

Phillips, Cindy

From: DeAngelo, Gregory
Sent: Friday, February 13, 2004 5:45 PM
To: Phillips, Cindy
Cc: DeAngelo, Gregory
Subject: Comments on TEC Title V Revision Request

Hi Cindy, I was only able to take a fairly quick look through the application so far. I did not check out the detailed requests by TEC with respect to the "true" administrative corrections they noted in the marked-up copy of their Title V permit. I did look into the five or six "big ticket" items, and I agree that they cannot be done through Title V revision without an accompanying AC permit. Details follow. (I might be fuzzy on details of when an AC permit is necessary and when it isn't...)

(1) Petcoke sulfur content monitoring

I can understand their reluctance to continue monitoring petcoke sulfur content, as this generates "credible evidence" and is duplicative with the SO2 CEMS. However, this requirement is from a construction permit, so an AC modification is necessary first. Note that I don't see in their permit a limit for the sulfur content of petcoke (i.e., there's no weight percent number or anything), instead it looks like measuring the petcoke sulfur content is to provide reasonable assurance of compliance with the SO2 limits. IF SO2 CEMS is required at all times for Units 1 - 3, then seems okay to do this. Do they have one SO2 CEMS per unit to show individual compliance with the lb/MMBtu limits?

(2) Coal washing

Their letter mentions that removing this requirement was part of the proposed changes to their siting certification. I don't know how to check that claim, but I do know that the requirement to wash coal is still in their siting conditions. See the tags I put in their application on the final certification modification ("L") from July 2003. There is currently no open revisions to the certification requirements. I included a copy of the latest siting certification update in the binder.

Regardless, coal washing is a requirement from a PSD permit, so an AC modification would be required.

Also, they bring up the Consent Decree. The CD requires scrubber optimization and use, but doesn't mention changing any existing operating parameters. One could argue that the CD's conditions regarding scrubber use assumed current operating conditions including coal washing.

(3) Spare FGD module

This is a requirement of the NSPS. See 60.46a(d). Nothing in the Consent Decree removes this obligation.

(4) SO2 percent reduction calculation

See prior note regarding draft siting certification. The latest modification to their siting conditions includes this calculation. You need the calculation approach from B.28 to check the 90 percent reduction requirement from B.7. (Note that TEC did not request the removal of B.7.)

(5) Flyash transfer

This change seems okay to me, provided that their request isn't changing any of the numbers...

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BIG BEND STATION
TITLE V AIR OPERATION PERMIT
REVISION APPLICATION

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ECT No. 030609-0100

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