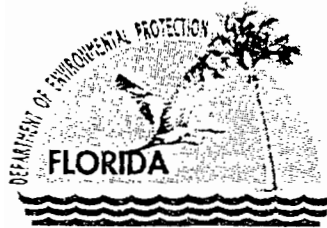


File



Department of Environmental Protection

Jeb Bush
Governor

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400
June 7, 2000

David B. Struhs
Secretary

Mr. Gregory M. Nelson, P.E.
Designated Representative
Acid Rain Program
Tampa Electric Company
P.O. Box 111
Tampa, FL 33601-0111

Re: Acid Rain Phase II NO_x Compliance Plan Revisions
Big Bend and Gannon Stations; ORIS Codes: 0645 and 0646

Dear Mr. Nelson:

We have received your recent request for the issuance of Acid Rain Permits for the referenced facilities that includes a proposed System Wide NO_x averaging plan for compliance.

Please note that our letter of January 19, 2000 was not an approval of the compliance plan, but only indicated that the Department deemed your application complete. Approval of acid rain compliance plans is made through the permitting process.

We are currently drafting the format of an appropriate "separate" Acid Rain Permit, based on the recent change in the Florida Statutes. Following this effort, we will evaluate the compliance plan for acceptance, and advise you of formal approval if granted. The earliest effective date of the approval of the plan is January 1, 2001.

If you should have any questions, please contact Tom Cascio at 850/921-9526.

Sincerely,

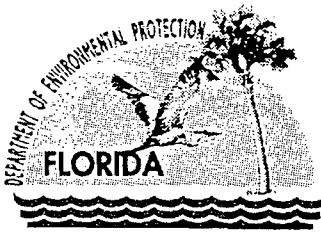
Scott M. Sheplak
Scott M. Sheplak, P.E.
Administrator
Title V Section

cc: Jenny Jachim, EPA Region 4
Jerry Campbell, EPCHC
Bill Thomas, SWD
Clair Fancy
Cindy Phillips
Pat Comer, Esq.

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TV Permit File
0570039-fig Rev.



Department of Environmental Protection

Jeb Bush
Governor

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

David B. Struhs
Secretary

October 20, 2000

Mr. Jamie Hunter
Consulting Engineer, Environmental Affairs
Tampa Electric Company
P.O. Box 111
Tampa, Florida 33601-0111

Re: Recognition of Latex Binder as a Dust Suppressant

Dear Mr. Hunter:

We have received your request to begin using a latex binder on your coal as a means of suppressing fugitive dust (Latex DL 298NA, made by DOW Chemical Company). We have also received a certification from your Professional Engineer detailing the lack of detrimental environmental effects resulting from the use of this product.

It is our opinion that this particular material falls within the classification of "chemical dust suppressant" that is authorized by your Title V permit (see Appendix TV-3, condition 57.). For inspection purposes, please retain on-site a copy of the material safety data sheet (MSDS), a copy of your contract with the coal supplier specifying the material that will be applied to your coal, and a certification from the supplier accompanying each delivery that attests that this is the only material that has been applied to your coal. If TECO or the supplier desires to use a different material, you must inform the Department and receive concurrence prior to combusting the new product.

Under the provisions of Rule 62-297.310(7)(b), F.A.C., if, at any time, the Department has reason to believe that any of your emission limits are not being met (i.e. increased particulate matter, etc.), it shall require the owner or operator of the emissions unit to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to the Department.

Should you have any questions regarding this matter, please contact Jonathan Holtom, P.E., at (850) 921-9531, or write to me at the above letter head address.

Sincerely,

A handwritten signature in black ink, appearing to read "C.H. Fancy", is written over the typed name.

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

CHF/jh

cc: Mr. Thomas W. Davis, P.E., ECT
Mr. Buck Oven, P.E., DEP
Mr. Jerry Kissel, P.E., DEP-SWD
Mr. Jerry Campbell, P.E., EPCHC

"More Protection, Less Process"

Printed on recycled paper.

Jonathan

-91-



TAMPA ELECTRIC

October 18, 2000

Mr. Scott Sheplak, P.E.
Florida Department of Environmental Protection
111 South Magnolia Drive, Suite 4
Tallahassee, Florida 32301

Via FedEx
Airbill No. 7903 8371 3550

**Re: Tampa Electric Company
Big Bend Station
FDEP Files No. 0570039-002-AV
Notification of Use of Coal Treated with Binder
Additional Information/ PE Certification**

Dear Mr. Sheplak:

As you know, Tampa Electric Company (TEC) recently notified the Department of the intended use of coal treated with a latex binder, as well as two other potential binders. Based on conversations with Jonathan Holtom, additional information, signed and sealed by a Professional Engineer, was requested. Please find enclosed the requested additional information regarding the binder LATEX DL 298NA. At this time, this is the only product that TEC is proposing to have coal treated with prior to delivery.

TEC is requesting a written response from the Department confirming our ability to use coal treated with the above referenced binder. TEC intends to begin the use of this fuel on, or after November 1, 2000. Please feel free to telephone me at (813) 641-5033, if you have any questions.

Sincerely,

Jamie Hunter
Consulting Engineer
Environmental Affairs

EP\gmJJH937

Enclosure

c/enc: Mr. Jonathan Holtom, FDEP – Tallahassee
Mr. Jerry Kissel, FDEP-SW District
Mr. Jerry Campbell, EPCHC

10/19/00 cc = Jonathan Holtom



Environmental Consulting & Technology, Inc.

October 17, 2000

Mr. Jamie Hunter
Consulting Engineer
Tampa Electric Company
6944 U.S. Highway 41 North
Apollo Beach, FL 33572-9200

**Re: Tampa Electric Company
Big Bend Station
FDEP File No. 0570039-002-AV
Use of Coal Treated with Binder
Response to Request for Additional Information**

Dear Mr. Hunter:

In response to a request by the Florida Department of Environmental Protection (FDEP), this letter provides a professional engineer certification with respect to several environmental issues concerning the use of coal treated with a binder. The coal binder will serve to reduce fugitive particulate matter emissions during coal handling and storage. This certification addresses the collateral issues of: (a) potential emissions of volatile organic compound (VOC) emissions, (b) binder combustion emissions, and (c) potential surface runoff contamination. Each of these issues are discussed in the following sections:

A. Potential for VOC Emissions

The coal binder (LATEX DL 298NA) is a latex material manufactured by the Dow Chemical Company. The Material Safety Data Sheet (MSDS) indicates that the product is a milky white liquid emulsion comprised of a proprietary carboxylated styrene/butadiene polymer (from 40 to 62 percent by weight) and water (from 38 to 60 percent by weight). The physical and chemical properties section of the MSDS shows a vapor pressure of 17.5 mm Hg (0.338 psia) at 20°C (68°F) and a boiling point of 100°C (212°F) for the latex polymer/water product. Pure water at 20°C has the same vapor pressure and boiling point. Accordingly, the latex polymer component of the LATEX DL 298NA polymer/water mixture does not contribute to the volatility to the product. VOC emissions due to evaporative losses from the binder will therefore be negligible.

B. Coal Binder Combustion Emissions

The LATEX DL 298NA material is a liquid emulsion comprised of a polymerized hydrocarbon (i.e., carboxylated styrene/butadiene polymer) and water. The high temperature

3701 Northwest
98th Street
Gainesville, FL
32606

(352)
332-0444

FAX (352)
332-6722

Mr. Jamie Hunter
October 17, 2000
Page 2 of 2

combustion temperatures and combustion residence times occurring in the Big Bend coal-fired units would be expected to result in essentially complete combustion of the LATEX DL 298NA material to carbon dioxide (CO₂) and water (H₂O). The LATEX DL 298NA material also represents a very small portion of the total mass of coal fuel that is combusted in the Big Bend units.

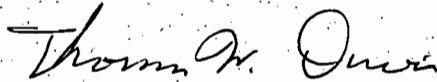
C. Potential Surface Runoff Contamination

The LATEX DL 298NA MSDS indicates that the polymer component of the LATEX DL 298NA material is insoluble in water. Once applied, the polymer component of the LATEX DL 298NA material would be expected to remain with the coal (due to its insolubility in water) and ultimately be oxidized in the Big Bend boilers. Surface runoff from the treated coal handling and storage areas would therefore be expected to have negligible amounts of the water insoluble polymer component of the LATEX DL 298NA binder material.

Please contact me at (352) 332-6230, Ext. 351 if there are any questions regarding this certification.

Sincerely,

ENVIRONMENTAL CONSULTING & TECHNOLOGY, INC.

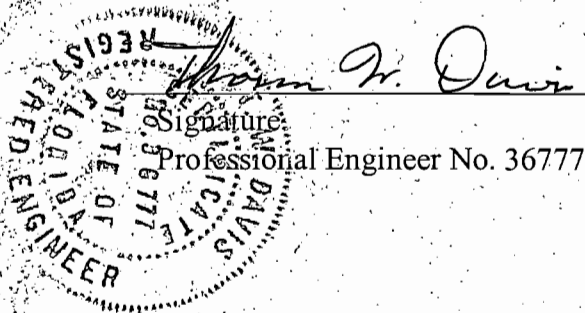


Thomas W. Davis, P.E.
Principal Engineer

Professional Engineer Statement:

I, the undersigned, hereby certify that:

To the best of my knowledge, the emission estimates reported in this certification are true, accurate, and complete based upon reasonable techniques available for estimating emissions.



10/17/00
Date

Whereas the EPC believes the combustion modifications and fuel switching proposed by the Tampa Electric Company will address the secondary environmental impacts associated with nitrogen oxide emissions in the Tampa Bay area;

It is therefore agreed that the Tampa Electric Company will voluntarily commit to the EPC to meet the following NOx emission limitations for the Phase II affected units. EPC, in return, will maintain their position that these limits should apply on a federal level. These limitations will be on a system-wide, heat-input weighted, annual average basis, commencing 01/01/98 and extending until such time as one of the signatories voids the MOU as provided below:

Affected Units	Maximum System-wide Annual Average		
	NOx Emission Rate		
	Eff. 01/01/98	Eff. 01/01/99	Eff. 01/01/00
Gannon 3, 4, 5, 6 and Big Bend 1, 2, 3	1.03	0.96	0.91

These nitrogen oxide emission rates reflect that the Tampa Electric Company will maintain the reductions achieved in 1996 through 1998; make an additional 5% reduction in 1999; and make another 5% reduction in 2000. Adherence to this commitment will be determined by the Tampa Electric Company's Continuous Emission Monitors (CEMs) as reported to the EPA.

These limitations are in effect for both parties unless, or until the compliance date upon which, an EPA, a regional, a state or a local ruling requires the boilers to meet a more stringent NOx emission rate. At such time, this MOU may be voided by either party by stating their intention in writing.

This MOU shall take effect upon the date of execution by the Executive Director of the EPC; and shall terminate only as discussed above or upon the date of Tampa Electric Company's compliance with an EPA Phase II NOx Reduction Rule equivalent in stringency to this MOU.

For the Tampa Electric Company

Official Signature: [Signature]

Date: 10/29/97

For the Environmental Protection Commission

Executive Director Signature: [Signature]

Date: 10/27/97

copy: Tom Rogers
AE
1/4 Marty
Cindy Scott
Lennon Jim P
1/5



Memorandum of Understanding (MOU) Nitrogen Oxide Emissions Rate Reductions

This MOU represents an agreement between the Environmental Protection Commission of Hillsborough County (EPC) and Tampa Electric Company (TEC), that supports TEC's Phase II nitrogen oxide (NOx) reduction activities and EPC's desire to partner with local industry to jointly address local environmental issues.

Whereas the EPC is responsible for protecting the quality of the air and the water for the citizens of this County;

Whereas the air borne emissions of nitrogen oxides may contribute to photochemical smog and ozone, to eutrophication and acidification of surface waters and to degradation of visibility;

Whereas the Tampa Electric Company locally operates ten coal-fired boilers which make up a significant portion of the area's total nitrogen oxide emission inventory;

Whereas the United States EPA has promulgated a nitrogen oxide emission reduction rule requiring tighter limitations for coal-fired boilers as part of their Acid Rain Program;

Whereas seven of the Tampa Electric Company's coal-fired boilers, designated as Gannon Unit 3, Gannon Unit 4, Gannon Unit 5, Gannon Unit 6, Big Bend Unit 1, Big Bend Unit 2, and Big Bend Unit 3 are subject to the EPA's Phase II Nitrogen Oxide Emission Reduction Rule;

Whereas the reductions in this EPA rule are not required until the year 2000 and there are substantial benefits for the area if the Tampa Electric Company were to commit to reduce emissions before the EPA deadline such as fewer precursors available for ozone formation or nitrogen deposition;

Whereas the Tampa Electric Company has already taken the initiative to reduce the nitrogen oxide emissions from some of the individual affected units by more than 20 percent, resulting in an overall reduction of over 10,000 tons from the 1995 levels;



TAMPA ELECTRIC

July 18, 1997

Mr. Scott Sheplak, Jr., P.E.
Administrator-Title V Section
Florida Department of Environmental Protection
111 South Magnolia Drive, Suite 4
Tallahassee, Florida 32301

RECEIVED

AUG 01 1997

BUREAU OF
REGULATION
Via Certified Mail
And Facsimile
#P 404 702 942

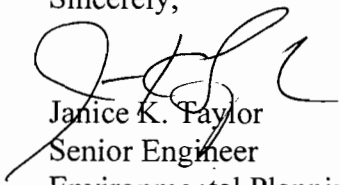
**Re: Tampa Electric Company
Polk Power Station
Title V-FDEP File No. 0570039-002-AV
Waiver of 90 Day Time Limit**

Dear Mr. Sheplak:

Please find enclosed an executed waiver of time which will expire on January 1, 1998 for the above referenced permit application.

I look forward to working with you on completing this permit processing. Feel free to telephone me at (813) 641-5039, if you have any questions. Thank you.

Sincerely,


Janice K. Taylor
Senior Engineer
Environmental Planning

Enclosure

EP/IMGCD

TAMPA ELECTRIC COMPANY
P.O. BOX 311
TAMPA, FL 33601-0111
HILLSBOROUGH COUNTY 223-0800
OUTSIDE OF HILLSBOROUGH COUNTY 1-888-223-0800
HTTP://WWW.TECOENERGY.COM
AN EQUAL OPPORTUNITY COMPANY

WAIVER OF 90 DAY TIME LIMIT
UNDER SECTIONS 120.60(2) and 403.0876, FLORIDA STATUTES

License (Permit, Certification): Application No. 1050233.001-AV

Applicant's Name: Polk Power Station - Tampa Electric Company

The undersigned has read Sections 120.60(2) and 403.0876, Florida Statutes, and fully understands the applicant's rights under that section.

With regard to the above referenced license (permit, certification) application, the applicant hereby with full knowledge and understanding of (his) (her) (its) rights under Sections 120.60(2) and 403.0876, Florida Statutes, waives the right under Sections 120.60(2) and 403.0876, Florida Statutes, to have the application approved or denied by the State of Florida Department of Environmental Regulation within the 90 day time period prescribed in Sections 120.60(2) and 403.0876, Florida Statutes. Said waiver is made freely and voluntarily by the applicant, is in (his) (her) (its) self-interest, and without any pressure or coercion by anyone employed by the State of Florida Department of Environmental Regulation.

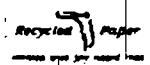
This waiver shall expire on the 1st day of January 1998.

The undersigned is authorized to make this waiver on behalf of the applicant.

Charles A Shelnut
SIGNATURE

Charles A. Shelnut
NAME (PLEASE TYPE OR PRINT)

General Manager - Polk Power Station





Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

May 19, 1997

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Stanley J. Martin
General Manager
Tampa Electric Company
P. O. Box 111
Tampa, Florida 33601-0111

Re: Request for Additional Time
File No. 0570039-002-AV
Big Bend Station, Hillsborough County

Dear Mr. Martin:

On May 12, the Department received a request via facsimile from Ms. Janice K. Taylor for an additional 60 (sixty) days to respond to our request for additional information. According to our records, your office received our request for additional information on February 19, 1997.

The request for additional time was made in accordance with Rule 62-213.420(1)(b)6.a., F.A.C. The Department grants the additional 60 (sixty) days to respond in accordance with Rule 62-213.420(1)(b)6.b., F.A.C. Your response to the requested additional information is now due to the Department on **July 19, 1997**.

Should you require additional time to respond to the request, you will need to "demonstrate good cause" for the additional extension of time in accordance with Rule 62-213.420(1)(b)6.c., F.A.C.

If you should have any questions, please call Cindy Phillips or me at 904/488-1344.

Sincerely,

Scott M. Sheplak, P.E.
Administrator
Title V Section

SMS/sk

cc: Ms. Janice Taylor, TEC
Mr. Thomas W. Davis, P.E., ECT
Mr. Jerry Kissel, P.E., FDEP, SWD
Mr. Richard Kirby, P.E., FPCHC
Mr. Thomas W. Reese, Esquire

"Protect, Conserve and Manage Florida's Environment and Natural Resources"

Z 127 635 723



Receipt for Certified Mail

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(See Reverse)

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P.O., State and ZIP Code Tampa, FL 33601-0111	
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Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date 05/19/97	
File No.: 0570039-002-AV	

Form 3800, March 1993



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MAY 15 1997

**BUREAU OF
AIR REGULATION**

May 12, 1997

Mr. Scott Sheplak, P.E.
Administrator-Title V Section
Florida Department of Environmental Protection
2600 Blair Stone Road, MS 5505
Tallahassee, Florida 32399-2400

**Via Facsimile and
Certified Mail No. P 404 702 916
Return Receipt Requested**

**Re: Tampa Electric Company
Big Bend Station
File No. 0570039-002-AV
Request for Additional Time**

Dear Mr. Sheplak:

Tampa Electric Company (TEC) received the Florida Department of Environmental Protection's (FDEP) request for additional information for our Big Bend Station on February 21, 1997. Due to time constraints, TEC requests sixty (60) additional days to respond to the Department's additional information request for the above referenced facility. This request is in accordance with Rule 62-213.420(1)(b)6., F.A.C.

Please telephone me at (813) 641-5039 if you have any questions. Thank you in advance for your consideration.

Sincerely,

Janice K. Taylor
Senior Engineer
Environmental Planning

EP\gm\JKT795

c: Ms. Cindy Phillips, FDEP - Tallahassee



**TAMPA
ELECTRIC**

FACSIMILE TRANSMITTAL SHEET

A TECO ENERGY COMPANY

ENVIRONMENTAL PLANNING

813/641-5036

813/641-5081 FAX

DATE: 5/12/97 X FOR IMMEDIATE DELIVERY

TO: SCOTT SHEPLAK

COMPANY: FDEP

NUMBER OF PAGES (Including cover page): 2

FROM: JANICE TAYLOR

COMMENTS: _____

Bardara, please advise.

Green card received date on request for add'l info?

Letter dated 2/13

90 days from receipt green card date — 05/20/97 + 60 days =



May 12, 1997

Mr. Scott Sheplak, P.E.
Administrator-Title V Section
Florida Department of Environmental Protection
2600 Blair Stone Road, MS 5505
Tallahassee, Florida 32399-2400

**Via Facsimile and
Certified Mail No. P 404 702 916
Return Receipt Requested**

**Re: Tampa Electric Company
Big Bend Station
File No. 0570039-002-AV
Request for Additional Time**

Dear Mr. Sheplak:

Tampa Electric Company (TEC) received the Florida Department of Environmental Protection's (FDEP) request for additional information for our Big Bend Station on February 21, 1997. Due to time constraints, TEC requests sixty (60) additional days to respond to the Department's additional information request for the above referenced facility. This request is in accordance with Rule 62-213.420(1)(b)6., F.A.C.

Please telephone me at (813) 641-5039 if you have any questions. Thank you in advance for your consideration.

Sincerely,

Janice K. Taylor
Senior Engineer
Environmental Planning

EP/gm/JKT796

c: Ms. Cindy Phillips, FDEP - Tallahassee

File



Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

February 13, 1997

Mr. Stanley J. Martin
General Manager, Big Bend Station
Tampa Electric Company
P.O. Box 111
Tampa, FL 33601-0111

RE: Request for Additional Information Regarding Initial Title V Permit Application
File No. 0570039-002-AV
Big Bend Station, Hillsborough County

Dear Mr. Martin:

Your initial Title V permit application for the Big Bend Station was "timely and complete" for purposes of the initial Title V application submission (see Rule 62-213.420(1)(a)1. and (b)2., F.A.C.).

However, in order to continue processing your permit application, the Department will need the additional information below pursuant to Rule 62-213.420(1)(b)3., F.A.C. and Rule 62-4.070(1), F.A.C. The additional information requested is organized by topic.

Should your response to any of the below items require new calculations, please submit the new calculations, assumptions, reference material and appropriate revised pages of the application form.

Combustion Sources

1. On the Segment (Process/Fuel) Information part of the application for Steam Generator Units Nos. 1-4, The Segment Comment field states that the "Btu per SCC unit value (Field 9) based on average fuel heat content of 11,000 Btu/lb." Is this the average heat input of all the coal fired, or the average heat input of all the coal and petcoke/coal blend combined? Why is this heat content lower than the minimum heat content shown in fuel analyses submitted? Please submit a separate Segment (Process/Fuel) Information form for each type of solid fuel as required by DEP Form No. 62-210.900(1)-Instructions.

2. a) Where in the process is the coal sampled for analysis? b) Where in the process is the petroleum coke/coal blend sampled for analysis? c) What is the frequency of sampling and analysis? d) Please explain why the petcoke/coal blend fuel analyses parameters list Sulfur in coal, and BTU in coal, etc., but make no mention of the petroleum coke or a blend.

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3. Although the application states that No. 2 fuel oil is used for ignition during start-up for Steam Generator Units No. 1, No. 2, No. 3 and No. 4, the firing of No. 2 fuel oil is not addressed in current operation permits for these units. Please submit the Segment (Process/Fuel) Information for fuel oil for these emission units as required by DEP Form No. 62-210.900(1)-Instructions.

4. Although the application states that solid fuels may be supplemented with used oil for Steam Generator Units No. 1, No. 2, No. 3 and No. 4, the firing of used oil is not addressed in current operation permits for these units. a) Is this "on-spec" used oil? b) Please submit the Segment (Process/Fuel) Information for used oil for these emission units as required by DEP Form No. 62-210.900(1)-Instructions

5. Due to the fact that the Segment (Process/Fuel) Information for Steam Generation Units Nos. 1-4 was not submitted for any liquid fuel/waste fired, and there was no differentiation made between coal and the petroleum coke/coal blend, please confirm that all pollutant emissions are at their maximum when coal is fired and that is the data which has been submitted in the application. If this is not true, please change the pollutant emission data to reflect the worst-case scenario fuel/fuel combination.

6. In the application, TEC's requested Methods of Compliance for SO₂ emissions limitations from the Steam Generators are as follows:

Unit No. 1, 2, or 3: weekly composite fuel sampling and fuel analysis
or continuous emission monitoring;
deletion of current requirement for annual stack testing

Units No. 1, 2, and 3, total group: daily composite fuel sampling and analysis;
deletion of current requirement for annual stack testing

In order to determine if an Alternate Sampling Procedure review is required, please answer the following questions. a) Is the fuel to be sampled and analyzed for calorific value? b) Is fuel sampling only to be used when the continuous monitor is not functional? c) Why is TEC not requesting to determine compliance with the total group emission limits by means of continuous emission monitoring? d) Is the monitoring equipment and procedure consistent with the requirements of 40 CFR 60 Appendix A Method 6C? e) Is TEC proposing **continuous compliance** while using the continuous SO₂ monitor?

7. Though not listed as such in the application, Rule 1-3.63(c), Rules of the Environmental Protection Commission of Hillsborough County, may be an applicable requirement for Units No. 1-4. This rule limits emissions from fossil fuel steam generators to 1.1 pounds SO₂ per million Btu heat input when liquid fuel is burned. Please provide assurance as to how this limit will be met in each unit if it applies to the facility. If it does not apply, please explain why.

8. Please clarify the following stack information provided in the application: a) For the nonintegrated mode, where is the SO₂ emissions sampling port for Steam Generator Unit No. 3? b) Why does Stack #3 include a recirculation duct and why is this not shown on the DOCUMENT I.I.D.3.G., OVERALL BOILER PROCESS FLOW DIAGRAM, and the BOILER NO. 4 TEST LOCATION - FIGURE 1? c) Why does the BOILER NO. 3 TEST LOCATION - FIGURE 1 show two ESP outlets to the stack and no FGD outlet? d) Based on DOCUMENT I.I.D.2.C., COMBUSTION EMISSION SOURCES, and DOCUMENT I.I.D.2.A., BIG BEND STATION EMISSION SOURCE IDENTIFICATION KEY SHEET, Combustion Sources CS-003 and CS-

004 have separate and distinct emission points (stacks). How can this be true for the integrated mode? Please revise these documents with notations about the integrated mode. e) Please provide a diagram of the Unit No. 3 integrated mode particulate emissions stack (duct) sampling location. f) Is the particulate sampling location shown in BOILER NO. 4 TEST LOCATION - FIGURE 1 the sampling location for the Boiler No. 4 in the integrated mode as well as the non-integrated mode?

9. Deletion of current annual visible emissions testing using EPA or FDEP Reference Method 9 was requested for Steam Generator Units 3 and 4 in the application. Is TEC proposing **continuous compliance** while using the continuous opacity monitors? Is **continuous compliance** being proposed for Unit 3 while it is operating in the non-integrated mode?

10. The Big Bend Station is located in an area of influence of a particulate matter air quality maintenance area. Therefore, the fossil fuel steam generators which have not received a PSD or New Source Review permit must comply with section 62-296.700, Reasonably Available Control Technology (RACT) Particulate Matter, F.A.C. Please provide the following information for Steam Generator Unit Nos. 1, 2, and 3: maximum dry standard volumetric flow rate, moisture content of gas stream that is emitted, and an operation and maintenance plan as described in Rule 62-296.700(6), F.A.C.

11. Recent information, provided in EPA's final interim report on HAP emissions from fossil fuel-fired electric utility steam generating units, indicates that a large amount of hydrogen fluoride (and, therefore, total fluorides) may be emitted from the Big Bend Station. By not listing total fluorides as a pollutant in the Facility Pollutant Information section of the application, as required by 62-213.420(3)(c), F.A.C., is TEC stating that the Big Bend Station emits or has the potential to emit less than 100 tons of total fluorides per year? What is the basis of this assumption?

12. a) By not listing total hazardous air pollutants (HAPS) as a pollutant in the Facility Pollutant Information section of the application, is TEC stating that the Big Bend Station emits or has the potential to emit less than 25 tons of HAPS per year? What is the basis for this assumption? b) Based on reported lead emissions alone, the facility emits or has the potential to emit more than 25 tons per year of HAPS and each of the four steam generator units emits more than 2500 pounds per year. Why are HAPS not identified as a pollutant for the facility and each of the steam generator units? c) Were the amounts of HAP emissions generated from the burning of petcoke considered when the potential HAP emissions were identified for the steam generator units and total facility? d) Is the petcoke received from only one source? What reasonable assurance can be given that the petcoke is analyzed to the extent to verify that no major amounts of individual HAPS will be emitted from the facility, other than those already listed in the application?

13. Rule 62-213.420(3)(c), F.A.C., states that each Title V source that emits or has the potential to emit any hazardous air pollutant or total hazardous air pollutants in a major amount (5 tons per year for lead, 10 tons per year for any other hazardous air pollutant, 25 tons per year for total hazardous air pollutants) must identify, for each emissions unit, each such pollutant which the applicant knows or has reason to believe would be emitted in an amount equal to or greater than 1,000 pounds per year for each individual hazardous air pollutant (HAP) or 2,500 pounds per year for total hazardous air pollutants (HAPS). a) By not listing lead as a pollutant in the Facility Pollutant Information section of the application, is TEC stating that the Big Bend Station emits or

has the potential to emit less than 5 tons of lead per year? What is the basis of this assumption?

b) If the facility does not exceed this major source threshold for lead, why are the lead emissions for each unit identified in the emissions units Pollutant Information sections? {Note: In the Annual Operating Report for 1995, TEC reported annual lead emissions of 32.5 tons for the facility.} c) By not listing arsenic compounds, chromium compounds, or manganese compounds as a pollutant in the Facility Pollutant Information section of the application, is TEC stating that the Big Bend Station emits or has the potential to emit less than 10 tons each of arsenic compounds, chromium compounds, and manganese compounds per year? What is the basis for this assumption? d) Based on emission factors from AP-42 Table 1.1-13 (1/95), the facility emits or has the potential to emit as much arsenic compounds, chromium compounds, or manganese compounds as it does lead. Why are arsenic, chromium, and manganese compounds not identified as pollutants for the facility and each of the steam generator units?

14. The following hazardous air pollutants are listed in the application as being emitted from:

Steam Generator Units No. 1 and 2 - Pb, HCl, HF, Ni, and Se;

Steam Generator Unit No. 3 - Pb, HCl, HF, Mn, Ni, and Se;

Steam Generator Unit No. 4 - Pb, HCl, and HF;

Combustion Turbine No. 1 - HCl ;

Combustion Turbine No. 2 - HCl, HF, and Ni;

Combustion Turbine No. 3 - HCl, and Mn.

a) Why does Steam Generator Unit No. 4 not emit 1,000 pounds or more per year each of Se and Ni, when Units 1, 2 and 3 do?

b) Why does Combustion Turbine No. 2 emit 1,000 pounds or more per year each of HF and Ni, when Combustion Turbines No. 1 and No. 3 do not?

c) Why does Combustion Turbine No. 3 emit 1,000 pounds or more per year of Mn, when Combustion Turbines No. 1 and No. 2 do not?

d) Why does Steam Generator No. 3 emit 1,000 pounds or more per year of Mn, when Steam Generators Nos. 1, 2 and 4 do not?

15. Please provide the following additional information about control devices/methods: a) If TEC is adding ammonia to the flue gas from Unit No. 4, ammonia injection should be listed as a control device/method and a detailed description of the process should be submitted. b) If Stack #3 includes a recirculation duct to return exhaust gas to the inlet of the FGD scrubber, Flue Gas Recirculation should be listed as a control device/method and a detailed description of the process should be submitted. c) Please explain why, and in what quantities, TEC is adding SO₃ to the flue gases from Units Nos. 1-3, and quantify the effect on emissions. d) Is the SO₃ purchased or is it created on-site?

16. In the Emission Inventory Worksheet for Unit No. 3 on page CS-003 of Appendix C, how was the NO_x potential emission rate calculated to be 3154.1 tpy? Should this not be 12,616.6 tpy as shown on the Appendix B Emission Rate Summary sheet?

17. In the Emission Inventory Worksheet for Unit No. 4 on page CS-004 of Appendix C, and on the Appendix B Emission Rate Summary sheet, the CO potential emission rates are listed as 125.6 lb/hr and 550 tpy. However, Permit No. PSD-FL-040 (October 9, 1985 Modification) limits the CO emissions to 124 lb/hr, which equates to 543 tpy. Please correct these emissions numbers.

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18. Is Steam Generator Unit No. 4 a tangentially fired boiler or a dry bottom wall-fired boiler? The Source Classification Code (SCC) listed in the application for Steam Generator Unit No. 4 is 1-01-002-02 which designates an Electric Generation External Combustion Boiler, Pulverized Coal: Dry Bottom (Bituminous Coal). However, if Unit No. 4 is tangentially fired (as stated elsewhere in the application and in the monitoring plan for Unit No. 4, the more appropriate SCC would be 1-01-002-12 which designates an Electric Generation External Combustion Boiler, Pulverized Coal: Dry Bottom (Tangential)(Bituminous Coal). Also, if it is tangentially fired, why is Unit No. 4 not listed in "Table 1 - Phase I Tangentially Fired Units," 40 CFR 76 Appendix A? Is this due to the fact that Unit No. 4 was not originally a Phase I Unit?

19. Though referenced in the Emissions Unit Supplemental Information sections for Steam Generator Units No. 2, 3, and 4, supplemental information section III.I.11, Alternative Modes of Operation (Emissions Trading), was not included with the application. Please explain.

20. Facility Pollutant Detail Information was not provided. Please submit this section of the application to identify the multi-unit emissions caps. For example, there are multi-unit emissions caps for sulfur dioxide emissions from Steam Generator Units 1-3.

Solid Fuel Handling

21. Please submit a separate Segment(Process/Fuel) Information form for each type of solid fuel as required by DEP Form No. 62-210.900(1)-Instructions. Please submit revisions to drawings and diagrams as needed. For example, if specific storage piles or conveyors are used for petroleum coke/coal blend fuel only, please indicate this on the drawings and diagrams.

22. Particulate emissions estimates should be based on the solid fuel which has the potential to emit the most particulate matter. Which solid fuel has the potential to emit the most particulate matter when handled? Please submit documentation to support your conclusion.

23. The Condition I.A.3. of the PA 79-12 Conditions of Certification (revised 6-2-81 and modified 9-13-95) states that particulate emissions from the coal handling facilities shall be controlled by use of control devices. Within ten (10) working days after it became available, TEC was required to submit technical data pertaining to the selected particulate emissions control for the coal handling facility. This information was to include, but not be limited to, guaranteed efficiency and emission rates, and major design parameters such as air/cloth ratio and flow rate. However, there is no mention of any control devices for the conveyors and transfer points in the Title V application. Please clarify what types of particulate controls are used for each of the solid fuel handling and storage sources FH-001 through FH-031, FH-036 through FH-047, FH-050 through FH-058, and FH-063 through FH-073.

24. Specific Condition No. 5.a. of Permit No. PSD-FL-040 for Steam Generator Unit No. 4 requires that all conveyors and conveyor transfer points (except the coal handling stacker reclaimer, the tail end conveyor feeding tripper and the barge unloading belt) be enclosed to minimize fugitive emissions of particulate matter. a) Are there any vents or stacks associated with the enclosures? b) Which identification numbers in the application Document II.D.2.A. correspond to the coal handling stacker reclaimer and the tail end conveyor feeding tripper? c) Is conveyor belt

CB-A1 moved to line up with a barge, or does the barge line up with CB-A1 to unload? Is conveyor belt CB-B1 moved to line up with CB-A1, or does CB-B1 stay in one place?

25. The modified Conditions of Certification limit the maximum **annual** transloading of solid fuel to 4000 tons in Condition No. I.A.3.d. and 1,428,030 tons in Condition No. I.A.3e. We believe this is an error. Please contact Mr. Buck Oven in the Department's Power Plant Siting Office to arrange to have this condition revised in the Conditions of Certification.

26. The Conditions of Certification require that the annual quantity of solid fuel loaded by each transloading source/emission point be submitted to the EPCHC in an annual operating report. Please provide the required process rate information for each transloading source/emissions point by completing the appropriate application sections. At Big Bend Station, what annual quantities of fuels is TEC receiving, handling, blending, and/or shipping for the TEC Polk Power Generating Station?

27. The Big Bend Station is located in an area of influence of a particulate matter air quality maintenance area. Therefore, unless exempted by rule, materials handling, sizing, screening, crushing, and grinding operations are regulated by the particulate matter RACT requirements in Rule 62-296.711, F.A.C. In the application Table A-2, TEC states that RACT only applies to the conveyors to the blending bins [CH-032 through CH-035], and to the conveyors to the coal bunkers [CH-059 through CH-062], assuming that CH = FH in Document II.D.2.A. Is TEC requesting that the other solid fuel handling equipment (other than the storage piles) be exempted from RACT? If so, on what basis?

28. How many blending bins are there? Please describe how the petcoke/coal blend and the (approximately) 3.5% sulfur coal that are fired in Steam Generator Unit No. 4 kept segregated from the lower-sulfur coal that is fed to Steam Generator Units No. 1-3?

29. In the application, Table A-1 "Summary of Federal EPA Regulatory Applicability and Corresponding Requirements for Big Bend Station," states that 40 CFR 60 Subpart Y "Standards of Performance for Coal Preparation Plants", only applies to emission units CH-048 through CH-052 (CH = FH in Document II.D.2.A?), CH-055 and CH-056. Please explain why TEC believes that Subpart Y does not apply to the other solid fuel handling sources (excluding storage piles) listed in Document II.D.2.A.

30. a) The Pollutant Information section for estimated particulate matter emissions lists an emissions factor of 0.01. In what section of AP-42 was the emissions factor of 0.01 obtained? The calculations of emissions were not included in Appendix C. b) Tampa Electric Company reported total particulate matter emissions from the coal yard to be 641 tons for calendar year 1995. Please explain why your application states that the particulate matter emissions are estimated to be 25 to 100 tons per year?

31. Please explain why TEC believes that the process weight table found in Rule 62-296.320(4)2., F.A.C., does not apply to any of the coal processing equipment.

32. The following information is requested in order to determine if there are additional sources of particulate matter emissions from solid fuel handling/processing that were not included in the

application. a) In the application, DOCUMENT II.D.2.A., "BIG BEND STATION EMISSION SOURCE IDENTIFICATION KEY SHEET", lists a Source ID, FH-067, as the Transloading Storage Pile to Loadout Conveyor. Is there actually a separate "Transloading" storage pile, or is this merely a reference to the north, south, or middle storage pile, whichever is being used as the transloading loadout storage pile at a given time? b) In the application, DOCUMENT II.D.3.D., "FUEL HANDLING PROCESS FLOW DIAGRAM, SOUTH FUEL YARD", shows dozer operations on the Long Term Fuel Storage Pile. From what location(s) in the fuel handling process does the dozer bring the fuel to the pile, and to which location(s) is the fuel from the pile returned to the process? c) Application DOCUMENT II.D.3.F., "FUEL HANDLING PROCESS FLOW DIAGRAM, CRUSHER TOWER AND BUNKERS", shows emission points (FH-050 and FH-051) where the crushers discharge onto conveyor belts CB-W1 and CB-W2. Why is there not a corresponding emission point shown for where the crushers discharge onto conveyor belt CB-U?

Limestone Handling

33. a) Application DOCUMENT II.D.2.A., "BIG BEND STATION EMISSION SOURCE IDENTIFICATION KEY SHEET", lists two emission points (LSH-004 and LSH-005) from Conveyor LE to the South Storage Silo. Are these two emission points the exhausts from the two baghouses DC-4 & DC-5? Are each of these baghouses a Flex Kleen Model No. 58-BVBC-36-IIG? Is one of the baghouses controlling dust from conveyor belt LE, or are both baghouses collecting dust from the south storage silo? b) Similarly, two emission points (LSH-006 and LSH-007) are listed for Conveyor LE to the North Storage Silo. Are these two emission points the exhausts from the two baghouses DC-6 & DC-7? Are each of these baghouses a Flex Kleen Model No. 58-BVBC-36-IIG? Is one of the baghouses controlling dust from conveyor belt LE, or are both baghouses collecting dust from the north storage silo?

34. Application DOCUMENT II.D.3.J., "LIMESTONE HANDLING PROCESS FLOW DIAGRAM", shows unidentified conveyors from the storage silos to the ball mills. Please identify these conveyors and any emission points from them.

35. No emissions are indicated from the ball mills. Please explain how emissions are controlled. Also, please explain where the limestone goes after it is ground, the method of conveying the ground limestone, and any associated emission points.

36. No emissions are indicated from the limestone storage building. Please explain how fugitive emissions are controlled at the entrance and exit from the building.

37. All of the limestone handling and storage sources are grouped together as one emission unit with one Standard Classification Code (SCC), 30510105 (Bulk Materials Conveyors-Limestone), with a maximum process rate of 168 tons/hr and requested hours of operation of 8760 hours per year. Please break this one emission unit down into several segments with the appropriate application sections completed. When creating segments consider operating characteristics. For example, is a maximum process rate of 168 tons/hr a realistic rate for truck unloading? Is conveyor belt CB-LC always operating when CB-LB is? When CB-LD is? Here are some suggested segments with corresponding SCCs:

<u>Emission Unit</u>	<u>SCC</u>
Limestone Railcar/Truck Unloading	30510405
Limestone Transfer Tower LL1	30510105
Enclosed Limestone Storage Structure (fugitive emissions?)	30510205
Limestone Transfer Tower LL2	30510205
South Limestone Storage Tower	30510205
North Limestone Storage Tower	30510205
South Limestone Ball Mill	30501601
North Limestone Ball Mill	30501601

38. Why are the requested hours of operation 8760 hours per year when the potential emissions, on the Emission Inventory Worksheets LSH-001 through LSH-007, are calculated on the basis of 1460 hours per year? How were the potential emissions of 6.07 lb/hr and 4.45 tons/year calculated?

39. The potential PM emissions shown on Emission Inventory Worksheet LSH-001 are 0.65 lb/hr and 0.47 tpy. However, based on the equation, operating hours, exhaust flow rate, and exit grain loading given, the potential PM emission rates appear to be 0.58 lb/hr and 0.42 tpy. Please recalculate and verify your numbers.

Fly Ash Handling and Storage Sources

40. a) How is the fly ash, dry and wet, transferred to the silos? b) What is the maximum loading rate to Silo #2? c) Why are there particulate emissions (FA-003 and FA-008) associated with the "wet" transfers? Does Silo #2 handle any wet (pug mill) transfer fly ash? d) How will the future connection between Silo #1 and Silo #2 (as indicated on DOCUMENT II.D.3.K.) impact particulate emissions?

41. In the application, DOCUMENT II.D.2.A., "BIG BEND STATION EMISSION SOURCE IDENTIFICATION KEY SHEET", describes trucks unloading fly ash into Silo #1 but does not describe trucks unloading into Silo #2 or #3. However, DOCUMENT II.D.3.K., "FLYASH HANDLING PROCESS FLOW DIAGRAM", does show trucks unloading fly ash into Silo #2 and Silo #3. Do trucks unload fly ash into Silo #2 and Silo #3 or not? Is fly ash from off-site actually trucked into the facility and unloaded into the fly ash silos, or is the truck unloading process simply a way of transferring fly ash from one on-site fly ash silo to another?

Gypsum Handling and Storage Emission Sources

42. How is the actual sludge dewatering performed? Are there any fugitive particulate emissions associated with this process?

Slag and Bottom Ash Handling

43. How long does the slag and the bottom ash typically stay in the stackout piles before it is loaded into trucks? Is it still wet when loaded? Are there any fugitive particulate emissions associated with this process?

Fuel Oil Storage and Handling

44. Please provide a list of the contents and capacities of the storage tanks STR-001 through STR-009. Please also list the construction dates and any modification or reconstruction dates. (STR-001 and STR-002 contain No. 2 only per Table A-1.) Do the storage tank emit any VOCs or HAPs?

45. The No. 2 Fuel Oil Analysis submitted in the application lists the heat content units as "Btu/lb". Is this correct?

Abrasive Blast Media Storage

46. What type of abrasive blast media is used? Where does the blasting occur? Please provide information for this source so that it may be included in the Title V permit per Rule 210.300(3)(b).

Ship Repair Facility

47. Based on comments received from EPCHC, during an EPCHC inspection on June 6, 1994, a ship repair facility (GC Services, a TEC Transport Company) was found operating along side the Big Bend Station coal yard. TEC provided information regarding this operation following an inspection performed on December 6, 1994. During that inspection, EPCHC was informed that the operations would be included in the Title V application for the power plant. Please provide this information for an after-the-fact construction application and submit a compliance plan, or indicate why this source does not need to be included in the Title V permit.

List of Proposed Exempt Activities

48. Currently, in order for an emissions unit and/activity to be "exempt" in the Title V permit, the emissions unit and/or activity cannot exceed one or more of the emissions thresholds or have a unit-specific requirement (see Rule 62-213.430(6), F.A.C.). Also, the Department has issued guidance on emission units and/or activities that are considered "trivial" (see enclosed DARM-PER/V-15, revised March 15, 1996). These emissions units and/or activities no longer need to be included in Title V permit applications. "Trivial" emission units and/or activities will not be included in the Title V permit. Please update your attachment "List of Proposed Exempt Activities" and provide sufficient information to classify the emissions units and/or activities into two new categories - those that are "exempt" and those that are "unregulated".

To properly update the "List of Proposed Exempt Activities" you need to consider the requirements of Rule 62-213.430(6), F.A.C. If the answer to any of the following questions is yes, an emissions unit and/or activity cannot be "exempt".

- (1) Does any unit or activity have a unit-specific applicable requirement?
- (2) Does any unit or activity emit, or have the potential to emit, equal to or greater than:
 - 1,000 pounds/year of any hazardous air pollutant (HAP);
 - 2,500 pounds/year of total HAPs; and/or
 - 5 TPY of any other regulated air pollutant, i.e, volatile organic compound (VOC)?

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49. The National Emission Standards for Halogenated Solvent Cleaning (40 CFR 63, Subpart T) apply if you own or operate a solvent cleaning machine that uses a solvent that contains 5 percent or more by weight of any one of any combination of the following halogenated solvents: Carbon Tetrachloride; Chloroform; Perchloroethylene; 1,1,1-Trichloroethane; Trichloroethylene; or Methylene chloride. a) Are any of these six solvents being used at this facility? b) If yes, what is the amount of solvent (in gallons) used annually at parts-cleaning and degreasing stations? c) Are buckets, pails, and beakers with capacities greater than 7.6 liters (2 gallons) being used?

50. Do the vehicle refueling operations dispense 20,000 gallons/month or more of gasoline? If so, Stage I vapor control applies per Rule 62-252.300(1), F.A.C.

Miscellaneous

51. Please submit a copy of all the approved emissions Alternate Sampling Procedures (ASPs) and all approved fuel sampling and/or washing procedures that are currently being utilized for the Big Bend Station.

52. A "once-through cooling water system" is mentioned in the introduction to the application. Is this a cooling tower?

Responsible Official (R.O.) Certification Statement: Rule 62-213.420, F.A.C., requires that all Title V permit applications must be certified by a responsible official. Due to the nature of the information requested above, your response should be certified by the responsible official. Please complete and submit a new R.O. certification statement page from the new long application form, DEP Form No. 62-210.900, effective March 21, 1996 (enclosed).

Professional Engineer (P.E.) Certification Statement: Rule 62-4.050(3), F.A.C., requires that all applications for a Department permit must be certified by a professional engineer registered in the State of Florida. This requirement also applies to responses to Department requests for additional information of an engineering nature. As a result, your response above should be certified by a professional engineer registered in the State of Florida. Please complete and submit a new P.E. certification statement page from the new long application form, DEP Form No. 62-210.900, effective March 21, 1996 (enclosed).

The Department must receive a response from you within 90 (ninety) days of receipt of this letter, unless you (the applicant) request additional time under Rule 62-213.420(1)(b)6., F.A.C. A copy of your response should be sent to Mr. Richard Kirby at the Environmental Protection Commission of Hillsborough County, Air Management Division, 1410 North 21 Street, Tampa, Florida, 33605.

For Information Purposes (no response required)

1. The visible emissions subtype codes VE, VES are no longer used. The visible emissions subtype code is now simply the letters "VE" followed immediately by two digits representing the opacity standard; for example, VE20 is the appropriate visible emissions subtype code for an opacity limitation of 20%. There is no VE100 subtype for periods of excess emissions because

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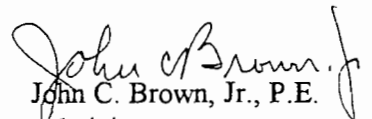
best operational practices, including shutdown, should be utilized to prevent an hour's worth of 100% percent opacity.

2. Your Title V application requested that a petcoke/coal blend be burned in Steam Generator Units No. 1 and No. 2. Approval to burn this fuel must be obtained through preconstruction review (i.e., applying for and receiving an air construction permit). Subsequently, the Title V permit application or permit revision application can be submitted.

3. Though requested in the application, non-hazardous boiler chemical cleaning waste will not be listed as a permitted fuel in the Title V permit.

If you should have any questions, please call Ms. Cindy L. Phillips, P.E., or Mr. Scott M. Sheplak, P.E., at (904)488-1344. If you prefer, you may also send email to Ms. Phillips at the following address: PHILLIPS_C@DEP.STATE.FL.US.

Sincerely,


John C. Brown, Jr., P.E.
Administrator
Title V Section

JCB/SMS/CLP

Enclosures

cc: Janice Taylor, TEC ✓
Thomas W. Davis, P.E., ECT ✓
Richard Kirby, P.E., EPCHC ✓
Jerry Kissel, P.E., SWD ✓
Thomas W. Reese, Esq. ✓

*Sent letter
to all cc's
with check
mark by them.
2-14-97 SJK*

*original sent to
addressee by
Certified Mail.
2-14-97*

Owner/Authorized Representative or Responsible Official

1. Name and Title of Owner/Authorized Representative or Responsible Official:
2. Owner/Authorized Representative or Responsible Official Mailing Address: Organization/Firm: Street Address: City: State: Zip Code:
3. Owner/Authorized Representative or Responsible Official Telephone Numbers: Telephone: () - Fax: () -
4. Owner/Authorized Representative or Responsible Official Statement: <i>I, the undersigned, am the owner or authorized representative* of the non-Title V source addressed in this Application for Air Permit or the responsible official, as defined in Rule 62-210.200, F.A.C., of the Title V source addressed in this application, whichever is applicable. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof. I understand that a permit, if granted by the Department, cannot be transferred without authorization from the Department, and I will promptly notify the Department upon sale or legal transfer of any permitted emissions unit.</i> _____ Signature Date

* Attach letter of authorization if not currently on file.

4. Professional Engineer Statement:

I, the undersigned, hereby certify, except as particularly noted herein, that:*

(1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this Application for Air Permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; and

(2) To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application.

If the purpose of this application is to obtain a Title V source air operation permit (check here [] if so), I further certify that each emissions unit described in this Application for Air Permit, when properly operated and maintained, will comply with the applicable requirements identified in this application to which the unit is subject, except those emissions units for which a compliance schedule is submitted with this application.

If the purpose of this application is to obtain an air construction permit for one or more proposed new or modified emissions units (check here [] if so), I further certify that the engineering features of each such emissions unit described in this application have been designed or examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application.

If the purpose of this application is to obtain an initial air operation permit or operation permit revision for one or more newly constructed or modified emissions units (check here [] if so), I further certify that, with the exception of any changes detailed as part of this application, each such emissions unit has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with all provisions contained in such permit.

Signature

Date

(seal)

* Attach any exception to certification statement.

Memorandum

Florida Department of
Environmental Protection

DARM-PER/V-15
REVISED

TO: District Air Program Administrators
County Air Program Administrators
Bureau of Air Regulation Engineers

FROM: Howard L. Rhodes, Director *HLR*
Division of Air Resources Management

DATE: March 15, 1996

SUBJECT: Revision to Trivial List of Activities at a
Title V Facility

This guidance replaces the February 12, 1996 Guidance, DARM-PER/V-15. The only change is the rule siting in text of document.

Attachment A of a July 3, 1995 Environmental Protection Agency (EPA) memorandum, "Initial Operating Permit Application Compliance Certification Policy," commonly called the White Paper, attached, comprises a listing of trivial activities.

With one exception, Title V permits will not require that these activities be listed in the Title V permit applications or the Title V permits. These activities are treated as if they emit no air pollutants.

The EPA listing conditionally includes painting under the category of plant maintenance and upkeep activities (page 1) as a trivial activity. If painting activities at a Title V source in Florida result in emissions that are below the thresholds for exemption in Rule 62-213.430(6)(b), F.A.C., they may be included in the application as exemptible activities. Otherwise, they should be listed, but not quantified, as unregulated activities, provided the painting activities are not subject to an applicable requirement. If the painting activities result in emissions that trigger applicable requirements, they must be reported and quantified.

HLR/jb/k

Attachment

knows or has reason to believe would be emitted in an amount equal to or greater than:

a. 5.0 tons per year for carbon monoxide, nitrogen oxides, particulate matter, sulfur dioxide, and volatile organic compounds; or

b. 500 pounds per year for lead and lead compounds expressed as lead.

4. Each Title V source that emits or has the potential to emit any hazardous air pollutant or total hazardous air pollutants in a major amount as set forth in Rule 62-213. (3) (c)1., F.A.C., shall identify, for each emissions unit, each such pollutant which the applicant knows or has reason to believe would be emitted in an amount equal to or greater than:

a. 1,000 pounds per year for each hazardous air pollutant.

b. 2,500 pounds per year for total hazardous air pollutants.

5. Title V sources which are also subject to the Federal Acid Rain Program shall report all emissions of sulfur dioxide and nitrogen oxides from any acid rain unit in accordance with this subsection or the reporting requirements of the Federal Acid Rain Program, whichever are more stringent.

(d) Process and operating information;

(e) Control equipment information;

(f) Calculations;

(g) Identification of all applicable requirements and test methods;

(h) Limitations on source operation affecting emissions;

(i) Proposed alternate methods of operation;

(j) Compliance statement;

(k) Compliance schedule and methodology, if applicable;

(l) Reporting and recordkeeping requirements;

(m) A list of emissions units or activities for which exemption is requested because of size or production rate and any information needed to demonstrate

that the units or activities qualify for exemption under the provisions of Rule 62-213.430(6), F.A.C.

(4) Certification by Responsible Official. In addition to the professional engineering certification required for applications by Rule 62-4.050(3), F.A.C., any application form, report, compliance statement, compliance plan and compliance schedule submitted pursuant to this chapter shall contain a certification signed by a responsible official that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
Specific Authority: 403.061, 403.087, F.S.
Law Implemented: 403.061, 403.0872, F.S.
History: New 11-28-93; Amended 4-17-94; Formerly 17-213.420; Amended 11-23-94, 4-2-95, 10-11-95, 3-13-96, 3-20-96.

62-213.430 Permit Issuance, Renewal, and Revision.

(1) Action on Application. Except for those applications submitted pursuant to Rule 62-213.420(1)(a)1., F.A.C., the Department shall issue a draft permit or a determination that the requested permit be denied within 90 days after receipt of the latest of: the application; the last item of information requested pursuant to Rule 62-213.420(1)(b), F.A.C.; or, a written request to process the application without the requested information. The Department shall issue a permit, permit revision or renewal only after all of the following conditions have been met:

(a) The applicant has submitted a complete application, properly certified by a responsible official as required by Rule 62-213.420(4), F.A.C., and either all corrected and supplemental information requested or a written request to process the application without such information pursuant to Rule 62-213.420(1)(b)3. and 4., F.A.C.;

(b) The Department and the applicant have complied with the requirements for notice and public participation described in Rules 62-103.150 and 62-210.350, F.A.C.;

(c) The Department has complied with the requirements for notifying and responding to affected states and approved local air programs pursuant to Rule 62-213.450(2) and (3), F.A.C.;

(d) The Department has provided EPA with a copy of the draft permit, proposed permit and any notices required under Rule 62-213.450(1) and (2), F.A.C., and has not received written EPA objection to issuance of the permit within the time period specified in Rule 62-213.450(4). If the Department receives timely EPA objection, the Department shall not take final action until the Department receives written notice that the objection is resolved or withdrawn;

(e) The Department has provided a statement to EPA setting forth the basis for the draft permit conditions, including references to the applicable statutory or regulatory provisions.

(2) Permit Denial. If the Department proposes to deny the permit application, the Department shall provide the applicant an explanation of the denial in accordance with Rule 62-4.070(6), F.A.C.

(3) Permit Renewal and Expiration. Permits being renewed are subject to the same requirements that apply to permit issuance at the time of application for renewal. Permit renewal applications shall contain that information identified in Rules 62-210.900(1) and 62-213.420(3), F.A.C. Unless a Title V source submits a timely application for permit renewal in accordance with the requirements of Rule 62-4.090(1), F.A.C., the existing permit shall expire and the source's right to operate shall terminate.

(4) Permit Revision Procedures. Permit revisions shall meet all requirements of this chapter, including those for content of applications, public participation, review by approved local air programs and affected States, and review by EPA, as they apply to permit

issuance and permit renewal, except that permit revisions for those activities implemented pursuant to Rule 62-213.412, F.A.C., need not meet the requirements of Rule 62-213.430(1)(b), F.A.C. The Department shall require permit revision in accordance with the provisions of Rule 62-4.080, F.A.C., and 40 CFR 70.7(f), whenever any source becomes subject to any condition listed at 40 CFR 70.7(f)(1), hereby adopted and incorporated by reference.

(5) EPA Recommended Actions. Within 90 days after receipt of notification from EPA that cause exists to modify, suspend, or revoke a permit, the Department shall investigate and determine whether cause exists pursuant to 40 CFR 70.7(f)(1), hereby adopted and incorporated by reference, and shall forward the determination to EPA. If cause exists, the Department shall proceed according to the requirements of Rule 62-4.080 or 62-4.100, F.A.C., and 40 CFR 70.7(f) to modify, suspend, or revoke the permit.

(6) Exemption of Emissions Units or Pollutant-Emitting Activities.

(a) All requests for exemption of emissions units or activities made pursuant to Rule 62-213.420(3)(m), F.A.C., shall be processed in conjunction with the permit, permit renewal or permit revision application submitted pursuant to this chapter. Exemptions shall be approved by the Department consistent with the provisions of Rule 62-4.040(1)(b), F.A.C. Emissions units or activities which are added to a Title V source after issuance of a permit under this chapter shall be incorporated into the permit at its next renewal, provided such emissions units or activities have been exempted from the requirement to obtain an air construction permit and also qualify for exemption from permitting pursuant to this rule.

(b) No exemption shall be granted to any emissions unit or activity if:

1. Such unit or activity would be subject to any unit-specific applicable requirement;

2. Such unit or activity, in combination with other units and activities proposed for exemption, would cause the facility to exceed any major source threshold(s) as defined in Rule 62-213.420(3)(c)1., F.A.C., unless it is acknowledged in the permit application that such units or activities would cause the facility to exceed such threshold(s); or

3. Such unit or activity would emit or have the potential to emit:

a. 500 pounds per year or more of lead and lead compounds expressed as lead;

b. 1,000 pounds per year or more of any hazardous air pollutant;

c. 2,500 pounds per year or more of total hazardous air pollutants; or

d. 5.0 tons per year or more of any other regulated pollutant.

Specific Authority: 403.061, 403.087, F.S.

Law Implemented: 403.031, 403.061, 403.087, 403.0872, F.S.

History: New 11-28-93, Formerly 17-213.430; Amended 11-23-94, 3-13-96, 3-20-96.

62-213.440 Permit Content.

(1) Standard Permit Requirements. Each permit issued under this chapter shall incorporate all applicable requirements for the Title V source and for each method of operation proposed by the applicant and approved by the Department. Each such permit shall include all emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements, with citation to the Department's rule authority for each term or condition, and identification of any difference in form from the applicable requirement upon which the term or condition is based. Emissions units or pollutant-emitting activities within a Title V source exempted by Rule 62-210.300(3), F.A.C., or by specific exemption

granted by the Department consistent with Rule 62-4.040(1)(b), F.A.C., shall be identified.

(a) Permit Duration. Permits for sources subject to the Federal Acid Rain Program shall be issued for terms of five years. Operation permits for Title V sources may not be extended as provided in Rule 62-4.080(3), F.A.C., if such extension will result in a permit term greater than five years.

(b) Monitoring and Related Recordkeeping and Reporting Requirements.

1. Each permit shall specify the following requirements with respect to monitoring:

a. Emissions monitoring and analysis procedures or test methods specified by applicable requirements;

b. Where the applicable requirement does not specify a method for periodic testing or instrumental or noninstrumental monitoring, periodic monitoring sufficient to yield reliable data and demonstrate compliance with the permit. Such monitoring requirements shall assure use of recordkeeping terms, test methods, units, averaging periods, and other statistical conventions consistent with the applicable requirement; and

c. Requirements concerning the use, maintenance, and installation of monitoring equipment or methods.

2. The permit shall incorporate all applicable recordkeeping requirements including:

a. Records of monitoring information that specify the date, place, and time of sampling or measurement and the operating conditions at the time of sampling or measurement, the date(s) analyses were performed, the company or entity that performed the analyses, the analytical techniques or methods used, and the results of such analyses;

b. Retention of records of all monitoring data and support information for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original

ATTACHMENT A

LIST OF ACTIVITIES THAT MAY BE TREATED AS "TRIVIAL"

The following types of activities and emissions units may be presumptively omitted from part 70 permit applications. Certain of these listed activities include qualifying statements intended to exclude many similar activities.

Combustion emissions from propulsion of mobile sources, except for vessel emissions from Outer Continental Shelf sources.

Air-conditioning units used for human comfort that do not have applicable requirements under title VI of the Act.

Ventilating units used for human comfort that do not exhaust air pollutants into the ambient air from any manufacturing/industrial or commercial process.

Non-commercial food preparation.

Consumer use of office equipment and products, not including printers or businesses primarily involved in photographic reproduction.

Janitorial services and consumer use of janitorial products.

Internal combustion engines used for landscaping purposes.

Laundry activities, except for dry-cleaning and steam boilers.

Bathroom/toilet vent emissions.

Emergency (backup) electrical generators at residential locations.

Tobacco smoking rooms and areas.

Blacksmith forges.

Plant maintenance and upkeep activities (e.g., grounds-keeping, general repairs, cleaning, painting, welding, plumbing, re-tarring roofs, installing insulation, and paving parking lots) provided these activities are not conducted as part of a manufacturing process, are not related to the source's primary business activity, and not otherwise triggering a permit modification.

¹Cleaning and painting activities qualify if they are not subject to VOC or HAP control requirements. Asphalt batch plant owners/operators must still get a permit if otherwise required.

Repair or maintenance shop activities not related to the source's primary business activity, not including emissions from surface coating or de-greasing (solvent metal cleaning) activities, and not otherwise triggering a permit modification.

Portable electrical generators that can be moved by hand from one location to another².

Hand-held equipment for buffing, polishing, cutting, drilling, sawing, grinding, turning or machining wood, metal or plastic.

Brazing, soldering and welding equipment, and cutting torches related to manufacturing and construction activities that do not result in emission of HAP metals.³

Air compressors and pneumatically operated equipment, including hand tools.

Batteries and battery charging stations, except at battery manufacturing plants.

Storage tanks, vessels, and containers holding or storing liquid substances that will not emit any VOC or HAP.⁴

Storage tanks, reservoirs, and pumping and handling equipment of any size containing soaps, vegetable oil, grease, animal fat, and nonvolatile aqueous salt solutions, provided appropriate lids and covers are utilized.

²"Moved by hand" means that it can be moved without the assistance of any motorized or non-motorized vehicle, conveyance, or device.

³Brazing, soldering and welding equipment, and cutting torches related to manufacturing and construction activities that emit HAP metals are more appropriate for treatment as insignificant activities based on size or production level thresholds. Brazing, soldering, welding and cutting torches directly related to plant maintenance and upkeep and repair or maintenance shop activities that emit HAP metals are treated as trivial and listed separately in this appendix.

⁴Exemptions for storage tanks containing petroleum liquids or other volatile organic liquids should be based on size limits such as storage tank capacity and vapor pressure of liquids stored and are not appropriate for this list.

Equipment used to mix and package, soaps, vegetable oil, grease, animal fat, and nonvolatile aqueous salt solutions, provided appropriate lids and covers are utilized.

Drop hammers or hydraulic presses for forging or metalworking.

Equipment used exclusively to slaughter animals, but not including other equipment at slaughterhouses, such as rendering cookers, boilers, heating plants, incinerators, and electrical power generating equipment.

Vents from continuous emissions monitors and other analyzers.

Natural gas pressure regulator vents, excluding venting at oil and gas production facilities.

Hand-held applicator equipment for hot melt adhesives with no VOC in the adhesive formulation.

Equipment used for surface coating, painting, dipping or spraying operations, except those that will emit VOC or HAP.

CO₂ lasers, used only on metals and other materials which do not emit HAP in the process.

Consumer use of paper trimmers/binders.

Electric or steam-heated drying ovens and autoclaves, but not the emissions from the articles or substances being processed in the ovens or autoclaves or the boilers delivering the steam.

Salt baths using nonvolatile salts that do not result in emissions of any regulated air pollutants.

Laser trimmers using dust collection to prevent fugitive emissions.

Bench-scale laboratory equipment used for physical or chemical analysis, but not lab fume hoods or vents.⁵

Routine calibration and maintenance of laboratory equipment or other analytical instruments.

⁵Many lab fume hoods or vents might qualify for treatment as insignificant (depending on the applicable SIP) or be grouped together for purposes of description.

Equipment used for quality control/assurance or inspection purposes, including sampling equipment used to withdraw materials for analysis.

Hydraulic and hydrostatic testing equipment.

Environmental chambers not using hazardous air pollutant (HAP) gasses.

Shock chambers.

Humidity chambers.

Solar simulators.

Fugitive emission related to movement of passenger vehicles, provided the emissions are not counted for applicability purposes and any required fugitive dust control plan or its equivalent is submitted.

Process water filtration systems and demineralizes.

Demineralized water tanks and demineralizer vents.

Boiler water treatment operations, not including cooling towers.

Oxygen scavenging (de-aeration) of water.

Ozone generators.

Fire suppression systems.

Emergency road flares.

Steam vents and safety relief valves.

Steam leaks.

Steam cleaning operations.

Steam sterilizers.

Z 392 940 829



Receipt for Certified Mail

No Insurance Coverage Provided
Do not use for International Mail
(See Reverse)

1-2-1111-1111, March 1993

Sent to <i>Big Bend Station</i> <i>Stanley J. Martin Tampa Electric Co.</i>	
Street and No. <i>P.O. Box 111</i>	
P.O., State and ZIP Code <i>Tampa, FL 33601-0111</i>	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date <i>2-14-97</i>	

*Sent letter and attachments
2-14-97 SJK*

Id at line over top of envelope to the right of the return address

CERTIFIED

Z 392 940 829

MAIL

Is your RETURN ADDRESS completed on the reverse side?

SENDER:

- Complete items 1 and/or 2 for additional services.
- Complete items 3 and 4a & b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):

- 1. Addressee's Address
 - 2. Restricted Delivery
- Consult postmaster for fee.

3. Article Addressed to:
 Mr. Stanley J. Martin
 General Manager, Big Bend Station
 Tampa Electric Company
 Post Office Box 111
 Tampa, Florida 33601-0111

4a. Article Number
Z 392 940 829

- 4b. Service Type
- Registered
 - Insured
 - Certified
 - COD
 - Express Mail
 - Return Receipt for Merchandise

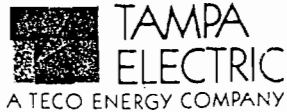
7. Date of Delivery

5. Signature (Addressee)

6. Signature (Agent)

8. Addressee's Address (Only if requested and fee is paid)

Thank you for using Return Receipt Service



November 19, 1996

RECEIVED

NOV 25 1996

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:

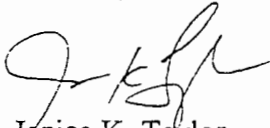
Tampa Electric Company
Janice K. Taylor
Senior Engineer
P.O. Box 111
Tampa, FL 33601-0111

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

Mr. John C. Brown, P.E.
November 19, 1996
Page 2 of 2

Thank you in advance for your consideration in this matter.

Sincerely,

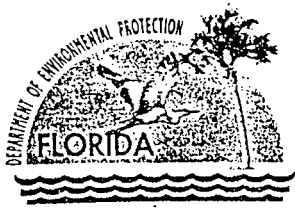


Janice K. Taylor
Senior Engineer
Environmental Planning

Enclosures

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

EP/gm/JKT777



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 citings 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

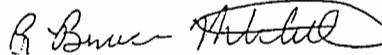
Telephone: 813/272-5530
Fax: 813/272-5605

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

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
Thomas W. Reese

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

RECEIVED

OCT 11 1996

BUREAU OF
AIR REGULATION



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):

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	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

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

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

Mr. G. F. Anderson
 February 28, 1995
 Page 2 of 4

~~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:

<u>Pollutant</u>	<u>Fuel</u>	<u>Basis</u>	<u>Emissions Limitations</u>	
			<u>7F CT Postdemonstration</u>	<u>Period</u>
			<u>lb/hr</u>	<u>tpv</u>
NO _x	Oil	42 ppmvd	311	N/A
	Syngas	25 ppmvd	222.5	2,644
			220.25	1,032.9

I. Auxiliary Boiler Operation

Normal operation of the auxiliary boiler shall be limited to a maximum of ~~2,000~~ 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/yr) in the standby mode. The following emission limitations shall apply:

1. NO_x emissions shall not exceed ~~6.16~~ 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. Owen, PPS
T. Davis, P.E., ECT

COMMISSION

DOTTIE BERGER
PHYLLIS BUSANSKY
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TELEPHONE (813)272-7104

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

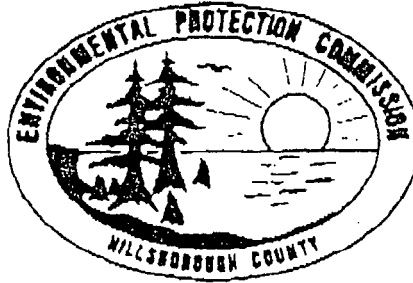
SPECIAL INSTRUCTIONS: _____

COMMISSION

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EXECUTIVE DIRECTOR

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MEMORANDUM

DATE: September 10, 1996
TO: John Brown
FROM: Rick Kirby **THRU:** Jerry Campbell
 Iwan Choronenko *[Signature]*
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, FDEP 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
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UCL 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 SO₃ to flue gases. These processes should be thoroughly explained and the effects on emissions quantified.
9. TECO uses molten sulfur to generate SO₃ 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