

Florida Department of Environmental Protection

Memorandum

TO: Trina Vielhauer, Bureau of Air Regulation
THROUGH: Al Linero, Air Permitting South Program *aal*
FROM: Teresa Heron, Air Permitting South Program *T.H.*
DATE: July 30, 2007
SUBJECT: Draft Air Permit No. 0570039-028-AV, Title V Permit Revision
Tampa Electric Company (TEC)
Solid Fuel Yard Transloading Operation

Attached for your review are the following items:

- Intent to Issue Permit and Public Notice Package;
- Statement of Basis;
- Draft Permit; and
- PE Certification.

The purpose of this draft permit package is to revise Title V air operation 0570039-017-AV by incorporating air construction Permit No. 0570039-025-AC. The Statement of Basis summarizes the facility, equipment, controls, primary rule applicability and describes the changes. The P.E. certification briefly summarizes the proposed project.

We recommend your approval of the attached draft permit for this project.

Attachments

TV/aal/tmh

P.E. CERTIFICATION STATEMENT

Tampa Electric Company Big Bend Station
Post Office Box 111
Tampa, Florida 33601-0111

DRAFT Air Permit No.: 0570039-028-AV
Big Bend Station, Transloading Project
Title V Permit Revision
Hillsborough County, Florida

PROJECT DESCRIPTION

The applicant proposes to revise the Title V Operation Permit for the Tampa Electric Company (TEC) Big Bend Station located at located at Wyandotte Road, Apollo Beach, Hillsborough County, Florida.

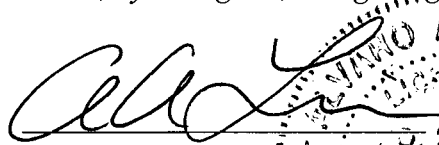
The Big Bend Station consists of four coal and petroleum coke-fueled steam generators (Units Nos. 1 through 4); four steam turbines; three simple-cycle combustion turbines (CT Nos. 1, 2, and 3); solid fuels, fly ash, limestone, gypsum, slag, and bottom ash storage and handling facilities, and fuel oil storage tanks. In addition, there is a ship surface coating operation and a variety of ancillary equipment needed to support operations of this facility.

TEC applied to the Florida Department of Environmental Protection (Department) for a Title V Air Operation Permit Revision to incorporate the terms and conditions of air construction permit 0570039-025-AC. The referenced air construction permit (prepared under my supervision) to be incorporated into this operation permit revision allowed additional transloading of coal and petroleum coke typically received by barge at the solid fuel yard for off-site shipping and to authorize slag transloading. Emissions points associated with this operation are: (a) the transfer of slag from a barge to the fuel storage yard (b) the transfer of coal, petroleum coke or slag from a storage pile by mobile equipment to trucks, and (c) coal, petroleum coke, or slag truck travel on the facility paved and unpaved roads.

According to the Hillsborough County Environmental Protection Commission, the compliance authority for the facility, the company has not yet tested for visible emissions for some of the transloading scenarios because they have not yet operated under those modes. A compliance plan has been included to insure that such testing is conducted at a future time when such modes occur.

My own review extends only to incorporation of the transloading scenarios that have been added to this permit and not to the previous evaluations by the professional engineers who reviewed the application for Permit No. 0570039-017-AV that is revised by this action.

I HEREBY CERTIFY that the air pollution control engineering features described in the above referenced application and subject to the proposed permit conditions provide reasonable assurance of compliance with applicable provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 62-4 and 62-204 through 62-297. However, I have not evaluated and I do not certify aspects of the proposal outside of my area of expertise (including but not limited to the electrical, mechanical, structural, hydrological, and geological features).


Alvaro A. Linero, P.E. (Date) 7/30/07

Registration Number: 26032
STATE OF FLORIDA
PROFESSIONAL ENGINEER

P.E. CERTIFICATION STATEMENT

PERMITTEE

Ms. Karen Sheffield, General Manger
Tampa Electric Company Big Bend Station
Post Office Box 111
Tampa, Florida 33601-0111

DRAFT AIR PERMIT No.: 0570039-028-AV

Big Bend Station
Title V Permit Revision
Fuel/Slag Transloading
Hillsborough County, Florida

PROJECT DESCRIPTION

The purpose of the revision is to incorporate the changes approved by air construction permit 0570039-025-AC issued on October 31, 2006. The referenced air construction permit to be incorporated into this operation permit revision authorizes:

- Additional transloading for offsite shipping of coal and petroleum coke that is typically received by barge at the solid fuel yard; and
- Slag transloading.

Emissions points associated with this operation are: (a) the transfer of slag from a barge to the fuel storage yard (b) the transfer of coal, petroleum coke or slag from a storage pile by mobile equipment to trucks, and (c) coal, petroleum coke, or slag truck travel on the facility paved and unpaved roads.

The revision has been prepared as DRAFT Title V air operation permit revision No. 0570039-028-AV which is a revision to the Facility Title V air operation permit that was effective on January 1, 2005.

The revision rolls the conditions from the previously evaluated and approved air construction permit to the operation permit including the process limits, hours of operation, materials and the reasonable precautions to control fugitive emissions.

I HEREBY CERTIFY that the air pollution control engineering features described in the above referenced application and subject to the proposed permit conditions provide reasonable assurance of compliance with applicable provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 62-4 and 62-204 through 62-297. However, I have not evaluated and I do not certify aspects of the proposal outside of my area of expertise (including, but not limited to, the electrical, mechanical, structural, hydrological, geological, and meteorological features).

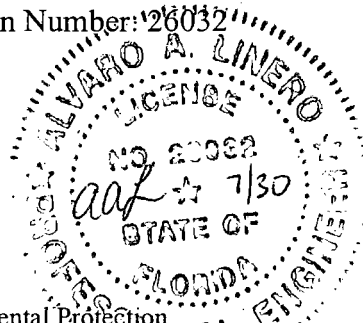
A. A. Linero

7/30/07

A. A. Linero, P.E.

(Date)

Registration Number: 26032





Florida Department of Environmental Protection

Bob Martinez Center
2600 Blairstone Road
Tallahassee, Florida 32399-2400

Charlie Crist
Governor
Jeff Kottkamp
Lt. Governor
Michael W. Sole
Secretary

July 30, 2007

Electronically Sent – Received Receipt Requested

kasheffield@tecoenergy.com

Ms. Karen Sheffield, General Manager
Tampa Electric Company Big Bend Station
Post Office Box 111
Tampa, Florida 33601-0111

Re: Draft: Title V Air Operation Permit No. 0570039-028-AV
Tampa Electric Company – Big Bend Station
Revision of Title V Operation Permit No. 0570039-017-AV

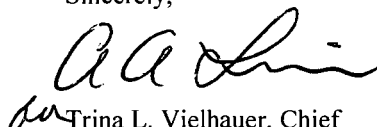
Dear Ms. Sheffield:

On May 1, 2007, you respectively submitted an application for a Title V air operation permit revision to incorporate air construction permit 0570039-025-AC permit for the Big Bend Station, which is located at Big Bend Road, North Ruskin. Enclosed are the following documents: “Statement of Basis”, “DRAFT Title V Air Operation Permit”, “Written Notice of Intent to Issue Title V Air Operation Permit”, and “Public Notice of Intent to Issue Title V Air Operation Permit”.

The “Statement of Basis” summarizes the emissions units regulated by the Title V permit and the revisions made to the permit. The “DRAFT Title V Air Operation Permit” (DRAFT Permit) include specific conditions that regulate the emissions units at this facility. The “Written Notice of Intent to Issue Title V Air Operation Permit” provides important information regarding: the Department’s intent to issue the DRAFT Permit; the requirements for publishing a Public Notice of the Department’s intent to issue the DRAFT Permit; the procedures for submitting comments on the DRAFT Permit; the requirements for requesting a public meeting; the requirements for filing a petition for an administrative hearing; and the availability of mediation. The “Public Notice of Intent to Issue Title V Air Operation Permit” is the actual notice that you must have published in the legal advertisement section of a newspaper of general circulation in the area affected by this project.

If you have any questions, please contact the Project Engineer, Ms. Teresa Heron, at 850/921-9529 or Teresa.Heron@dep.state.fl.us.

Sincerely,


Trina L. Vielhauer, Chief
Bureau of Air Regulation

TLV/aal/th

Enclosures

**WRITTEN NOTICE OF INTENT TO ISSUE
TITLE V AIR OPERATION PERMIT**

*In the Matter of an
Application for a Title V Air Operation Permit by:*

Ms. Karen Sheffield, General Manger
Tampa Electric Company Big Bend Station
Post Office Box 111
Tampa, Florida 33601-0111

DRAFT Air Permit No.: 0570039-028-AV
Big Bend Station
Title V Permit Revision
Hillsborough County, Florida

Facility Location: The Tampa Electric Company (TEC) Big Bend Station is located at Wyandotte Road, Apollo Beach, Hillsborough County, Florida.

Project: On May 1, 2007, the applicant applied to the Department of Environmental Protection (Department) for an application for a Title V Air Operation Permit Revision. Details of the project are provided in the in the application and the enclosed "Statement of Basis" that summarizes the emissions units regulated by the Title V permit and the revisions made to the permit.

Permitting Authority: Applications for Title V air operation permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4, 62-210, and 62-213 and 62-214, Florida Administrative Code (F.A.C.). The proposed project is not exempt from air permitting requirements and an air permit is required to operate the facility. The Bureau of Air Regulation is the Permitting Authority responsible for making a permit determination regarding this project. The Permitting Authority's physical address is: Bureau of Air Regulation at 111 S. Magnolia, Suite 4, Tallahassee, FL 32301. The Permitting Authority's mailing address is: Bureau of Air Regulation, MS 5505, 2600 Blair Stone Road, Tallahassee, FL 32399-2400. The telephone number is 850/488-0114 and facsimile 850/921-9533.

Project File: A complete project file is available for public inspection during the normal business hours of 8:00 a.m. to 5:00 p.m., Monday through Friday (except legal holidays), at the address indicated above for the Permitting Authority. The complete project file includes the DRAFT Permit, the Statement of Basis, the application, and the information submitted by the applicant, exclusive of confidential records under Section 403.111, F.S. Interested persons may view the DRAFT Permit and file electronic comments by visiting the following website: www.dep.state.fl.us/air/eproducts/ards/. A copy of the complete project file is also available at the following offices:

Florida Department of Environmental Protection
Southwest District Office
13051 N. Telecom Parkway
Temple Terrace, Florida 33637-0926
Telephone: (813)632-7600
Facsimile: (813)744-6084

Environmental Protection Commission
of Hillsborough County
Air Management Division
3629 Queen Palm Dr
Tampa, FL 33619-1309
Telephone: (813)627-2600

Notice of Intent to Issue Air Permit: The Department gives notice of its intent to issue a permit to the applicant for the project described above. The applicant has provided reasonable assurance that operation of the facility will not adversely impact air quality and that the project will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-214, 62-296, and 62-297, F.A.C. The Department will issue a PROPOSED Permit and subsequent FINAL Permit in accordance with the conditions of the DRAFT Permit unless a response received in accordance with the following procedures results in a different decision or a significant change of terms or conditions.

Public Notice: Pursuant to Section 403.815, F.S. and Rules 62-110.106 and 62-210.350, F.A.C., you (the applicant) are required to publish at your own expense the enclosed "Public Notice of Intent to Issue Title V Air Operation Permit" (Public Notice). The Public Notice shall be published one time only as soon as possible in the legal advertisement section of a newspaper of general circulation in the area affected by this project. The newspaper used must meet the requirements of Sections 50.011 and 50.031, F.S. in the county where the activity is to take place. If you are uncertain that a newspaper meets these requirements, please contact the Department at above address or phone number. Pursuant to Rule 62-110.106(5), F.A.C., the applicant shall

**WRITTEN NOTICE OF INTENT TO ISSUE
TITLE V AIR OPERATION PERMIT**

provide proof of publication to the Department at the above address within seven (7) days of publication. Failure to publish the notice and provide proof of publication may result in the denial of the permit pursuant to Rule 62-110.106(11), F.A.C.

Comments: The Department will accept written comments concerning the DRAFT Permit for a period of thirty (30) days from the date of publication of this Public Notice. Written comments must be post-marked, and all e-mail or facsimile comments must be received by the close of business (5 pm), on or before the end of this 30-day period, by the Department at the above address, email or facsimile. As part of his or her comments, any person may also request that the Department hold a public meeting on this permitting action. If the Department determines there is sufficient interest for a public meeting, it will publish notice of the time, date, and location on the Department's official web site for notices at <http://faw.dos.state.fl.us> and in a newspaper of general circulation in the area affected by the permitting action. For additional information, contact the Department at the above address or phone number. If written comments or comments received at a public meeting result in a significant change to the DRAFT Permit, the Department will issue a Revised DRAFT Permit and require, if applicable, another Public Notice. All comments filed will be made available for public inspection.

Petitions: A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed with (received by) the Department's Agency Clerk in the Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. Petitions filed by the applicant or any of the parties listed below must be filed within fourteen (14) days of receipt of this Written Notice of Intent to Issue Title V Air Operation Permit. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S., must be filed within fourteen (14) days of publication of the attached Public Notice or within fourteen (14) days of receipt of this Written Notice of Intent to Issue Title V Air Operation Permit, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Department for notice of agency action may file a petition within fourteen (14) days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the Department's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner; the name, address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of how and when each petitioner received notice of the agency action or proposed action; (d) A statement of all disputed issues of material fact. If there are none, the petition must so state; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and, (g) A statement of the relief sought by the petitioner, stating precisely the action the petitioner wishes the agency to take with respect to the agency's proposed action. A petition that does not dispute the material facts upon which the Department's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.


**WRITTEN NOTICE OF INTENT TO ISSUE
TITLE V AIR OPERATION PERMIT**

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Department's final action may be different from the position taken by it in this Written Notice of Intent to Issue Title V Air Operation Permit. Persons whose substantial interests will be affected by any such final decision of the Department on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation: Mediation is not available in this proceeding.

Objections: Finally, pursuant to 42 United States Code (U.S.C.) Section 7661d(b)(2), any person may petition the Administrator of the EPA within sixty (60) days of the expiration of the Administrator's 45 (forty-five) day review period as established at 42 U.S.C. Section 7661d(b)(1), to object to the issuance of any Title V air operation permit. Any petition shall be based only on objections to the Permit that were raised with reasonable specificity during the thirty (30) day public comment period provided in the Public Notice, unless the petitioner demonstrates to the Administrator of the EPA that it was impracticable to raise such objections within the comment period or unless the grounds for such objection arose after the comment period. Filing of a petition with the Administrator of the EPA does not stay the effective date of any permit properly issued pursuant to the provisions of Chapter 62-213, F.A.C. Petitions filed with the Administrator of EPA must meet the requirements of 42 U.S.C. Section 7661d(b)(2) and must be filed with the Administrator of the EPA at: U.S. EPA, 401 M Street, S.W., Washington, D.C. 20460. For more information regarding EPA review and objections, visit EPA's web site at: www.epa.gov/region4/air/permits/Florida.htm.

Executed in Tallahassee, Florida.


Trina L. Vielhauer, Chief
Bureau of Air Regulation

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this "Written Notice of Intent to Issue Air Permit" package (including the Public Notice, the Statement of Basis, and the DRAFT Permit) was sent by electronic mail before the close of business on 7/30/07 to the persons listed below:

Karen Sheffield, TEC: kasheffield@tecoenergy.com

Byron Burrows, TEC: btburrows@tecoenergy.com

Cindy Zhang-Torres, FDEP-SWD: cindy.zhang-torres@dep.state.fl.us

Diana Lee, EPCHC: lee@epchc.org

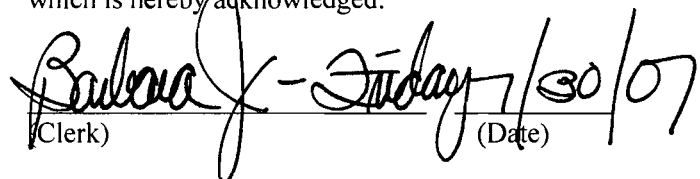
Jeff Sims, EPCHC: simsj@epchc.org

Jim Little, EPA Region 4: little.james@epamail.epa.gov

Kathy Forney, U.S. EPA Region 4: Forney.kathleen@epa.gov

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated agency clerk, receipt of which is hereby acknowledged.



(Clerk) (Date)

STATEMENT OF BASIS

FACILITY DESCRIPTION

The Tampa Electric Company (TEC) Big Bend Station is a nominal 2,028 MW electric generation facility. This facility consists of four coal and petroleum coke-fueled steam generators (Units Nos. 1 through 4); four steam turbines; three simple-cycle combustion turbines (CT Nos. 1, 2, and 3); solid fuels, fly ash, limestone, gypsum, slag, and bottom ash storage and handling facilities; and fuel oil storage tanks. In addition, there is a ship surface coating operation.

PRIMARY REGULATORY REQUIREMENTS

- The facility is a major source of hazardous air pollutants (HAP).
- The facility is a Title V major source of air pollution in accordance with Chapter 213, F.A.C.
- The facility is a major stationary source (PSD-major source) in accordance with Rule 62-212.400, F.A.C.
- The facility operates units subject to the Standards of Performance for New Stationary Sources pursuant to 40 CFR Part 60.
- The steam generators (Units 1 through 4) are not subject to the National Emissions Standards for Hazardous Air Pollutants pursuant to 40 CFR Part 63.
- Units 1 through 4 are subject to the Acid Rain provisions of the Clean Air Act.
- Units 1 through 4 are subject to the Federal Clean Air Interstate Rule (CAIR) in accordance with the Final Department Rules issued pursuant to CAIR as implemented by FDEP in Rule 62-296.470, Florida Administrative Code (F.A.C.).
- Units 1 through 4 are subject to the Federal Clean Air Mercury Rule (CAMR) implemented by the Department in Rule 62-296.480, F.A.C.
- Unit 4 was originally certified pursuant to the power plant siting provisions of Chapter 62-17, F.A.C.

PROJECT DESCRIPTION

On May 1, 2007 TEC submitted an application to revise its facility Title V air operation Permit No. 0570039-017-AV that has an effective date of January 1, 2005. The purpose of the revision is to incorporate the changes approved by air construction permit 0570039-025-AC issued on October 31, 2006. The referenced air construction permit to be incorporated into this operation permit revision authorizes:

- Additional transloading for offsite shipping of coal and petroleum coke that is typically received by barge at the solid fuel yard; and
- Slag transloading.

Emissions points associated with this operation are: (a) the transfer of slag from a barge to the fuel storage yard (b) the transfer of coal, petroleum coke or slag from a storage pile by mobile equipment to trucks, and (c) coal, petroleum coke, or slag truck travel on the facility paved and unpaved roads.

The revision has been prepared as DRAFT Title V air operation permit revision No. 0570039-028-AV.

DETAILS OF REVISION

The overall change to the present Title V Permit is the inclusion of additional conditions from air construction permit No. 0570039-025-AC related to fuel and slag transloading operations at the solid fuel yard. The changes will be made as additional conditions to Subsection H of the Title V Operation Permit. These are listed as conditions H.6 through H.12 in the attached draft revision of Subsection H.

Appendix F has been added and is a list of the known emissions points comprising Emissions Unit 010, Solid Fuel Yard – Fugitive Emissions, and Emissions Units 029 and 030.

ADDITIONAL CHANGE REQUESTED BY TEC

TEC also proposed to modify Specific Condition No. 1 of Construction Permit 0570039-025-AC (refer to attached DRAFT Subsection H, specific condition H.8) to delete the sentence “only one material will be transloaded at a time”.

The requested change will not be made at this time because it contradicts the enforceable condition from the air construction and would require the Department to process a construction permit modification. Furthermore, the applicant did not provide reasonable assurance that the multiple products can be transloaded simultaneously while meeting the permitted visible emissions standards that presently require testing while transloading one product at a time.

TEC can request to demonstrate its ability to comply with the visible emissions standards while transloading multiple products. After such demonstration, TEC can submit a request for a construction permit modification with a description of the reasonable precautions to comply with the visible emissions standards.

CONCLUSION

This project, Title V air operation permit revision No. 0570039-028-AV, revises Title V air operation permit No. 0570039-017-AV, which was effective January 1, 2005. This Title V air operation permit revision is issued under the provisions of Chapter 403, F.S., and Chapters 62-4, 62-210 and 62-213, F.A.C. In accordance with the terms and conditions of this permit, the above named permittee is hereby authorized to operate the facility as shown on the application and approved drawings, plans, and other documents on file with the Department.

**PUBLIC NOTICE OF INTENT TO ISSUE
TITLE V AIR OPERATION PERMIT**

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

DEP File 0570039-028-AV
Revision of Title V Operation Permit

Tampa Electric Company – Big Bend Station
Hillsborough County

Applicant: The applicant for this project is Tampa Electric Company (TEC), Post Office Box 111, Tampa, Florida 33601-0111. The applicant's responsible official is Ms. Karen Sheffield, General Manager.

Facility Location: TEC operates the Big Bend Station located at Wyandotte Road, Apollo Beach, Hillsborough County, Florida. The Big Bend Station consists of four coal and petroleum coke-fueled steam generators (Units Nos. 1 through 4); four steam turbines; three simple-cycle combustion turbines (CT Nos. 1, 2, and 3); solid fuels, fly ash, limestone, gypsum, slag, and bottom ash storage and handling facilities, and fuel oil storage tanks. In addition, there is a ship surface coating operation and a variety of ancillary equipment needed to support operations of this facility.

Project: TEC applied to the Florida Department of Environmental Protection (Department) for an application for a Title V Air Operation Permit Revision to incorporate the terms and conditions of air construction permit 0570039-025-AC. The referenced air construction permit to be incorporated into this operation permit revision allowed additional transloading of coal and petroleum coke typically received by barge at the solid fuel yard for off-site shipping and to authorize slag transloading. Emissions points associated with this operation are: (a) the transfer of slag from a barge to the fuel storage yard (b) the transfer of coal, petroleum coke or slag from a storage pile by mobile equipment to trucks, and (c) coal, petroleum coke, or slag truck travel on the facility paved and unpaved roads.

Permitting Authority: Applications for Title V air operation permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4, 62-210, and 62-213 and 62-214 of the Florida Administrative Code (F.A.C.). The proposed project is not exempt from air permitting requirements and an air permit is required to operate the facility. The Bureau of Air Regulation is the Permitting Authority responsible for making a permit determination regarding this project. The Permitting Authority's physical address is: Bureau of Air Regulation at 111 S. Magnolia, Suite 4, Tallahassee, Florida. The Permitting Authority's mailing address is: Bureau of Air Regulation, MS 5505, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400. The telephone number is (850)488-0114 and facsimile (850)921-9533.

Project File: A complete project file is available for public inspection during the normal business hours of 8:00 a.m. to 5:00 p.m., Monday through Friday (except legal holidays), at address indicated above for the Permitting Authority. The complete project file includes the DRAFT Permit, the Statement of Basis, the application, and the information submitted by the applicant, exclusive of confidential records under Section 403.111, F.S. Interested persons may view the DRAFT Permit and file electronic comments by visiting the following website: www.dep.state.fl.us/air/eproducts/ards/. A copy of the complete project file is also available at the following offices:

Florida Department of Environmental Protection
Southwest District Office
13051 N. Telecom Parkway
Temple Terrace, Florida 33637-0926
Telephone: (813)632-7600
Facsimile: (813)744-6084

Environmental Protection Commission
of Hillsborough County
Air Management Division
3629 Queen Palm Dr
Tampa, FL 33619-1309
Telephone: (813)627-2600

Notice of Intent to Issue a Permit: The Department gives notice of its intent to issue a permit to the applicant for the project described above. The applicant has provided reasonable assurance that operation of the facility will not adversely impact air quality and that the project will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-214, 62-296, and 62-297, F.A.C. The Department will issue a PROPOSED Permit and subsequent FINAL Permit in accordance with the conditions of the DRAFT Permit unless a response received in accordance with the following procedures results in a different decision or a significant change of terms or conditions.

Comments: The Department will accept written comments concerning the DRAFT Permit for a period of thirty (30) days from the date of publication of this Public Notice. Written comments must be post-marked and all e-mail or facsimile comments must be received by the close of business (5 pm) on or before the end of this 30-day period by the Department at the above address, email or facsimile. As part of his or her comments, any person may also

(Public Notice to be Published in the Newspaper)

**PUBLIC NOTICE OF INTENT TO ISSUE
TITLE V AIR OPERATION PERMIT**

request that the Department hold a public meeting on this permitting action. If the Department determines there is sufficient interest for a public meeting, it will publish notice of the time, date, and location on the Department's official web site for notices at <http://faw.dos.state.fl.us> and in a newspaper of general circulation in the area affected by the permitting action. For additional information, contact the Department at the above address or phone number. If written comments or comments received at a public meeting result in a significant change to the DRAFT Permit, the Department shall issue a Revised DRAFT Permit and require, if applicable, another Public Notice. All comments filed will be made available for public inspection.

Petitions: A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed with (received by) the Department's Agency Clerk in the Office of General Counsel of the Department of Environmental Protection at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S., must be filed within fourteen (14) days of publication of this Public Notice or receipt of a written notice, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Department for notice of agency action may file a petition within fourteen (14) days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the Department's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address and telephone number of the petitioner; the name address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial rights will be affected by the agency determination; (c) A statement of how and when the petitioner received notice of the agency action or proposed action; (d) A statement of all disputed issues of material fact. If there are none, the petition must so state; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and, (g) A statement of the relief sought by the petitioner, stating precisely the action the petitioner wishes the agency to take with respect to the agency's proposed action. A petition that does not dispute the material facts upon which the Department's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Department's final action may be different from the position taken by it in this Public Notice of intent. Persons whose substantial interests will be affected by any such final decision of the Department on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation: Mediation is not available for this proceeding.

Objections: In addition to the above right to petition, pursuant to 42 United States Code (U.S.C.) Section 7661d(b)(2), any person may petition the Administrator of the EPA within sixty (60) days of the expiration of the Administrator's 45 (forty-five) day review period as established at 42 U.S.C. Section 7661d(b)(1), to object to the issuance of any Title V air operation permit. Any petition shall be based only on objections to the Permit that were raised with reasonable specificity during the thirty (30) day public comment period provided in the Public Notice, unless the petitioner demonstrates to the Administrator of the EPA that it was impracticable to raise such objections within the comment period or unless the grounds for such objection arose after the comment period. Filing of a petition with the Administrator of the EPA does not stay the effective date of any permit properly issued pursuant to the provisions of Chapter 62-213, F.A.C. Petitions filed with the Administrator of EPA must meet the requirements of 42 U.S.C. Section 7661d(b)(2) and must be filed with the Administrator of the EPA at: U.S. EPA, 401 M Street, S.W., Washington, D.C. 20460. For more information regarding EPA review and objections, visit EPA's Region 4 web site at www.epa.gov/region4/air/permits/Florida.htm.

DRAFT TITLE V PERMIT REVISION

This permitting action will revise Subsection H by adding specific conditions H.6 through H.12.

Subsection H. Solid Fuel Yard

This section addresses the following Regulated Emissions Units:

<u>E.U. ID No.</u>	<u>Brief Description</u>
010	Solid Fuel Yard, Fugitive Emissions
029	Cyclone collectors for fuel blending bins (FH-032 through FH-035)
030	Cyclone collectors for fuel mills (FH-048 and FH-049)

Descriptions

Solid fuel is unloaded from ship/barge into the Solid fuel yard, the blending bins or directly to the tripper room via belt conveyors. Solid fuel from the piles is loaded onto belt conveyors using a rail mounted or mobile reclaimer. The solid fuel is then belt conveyed to the blending bins, which consists of six storage bins, where the solid fuel may be blended for use at the plant, or transloaded into trucks for shipment off site. Particulate matter (PM) emissions from the conveyors in the blending bins are controlled by 4 rotoclones, one at the conveyor drop, and one for every 2 bins. Blending bins can either feed the transloader, or solid fuel can be conveyed, via 2 parallel belts (T1, T2) to 2 crushers (each belt has a crusher), or diverted directly to the tripper room. PM emissions from the 2 crushers and transfer tower are controlled by 2 rotoclones.

From the tripper room, 2 trippers bunker the solid fuels into 4 solid fuel bunkers. Each unit has its own respective bunker. From the bunkers, the solid fuel is gravity fed into 14 mills, and then fed into the boilers. There are 3 ball mills, each for Unit Nos. 1 – 3, and 5 bowl mills for Unit No. 4. From the mills, the solid fuel is pneumatically fed into classifiers, two for each mill on Unit Nos. 1-3 and one for each mill on Unit No. 4 for a total of 23 classifiers, and then into the respective boilers.

The following conditions apply to the Emissions Units listed above:

H.1. TEC shall maintain a daily log of the amounts and types of fuels used and copies of fuel analyses containing information on sulfur content, ash content and heating values.

[Power Plant Siting Certification PA 79-12]

H.2. Particulate matter emissions from the solid fuel handling facilities:

- (a) Pursuant to Chapter 1-3.62 Rules of the Environmental Protection Commission of Hillsborough County, visible emission shall not exceed 20% opacity for any unconfined emission unit in the fuel yard. Unconfined emissions as defined by Rule 62-296.200, F.A.C., shall include the static fuel piles, etc. Pursuant to Rule 62.296.711(2), F.A.C., visible emissions shall not exceed 5 percent opacity for the remaining emission units in the fuel yard. Visible emissions compliance tests shall be demonstrated using EPA Reference Method 9, 40 CFR Part 60, Appendix A, Visual Determination of Fugitive Emissions from Material Sources (July 1, 1993 version). All testing shall be done within 90 days of completing reconfiguration of the fuel yard, and prior notification of testing shall be submitted in writing at least 15 days beforehand to the EPC of Hillsborough County. Particulate emissions shall be controlled by use of control devices. Tampa Electric will perform an annual VE test to demonstrate compliance with the opacity standard established for the solid fuel yard.

DRAFT TITLE V PERMIT REVISION

- (b) The permittee must submit to the Department within ten (10) working days after it becomes available, copies of technical data pertaining to the selected particulate emissions control for the coal handling facility. These data should include, but not be limited to, guaranteed efficiency and emission rates, and major design parameters such as air/cloth ratio and flow rate. The Department may, upon review of these data, disapprove the use of such device if the Department determines the selected control device to be inadequate to meet the emission limits specified in condition (a) above. Such disapproval shall be issued within 30 days of receipt of the technical data.
- (c) The fuel pile operations are subject to Rule 62-296.310(3), F.A.C., Unconfined Emissions of Particulate Matter. Reasonable precautions to minimize unconfined particulate matter shall be in accordance with Rule 62-296.310(3)(c), F.A.C.,; and, may include, but shall not be limited to, the coating of roads and construction sites used by contractors and regrassing or watering areas of disturbed fuel.
- (d) From each fuel transloading source/emissions point (i.e., off-loading and loading of fuel {for export from Big Bend Station}), the maximum hourly transloading transfer of fuel shall not exceed 4,000 tons, 24-hour rolling average.
- (e) From each fuel transloading source/emissions point, (i.e., off-loading and loading of fuel {for export from Big Bend Station}), the maximum annual transloading transfer of fuel shall not exceed 1,428,030 tons.
- (f) The number of railcars and trucks and the quantity of fuel loaded by each fuel transloading source/emissions point (i.e., off-loading and loading of fuel {for export from Big Bend Station*}) shall be recorded, maintained, and kept on file for a minimum of five years. The annual quantity of fuel loaded by each fuel transloading source/emissions point shall be submitted in the Annual Operation Report.

[Power Plant Siting Certification PA 79-12]

*Permitting Note.

- H.3. All conveyors and conveyor transfer points shall be enclosed to preclude particulate matter emissions excepting the coal handling stacker reclaimer, the tail end conveyor feeding the tripper and the barge unloading belt which are exempted for feasibility considerations. [PSD-FL-040]
- H.4. Coal storage piles shall be shaped, compacted and oriented to minimize wind erosion. [PSD-FL-040]
- H.5. Water sprays for storage piles, handling equipment, etc., including the handling equipment exempted from the conveyor enclosure requirement, shall be applied during dry periods and as necessary to all facilities to maintain opacity below 20 percent. [Rules 62-4.160(2) and 62-296.320(4)(c), F.A.C.]
- H.6. An updated list of the Emissions Points (FH-001 through FH-076b) related to Emissions Units 010, 029 and 030 is attached as Appendix F. [Permit No. 0570039 -025-AC]

Operating Requirements

- H.7. Hours of Operation. The solid fuel yard is allowed to operate continuously, i.e., 8,760 hours/year. [Rules 62-4.160(2) and 62-210.200, F.A.C., P.T.E.; Permit No. 0570039 -025-AC]

DRAFT TITLE V PERMIT REVISION

The subsequent conditions address these listed Emissions Points related to Emissions Unit 010:

Emissions Point	Description of Emissions Point
FH-074a PET	Reclaim from Petcoke Storage Pile to Trucks
FH-074b COAL	Reclaim from Coal Storage Pile to Trucks
FH 074c SLAG	Reclaim from Slag Storage Pile to Trucks
FH-075a PET/COAL/SLAG	Truck Traffic (paved roads, empty trucks)
FH 075b PET/COAL/SLAG	Truck Traffic (paved roads, full trucks)
FH-076a PET/COAL/SLAG	Truck Traffic (unpaved roads, empty trucks)
FH-076b PET/COAL/SLAG	Truck Traffic (unpaved roads, full trucks)

Description of Operations related to Emissions Unit 010/Emissions Points FH-074a – FH-076b

Coal, petcoke, or slag related to the additional transloading is brought in by barge at infrequent intervals and transferred to Transfer Station T2 using existing conveyors. From Station T2, the transloaded materials are transferred to storage piles located in the fuel yard using a combination of existing conveyors. The coal, petcoke, and slag is then loaded into trucks using front-end loaders for off-site shipment.

Essential Potential to Emit (PTE) Parameters

H.8. Materials Allowed and Permitted Capacity. The allowable materials to be transloaded via the emission points listed above as FH-074, FH-075, and FH-076 are coal (except residual coal), petcoke or slag. Maximum annual transloading rates at these three additional emissions points shall not exceed 150,000 tons per year for each material and 450,000 tons per year for all three materials combined; only one material will be transloaded at a time.

The maximum solid fuel/slag transloading shall not exceed 4,000 tons per hour on a 24-hr rolling average and shall not exceed 1,428,030 tons per year.

[Rules 62-4.070 (3), and 62-210.200 (PTE), F.A.C.; Site Certification No. PA79-12 C and D; and Permit No. 0570039-025-AC]

Emission Limitations and Standards

H.9. Visible Emissions. Visible emissions generated by fugitive or unconfined particulate matter from this transloading operation (emissions points FH-074a, FH-074b, and FH-074c) shall not exceed 20% opacity. [Rule 62-296.320(4)(b)1, F.A.C.; Permit No. 0570039 –025-AC]

Test Methods and Procedures

H.10. Test Methods and Frequency: Visible emissions shall be determined using EPA Method 9, adopted and incorporated by reference in Rule 62-204.800, F.A.C., and referenced in Chapter 62-297, F.A.C. Annual testing shall be performed on emissions points FH-074a PET and FH-074b COAL. For the purpose of the VE test, the hourly transloading rate to trucks at the subject emissions points shall be as close to 144 tons per hour as practicable.

[Rules 62-204.800, 62-297.310(7)(a)4., and 62-297.400, F.A.C.; Permit No. 0570039-025-AC]

{Permitting Note: No annual testing is required for emission point FH-074c SLAG assuming the initial visible emissions test performed validates that slag handling has minimal emissions.}

DRAFT TITLE V PERMIT REVISION

Reasonable Assurances

- H.11. Controls: All controls associated with the transfer points (i.e., the enclosures and dust suppression) shall be maintained to the extent that the capture efficiencies credited will be achieved. Trucks used to transport coal, petcoke or slag shall utilize tarps at all times except when loading/unloading. Reasonable precautions to prevent unconfined emissions of particulate matter shall be in accordance with Rule 62-296.320(4), F.A.C. and are enumerated in Appendix C, Common Condition 11. of Permit No. 0570039-025-AC.
[Rule 62-4.070(3), and Rule 62-296.320(4) (c) F.A.C.; Permit No. 0570039-025-AC]

Reports and Records

- H.12. Recordkeeping and Report Duration: The quantity and type of fuel loaded and transported off-site by each fuel transloading operation emissions point covered in this permit shall be recorded and maintained. The annual quantity of each transloaded material shall be submitted in the Annual Operation Report. All reports and records required by this permit shall be kept for at least (5) years from the date the information was recorded.
[Rule 62-4.160(14)(b), F.A.C. and Permit No. 0570039-025-AC]

APPENDIX F – Solid Fuel Yard Fugitives Emissions Points

The Big Bend Solid Fuel Yard includes ARMS Emissions Units 010, 029 and 030 with the following emissions points:

<u>Description</u>	<u>Facility Emissions Point</u>	<u>Emissions Unit ID. No.</u>
Barge Clamshell to Conveyor D1	FH-001	010
Barge Bucket Elevator to Conveyor A1	FH-002	010
Conveyor A1 to Conveyor B1	FH-003	010
Conveyor B1 to Conveyor D1	FH-004	010
Self-Unloading Barge to Conveyor D1	FH-005	010
Conveyor D1 to Conveyor E1	FH-006	010
Conveyor E1 to Conveyor Y or Conveyor F1	FH-007	010
Conveyor Y to Conveyor Z	FH-008a	010
Conveyor Z to West Emergency Pile	FH-008b	010
Dozer Operations on West Emergency Storage Pile	FH-009	010
West Emergency Storage Pile	FH-010	010
Dozer Reclaim from West Emergency Pile to Portable Conveyor	FH-011a	010
Conveyor Z to Conveyor P	FH-012	010
Conveyor P to Intermediate Conveyor	FH-013	010
Intermediate Conveyor to North Stacker Conveyor (G2)	FH-014	010
North Stacker Conveyor (G2) to North/Center Storage Pile	FH-015	010
Mobile Reclaimer to North Stacker Conveyor (G2)	FH-016	010
North Stacker Conveyor (G2) to Conveyor P	FH-017	010
Dozer Operations on North Storage Pile	FH-018	010
North Storage Pile	FH-019	010
Dozer Operations on Middle (Common) Storage Pile	FH-020	010
Fuel Storage - Middle (Common) Storage Pile	FH-021	010
Conveyor F1 to South Stacker Conveyor (G1)	FH-022	010
South Stacker Conveyor (G1) to South/Center Storage Pile	FH-023	010
South Reclaimer to South Reclaimer Conveyor (G1)	FH-024	010
South Reclaimer Conveyor (G1) to Conveyor F1	FH-025	010
Dozer Operations on South Storage Pile	FH-026	010
South Storage Pile	FH-027	010
Conveyor P to Conveyor J2	FH-028	010
Conveyor J2 to Conveyor Q2	FH-029	010
Conveyor F1 to Conveyor J1	FH-030	010
Conveyor J1 to Conveyor Q1	FH-031	010
Blending Bins to Conveyors T1, T2	FH-036 thru FH-047	010
Crusher to Conveyor W1	FH-050	010
Crusher to Conveyor W2	FH-051	010
Conveyor U to East Emergency Storage Pile	FH-052	010
Dozer Operations on East Emergency Storage Pile	FH-053	010
East Emergency Storage Pile	FH-054	010
Conveyor W1 to Conveyor L1	FH-055	010
Conveyor W2 to Conveyor L2	FH-056	010
Dozer Reclaim from East Emergency Pile to "K" Feeders	FH-057	010
"K" Feeders to Conveyors L1 or L2	FH-058	010
Conveyors L1 and L2 to Conveyors M1 and M2, and Conveyors M1 and M2 to Coal Bunkers	FH-059 thru FH-062	010
Dozer Operations on Storage Pile	FH-063	010

APPENDIX F – Solid Fuel Yard Fugitives Emissions Points

Dozer Reclaim from Storage Pile to Loadout Conveyor	FH-064	010
Loadout Conveyor to Rail Transfer Conveyor	FH-065	010
Railcar Loading	FH-066	010
Non-TEC Fuel Stockpile to Loadout Conveyor	FH-067	010
Non-TEC Fuel Truck Loading	FH-068	010
Polk Fuel Truck Loading	FH-069	010
Long Term Storage Pile	FH-070	010
Dozer Operations on Long Term Storage Pile	FH-071	010
Trucks, Full	FH-072	010
Trucks, Empty	FH-073	010
Reclaim from Petcoke Storage Pile to Trucks (PET)	FH-074a	010
Reclaim from Coal Storage Pile to Trucks (COAL)	FH-074b	010
Reclaim from Slag Storage Pile to Trucks (SLAG)	FH 074c	010
Truck Traffic (paved roads, empty trucks) (PET/COAL/SLAG)	FH-075a	010
Truck Traffic (paved roads, full trucks) (PET/COAL/SLAG)	FH-075b	010
Truck Traffic (unpaved roads, empty trucks) PET/COAL/SLAG	FH-076a	010
Truck Traffic (unpaved roads, full trucks) PET/COAL/SLAG	FH-076b	010
Conveyors Q1 and Q2 to Blending Bins	FH-032 thru FH-035	029
Conveyor T1 to Crusher #1	FH-048	030
Conveyor T2 to Crusher #2	FH-049	030

Friday, Barbara

From: Nelson, Deborah
Sent: Monday, July 30, 2007 4:44 PM
To: 'kasheffield@tecoenergy.com'; 'btburrows@tecoenergy.com'; Zhang-Torres; 'lee@epchc.org'; 'simsj@epchc.org'; 'little.james@epamail.epa.gov'; 'forney.kathleen@epa.gov'
Cc: Nelson, Deborah; Friday, Barbara; Heron, Teresa; Linero, Alvaro
Subject: Tampa Electric Company-Big Bend Station, DRAFT Air Permit No. 0570039-028-AV
Attachments: 0570039-028-AV.pdf

Dear Sir/Madam:

Please send a "reply" message verifying receipt of the attached document(s); this may be done by selecting "Reply" on the menu bar of your e-mail software and then selecting "Send". We must receive verification of receipt and your reply will preclude subsequent e-mail transmissions to verify receipt of the document(s).

The document(s) may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible.

The document is in Adobe Portable Document Format (pdf). Adobe Acrobat Reader can be downloaded for free at the following internet site:
<http://www.adobe.com/products/acrobat/readstep.html>.

The Bureau of Air Regulation is issuing electronic documents for permits, notices and other correspondence in lieu of hard copies through the United States Postal System, to provide greater service to the applicant and the engineering community. Please advise this office of any changes to your e-mail address or that of the Engineer-of-Record.

Thank you,

DEP, Bureau of Air Regulation

Debbie Nelson
Meteorologist
Air Permitting South
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7/31/2007