
MCAP President



CC: Governor Jeb Bush
David B. Struhs, DEP Secretary



Scott
Copies
Scott
11/18
OK

RECEIVED

NOV 17 1999

DIVISION OF AIR
RESOURCES MANAGEMENT

ORIGINAL: CLAIR
KC: HLR

**MANATEE COUNTY
GOVERNMENT**
OFFICE OF THE COUNTY ADMINISTRATOR
"To Serve with Excellence"

November 12, 1999

Sent Via Facsimile 11/12/99

RECEIVED

NOV 17 1999

Mr. Howard L. Rhodes, Director, DARM
Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2400

BUREAU OF AIR REGULATION

RE: Initial Title V Air Operation Permit; Tampa Electric Company - Big Bend Station

Dear Mr. Rhodes:

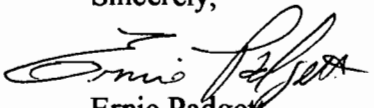
On numerous occasions, Manatee County has expressed its concern with the volume of air pollutants emitted by facilities to our north. Modeling shows that we are the downwind recipients of a huge emissions load, consisting primarily of sulfur dioxide (SO₂) and nitrogen oxides (NO_x) from coal-fired power plants in Hillsborough County.

We are aware of the pending Title V permit for TECO's Big Bend, and wish to go on record as objecting to the liberal emission limits in the draft permit, given the impressive advances in pollution control technology since the plant was built.

The Commission echoes opinions in the lawsuit EPA recently filed against TECO, and agrees that the company has shown bad faith over the years, skirting Clean Air Act provisions by claiming major plant modifications - which would require re-permitting to New Source Performance Standards - were "routine maintenance", thereby extending the plants' life and increasing generating capacity without reducing emissions to the extent achievable by modern technology. Circumvention of the rules has allowed TECO to release massive amounts of SO₂, NO_x and particulate matter into the environment.

In light of the foregoing, the Commission asks that DEP reduce the term of the Big Bend Title V permit to no more than two years, pending the outcome of the federal lawsuit. The "grandfathered" status of the Big Bend plant has allowed TECO to reap handsome profits, to the detriment of the regional environment. It is beyond time for the plants to conform with today's standards.

Sincerely,


Ernie Padgett
County Administrator

File TEC - Big Band



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

copy: D. Walters - Gulf
J. Hunter - TECO
11/24 E. Middelmeier - NW dist
B. Thomas - SW dist
J. Campbell - HCEPC
P. Comer - OGC
H. Rhodes - VARMO

NOV 17 1999

RECEIVED

NOV 22 1999

4APT-ARB

Mr. Clair H. Fancy, P.E.
Chief
Bureau of Air Regulation
Air Resources Management Division
Florida Department of Environmental
Protection
Mail Station 5500
2600 Blair Stone Road
Tallahassee, FL 32399-2400

BUREAU OF AIR REGULATION

Dear Mr. Fancy:

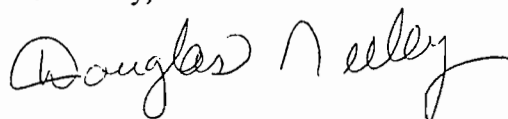
This letter is to follow up on our recent conversation regarding the approval process for the multi-state Phase II Acid Rain NOx Averaging Plan submitted by participating Southern Company plants to their respective State permitting authorities. Our conversation focused on the status of the proposed averaging plan, should the process of approval through the issuance of permits incorporating the plan not be completed by all the relevant permitting authorities by the Phase II effective date of January 1, 2000.

It is our understanding that the Florida Department of Environmental Protection (FDEP) has set a goal to complete the title V permitting process (i.e., finalize the title V permits) for the Gulf Power plants participating in the Southern Company Phase II NOx Averaging Plan by the end of this year. There remains the possibility, however, due to title V permitting delays that the FDEP may not approve Southern Company's plan and incorporate the plan into final title V permits by the end of this year.

The Acid Rain Division of the Environmental Protection Agency (EPA) considers a compliance plan submitted with an Acid Rain permit application to be part of the Acid Rain permit application (see 40 CFR 72.31(c)). This would include a Phase II NOx Averaging Plan; however, it would not include a petition for an alternative emission limitation period, a final alternative emission limitation or a renewal of a final alternative emission limitation. Therefore, the permit application shield provided in the Acid Rain regulations extends to a Phase II NOx Averaging Plan that is timely and complete (see 40 CFR 72.32(b)). Further, a complete Phase II NOx Averaging Plan is binding on the owners and operators until issuance or denial of the Acid Rain permit (see 40 CFR 72.32(c)). Under these rule provisions the units included in the Southern Company Phase II NOx Averaging Plan are required to operate in accordance with the terms of the averaging plan until the final approval of the plan (i.e., when all permitting authorities with jurisdiction over the units in the plan have approved the plan) (see 40 CFR 72.40(b)(2)).

If you have any questions or concerns regarding this matter, please contact Jenny Jachim of the EPA Region 4 staff at (404) 562-9126.

Sincerely,

A handwritten signature in cursive script that reads "Douglas Neeley". The signature is written in black ink and is positioned above the typed name.

R. Douglas Neeley
Chief
Air & Radiation Technology Branch
Air, Pesticides and Toxics
Management Branch

cc: W. Danny Herrin, Southern Company Services, Inc.
Ronald W. Gore, Alabama Department of Environmental Management
Ronald C. Methier, Environmental Protection Division
James L. Carroll, Jefferson County Department of Health
Dwight Alpern, Acid Rain Division
Robert Miller, Acid Rain Division



TAMPA ELECTRIC

November 10, 1999

Ms. Cindy Phillips
Florida Department of Environmental Protection
111 South Magnolia Drive, Suite 4
Tallahassee, Florida 32301

Via Facsimile and FedEx
Airbill No. 7910 1191 1654

**Re: Tampa Electric Company (TEC)
Comments on Revised Big Bend Station DRAFT Title V Permit
FDEP File no. 0570039-002-AV**

Dear Ms. Phillips:

Please find enclosed suggested revisions to the Big Bend Title V Draft Permit as submitted by Tampa Electric Company. TEC understands that the Department will strike all references to fuel sampling as the method of compliance with the sulfur dioxide ambient air quality standards. Instead, TEC requests that CEMs be used as the method of compliance as stated in the Proposed Tampa Electric Company Sulfur Dioxide Regulatory Compliance Plan. This document was submitted to the Department in December 1998. If you have any questions, please telephone me at (813) 641-5033.

Sincerely,

Jamie Hunter
Administrator - Air Programs
Environmental Planning

EP\gm\SKT121

Enclosure

c/enc: Mr. Clair Fancy - FDEP
Mr. Scott Sheplak - FDEP — 11/15/99
Mr. Jerry Kissel - FDEP SW
Mr. Rick Kirby - EPCHC

**TAMPA ELECTRIC COMPANY
COMMENTS REGARDING THE REVISED DRAFT TITLE V AIR
OPERATION PERMIT FOR
BIG BEND STATION
FDEP FILE NO. 0570039-002-AV**

Section II. Facility-wide Conditions

TEC Comment 1:

TEC requests Appendix U-1, List of Unregulated Emissions Units and Activities, as cited in Condition 5, be modified as follows to delete the noted activities:

| <u>E.U. ID No.</u> | <u>Brief Description of Emissions Units and/or Activities</u> |
|--------------------|---|
| -xxx | Slag and bottom ash sources BH-001 through BH-004 |
| | Gypsum handling and storage sources GH-001 through GH-017 |
| | No. 2 Fuel Oil Storage Tanks > 550 gallons |
| | Vehicle Refueling Operations |
| | Turbine Vapor Extractor |

TEC Comment 2:

Consistent with the previously issued Title V Air Operation Permit for Hookers Point Station, TEC requests Appendix I-1, List of Insignificant Emissions Units and/or Activities, as cited in Condition 6, be modified as follows to include:

14. Turbine vapor extractors.
15. Architectural coatings.
16. Surface coating operations utilizing only coatings containing 5.0 percent or less VOCs, by volume.
17. Evaporation of non-hazardous boiler chemical cleaning waste which was generated on site.

Section III. Regulated Emissions Units Conditions.

TEC Comment 3:

The descriptions of Units 1, 2, and 3 should be changed as follows:

Descriptions. Unit No. 1 is a 4037 MMBtu/hour, coal-fired, "wet" bottom, ~~opposed-turbo~~-fired utility boiler manufactured by Riley Stoker Corporation. The generator nameplate capacity is 445.5 MW. Unit No. 1 began commercial operation in 1970.

Unit No. 2 is a 3996 MMBTU per hour, coal-fired, “wet” bottom, ~~opposed~~ turbo-fired utility boiler manufactured by Riley Stoker Corporation. The generator nameplate capacity is 445.5 MW. Unit No. 2 began commercial operation in 1973.

Unit No. 1 and Unit No. 2 share a common stack (Stack #1). Particulate emissions generated during the operation of the units are controlled by dry electrostatic precipitators (ESPs) manufactured by Western Precipitator Division, Joy Manufacturing Corporation. ESP control efficiency is 99.7%.

Unit No. 3 is a 4115 MMBTU/hour, coal-fired, “wet” bottom, ~~opposed~~ turbo-fired utility boiler manufactured by Riley Stoker Corporation. The generator has a nameplate capacity of 445.5 MW. Unit No. 3 began commercial operation in 1976. This unit may be fired on coal or a coal/petroleum coke blend consisting of a maximum of 20.0 percent petroleum coke by weight. Operation of this unit may include diverting all of the flue gas into the existing Big Bend Unit No. 4 flue gas desulfurization (FGD) system for sulfur dioxide emission reduction. Sulfur dioxide emissions that are generated and not diverted through the Unit No. 4 FGD system are uncontrolled. Particulate matter emissions generated during the operation of the unit are controlled by a dry electrostatic precipitator (ESP) manufactured by Research-Cottrell, Inc. ESP control efficiency is 99.7%.

{Permitting note: Units No. 1, No. 2, and No. 3 are regulated under the federal Acid Rain Program, Phase I and Phase II, adopted and incorporated by reference in Rule 62-204.800, F.A.C.; and regulated under 62-296.405, F.A.C.}

TEC Comment 4:

Specific Condition A.1 should be changed to delineate averaging time and add the permitting note below:

A.1. Capacity. The maximum permitted heat input rate on a monthly average basis for each unit is as follows:....

TEC Comment 5:

Specific Condition A.1b should be amended to delete the last sentence in this paragraph. TEC’s understands that these tests must be conducted in steady state mode. Therefore, to comply, the unit must be in manual operations (i.e. operated by control room operator).

TEC Comment 6:

Because there are no underlying applicable requirements, TEC requests that the Specific Condition A.2.a be modified as follows to delete any reference to vanadium:

Normal operations: The only fuel allowed to be burned in Units Nos. 1 and 2 is coal. The only fuels allowed to be burned in Unit No. 3 are coal and coal/petroleum coke blend containing a maximum of 20% petroleum coke by weight. The sulfur content of the petroleum coke shall not exceed 6.0% by weight (dry basis). ~~Vanadium content of the mineral ash from the petroleum coke fired shall not exceed 35.0% by weight (ignited basis).~~

TEC Comment 7:

TEC requests Specific Condition A.2 be modified as follows to clarify when fuel oil combustion is allowed:

- b. Startup operation: In addition to the fuels allowed to be burned during normal operation, each unit may also burn new No. 2 oil during startup, shutdown, flame stabilization and during the start of a mill on an already operating unit.
- ~~c. Coal should not be burned in Unit No. 4 unless both the electrostatic precipitator and limestone scrubber are operating properly.~~
- c. The injection of nonhazardous boiler chemical cleaning waste is allowed.

TEC Comment 8:

Since TEC must comply with all applicable ambient air quality particulate matter standards, TEC feels that Specific Condition A.7 is unnecessary and should be eliminated.

TEC Comment 9:

Dispersion modeling submitted under separate cover has demonstrated modeled compliance with the National and Florida ambient air quality standards for sulfur dioxide for Big Bend Station operating at the existing permit conditions. On this basis, TEC requests that Specific Condition A.8.a be modified as follows:

Nonintegrated Operation - Units No. 1, No. 2, and No. 3, each shall not emit more than 6.5 pounds of sulfur dioxide per million Btu heat input on a two-hour average; nor shall Units No. 1, No. 2, and No. 3, in total emit more than 31.5

tons per hour of sulfur dioxide on a three-hour average and 25 tons per hour of sulfur dioxide on a 24-hour block average.

TEC Comment 10:

To promote clarity, TEC requests Specific Condition A.8.b be modified as follows:

Integrated Operation - While in the integrated mode Units 3 and 4 shall meet the pounds per million Btu and percent reduction sulfur dioxide limitations that are applicable to Unit No. 4. (Specific Conditions B.7 and B.8).

TEC Comment 11:

To maintain consistency with condition A.8.a, TEC requests that Specific Conditions A.8.c and A.8.d be modified as follows:

- c. Units No. 1 and No. 2, in total, shall not emit more than 16.5 tons per hour of sulfur dioxide on a 24-hour block average.
- d. Unit No. 3 shall not emit more than 8.5 tons per hour of sulfur dioxide on a 24-hour block average.
[40 CFR 60.40a; Permit No. PSD-FL-040; Applicant request.]

TEC Comment 12:

Specific Condition A.9 states that during integrated conditions, Unit No. 3 shall meet the nitrogen oxide limitations that are applicable to Unit No. 4. This statement should be deleted as the integration mode of operations pertains to SO₂ emissions only. No applicable requirement for Unit 3 to meet the Unit 4 NO_x emissions limits in any operating mode.

TEC Comment 13:

Specific Condition A.11 should be edited to reflect the fact that TEC intends to demonstrate compliance with all applicable sulfur dioxide limits through the use of CEM data. As such, Condition A.11 should read as follows:

During each federal fiscal year (October 1 - September 30), unless otherwise specified by rule, order, or permit, the TECO shall have formal compliance tests conducted on each Steam Generator Unit. Unit No. 1, Unit No. 2, and Unit No. 3 shall each be individually stack tested for particulate matter and visible emissions, under both sootblowing and non-sootblowing operation conditions, ~~and for sulfur dioxide emissions.~~ Due to the common stack, Unit No. 1 shall not be in operation

during the compliance testing of Unit No. 2, and Unit No. 2 shall not be in operation during the compliance testing of Unit No. 1. ~~Testing of Unit No. 3 shall be conducted under nonintegrated conditions (i.e., no diversion of flue gas emission is allowed during compliance testing.)~~

TEC Comment 14

Consistent with existing operation permits for Big Bend Station, TEC requests the following statement be added to Specific Condition A.14:

A test under sootblowing conditions which demonstrates compliance with a non-sootblowing limitation will be accepted as proof of compliance with that non-sootblowing limitation.

TEC Comment 15:

Since the method of compliance for sulfur dioxide will be the use of CEMs, TEC feels that Specific Condition A.15 should be eliminated.

TEC Comment 16

Consistent with Comment 9, TEC requests Condition A.18(3) be modified as follows:

Daily composite fuel sampling and analysis to show compliance with the emissions cap for Units 1 through 3 of 25 tons of sulfur dioxide per hour on a 24-hour block average.

TEC Comment 17:

Paragraph three of the Unit 4 description should read:

As an option, Unit No. 3 exhaust gas, following particulate matter removal by the unit's ESP, will be routed to the inlet of the Unit No. 4 flue gas desulfurization (FGD) system scrubber. In this integrated mode, Unit No. 3 will meet the same sulfur dioxide emissions limitations as Unit No. 4. The FGD scrubber will continue to treat the exhaust gas from Unit #4. The FGD scrubber outlet stream, consisting of the combined Unit No. 3 and Unit No. 4 treated exhaust, will then be split and discharged through Stacks #2 and #3. Stack #3 does *not* include a recirculation duct to return exhaust gas to the inlet of the FGD scrubber. Continuous opacity monitoring systems (COMS) will be located at the outlet of Unit #3 and Unit #4 ESPs. Continuous SO₂, CO₂, and NO_x emissions monitoring systems (CEMS) will be located in Stacks #2 and #3. These

monitoring systems will be used to determine compliance ~~with~~ with all current applicable requirements.

TEC Comment 18:

Specific Condition B.1 should be amended to delete the last sentence in this paragraph. TEC's understanding is that these tests must be conducted in steady state mode. Therefore to comply the unit must be in manual operations (i.e. operated by control room operator).

TEC Comment 19:

Because no underlying applicable requirements exist, TEC requests that the Condition B.2 be modified as follows to delete any reference to vanadium:

- a. Normal operations: The only fuels fired in Unit No. 4 shall be coal or a coal/petroleum coke blend containing a maximum of 20.0% petroleum coke by weight. The sulfur content of the petroleum coke shall not exceed 6.0% by weight (dry basis). ~~Vanadium content of the mineral ash from the petroleum coke fired shall not exceed 35.0% by weight (ignited basis).~~

TEC Comment 20:

Specific Condition B.1 should be consistent with Specific Condition A.1 to clarify averaging time of monthly basis.

TEC Comment 21:

TEC requests that Specific Condition B.2 be modified as follows to clarify when fuel oil combustion is allowed, that injection of nonhazardous boiler cleaning chemical waste is allowed, and to eliminate an vague and unnecessary language:

- b. Startup operation: In addition to the fuels allowed to be burned during normal operation, Unit 4 may also burn new No. 2 oil during startup, shutdown, flame stabilization and during the start of an additional mill on an already operating unit.
- c. ~~Coal should not be burned in Unit No. 4 unless both the electrostatic precipitator and limestone scrubber are operating properly.~~
- c. The injection of nonhazardous boiler chemical cleaning waste is allowed.

TEC Comment 22:

Consistent with Comment 8, TEC feels that Specific Condition B.5.b should be eliminated.

TEC Comment 23:

TEC feels that the last sentence of Specific Condition B.7 should be eliminated. Again, TEC must comply with all applicable ambient air standards for sulfur dioxide and, therefore, a limit based on heat input is unnecessary.

TEC Comment 24:

TEC requests that Specific Condition B.7 be clarified as follows:

Sulfur dioxide emissions from Unit No. 4 when combusting solid fuel ~~or solid-derived fuel~~ shall not exceed. . .

TEC Comment 25:

TEC requests that Specific Condition B.9 be eliminated to reduce unnecessary paperwork. The heat input obtained from oil combustion is negligible compared to the heat input obtained from solid fuel combustion. Because of this large disparity, the results obtained from the calculations required under Specific Condition B.9 are the same regardless of whether the oil figures are included in the equation.

TEC Comment 26:

TEC requests that Specific Condition B.10 be changed as follows to be consistent with the other portions of the permit and to delete a regulatory requirement not currently in the Unit 4 permit :

B.10. Nitrogen dioxide emissions from Unit No. 4 when combusting bituminous coal or a coal/petroleum coke blend shall not exceed 0.60 lb/million Btu heat input. ~~Based upon a heat input of 4330 million Btu/hour, NO_x emissions shall not exceed 2598 lb/hr. Nitrogen dioxide emissions from Unit No. 4 when combusting liquid fuel shall not exceed 0.30 lb/million Btu heat input.~~ These emission limits are based on a 30-day rolling average. These standards apply at all times except during periods of startup, shutdown, or malfunction.

[Rule 62-204.800(7)(b)2., F.A.C.; 40 CFR 60.44a(a); 40 CFR 60.46a(b); 40 CFR 60.46a(c)]

TEC Comment 27:

TEC requests that Specific Condition B.11 be eliminated, consistent with TEC Comment 25.

TEC Comment 28:

Specific Condition B.13 should be changed to reflect TEC previous request to delete Specific Condition B.9.as follows:

The sulfur dioxide emission standards in specific conditions B.7. and ~~B.9....~~

TEC Comment 29:

Specific Condition B.15 should be changed to reflect TEC previous request to delete Specific Conditions B.9.and B.11.as follows:

Compliance with the sulfur dioxide emission limitations and percentage reduction requirements in specific conditions B.7. and ~~B.9.~~, and the nitrogen oxides emission limitations in specific conditions B.10. and ~~B.11.~~, is based on the *average emission rate* for 30 successive boiler operating days

TEC Comment 30:

Specific Condition B.30 should be changed to reflect the requested elimination of Condition B.9 as follows:

TECO shall determine compliance with the SO₂ standards in specific conditions B.7. and ~~B.9.~~ as follows:

TEC Comment 31:

Specific Condition B.31 should be changed to reflect the requested elimination of Condition B.11 as follows:

TECO shall determine compliance with the NO_x standards in specific conditions B.10. and ~~B.11.~~ as follows:

TEC Comment 32

Specific Condition B.36 should be changed to reflect the requested elimination of Condition of B.9 as follows:

If any sulfur dioxide standards under specific conditions ~~B.7. or B.9. are~~ is exceeded during emergency conditions because of control system malfunction, the owner or operator of the affected facility shall submit a signed statement

TEC Comment 33

Specific Condition B.37 should be changed to reflect the requested elimination of Condition of B.9 as follows:

If fuel pretreatment credit is claimed toward the sulfur dioxide emission standards in specific conditions B.7. ~~or B.9.~~ TECO shall submit a signed statement:

TEC Comment 34

Because an ambient air standard no longer exists for total suspended particulate matter (TSP), TEC requests Specific Condition B.45.a be modified as follows:

a. Ambient Air Monitoring. TECO shall continue to operate the existing two ambient monitoring devices for sulfur dioxide in accordance with EPA reference methods in 40 CFR 53., ~~and existing two ambient monitoring devices for suspended particulates at the locations designated on Figure 2.~~ The monitoring devices shall be specifically located at a location approved by the Department. The frequency of operation shall be every six days for TSP ~~and continuously for sulfur dioxide,~~ unless otherwise specified by the Department. ~~New or existing monitoring devices shall be located as designated by the Department.~~ Such monitoring shall be continued until ~~by the Department that~~ the effects of the modification on ambient air quality have been quantified.

TEC Comment 35:

TEC requests that Specific Condition B.45.b be eliminated. TEC does not believe the Florida Department of Environmental Protection (FDEP) has the authority to require PM_{2.5} monitoring solely through the Title V Air Operation Permit program.

TEC Comment 36:

To ensure consistency with Comment 34, TEC requests that Specific Condition B.46. be changed to the following:

Ambient Monitoring Specifications and Reporting Requirements. Ambient monitoring activities required by specific condition B.46. of this permit for sulfur

dioxide, ~~total suspended particulate matter, and PM_{2.5}~~ shall be conducted in such a manner so as to meet the minimum quality assurance requirements as delineated in 40 CFR Parts 50 and 58.14; Part 58, Appendices A, C, D and E; and the Department's *State-Wide Quality Assurance Air Program Plan (Plan)*. Changes to the *Plan* will be distributed by the Department's Bureau of Air Monitoring and Mobile Sources (BAMMS) to the owner or operator.

TEC Comment 37:

TEC requests that Specific Condition B.70 be eliminated because this condition is obsolete.

TEC Comment 38:

TEC requests that Specific Condition C.2 be modified as follows:

Hours of Operation. Combustion Turbine No. 2 shall not be operated more than 10 hours per day, 365 days per year. Hours of operation shall not exceed 3650 hours per year. Combustion Turbines 1 and 3 may operate for 8760 hours per year.

[Rule 62-210.200, F.A.C., Definitions (PTE), AC-29-2210]

TEC Comment 39:

TEC requests the fly ash handling description be modified as follows to reflect the Title V Air Operation Permit application:

Fly Ash silo No. 1 handles fly ash from Steam Generator Units No. 1 and No. 2. Fly ash is pneumatically conveyed from the individual electrostatic precipitators to Silo No. 1. Also, the fly ash may be pneumatically conveyed from tanker trucks to Silo No. 1, Silo No. 2, and between Silos No. 1 and No. 2. . . .

TEC Comment 40:

TEC requests that Specific Condition D.1 be modified as follows to be consistent with the existing operating permits and the Title V Air Operation Permit application:

. . . For Fly Ash Silo No. 2, the maximum permitted loading rate is 44.5 ~~44.9~~ tons per hour. . . .

TEC Comment 41:

TEC requests that Specific Condition E.4 be eliminated because this condition is obsolete.

TEC Comment 42:

TEC requests that Specific Condition F.5 be eliminated because this condition is obsolete.

TEC Comment 43:

TEC requests that Specific Condition H.1 be deleted as there is no current permit or regulatory requirement for this condition.

TEC Comment 44:

TEC requests that Specific Condition H.3.a be clarified as follows:

Pursuant to Chapter 1-3.62 of the Environmental Protection Commission of Hillsborough county, visible emissions shall not exceed 20 % opacity for any unconfined emission unit in the fuel yard. ~~Unconfined emissions as (sic) defined by Rule 62.296.200, F.A.C., shall include static fuel piles, etc.~~ Pursuant to Rule 62.296,711(2), F.A.C. visible emissions shall not exceed 5 percent opacity for the remaining emissions units in the fuel yard.

TEC Comment 45:

TEC requests that Specific Condition H.3 be eliminated because this condition is obsolete.

TEC Comment 46:

Clarify Specific Condition I.1:
... 2 gallons per hour on a 24 hour basis.

TEC Comment 47:

TEC requests that Specific Condition J.1 be modified as follows for clarity:

The maximum annual usage of abrasive blast media in the abrasive blast booth shall not exceed 3 tons per year.

TEC Comment 48:

In both Specific Condition J.5 and J.7 require either 12-month consecutive or rolling 12 month totals be kept. TEC requests that both these conditions be changed to reflect a calendar year. As FDEP is aware, annual emissions reporting is based on calendar year and TEC believes additional record keeping is not warranted.

TEC Comment 49

Since the new scrubber serving units 1 and 2 is scheduled to begin operation on January 1, 2000, TEC requests that the scrubber construction permit (DEP File No. 0570039-003-AC and 0570039-004-AC) be incorporated into the Title V permit.