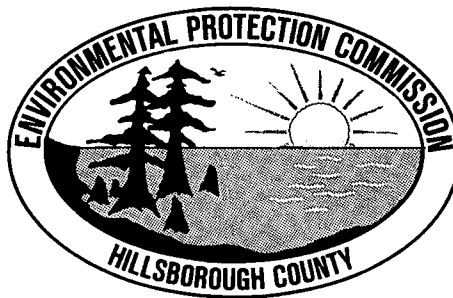


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Executive Director  
Richard D. Garrity, Ph.D.

August 26, 2002

Ms. Cindy Phillips, P.E.  
Department of Environmental Protection, Bureau of Air Regulation  
2600 Blair Stone Road  
Mail Station 5505  
Tallahassee, FL 32399-2400

Re: Hillsborough County - AP  
DEP File No. 0570039-013-AV

Dear Ms. Phillips:

Thank you for forwarding a copy of the Draft Title V Air Operation Permit Revision Application for TEC Big Bend to EPC staff for review. After reviewing the application, EPC staff offers the following comments for your consideration:

1. The NO<sub>x</sub> and CO testing required by Specific Condition No. 4 (Permit No. 0570039-012-AC) has not been completed. According to the application, TEC does not anticipate the completion of the testing until October 2002. (See Page Nos. 26, 42, 58, and 74 of the application). Because TEC has not provided reasonable assurance that the burning of the material will not cause a significant net emissions increase, EPC staff believes the permit revision should be held incomplete until the required tests have been conducted, submitted, and reviewed by Department and/or EPC personnel. [Rule 62-4.070, F.A.C.]
2. On Page No. 10, Fields 1 through 6 (Area Map Showing Facility Location, Facility Plot Plan, Process Flow Diagram(s), Precautions to Prevent Emissions of Unconfined Particulate Matter, Fugitive Emissions Identification, and Supplemental Information for Construction Permit Application) a waiver was requested. A note at the bottom of the page referenced the Initial Title V Operation Permit Application as the reason for not resubmitting the information. The current revision application is to incorporate the handling and firing of residual fuel, which also includes the construction of a storage and handling building. Therefore, Fields 2, 3, 4, and

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- 5 (Facility Plot Plan, Process Flow Diagram(s), Precautions to Prevent Emissions of Unconfined Particulate Matter, and Fugitive Emissions Identification) should be resubmitted to include the new building and conveyor systems(s). Additionally, the changes that are currently being made in accordance with the Consent Decree and Consent Final Judgement need to be reflected in the supplemental information. [Rule 62-4.070, F.A.C.]
3. On Page No. 11, Fields 8, 9, 10, 11, and 12 (List of Proposed Insignificant Activities, List of Equipment/Activities Regulated under Title VI, Alternative Methods of Operation, Alternative Modes of Operation (Emissions Trading), and Identification of Additional Applicable Requirements) were left blank. A note at the bottom of the page referenced the Initial Title V Operation Permit Application as the reason for not resubmitting the information. Although this information is not critical for the processing of the Title V Revision, please request that TEC personnel complete these fields in order to ensure that no changes or modifications have occurred to these activities that would change their status.
  4. On Page Nos. 13, 29, 45, and 61, Emissions Unit Details, Field No. 1 (Package Unit, Manufacturer, Model Number) was left blank. Although these are not critical for the processing of the Title V Revision, please request that TEC personnel complete these fields in order to ensure that the emission units have not been modified.
  5. Page Nos. 15, 31, 47, and 63, Emissions Unit Regulations, were left blank. A note at the bottom of the page referenced the initial Title V Operation Permit Application. Although these are not critical for the processing of the Title V Revision, please request that TEC personnel complete these fields.
  6. Page Nos. 22, 24, 25, 38, 40, 41, 54, 56, 57, 70, 72, and 73, Emissions Unit Pollutant Detail Information, Visible Emissions Information, and Continuous Monitor Information (Sections G, H, and I), were left blank. A note referenced the Initial Title V Operation Permit Application as the reason for not resubmitting the information. However, Rule 62-213.420(1)(b)(a), F.A.C. requires the submission of information concerning fugitive and stack emissions. Please request TEC personnel complete these fields.
  7. Page Nos. 27, 43, 59, and 75, Additional Supplemental Requirements for Title V Air Operation Permit Applications, Fields 11, 13, and 15 (Alternative Methods of Operation, Identification of Additional Applicable Requirements, and Acid Rain Part Application) were left blank. A note at the bottom of the page referenced the Initial Title V Operation

Permit Application. Although these are not critical for the processing of the Title V Revision, please request that TEC personnel complete these fields.

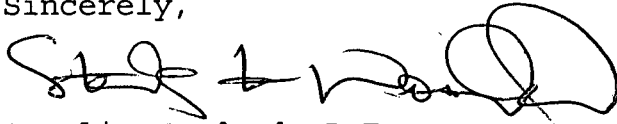
8. On Page No. 77, Emissions Unit Control Equipment, Field No. 1 contains a description of the storage building for the residual coal. Please have TEC personnel revise the description to include a better quantitative description of the openings in the building. [Rule 62-4.070, F.A.C.]
9. On Page Nos. 79, 84, 91, and 96, Emissions Unit Regulations and Visible Emissions Information, Rule 62-297.620(4), F.A.C. is referenced. Please note, Rule 62-297.620(4) addresses those emissions units which have a baghouse for a control device. It allows the waiver of a particulate matter test in lieu of an opacity standard of less than 5%. The building has no baghouse or control device. Therefore, the rule cite is not appropriate. Although the particulate matter emissions are not declared, EPC staff believes Rule 62-296.711, F.A.C. is appropriate. Additionally, please request TEC personnel complete Section G, Emissions Unit Pollutant Detail Information, (Page Nos. 83 and 95) for Emissions Unit Nos. 037 and 038. [Rules 62-4.070, and 62-296.711, and DEP Form 62-210.900(1), F.A.C.]
10. On Pages 86 and 98, Emissions Unit Supplemental Information, Field No. 5, Compliance Test Report, should be filled out. EPC staff is aware the NO<sub>x</sub> and CO testing is not yet completed; however field no. 5 should be filled out. [DEP Form 62-210.900(1), F.A.C.]
11. On Pages 86 and 98, Emissions Unit Supplemental Information, Field No. 7 (Operation and Maintenance Plan) indicates an Operation and Maintenance Plan (O&M) is not applicable. EPC staff believes the Operation and Maintenance Plan should include the storage building and any activities conducted within the storage building. [Rules 62-296.700 and 62-4.070, F.A.C.]
12. Appendix DOC.II.C.14 and DOC.II.C.15 is unsigned. Please request that TEC personnel submit a signed copy of DEP Form 62-213.900(7), F.A.C.
13. EPC staff noted the application did not contain a CAM Plan for Units 1 through 4. Because these units are considered to be "Large Pollutant-Specific Emissions Units", a CAM Plan should be submitted as part of an application for a significant permit revision in accordance with Rule 40 CFR 64.5 (a)(2).

Cindy Phillips  
August 26, 2002

Page 4

Thanks again for the opportunity to provide comments. If you have any questions, please feel free to contact Rob Kalch at (813) 272-5530.

Sincerely,

A handwritten signature in black ink, appearing to read "Sterlin Woodard". The signature is fluid and cursive, with a large loop at the end.

Sterlin Woodard, P.E.  
Assistant Director

rsk

cc: Darryl Scott, TEC  
Dru Latchman, TEC, Air Programs, Environmental Affairs