

**Sheplak, Scott**

-file-

**From:** Sheplak, Scott  
**Sent:** Friday, September 11, 2009 1:19 PM  
**To:** Pennington, Jim  
**Cc:** Phillips, Cindy; Holtom, Jonathan; 'Waters, Jason'  
**Subject:** RE: Order Entering Second Amendment to Tampa Electric CD, along with copy of 2d Amendment signed by District Judge . . .

Thanks Jim.

TECO had been under this federal enforcement with the U.S. Big Bend is greatly reducing air pollutant emissions under the federal consent decree. The newly formatted/renewed Title V permit I am working on will reflect the significant air pollutant emission reductions. The Big Bend units along with Gulf Power units are in a group of the largest emitters in the state of Florida. I do not think the U.S. ever settled the Gulf Power-Crist notice of violation. Thanks for the quick response!

Scott

-----Original Message-----

**From:** Pennington, Jim  
**Sent:** Friday, September 11, 2009 11:37 AM  
**To:** Sheplak, Scott  
**Cc:** Phillips, Cindy; Holtom, Jonathan; 'Waters, Jason'  
**Subject:** FW: Order Entering Second Amendment to Tampa Electric CD, along with copy of 2d Amendment signed by District Judge . . .

Scott,

I talked to David Lloyd and this e-mail forwards his e-mail with the second amendment attached. It has been entered by the court. He said that TECO is on track with the conditions of the Consent Decree and has greatly reduced emissions as a result. The compliance plan needs to reflect that the court has approved the amendment.

Jim

-----Original Message-----

**From:** Lloyd.David@epamail.epa.gov [mailto:Lloyd.David@epamail.epa.gov]  
**Sent:** Friday, September 11, 2009 11:20 AM  
**To:** Pennington, Jim  
**Subject:** Fw: Order Entering Second Amendment to Tampa Electric CD, along with copy of 2d Amendment signed by District Judge . . .

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----- Forwarded by David Lloyd/R4/USEPA/US on 09/11/2009 11:19 AM -----

**From:** "Mariani, Tom (ENRD)" <TMariani@ENRD.USDOJ.GOV>

To: Michiko Kono/R4/USEPA/US@EPA, David Lloyd/R4/USEPA/US@EPA, Shaun Burke/DC/USEPA/US@EPA

Cc: "Davis, Buffy (ENRD)" <BDavis@ENRD.USDOJ.GOV>, "ENRD-NOX Case Emails" <NOXCase@ENRD.USDOJ.GOV>

Date: 06/22/2009 11:48 AM

Subject: Order Entering Second Amendment to Tampa Electric CD, along with copy of 2d Amendment signed by District Judge . . .

(See attached file: FDS[2].pdf)

**Tracking:**

**Recipient**

Pennington, Jim  
Phillips, Cindy  
Holtom, Jonathan  
'Waters, Jason'

**Delivery**

Delivered: 9/11/2009 1:19 PM  
Delivered: 9/11/2009 1:19 PM  
Delivered: 9/11/2009 1:19 PM

**Read**

Read: 9/11/2009 1:53 PM  
  
Read: 9/11/2009 1:28 PM

**Sheplak, Scott***-file-*

**From:** Sheplak, Scott  
**Sent:** Friday, September 11, 2009 9:38 AM  
**To:** Pennington, Jim  
**Cc:** Phillips, Cindy; Holtom, Jonathan  
**Subject:** RE: Big Bend Title V Compliance Plan

<b>Tracking:</b>	<b>Recipient</b>	<b>Delivery</b>
	Pennington, Jim	Delivered: 9/11/2009 9:38 AM
	Phillips, Cindy	Delivered: 9/11/2009 9:38 AM
	Holtom, Jonathan	Delivered: 9/11/2009 9:38 AM

Jim thanks for looking into this for me. Have a great Friday!

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**From:** Sheplak, Scott  
**Sent:** Wednesday, September 09, 2009 1:13 PM  
**To:** Holtom, Jonathan  
**Cc:** Phillips, Cindy  
**Subject:** FW: Big Bend Title V Compliance Plan

Fyi

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**From:** Ward, Julie M. [mailto:jmward@tecoenergy.com]  
**Sent:** Wednesday, September 09, 2009 1:09 PM  
**To:** Sheplak, Scott  
**Cc:** Burrows, Byron T.  
**Subject:** Big Bend Title V Compliance Plan

Scott,

I have attached the Compliance plan for the Consent Decree outstanding items.

Thank you and please let me know if you have any questions or comments.

Julie Ward  
 Engineer  
 EH&S Air Programs  
 Tampa Electric Company

Office: (813) 228-4740  
 Cell: (813) 476-3237  
 Fax: (813) 228-1308  
 Email: [jmward@tecoenergy.com](mailto:jmward@tecoenergy.com)

9/11/2009

**Sheplak, Scott**

-file-

**From:** Ward, Julie M. [jimward@tecoenergy.com]  
**Sent:** Monday, October 05, 2009 6:12 PM  
**To:** Sheplak, Scott  
**Cc:** Burrows, Byron T.  
**Subject:** RE: Big Bend Title V air operation/Title IV acid rain permit renewal

Scott,

I will be sending the requested information in items 1 and 2 as soon as possible.

Regarding the third item, the CT's 2 & 3 were permanently removed from site on December 22, 2008.

Thank you and please let me know if you need anything further.

Julie Ward

-----Original Message-----

**From:** Sheplak, Scott [mailto:Scott.Sheplak@dep.state.fl.us]  
**Sent:** Thursday, October 01, 2009 5:28 PM  
**To:** Ward, Julie M.; Burrows, Byron T.  
**Cc:** Tom Davis; Holtom, Jonathan  
**Subject:** Big Bend Title V air operation/Title IV acid rain permit renewal

As a follow up to our recent telephone conversation, I need the following previously requested items in order to process the Title V air operation/Title IV acid rain permit renewal:

1. Current executed (signed & dated by D.R.) Acid Rain Phase II NO<sub>x</sub> Compliance Plan(s) and Averaging Plan(s); 2. The proposed CAM Plan with justification to include the data used to support all proposed indicators and ranges, certified by a Florida P.E.: and,
3. Regarding the CT Nos. 2 & 3 - What were the dates (Month day, 2008) that these units were removed from the site? {The retired CAIR unit exemption forms indicate that the "permanent retirement dates" were September 30, 2008 for both units.}.

As part of the Title V air operation permit renewal application submitted, the application simply references a Phase II NO<sub>x</sub> Averaging Plan previously submitted on 06/28/2004 (copy attached)." We need current applicable Phase II NO<sub>x</sub> acid rain form(s) to be submitted. Our web site (<http://www.dep.state.fl.us/Air/forms/acidrain.htm>) contains the current forms. Note, the EPA form is available to be used as the Compliance Plan.

If you want to have a renewed permit by 01/01/2010, we need these items as soon as possible, absolutely no later than 10/13/2009 so that we can issue a Draft/Proposed permit.

If you should have any questions or comments, feel free to contact me.

Sincerely,

Scott M. Sheplak, P.E.  
DEP - Title V Section  
Mail Station #5505  
2600 Blair Stone Road  
Tallahassee, FL 32399

Telephone 850/921-9532  
Fax 850/921-9533

The Department of Environmental

Protection values your feedback as a customer. DEP Secretary Michael W. Sole is committed to continuously assessing and

improving the level and quality of services provided to you. Please take a few minutes to comment on the quality of service you received. Copy the url below to a web browser to complete the DEP

survey: <http://survey.dep.state.fl.us/?refemail=Scott.Sheplak@dep.state.fl.us> Thank you in advance for completing the survey.

NOTICE: This email is intended only for the individual(s) to whom it is addressed and may contain confidential information. If you have received this email by mistake, please notify the sender immediately, delete this email from your system and do not copy or disclose it to anyone else. Although we take precautions to protect against viruses, we advise you to take your own precautions to protect against viruses as we accept no liability for any which remain.

**Sheplak, Scott**

-file-

**From:** Ward, Julie M. [jmward@tecoenergy.com]  
**Sent:** Thursday, September 24, 2009 12:52 PM  
**To:** Sheplak, Scott  
**Cc:** Burrows, Byron T.  
**Subject:** RE: RICE information

Scott,

All of the engines in the table are compression ignition engines (using diesel fuel).

E.U. ID No. -043 is the Diesel Emergency Black Start Generator listed last on the table I sent you. Also, the "coal field generator" is not currently on site or put on service but will be during the month of October 2009.

Thank you and let me know if you need anything else.

Julie

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**From:** Sheplak, Scott [mailto:Scott.Sheplak@dep.state.fl.us]  
**Sent:** Thursday, September 24, 2009 12:12 PM  
**To:** Ward, Julie M.  
**Cc:** Burrows, Byron T.  
**Subject:** RE: RICE information

From: Julie M. Ward  
 Sent: Thursday, September 24, 2009 12:52 PM  
 To: Scott Sheplak  
 Subject: RE: RICE information

Thanks, it seems every utility has "ICE."

Are the engines in the submitted table below all compression ignition (CI) type engines?

Also, are any of the engines identified in the submitted table below (specifically, the "coal field generator" or the "diesel emergency black start generator") the same as the engine referenced as the "Caterpillar 800 kW engine" assigned E.U. ID No. -043 under Permit No. 0570039-040-AC?

*The Department of Environmental Protection values your feedback as a customer. DEP Secretary Michael W. Sole is committed to continuously assessing and improving the level and quality of services provided to you. Please take a few minutes to comment on the quality of service you received. Simply click on [this link to the DEP Customer Survey](#). Thank you in advance for completing the survey.*

**From:** Ward, Julie M. [mailto:jmward@tecoenergy.com]  
**Sent:** Wednesday, September 23, 2009 1:30 PM  
**To:** Sheplak, Scott  
**Cc:** Burrows, Byron T.  
**Subject:** RICE information

Scott,

9/24/2009

### RICE Engine Applicability Table

Quantity	Engine	In-Service Date	HP Rating	Rule Applicability
1	Emergency Diesel Generator	July 1984	550 bhp	NESHAPS Subpart <i>ZZZZ</i>
1	Emergency Diesel Generator	June 1975	160 bhp	NESHAPS Subpart <i>ZZZZ</i>
1	Emergency Diesel Generator	June 1970	160 bhp	NESHAPS Subpart <i>ZZZZ</i>
1	Fire Pump Engine	January 2000	596 bhp	NESHAPS Subpart <i>ZZZZ</i>
1	Coal Field Generator	October 2009	349	NESHAPS Subpart <i>ZZZZ</i>
1	Diesel Emergency Black Start Generator	August 2009	1495 bhp	NESHAPS Subpart III  NESHAPS Subpart <i>ZZZZ</i>



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OCT 03 2008

BUREAU OF AIR REGULATION

October 2, 2008

Ms. Trina Vielhauer  
Chief, Bureau of Air Regulation  
Florida Department of Environmental Protection  
Bureau of Air Regulation  
MS 5505  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

Via FedEx  
Airbill No. 7921 1814 9226

Re: Tampa Electric Company  
Big Bend Power Station (ORIS 0645)  
Emission Unit ID's 005 & 006  
DEP Form No. 62 210.900(1)(a)5

Dear Ms. Vielhauer

Attached are the completed DEP Forms 62 210.900(1)(a)5 in order to designate the above referenced units as Retired Units under the applicable programs: CAIR NO<sub>x</sub> Annual, CAIR SO<sub>2</sub> and CAIR NO<sub>x</sub> Ozone Season.

If you have any questions or comments, please contact me at (813) 228-1282.

Sincerely,

Byron T. Burrows, P.E.  
Alternate Acid Rain Designated Representative  
Environmental, Health & Safety

EHS/tik/JMW165

Enclosures

cc: Laurel DeSantis, EPA CAMD

TAMPA ELECTRIC COMPANY  
P. O. BOX 111 TAMPA, FL 33601-0111

(813) 228-4111

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# Retired Unit Exemption

For more information, see instructions and refer to 40 CFR 72.8, 96.105, 96.205, 96.305, and 60.4105, or a comparable state regulation, as applicable.

This submission is:  New  Revised

## STEP 1

Identify the unit by facility (source) name, State, ORIS/plant code and unit ID#.

Big Bend Power Station	FL	0645	005
Facility (Source) Name	State	ORIS/Plant Code	Unit ID#

## STEP 2

Indicate the program(s) that the unit is subject to:

- ~ CAIR NO<sub>x</sub> Annual
- ~ CAIR SO<sub>2</sub>
- ~ CAIR NO<sub>x</sub> Ozone Season

## STEP 3

Identify the date on which the unit was (or will be) permanently retired.

9/30/2008
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OCT 03 2008

BUREAU OF AIR REGULATION

## STEP 4

If the unit is subject to the Acid Rain Program, identify the first full calendar year in which the unit meets (or will meet) the requirements of 40 CFR 72.8(d).

January 1, 2009
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## STEP 5

Read the appropriate special provisions.

### Acid Rain Program Special Provisions

- (1) A unit exempt under 40 CFR 72.8 shall not emit any sulfur dioxide and nitrogen oxides starting on the date that the exemption takes effect. The owners and operators of the unit will be allocated allowances in accordance with 40 CFR part 73 subpart B.
- (2) A unit exempt under 40 CFR 72.8 shall not resume operation unless the designated representative of the source that includes the unit submits a complete Acid Rain permit application under 40 CFR 72.31 for the unit not less than 24 months prior to the date on which the unit is first to resume operation.
- (3) The owners and operators and, to the extent applicable, the designated representative of a unit exempt under 40 CFR 72.8 shall comply with the requirements of the Acid Rain Program concerning all periods for which the exemption is not in effect, even if such requirements arise, or must be complied with, after the exemption takes effect.
- (4) For any period for which a unit is exempt under 40 CFR 72.8, the unit is not an affected unit under the Acid Rain Program and 40 CFR part 70 and 71 and is not eligible to be an opt-in source under 40 CFR part 74. As an unaffected unit, the unit shall continue to be subject to any other applicable requirements under 40 CFR parts 70 and 71.
- (5) For a period of 5 years from the date the records are created, the owners and operators of a unit exempt under 40 CFR 72.8 shall retain, at the source that includes the unit, records demonstrating that the unit is permanently retired. The 5-year period for keeping records may be extended for cause, at any time prior to the end of the period, in writing by the Administrator or the permitting authority. The owners and operators bear the burden of proof that the unit is permanently retired.
- (6) On the earlier of the following dates, a unit exempt under 40 CFR 72.8(b) or (c) shall lose its exemption and become an affected unit under the Acid Rain Program and 40 CFR part 70 and 71: (i) the date on which the designated representative submits an Acid Rain permit application under paragraph (2); or (ii) the date on which the designated representative is required under paragraph (2) to submit an Acid Rain permit application. For the purpose of applying monitoring requirements under 40 CFR part 75, a unit that loses its exemption under 40 CFR 72.8 shall be treated as a new unit that commenced commercial operation on the first date on which the unit resumes operation.

### CAIR NO<sub>x</sub> Annual Trading Program Special Provisions

- (1) A unit exempt under 40 CFR 96.105(a) shall not emit any nitrogen oxides, starting on the date that the exemption takes effect.
- (2) The permitting authority will allocate CAIR NO<sub>x</sub> allowances under 40 CFR 96 subpart EE to a unit exempt under 40 CFR 96.105(a).
- (3) For a period of 5 years from the date the records are created, the owners and operators of a unit exempt under 40 CFR 96.105(a) shall retain, at the source that includes the unit, records demonstrating that the unit is permanently retired. The 5-year period for keeping records may be extended for cause, at any time before the end of the period, in writing by the permitting authority or the Administrator. The owners and operators bear the burden of proof that the unit is permanently retired.
- (4) The owners and operators and, to the extent applicable, the CAIR designated representative of a unit exempt under 40 CFR 96.105(a) shall comply with the requirements of the CAIR NO<sub>x</sub> Annual Trading Program concerning all periods for which the exemption is not in effect, even if such requirements arise, or must be complied with, after the exemption takes effect.
- (5) A unit exempt under 40 CFR 96.105(a) and located at a source that is required, or but for this exemption would be required, to have a title V operating permit shall not resume operation unless the CAIR designated representative of the source submits a complete CAIR permit application under 40 CFR 96.122 for the unit not less than 18 months (or such lesser time provided by the permitting authority) before the later of January 1, 2009 or the date on which the unit resumes operation.
- (6) On the earlier of the following dates, a unit exempt under 40 CFR 96.105(a) shall lose its exemption:
  - (i) The date on which the CAIR designated representative submits a CAIR permit application for the unit under 40 CFR 96.105(b)(5);
  - (ii) The date on which the CAIR designated representative is required under 40 CFR 96.105(b)(5) to submit a CAIR permit application for the unit; or
  - (iii) The date on which the unit resumes operation, if the CAIR designated representative is not required to submit a CAIR permit application for the unit.
- (7) For the purpose of applying monitoring, reporting, and recordkeeping requirements under 40 CFR 96 subpart HH, a unit that loses its exemption under 40 CFR 96.105(a) shall be treated as a unit that commences commercial operation on the first date on which the unit resumes operation.

### CAIR SO<sub>2</sub> Trading Program Special Provisions

- (1) A unit exempt under 40 CFR 96.205(a) shall not emit any sulfur dioxide, starting on the date that the exemption takes effect.
- (2) For a period of 5 years from the date the records are created, the owners and operators of a unit exempt under 40 CFR 96.205(a) shall retain, at the source that includes the unit, records demonstrating that the unit is permanently retired. The 5-year period for keeping records may be extended for cause, at any time before the end of the period, in writing by the permitting authority or the Administrator. The owners and operators bear the burden of proof that the unit is permanently retired.
- (3) The owners and operators and, to the extent applicable, the CAIR designated representative of a unit exempt under 40 CFR 96.205(a) shall comply with the requirements of the CAIR SO<sub>2</sub> Trading Program concerning all periods for which the exemption is not in effect, even if such requirements arise, or must be complied with, after the exemption takes effect.
- (4) A unit exempt under 40 CFR 96.205(a) and located at a source that is required, or but for this exemption would be required, to have a title V operating permit shall not resume operation unless the CAIR designated representative of the source submits a complete CAIR permit application under 40 CFR 96.222 for the unit not less than 18 months (or such lesser time provided by the permitting authority) before the later of January 1, 2010 or the date on which the unit resumes operation.
- (5) On the earlier of the following dates, a unit exempt under 40 CFR 96.205(a) shall lose its exemption:
  - (i) The date on which the CAIR designated representative submits a CAIR permit application for the unit under 40 CFR 96.205(b)(4);
  - (ii) The date on which the CAIR designated representative is required under 40 CFR 96.205(b)(4) to submit a CAIR permit application for the unit; or
  - (iii) The date on which the unit resumes operation, if the CAIR designated representative is not required to submit a CAIR permit application for the unit.
- (6) For the purpose of applying monitoring, reporting, and recordkeeping requirements under 40 CFR 96 subpart HHH, a unit that loses its exemption under 40 CFR 96.205(a) shall be treated as a unit that commences commercial operation on the first date on which the unit resumes operation.

### CAIR NO<sub>x</sub> Ozone Season Trading Program Special Provisions

- (1) A unit exempt under 40 CFR 96.305(a) shall not emit any nitrogen oxides, starting on the date that the exemption takes effect.
- (2) The permitting authority will allocate CAIR NO<sub>x</sub> Ozone Season allowances under 40 CFR 96 subpart EEEE to a unit exempt under 40 CFR 96.305(a).
- (3) For a period of 5 years from the date the records are created, the owners and operators of a unit exempt under 40 CFR 96.305(a) shall retain, at the source that includes the unit, records demonstrating that the unit is permanently retired. The 5-year period for keeping records may be extended for cause, at any time before the end of the period, in writing by the permitting authority or the Administrator. The owners and operators bear the burden of proof that the unit is permanently retired.
- (4) The owners and operators and, to the extent applicable, the CAIR designated representative of a unit exempt under 40 CFR 96.305(a) shall comply with the requirements of the CAIR NO<sub>x</sub> Ozone Season Trading Program concerning all periods for which the exemption is not in effect, even if such requirements arise, or must be complied with, after the exemption takes effect.
- (5) A unit exempt under 40 CFR 96.305(a) and located at a source that is required, or but for this exemption would be required, to have a title V operating permit shall not resume operation unless the CAIR designated representative of the source submits a complete CAIR permit application under 40 CFR 96.322 for the unit not less than 18 months (or such lesser time provided by the permitting authority) before the later of January 1, 2009 or the date on which the unit resumes operation.
- (6) On the earlier of the following dates, a unit exempt under 40 CFR 96.305(a) shall lose its exemption:
  - (i) The date on which the CAIR designated representative submits a CAIR permit application for the unit under 40 CFR 96.305(b)(5);
  - (ii) The date on which the CAIR designated representative is required under 40 CFR 96.305(b)(5) to submit a CAIR permit application for the unit; or
  - (iii) The date on which the unit resumes operation, if the CAIR designated representative is not required to submit a CAIR permit application for the unit.
- (7) For the purpose of applying monitoring, reporting, and recordkeeping requirements under 40 CFR 96 subpart HHHH, a unit that loses its exemption under 40 CFR 96.305(a) shall be treated as a unit that commences commercial operation on the first date on which the unit resumes operation.

### CAMR Hg Budget Trading Program Special Provisions

- (1) A unit exempt under 40 CFR 60.4105(a) shall not emit any mercury, starting on the date that the exemption takes effect.
- (2) The permitting authority will allocate Hg allowances under 40 CFR 60.4140 through 60.4142 to a unit exempt under 40 CFR 60.4105(a).
- (3) For a period of 5 years from the date the records are created, the owners and operators of a unit exempt under 40 CFR 60.4105(a) shall retain at the source that includes the unit, records demonstrating that the unit is permanently retired. The 5-year period for keeping records may be extended for cause, at any time before the end of the period, in writing by the permitting authority or the Administrator. The owners and operators bear the burden of proof that the unit is permanently retired.
- (4) The owners and operators and, to the extent applicable, the Hg designated representative of a unit exempt under 40 CFR 60.4105(a) shall comply with the requirements of the Hg Budget Trading Program concerning all periods for which the exemption is not in effect, even if such requirements arise, or must be complied with, after the exemption takes effect.
- (5) A unit exempt under 40 CFR 60.4105(a) and located at a source that is required, or but for this exemption would be required, to have a title V operating permit shall not resume operation unless the Hg designated representative of the source submits a complete Hg Budget permit application under 40 CFR 60.4122 for the unit not less than 18 months (or such lesser time provided by the permitting authority) before the later of January 1, 2010 or the date on which the unit resumes operation.
- (6) On the earlier of the following dates, a unit exempt under 40 CFR 60.4105(a) shall lose its exemption:
  - (i) The date on which the Hg designated representative submits a Hg Budget permit application for the unit under 40 CFR 60.4105(b)(5);
  - (ii) The date on which the Hg designated representative is required under 40 CFR 60.4105(b)(5) to submit a Hg Budget permit application for the unit; or
  - (iii) The date on which the unit resumes operation, if the Hg designated representative is not required to submit a Hg Budget permit application for the unit.
- (7) For the purpose of applying monitoring, reporting, and recordkeeping requirements under 40 CFR 60.4170 through 60.4176, a unit that loses its exemption under 40 CFR 60.4105(a) shall be treated as a unit that commences commercial operation on the first date on which the unit resumes operation.

Big Bend Power Station  
Plant Name (from STEP 1)

**STEP 6**

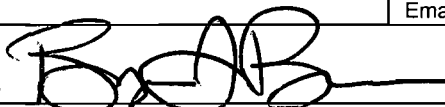
Read the statement of compliance and the appropriate certification statements and sign and date.

**Statement of Compliance**

I certify that the unit identified above at STEP 1 was (or will be) permanently retired on the date identified at STEP 3 and will comply with the appropriate Special Provisions listed at STEP 5.

**Certification (for Acid Rain, CAIR, or Hg designated representatives or alternate Acid Rain, CAIR, or Hg designated representatives only)**

I am authorized to make this submission on behalf of the owners and operators of the source and unit for which the submission is made. I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment.

Byron T. Burrows	Manager, Air Programs
Name	Title
Tampa Electric Company	
Owner Company Name	
(813) 228-1282	BTBurrows@TECOEnergy.com
Phone	Email
Signature 	October 2, 2008
	Date

**Certification (for certifying officials of units subject to the Acid Rain Program only)**

I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment.

Byron T. Burrows	Manager, Air Programs
Name	Title
Tampa Electric Company	
Owner Company Name	
(813) 228-1282	BTBurrows@TECOEnergy.com
Phone	Email
Signature	October 2, 2008
	Date



## Instructions for Submission of the Retired Unit Exemption Notice

Please type or print. If you have any questions regarding the submission of the Retired Unit Exemption notice, contact Robert Miller at [miller.robertl@epa.gov](mailto:miller.robertl@epa.gov) or 202.343.9077, or contact your local, State, or EPA Regional Acid Rain, CAIR, or CAMR contact, as appropriate. You may also call U.S. EPA's Acid Rain Hotline at (202) 343-9620.

Any reference in these instructions to the Designated Representative means the Acid Rain Designated Representative, CAIR Designated Representative, and/or Hg Designated Representative, as applicable. Any reference to the Alternate Designated Representative means the Alternate Acid Rain Designated Representative, the Alternate CAIR Designated Representative, and/or the Alternate Hg Designated Representative, as applicable. The Acid Rain Designated Representative, the CAIR Designated Representative, and the Hg Designated Representative for a facility (source) must be the same individual, and the Alternate Acid Rain Designated Representative, the Alternate CAIR Designated Representative, and the Alternate Hg Designated Representative for a facility (source) must be the same individual.

**Submission Deadline:** For units subject only to CAIR and/or CAMR, submit the retired unit exemption notice no later than 30 days after the date the unit is permanently retired (i.e., within 30 days of the date entered at STEP 3). For units subject only to the Acid Rain Program, submit the form by December 31 of the first year the unit is to be exempt. If the unit is subject to the Acid Rain Program and to CAIR and/or CAMR, submit the retired unit exemption notice no later than 30 days after the date the unit is permanently retired (i.e., within 30 days of the date entered at STEP 3).

**STEP 1** Enter the facility name and state where the unit is located, the ORIS/Plant Code for the facility, and Unit ID for the unit, consistent with the data listed on the most current Certificate of Representation for the facility. A Plant Code is a 4 or 5 digit number assigned by the Department of Energy's (DOE) Energy Information Administration (EIA) to facilities that generate electricity. For older facilities, "Plant Code" is synonymous with "ORISPL" and "Facility" codes. If the facility generates electricity but no Plant Code has been assigned, or if there is uncertainty regarding what the Plant Code is, contact EIA at (202) 586-4258 or (202) 586-2402. For facilities that do not produce electricity, use the facility identifier assigned by EPA (beginning with "88"). If the facility does not produce electricity and has not been assigned a facility identifier, contact Laurel DeSantis at [desantis.laurel@epa.gov](mailto:desantis.laurel@epa.gov) or (202) 343-9191.

**STEP 2** Identify the programs to which the unit is subject.

**STEP 3** Enter the date on which the unit was (or will be) permanently retired.

**STEP 4** If the unit is subject to the Acid Rain Program, identify the first full calendar year in which the unit meets (or will meet) the requirements of 40 CFR 72.8(d).

**STEP 5** Read the appropriate special provisions.

**STEP 6** Read the appropriate certification statements, sign, and date.

For units subject only to the Acid Rain Program, if no designated representative has been authorized, a certifying official for each owner of the unit must read the certification at STEP 6 labeled "for certifying officials of Acid Rain affected units only," enter his or her name, title, name of the owner company for which he or she is the certifying official, phone number, email address, and then sign and date. A certifying official is not required to submit a Certificate of Representation. If there is more than one owner of a unit for which no designated representative has been authorized, each owner of the unit must have a certifying official sign the appropriate certification at STEP 6.

Submit the original Retired Unit Exemption notice to the title V permitting authority for the facility, and a copy to U.S. EPA:

**For regular/certified mail:**

U.S. Environmental Protection Agency  
Clean Air Markets Division (6204J)  
Attention: Retired Unit Exemption  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460

**For overnight mail:**

U.S. Environmental Protection Agency  
Clean Air Markets Division (6204J)  
Attention: Retired Unit Exemption  
1310 L Street, NW  
Second Floor  
Washington, DC 20005  
(202) 343-9191

**Paperwork Burden Estimate**

The public reporting and recordkeeping burden for this collection of information is estimated to average 3.5 hours per response annually. Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to a collection of information; search data sources; complete and review the collection of information; and transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number.

Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including through the use of automated collection techniques to the Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822T), 1200 Pennsylvania Ave., NW., Washington, D.C. 20460. Include the OMB control number in any correspondence. **Do not send the completed form to this address.**



# Retired Unit Exemption

For more information, see instructions and refer to 40 CFR 72.8, 96.105, 96.205, 96.305, and 60.4105, or a comparable state regulation, as applicable.

This submission is:  New  Revised

**STEP 1**  
Identify the unit by facility (source) name, State, ORIS/plant code and unit ID#.

Big Bend Power Station	FL	0645	006
Facility (Source) Name	State	ORIS/Plant Code	Unit ID#

**STEP 2**  
Indicate the program(s) that the unit is subject to:

- ~ CAIR NO<sub>x</sub> Annual
- ~ CAIR SO<sub>2</sub>
- ~ CAIR NO<sub>x</sub> Ozone Season

**STEP 3**  
Identify the date on which the unit was (or will be) permanently retired.

9/30/2008

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**STEP 4**  
If the unit is subject to the Acid Rain Program, identify the first full calendar year in which the unit meets (or will meet) the requirements of 40 CFR 72.8(d).

January 1, 2009

**STEP 5**  
Read the appropriate special provisions.

### Acid Rain Program Special Provisions

- (1) A unit exempt under 40 CFR 72.8 shall not emit any sulfur dioxide and nitrogen oxides starting on the date that the exemption takes effect. The owners and operators of the unit will be allocated allowances in accordance with 40 CFR part 73 subpart B.
- (2) A unit exempt under 40 CFR 72.8 shall not resume operation unless the designated representative of the source that includes the unit submits a complete Acid Rain permit application under 40 CFR 72.31 for the unit not less than 24 months prior to the date on which the unit is first to resume operation.
- (3) The owners and operators and, to the extent applicable, the designated representative of a unit exempt under 40 CFR 72.8 shall comply with the requirements of the Acid Rain Program concerning all periods for which the exemption is not in effect, even if such requirements arise, or must be complied with, after the exemption takes effect.
- (4) For any period for which a unit is exempt under 40 CFR 72.8, the unit is not an affected unit under the Acid Rain Program and 40 CFR part 70 and 71 and is not eligible to be an opt-in source under 40 CFR part 74. As an unaffected unit, the unit shall continue to be subject to any other applicable requirements under 40 CFR parts 70 and 71.
- (5) For a period of 5 years from the date the records are created, the owners and operators of a unit exempt under 40 CFR 72.8 shall retain, at the source that includes the unit, records demonstrating that the unit is permanently retired. The 5-year period for keeping records may be extended for cause, at any time prior to the end of the period, in writing by the Administrator or the permitting authority. The owners and operators bear the burden of proof that the unit is permanently retired.
- (6) On the earlier of the following dates, a unit exempt under 40 CFR 72.8(b) or (c) shall lose its exemption and become an affected unit under the Acid Rain Program and 40 CFR part 70 and 71: (i) the date on which the designated representative submits an Acid Rain permit application under paragraph (2); or (ii) the date on which the designated representative is required under paragraph (2) to submit an Acid Rain permit application. For the purpose of applying monitoring requirements under 40 CFR part 75, a unit that loses its exemption under 40 CFR 72.8 shall be treated as a new unit that commenced commercial operation on the first date on which the unit resumes operation.

Big Bend Power Station  
Plant Name (from STEP 1)

### CAIR NO<sub>x</sub> Annual Trading Program Special Provisions

- (1) A unit exempt under 40 CFR 96.105(a) shall not emit any nitrogen oxides, starting on the date that the exemption takes effect.
- (2) The permitting authority will allocate CAIR NO<sub>x</sub> allowances under 40 CFR 96 subpart EE to a unit exempt under 40 CFR 96.105(a).
- (3) For a period of 5 years from the date the records are created, the owners and operators of a unit exempt under 40 CFR 96.105(a) shall retain, at the source that includes the unit, records demonstrating that the unit is permanently retired. The 5-year period for keeping records may be extended for cause, at any time before the end of the period, in writing by the permitting authority or the Administrator. The owners and operators bear the burden of proof that the unit is permanently retired.
- (4) The owners and operators and, to the extent applicable, the CAIR designated representative of a unit exempt under 40 CFR 96.105(a) shall comply with the requirements of the CAIR NO<sub>x</sub> Annual Trading Program concerning all periods for which the exemption is not in effect, even if such requirements arise, or must be complied with, after the exemption takes effect.
- (5) A unit exempt under 40 CFR 96.105(a) and located at a source that is required, or but for this exemption would be required, to have a title V operating permit shall not resume operation unless the CAIR designated representative of the source submits a complete CAIR permit application under 40 CFR 96.122 for the unit not less than 18 months (or such lesser time provided by the permitting authority) before the later of January 1, 2009 or the date on which the unit resumes operation.
- (6) On the earlier of the following dates, a unit exempt under 40 CFR 96.105(a) shall lose its exemption:
  - (i) The date on which the CAIR designated representative submits a CAIR permit application for the unit under 40 CFR 96.105(b)(5);
  - (ii) The date on which the CAIR designated representative is required under 40 CFR 96.105(b)(5) to submit a CAIR permit application for the unit; or
  - (iii) The date on which the unit resumes operation, if the CAIR designated representative is not required to submit a CAIR permit application for the unit.
- (7) For the purpose of applying monitoring, reporting, and recordkeeping requirements under 40 CFR 96 subpart HH, a unit that loses its exemption under 40 CFR 96.105(a) shall be treated as a unit that commences commercial operation on the first date on which the unit resumes operation.

### CAIR SO<sub>2</sub> Trading Program Special Provisions

- (1) A unit exempt under 40 CFR 96.205(a) shall not emit any sulfur dioxide, starting on the date that the exemption takes effect.
- (2) For a period of 5 years from the date the records are created, the owners and operators of a unit exempt under 40 CFR 96.205(a) shall retain, at the source that includes the unit, records demonstrating that the unit is permanently retired. The 5-year period for keeping records may be extended for cause, at any time before the end of the period, in writing by the permitting authority or the Administrator. The owners and operators bear the burden of proof that the unit is permanently retired.
- (3) The owners and operators and, to the extent applicable, the CAIR designated representative of a unit exempt under 40 CFR 96.205(a) shall comply with the requirements of the CAIR SO<sub>2</sub> Trading Program concerning all periods for which the exemption is not in effect, even if such requirements arise, or must be complied with, after the exemption takes effect.
- (4) A unit exempt under 40 CFR 96.205(a) and located at a source that is required, or but for this exemption would be required, to have a title V operating permit shall not resume operation unless the CAIR designated representative of the source submits a complete CAIR permit application under 40 CFR 96.222 for the unit not less than 18 months (or such lesser time provided by the permitting authority) before the later of January 1, 2010 or the date on which the unit resumes operation.
- (5) On the earlier of the following dates, a unit exempt under 40 CFR 96.205(a) shall lose its exemption:
  - (i) The date on which the CAIR designated representative submits a CAIR permit application for the unit under 40 CFR 96.205(b)(4);
  - (ii) The date on which the CAIR designated representative is required under 40 CFR 96.205(b)(4) to submit a CAIR permit application for the unit; or
  - (iii) The date on which the unit resumes operation, if the CAIR designated representative is not required to submit a CAIR permit application for the unit.
- (6) For the purpose of applying monitoring, reporting, and recordkeeping requirements under 40 CFR 96 subpart HHH, a unit that loses its exemption under 40 CFR 96.205(a) shall be treated as a unit that commences commercial operation on the first date on which the unit resumes operation.



### CAIR NO<sub>x</sub> Ozone Season Trading Program Special Provisions

- (1) A unit exempt under 40 CFR 96.305(a) shall not emit any nitrogen oxides, starting on the date that the exemption takes effect.
- (2) The permitting authority will allocate CAIR NO<sub>x</sub> Ozone Season allowances under 40 CFR 96 subpart EEEE to a unit exempt under 40 CFR 96.305(a).
- (3) For a period of 5 years from the date the records are created, the owners and operators of a unit exempt under 40 CFR 96.305(a) shall retain, at the source that includes the unit, records demonstrating that the unit is permanently retired. The 5-year period for keeping records may be extended for cause, at any time before the end of the period, in writing by the permitting authority or the Administrator. The owners and operators bear the burden of proof that the unit is permanently retired.
- (4) The owners and operators and, to the extent applicable, the CAIR designated representative of a unit exempt under 40 CFR 96.305(a) shall comply with the requirements of the CAIR NO<sub>x</sub> Ozone Season Trading Program concerning all periods for which the exemption is not in effect, even if such requirements arise, or must be complied with, after the exemption takes effect.
- (5) A unit exempt under 40 CFR 96.305(a) and located at a source that is required, or but for this exemption would be required, to have a title V operating permit shall not resume operation unless the CAIR designated representative of the source submits a complete CAIR permit application under 40 CFR 96.322 for the unit not less than 18 months (or such lesser time provided by the permitting authority) before the later of January 1, 2009 or the date on which the unit resumes operation.
- (6) On the earlier of the following dates, a unit exempt under 40 CFR 96.305(a) shall lose its exemption:
  - (i) The date on which the CAIR designated representative submits a CAIR permit application for the unit under 40 CFR 96.305(b)(5);
  - (ii) The date on which the CAIR designated representative is required under 40 CFR 96.305(b)(5) to submit a CAIR permit application for the unit; or
  - (iii) The date on which the unit resumes operation, if the CAIR designated representative is not required to submit a CAIR permit application for the unit.
- (7) For the purpose of applying monitoring, reporting, and recordkeeping requirements under 40 CFR 96 subpart HHHH, a unit that loses its exemption under 40 CFR 96.305(a) shall be treated as a unit that commences commercial operation on the first date on which the unit resumes operation.

### CAMR Hg Budget Trading Program Special Provisions

- (1) A unit exempt under 40 CFR 60.4105(a) shall not emit any mercury, starting on the date that the exemption takes effect.
- (2) The permitting authority will allocate Hg allowances under 40 CFR 60.4140 through 60.4142 to a unit exempt under 40 CFR 60.4105(a).
- (3) For a period of 5 years from the date the records are created, the owners and operators of a unit exempt under 40 CFR 60.4105(a) shall retain at the source that includes the unit, records demonstrating that the unit is permanently retired. The 5-year period for keeping records may be extended for cause, at any time before the end of the period, in writing by the permitting authority or the Administrator. The owners and operators bear the burden of proof that the unit is permanently retired.
- (4) The owners and operators and, to the extent applicable, the Hg designated representative of a unit exempt under 40 CFR 60.4105(a) shall comply with the requirements of the Hg Budget Trading Program concerning all periods for which the exemption is not in effect, even if such requirements arise, or must be complied with, after the exemption takes effect.
- (5) A unit exempt under 40 CFR 60.4105(a) and located at a source that is required, or but for this exemption would be required, to have a title V operating permit shall not resume operation unless the Hg designated representative of the source submits a complete Hg Budget permit application under 40 CFR 60.4122 for the unit not less than 18 months (or such lesser time provided by the permitting authority) before the later of January 1, 2010 or the date on which the unit resumes operation.
- (6) On the earlier of the following dates, a unit exempt under 40 CFR 60.4105(a) shall lose its exemption:
  - (i) The date on which the Hg designated representative submits a Hg Budget permit application for the unit under 40 CFR 60.4105(b)(5);
  - (ii) The date on which the Hg designated representative is required under 40 CFR 60.4105(b)(5) to submit a Hg Budget permit application for the unit; or
  - (iii) The date on which the unit resumes operation, if the Hg designated representative is not required to submit a Hg Budget permit application for the unit.
- (7) For the purpose of applying monitoring, reporting, and recordkeeping requirements under 40 CFR 60.4170 through 60.4176, a unit that loses its exemption under 40 CFR 60.4105(a) shall be treated as a unit that commences commercial operation on the first date on which the unit resumes operation.

Big Bend Power Station  
Plant Name (from STEP 1)

**STEP 6**

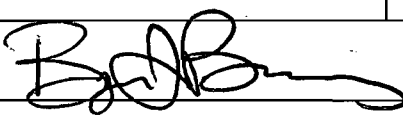
Read the statement of compliance and the appropriate certification statements and sign and date.

**Statement of Compliance**

I certify that the unit identified above at STEP 1 was (or will be) permanently retired on the date identified at STEP 3 and will comply with the appropriate Special Provisions listed at STEP 5.

**Certification (for Acid Rain, CAIR, or Hg designated representatives or alternate Acid Rain, CAIR, or Hg designated representatives only)**

I am authorized to make this submission on behalf of the owners and operators of the source and unit for which the submission is made. I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment.

Byron T. Burrows Name	Manager, Air Programs Title
Tampa Electric Company Owner Company Name	
(813) 228-1282 Phone	BTBurrows@TECOEnergy.com Email
Signature 	October 2, 2008 Date

**Certification (for certifying officials of units subject to the Acid Rain Program only)**

I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment.

Byron T. Burrows Name	Manager, Air Programs Title
Tampa Electric Company Owner Company Name	
(813) 228-1282 Phone	BTBurrows@TECOEnergy.com Email
Signature	October 2, 2008 Date



## Instructions for Submission of the Retired Unit Exemption Notice

Please type or print. If you have any questions regarding the submission of the Retired Unit Exemption notice, contact Robert Miller at [miller.robert1@epa.gov](mailto:miller.robert1@epa.gov) or 202.343.9077, or contact your local, State, or EPA Regional Acid Rain, CAIR, or CAMR contact, as appropriate. You may also call U.S. EPA's Acid Rain Hotline at (202) 343-9620.

Any reference in these instructions to the Designated Representative means the Acid Rain Designated Representative, CAIR Designated Representative, and/or Hg Designated Representative, as applicable. Any reference to the Alternate Designated Representative means the Alternate Acid Rain Designated Representative, the Alternate CAIR Designated Representative, and/or the Alternate Hg Designated Representative, as applicable. The Acid Rain Designated Representative, the CAIR Designated Representative, and the Hg Designated Representative for a facility (source) must be the same individual, and the Alternate Acid Rain Designated Representative, the Alternate CAIR Designated Representative, and the Alternate Hg Designated Representative for a facility (source) must be the same individual.

**Submission Deadline:** For units subject only to CAIR and/or CAMR, submit the retired unit exemption notice no later than 30 days after the date the unit is permanently retired (i.e., within 30 days of the date entered at STEP 3). For units subject only to the Acid Rain Program, submit the form by December 31 of the first year the unit is to be exempt. If the unit is subject to the Acid Rain Program and to CAIR and/or CAMR, submit the retired unit exemption notice no later than 30 days after the date the unit is permanently retired (i.e., within 30 days of the date entered at STEP 3).

**STEP 1** Enter the facility name and state where the unit is located, the ORIS/Plant Code for the facility, and Unit ID for the unit, consistent with the data listed on the most current Certificate of Representation for the facility. A Plant Code is a 4 or 5 digit number assigned by the Department of Energy=s (DOE) Energy Information Administration (EIA) to facilities that generate electricity. For older facilities, "Plant Code" is synonymous with "ORISPL" and "Facility" codes. If the facility generates electricity but no Plant Code has been assigned, or if there is uncertainty regarding what the Plant Code is, contact EIA at (202) 586-4258 or (202) 586-2402. For facilities that do not produce electricity, use the facility identifier assigned by EPA (beginning with "88"). If the facility does not produce electricity and has not been assigned a facility identifier, contact Laurel DeSantis at [desantis.laurel@epa.gov](mailto:desantis.laurel@epa.gov) or (202) 343-9191.

**STEP 2** Identify the programs to which the unit is subject.

**STEP 3** Enter the date on which the unit was (or will be) permanently retired.

**STEP 4** If the unit is subject to the Acid Rain Program, identify the first full calendar year in which the unit meets (or will meet) the requirements of 40 CFR 72.8(d).

**STEP 5** Read the appropriate special provisions.

**STEP 6** Read the appropriate certification statements, sign, and date.

For units subject only to the Acid Rain Program, if no designated representative has been authorized, a certifying official for each owner of the unit must read the certification at STEP 6 labeled "for certifying officials of Acid Rain affected units only," enter his or her name, title, name of the owner company for which he or she is the certifying official, phone number, email address, and then sign and date. A certifying official is not required to submit a Certificate of Representation. If there is more than one owner of a unit for which no designated representative has been authorized, each owner of the unit must have a certifying official sign the appropriate certification at STEP 6.

Submit the original Retired Unit Exemption notice to the title V permitting authority for the facility, and a copy to U.S. EPA:

**For regular/certified mail:**

U.S. Environmental Protection Agency  
Clean Air Markets Division (6204J)  
Attention: Retired Unit Exemption  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460

**For overnight mail:**

U.S. Environmental Protection Agency  
Clean Air Markets Division (6204J)  
Attention: Retired Unit Exemption  
1310 L Street, NW  
Second Floor  
Washington, DC 20005  
(202) 343-9191

**Paperwork Burden Estimate**

The public reporting and recordkeeping burden for this collection of information is estimated to average 3.5 hours per response annually. Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to a collection of information; search data sources; complete and review the collection of information; and transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number.

Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including through the use of automated collection techniques to the Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822T), 1200 Pennsylvania Ave., NW., Washington, D.C. 20460. Include the OMB control number in any correspondence. **Do not send the completed form to this address.**

**Sheplak, Scott**

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**From:** Sheplak, Scott  
**Sent:** Monday, August 03, 2009 4:29 PM  
**To:** Holtom, Jonathan  
**Subject:** FW: Comments on TECO Big Bend's TV Renewal Application  
**Attachments:** TECO Big Bend Renewal Comments 8-09.docx

**Tracking:**     **Recipient**         **Read**  
                  Holtom, Jonathan Read: 8/3/2009 4:30 PM

fyi


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**From:** Lee, Diana [mailto:Lee@epchc.org]  
**Sent:** Monday, August 03, 2009 3:54 PM  
**To:** Sheplak, Scott  
**Cc:** Sims, Jeff  
**Subject:** Comments on TECO Big Bend's TV Renewal Application

Scott,  
Attached are our comments on TECO Big Bend's TV Renewal Application. If you have any questions, please let me know.

Thanks,

Diana M. Lee, P.E.  
Chief, Air Permitting



8/3/2009

**MEMORANDUM**

**DATE:** August 3, 2009  
**TO:** Scott Sheplack - FDEP  
**FROM:** Jeff Sims **THRU:** Diana M. Lee, P.E.  
**SUBJECT:** TECO Big Bend Renewal

The following comments are in reference to the application for a Title V Renewal Permit (Permit No. 0570039-039-AV) for TECO's Big Bend Station.

The comments are based on TECO's Title V Permit Renewal Application Attachment I, submitted on December 30, 2008 titled. This submittal shows TECO's proposed changes to the last Revised Operating Permit (Permit No. 0570039-028-AV), which is an addendum to the original renewal application. The following are our comments in reference to the Permit Revision Mark Up: 0570039-028-AV:

1. On Page 2, Section I, Facility Information, Subsection A. Facility Description, the majority of the facility's operation description was removed. The remaining language states a generic process description of the facility. This is also the case on the each Subsection relating to the Steam Generator Units (Units 1-4), where most of the information describing the operation for each Emission Unit has been removed. It is important that the process description includes specific information of the facility information, especially for a facility that is a major source for all the criteria pollutants and is the largest source of air pollution in Hillsborough County. A detail account of the process and the equipment used in the power generation needs to be included in the permit, in order to determine if changes and modifications have occurred in the process that may require a permit review. Therefore, EPC staff does not agree with TECO's proposed deletions on the process description and each of the Subsections.
2. On Page 9, Subsection A, Steam Generators Units Nos. 1, 2 & 3, - EU No. 003, Unit No. 3 Steam Generator, was separated from this Subsection and made into its own Subsection (X). EPC staff has not objection to this change.
3. On Page 9, Subsection A, Steam Generators Units Nos. 1 & 2, TECO revised the language on the description, which states that the fuel fired in Units No. 1 and 2 consists of coal which may be blended with up to 20% petcoke and/or coal combustion products generated from Big Bend Station or the Polk Power Station. It is not clear what constitutes coal combustion products. TECO needs to be more specific on the type of coal combustion products and how these differ between the Polk Power Station and the Big Bend Station. The previous process description specified that the blend was coal residual from the Polk Power Station only. This new revision now includes coal combustion products form the Big Bend Station, which may imply that it most likely flyash processed by Separation Technologies. If that is the case, this may be considered to be a

modification of the permit that may require a permit review process. Therefore, EPC staff does not agree with TECO's proposed change.

4. On Page 9, Subsection A, Steam Generators Units Nos. 1 & 2, TECO removed the manufacturer specification to Units No. 1 and 2., specifically the reference to "wet" bottom boiler manufactured by Riley Stoker Corporation. Again, as stated in Comment No. 1, a detail account of the equipment needs to be included in the permit, in order to determine if changes and modifications have occurred in the process, that may require a permit review. Therefore, EPC staff does not agree with TECO's proposed deletion on the boilers manufacturer's information.

5. On Page 9, Subsection A, Steam Generators Units Nos. 1 & 2, it states that Unit No. 1 and Unit No. 2 share two common stacks (Stacks CS001 and CS0W1). However, the permit does not specify the difference between Stacks CS001 and CS0W1. The process description should explain the difference between these two stacks.

6. On Page 10, Specific Condition A.1. Capacity, TECO deleted "maximum permitted" and substituted it with "design" heat input rate... Even though, as stated in the permitting note that the heat input limitations have been placed in this permit to identify the capacity of each unit for the purposes of confirming that emissions testing is conducted within 90 to 100 percent of the unit's rated capacity, it may also be an indicator of possible modifications to the unit, and therefore, EPC staff believes that word "maximum" should remain in the condition.

7. On Page 10, Specific Condition A.2. a., TECO revised the language to state that the fuel fired in Units No. 1 and 2 shall consist of coal, or a coal/petroleum coke blend containing a maximum of 20% petroleum coke by weight and/or coal combustion products generated from Big Bend Station or the Polk Power Station. Please see Comment No. 3.

8. On Page 11, Specific Condition A.2., Methods of Operation-Fuels, sub-condition e. was added by TECO, which states that Tampa Electric Coal Combustion products (CCP) and fluxing agents: The total amounts of CCPs and fluxing agents burned shall not exceed 5% by weight of the total amount fired. It is not clear what constitutes coal combustion products and fluxing agents. Also, it is not clear as to how the limit of 5% was established? TECO needs to be more specific on the type of coal combustion products and the fluxing agents that they want to burn and explain how they derived the 5% value. This could be considered to be a modification of the permit that may require a permit review process. Please see Comment No. 3. Also, this condition does not specify a limit on the amount of coal that can be burn in each unit per day or per year.

9. On Page 11, Specific Condition A.3, the title heading for this condition, "FGD Operation Required for Petcoke, Coal Residual and Coal Combustion Products" implies that the FGD operation under this condition is only during the burning of the above mentioned products. Shouldn't it also include "coal"? Perhaps the title should say "FGD Operation". Also, this condition could be splitted into sub-conditions, to allow for better understanding on the different operational requirements of the FGD system. These FGD operational scenarios were added by TECO for this TV renewal permit, however, it is not clear as to where these operational limitations came from. The condition references Civil Action 99-2524 CIV-T-23F but EPC staff could not find a copy of this document. Most important, EPC staff has concerns regarding the shutdown of

the scrubber, as this could create an episode where SO<sub>2</sub> emissions could substantially affect a big portion of the Tampa Bay area. The shutdown of the scrubber system should be of last resort, after all other measures have been taken into account and implemented.

10. On Page 13, Specific Condition A.9, has SO<sub>2</sub> limits for Units No. 1, 2 and 3. This condition was in place when Units Nos. 1 and 2 did not have an FGD system. Since all these units have an FGD system, then this condition should be updated with new SO<sub>2</sub> limitations as a result of the installation of the FGD system. Furthermore, TECO added a condition that Unit 1 and/or 2 shall not exceed the emission rate for SO<sub>2</sub> of 0.25 lb/mBTU effective January 1, 2013. It is not clear as to what SO<sub>2</sub> limitation TECO has to comply with prior to this date.

11. On Page 15, Specific Condition A.10, should reference Permit 0570039-024-AC to the rule cite.

12. On Page 16, Specific Condition A.11, TECO added sub-condition (6), which states that excess emissions commencing from the time the unit(s) is synchronized with a utility electric distribution system through the time that the unit ceases to be synchronized with such utility electric distribution system. This condition references Civil Action 99-2524 CIV-T-23F. It is not clear what this event constitutes, it could be better clarified, especially for compliance purposes.

13. On Page 16, Specific Condition A.11, TECO removed “under both sootblowing and non sootblowing operation conditions”. It is not clear as why this was removed. Sootblowing conditions are considered to be worst case, and as such, TECO should test under those conditions, in order to demonstrate compliance with the PM standard of 0.03 lb/mmBTU, since they operate under sootblowing conditions.

14. On Page 16, Specific Condition A.15, TECO revised this condition to state that PM and VE testing may be conducted either with or without combusting Coal Combustion Products and/or fluxing agents. The language regarding required retests if testing done without flyash reinjection was removed. As edited, testing can be done without reinjection and then they could operate all year while re-injecting without re-testing. Also please see Comment Nos. 3, 8 and 13.

15. On Page 17, Specific Conditions A.18 and A.19 were removed by TECO. EPC staff does not agree with TECO’s proposed deletions.

16. Specific Conditions A.21 through A.24 (and X.21 – X.24) cite Rule 296.401 rather than Rule 296.405 F.A.C. The rule cite should be corrected.

17. On Page 19, Specific Condition A.29, TECO removed the condition that maintains the data that verifies that the 20% petroleum coke content has not been exceeded. EPC staff does not agree with TECO’s proposed deletion, as records should maintain to demonstrate compliance with Specific Condition A.2.

18. Subsection X addresses EU No. 003, Unit No. 3 Steam Generator, is new subsection created by TECO to separate Unit 3 from Units 1 and 2. Like Subsection A, it includes the process



description and specific conditions for Unit 3. All comments made for Subsection A are also applicable to this section. Only new comments specific to BB3 will be restated.

19. On Page 21, Process Description, it does not include a stack ID. It should be included similarly to the other units.

20. On Page 24, Specific Condition X.9., has SO<sub>2</sub> limits for Unit No. 3. Since this unit has an FGD system, then this condition should be updated with new SO<sub>2</sub> limitations as a result of the FGD system. Also, the references to Units 1 and 2 should be removed. See Comment 10.

21. Multiple Specific Conditions appear to be missing in the edited version in Subsection X.

22. Subsection B addresses EU No. 004, Unit No. 4. Like Subsections A and X, it includes the process description and specific conditions for Unit 4. All comments made for the above mentioned Subsections are also applicable to this section. Only new comments specific to BB4 will be restated.

23. Multiple Specific Conditions appear to be missing in the edited version in Subsection B.

24. On Page 33, Specific Condition B.10, establishes the CO limit. However, it should be pointed out that there are no other conditions that reference the use of a CO CEM or testing requirements. Also, Permit No. 0570039-042-AC, which established the CO limit is not posted in the DEP website for viewing. In addition, this condition should reference the AC permit that established this limit in the rule cite.

25. On Page 39, Specific Condition B.31, TECO removed the condition that requires the submittal of performance evaluation of the CEMs to the DEP and EPC. EPC staff does not agree with TECO's proposed deletion, as these tests are performed to provide reasonable assurance of compliance with the regulations, and thus, should be submitted for review to determine compliance.

26. For Unit No. 4 it does not appear to be a condition specifying annual PM and VE stack testing requirements. B.26 references Part 60 tests, but a condition directly stating annual testing requirements should be stated for clarity, similar to BB1-BB3.

27. Subsection C addresses EU Nos. 005, 006 and 007, Combustion Turbine Nos. 1, 2 and 3. No edits were done by TECO in this subsection. However TECO previously stated that CT2 and CT3 are no longer at the facility. CT1 was said to still be available, but likely to be decommissioned relatively soon. If this is the case, then CT2 and CT3 should be removed from permit.

28. On Page 51, Subsection D, Flyash Handling and Storage, under the Facility Description, TECO removed the manufacturer specification and airflow rating on the baghouse that controls the PM emissions from Silo No. 1 and Silo No. 2 loading operations and tanker truck loadout. As stated in Comment No. 1, a detail account of the operational equipment and control equipment needs to be included in the permit, in order to determine if changes and modifications have

occurred, that may require a permit review. Therefore, EPC staff does not agree with TECO's proposed deletion of the baghouses information.

29. On Page 52, Subsection D, Specific Condition D.3., it limits the VE from each silo baghouse and silo truck loadout to 20% opacity. On the other hand, Specific Condition D.4., limits the VE from the flyash handling and flyash silos to 5% opacity. Please note that Chapter 1-3.52, Rules of the EPC limit the visible emissions to 5% on loading or unloading of materials to or from containers such as railcars, trucks, ships, storage structures and stockpiles; conveyor systems; storage of materials in structures such as silos or enclosed bins... Therefore, all the activities under Subsection D are subject to a 5% opacity standard and Specific Condition D.3 should be removed from the permit. Also, this facility is in the area of influence for PM RACT.

30. On Page 52, Specific Condition D.x., TECO added this condition that exempts any EU that does not operate for more than 400 hours from an annual VE test and instead requires a VE test once each 5-year period. EPC staff does not agree with TECO's proposed new condition. According to Rule 62-297(7)(a)4.b., F.A.C., visible emissions testing is required every federal fiscal year if there is an applicable standard. Because all the EUs under Subsection D are subject to a 5% opacity standard, they are required to conduct a VE test annually, regardless of the hours of operation.

31. On Page 53, Specific Condition D.9., TECO removed this condition, which related to the use of reasonable precautions. EPC staff does not agree with TECO's proposed deletion, since this is a major source with a potential for generating a significant amount of unconfined emissions from the various activities at the facility. This condition should remain in the permit. Please note that EPC receives dust complaints from the citizens living in Apollo Beach, which is a residential community directly south of TECO Big Bend's facility, so it is important that TECO uses reasonable precautions in accordance with Rule 62-296.320, F.A.C., to minimize the dust impact on this community.

32. On Page 53, Specific Condition D.11., should specify compliance with Specific Conditions D.3, D.4, and D.5, not 3 and 4.

33. Subsection E addresses the Flyash Silo. 3. All comments made for Subsection D are also applicable to this section. Also, there is no reference to capacity of silo/truck loading in this subsection.

34. Subsection F addresses the Limestone Handling and Storage. All comments made for Subsection D are also applicable to this section. Also, there is no reference to capacities of the EUs in this subsection.

35. On Page 55, Subsection F, Process Description, TECO removed all information relating to the use of baghouses. The current TV permit shows that EU Nos. 012 and 013 are controlled by 2 baghouses each. Also, EU No. 023 shows as being controlled by baghouses. The removal of these baghouses from the permit implies that they may have been physically removed from these EUs within the past 5 years. EPC is not aware of any notification or permit determination to authorize such change, as it may require an AC permit, due to an increase of emissions, as there is no add-on

control. Also, EPC staff has concerns that TECO may not be able to comply with the 5% opacity standard. If the baghouses are in place, then it should be reflected in the permit including the manufacturer specification and airflow rating. If not, then this matter needs to be looked into further. Also, this affects Specific Condition F.4., which was removed from the permit by TECO. If the baghouses are in place, then this condition should remain in the permit.

36. Subsection F does not include a VE test requirement for EU No. 011. According to Rule 62-297(7)(a)4.b., F.A.C., visible emissions testing is required every federal fiscal year if there is an applicable standard. A specific condition should be added to require annual VE testing for EU No. 011 in order to demonstrate compliance with the 5% opacity standard. See Comment Nos. 29 and 30.

37. Subsection L (EU Nos. 20 and 21) was deleted from the permit and included into Subsection F. EPC staff does not have an objection with this change. However, the specific information in the Process Description and Specific Conditions L.1 – L.7 should also all be added to this subsection.

38. On Page 58, Subsection G, Process Description, TECO removed information relating to the process, which includes the use of Roto Clone. It is not clear if these have been removed from these EUs or just the description of the equipment has changed (i.e., the Roto clones are now being referred to as cyclone collectors). Please see Comment No. 35. Also, part of the process description has been removed. Please see Comment No. 1.

39. Subsection G does not include a VE test requirement. Please Comment nos. 29 and 30.

40. On Page 60, Subsection H, Process Description, TECO removed all the information relating to the solid fuel yard and replaced with very generic limited information. The permit should retain the details of the process for the receiving and handling of solid fuel, including blending and milling. Please see Comment No. 1. In addition, the description of EU030 – *Cyclonic Collectors for Fuel Mills* is confusing. According to Attachment B5 (process flow diagram) and Attachment L of the application, and the current process description, EU030 is controlling the 2 crushers located in the fuel yard. However, the existing process description also describes the “fuel mills” as the ball/bowl mills and classifiers following the bunkers. It would appear that the description for EU030 would be more appropriately renamed *Cyclonic Collectors for Fuel Crushers* to avoid confusion. It is unknown how the bowl/ball mills (pulverizers) and classifiers are currently controlled.

41. On Page 61, Specific Condition H.2., it addresses the PM emissions from the solid fuel handling facilities. Please note that Chapter 1-3.52, Rules of the EPC limit the visible emissions to 5% on loading or unloading of materials to or from containers such as railcars, trucks, ships, storage structures and stockpiles; conveyor systems; storage of materials in structures such as silos or enclosed bins... Therefore, the activities under this Subsection are subject to a 5% opacity. In addition, because the EUs under this Subsection are subject to a 5% opacity standard, they are required to conduct a VE test annually. Please comment Nos. 29 and 30.

42. On Page 62, Specific Condition H.2.(?), the emissions points related to EU No. 010, were removed from the permit. EPC staff does not agree with this deletion. All the emission points associated with the solid fuel yard should be listed in the permit.

43. On Page 64, Subsection I, Surface of Miscellaneous Metal Parts, TECO proposes that the surface coating be deemed insignificant. The unit is currently identified as being subject to VOC RACT. Unless TECO provides certification that they will not exceed the VOC emission exemption level of 3 lb/hr and 15 lb/day, the unit should remain in the permit as an emission unit.

44. On Page 89, Subsection O, Coal Residual Storage and Transfer, TECO changed the description of EUs 037 and 038, to Coal Combustion Products/Fluxing Agents Storage Facility and Transfer System. As stated in Comment No. 3, it is not clear what constitutes coal combustion products/fluxing agents. TECO needs to be more specific on the type of coal combustion products and fluxing agents.

45. On Page 89, Subsection O, Specific Condition O.2., TECO removed the statement that "open storage of residual coal is prohibited". EPC staff does not agree with this deletion. This type of material, which is fine material, created dust problems in the Apollo Beach area, which initiated the building of the enclosure a few years ago authorized by an AC permit. Therefore, any type of fine material should be stored in an enclosed building.

**Sheplak, Scott**


---

**From:** Lee, Diana [Lee@epchc.org]  
**Sent:** Monday, August 03, 2009 3:54 PM  
**To:** Sheplak, Scott  
**Cc:** Sims, Jeff  
**Subject:** Comments on TECO Big Bend's TV Renewal Application  
**Attachments:** TECO Big Bend Renewal Comments 8-09.docx

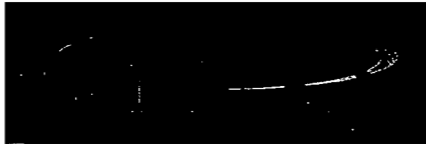
Scott,  
Attached are our comments on TECO Big Bend's TV Renewal Application. If you have any questions, please let me know.

Thanks,

Diana M. Lee, P.E.  
Chief, Air Permitting



8/3/2009



TAMPA ELECTRIC

June 12, 2009

Ms. Trina Vielhauer  
Chief Bureau of Air Regulation  
Florida Department of Environmental Protection  
111 South Magnolia Drive, Suite 4  
Tallahassee, Florida 32301

Via FedEx  
Airbill No. 7966 8853 8660

RECEIVED

JUN 16 2009

BUREAU OF AIR REGULATION

Re: **Tampa Electric Company**  
**Big Bend Station**  
**Permit #0570039-028-AV E.U. #002**  
**Civil Action No. 99-2524 CIV-T-23F**  
**Second Amendment**  
**PM CEM Higher Grain Loading Test Protocol**

Dear Ms. Vielhauer:

Tampa Electric Company (TEC) is requesting authorization to conduct Particulate Matter (PM) testing at elevated particulate matter loadings in order to achieve the high loadings necessary for certification of the Particulate Matter Continuous Emissions Monitoring (PM CEM) at Big Bend Station during the certification activities. Pursuant to Paragraph 32.G of the Second Amendment to the Consent Decree, TEC is to determine if the PM CEM is feasible. Specifically Paragraph 32.G of the Second Amendment to the Consent Decree states:

*"Notwithstanding whether Tampa Electric elects to exercise the option under Subparagraph 32.E to replace the PM CEM already operating at Big Bend, on or before eighteen months from the effective date of this Second Amendment, Tampa Electric also must install, calibrate, and commence continuous operation of a second PM CEM (in compliance with all applicable EPA regulation and guidance, including achievement of the acceptance criteria during the process undertaken for the initial correlation testing, which must be done in compliance with the EPA standard known as PS-11), which must serve one or more other Big Bend Units."*

In order to meet this requirement, TEC is planning a series of particulate emission tests, at several grain loadings, including grain loading typical of routine operation as well as a higher grain loading consistent with upset conditions. Testing at normal grain loadings and elevated grain loadings will enable TEC to evaluate the performance of the PM CEM and determine its feasibility not only within the range of permitted particulate emissions but beyond. In order to achieve this, TEC will reduce the collection efficiency of the electrostatic precipitator (ESP) on Big Bend Station Unit 4 for this evaluation. During this test period, Unit 4 will be scrubbed according to normal operation.

TAMPA ELECTRIC COMPANY  
P. O. BOX 111 TAMPA, FL 33601-0111

(813) 228-4111

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Ms. Trina Vielhauer  
June 12, 2009  
Page 2 of 2

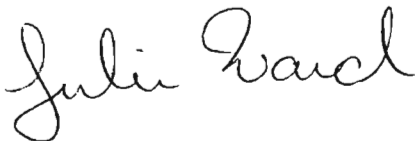
TEC is sensitive to both the Consent Decree requirements and the Title V Permit requirements. TEC requests that during this test period, opacity and particulate matter data in excess of the limits be excluded for the purposes of the compliance data reporting. Therefore, TEC is requesting a temporary variance with regard to the affected conditions of the Consent Decree and Title V Permit which may be directly attributed to this testing. Authorization of these tests is consistent with the Department's power and duty under Section 403.061(18), Florida Statutes, to "[e]ncourage and conduct studies, investigations, and research relating to pollution and its causes, effects, prevention, abatement, and control."

The specific equipment to be tested is the PM CEM, from which data will be collected and evaluated according to Method PS-11. The PM CEM data will be compared to the PM Method 5B data and TEC will also measure and record all other parameters required under Title V and the Consent Decree.

An authorization statement by Ronald D. Bishop, the Responsible Official for Big Bend Station, outlining his approval of the temporary variance request is provided as well as a signed and sealed statement by Byron Burrows, Professional Engineer. Details of the PM CEM plan as well as the certification were submitted according to the Second Amendment to the Consent Decree on March 23, 2009, in the PM CEM Collection Plan.

If you have any questions or need further information regarding the test procedures for Big Bend Station, please feel free to contact Ms. Julie Ward or me at (813) 228-1282.

Sincerely,



Julie Ward  
Engineer  
Environmental, Health & Safety

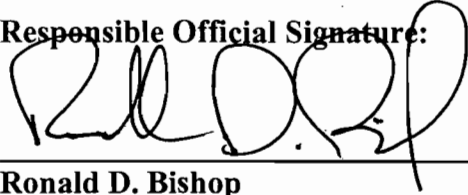
EHS/rk/JMW197

Cc: Mr. David Lloyd, EPA Region IV  
Ms. Mara Grace Nasca, FDEP SW  
Mr. Al Linero, FDEP  
Ms. Danielle Henry, FDEP  
Ms. Diana Lee, EPCHC  
Mr. Jason Waters, EPCHC

**CERTIFICATION BY RESPONSIBLE OFFICIAL  
BIG BEND STATION UNIT 4 PARTICULATE MATTER  
CONTINUOUS EMISSIONS MONITOR TEST TEMPORARY  
VARIANCE REQUEST**

**"I, the undersigned, am the responsible official, as defined in Chapter 62-210.200, F.A.C., for the Big Bend Station for which this temporary variance is being submitted. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made and data contained in this request are true, accurate and complete."**

**Responsible Official Signature:**



**Ronald D. Bishop**  
Director of Big Bend Power Station

6/12/09

Date:



**BIG BEND STATION UNITS 3 & 4 PARTICULATE MATTER  
CONTINUOUS EMISSIONS MONITOR TEST PROTOCOL  
AND SCHEDULE  
CERTIFICATION BY PROFESSIONAL ENGINEER**

**"I, the undersigned, am a registered professional engineer in the state of Florida and hereby certify to the best of my knowledge that all information submitted for this temporary variance to conduct special emissions testing for particulate matter continuous emissions monitoring at Big Bend Station is true, accurate and complete."**

**Professional Engineer Signature:**



6/12/09  
Date

**Registration Number:**

**Sheplak, Scott**

---

**From:** Sheplak, Scott  
**Sent:** Monday, June 29, 2009 3:18 PM  
**To:** Pichard, Errin; Holtom, Jonathan  
**Subject:** TECO-Big Bend  
**Attachments:** TECO letter dated 06 12 2009 re PM CEMS.pdf

**Tracking:**

<b>Recipient</b>	<b>Read</b>
Pichard, Errin	Read: 6/30/2009 7:51 AM
Holtom, Jonathan	Read: 6/30/2009 9:10 AM

Fyi, the attached letter from TECO is regarding PM CEMS at Big Bend. The 2nd amendment to the federal Consent Decree was executed (effective) on 02/04/2008.



TAMPA ELECTRIC

October 6, 2009

Mr. Scott Sheplak  
Florida Department of Environmental Protection  
Division of Air Resource Management  
111 South Magnolia Drive, Suite 4  
Tallahassee, Florida 32301

Via FedEx  
Airbill No. 7960 0749 8239

**Re: Tampa Electric Company  
Big Bend Station  
Title V Permit Renewal Application Supplemental Information  
Permit No. 0570039-028-AV**

Dear Mr. Sheplak:

Tampa Electric Company (TEC) has enclosed supplemental information as requested for the Big Bend Title V Renewal Application submitted on June 5, 2008. The enclosures are as follows:

1. Phase II, NOx Compliance Plan EPA form 7610-28
2. Big Bend Units 1-4 PM and Opacity Emission Results Table for FY2004-FY2009
3. PE Certification for the enclosed PM CAM Emission Result Table

A detailed Particulate Matter Compliance Assurance Monitoring Plan was submitted with the Title V Renewal Application. The updated emission results table supports the current PM CAM Plan.

TEC appreciates the cooperation and consideration of the Department in this Title V permit renewal process. If you have any questions or comments, please contact me at (813) 228-4740.

Sincerely,

Julie Ward  
Engineer – Air Programs

RECEIVED

OCT 07 2009

BUREAU OF AIR REGULATION

EHS/rk/JMW220

Enclosure

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Permit File Scanning Request from Elizabeth

Priority: -ASAP (Public Records Request, etc.) -Place in Normal Scanning Queue

Facility ID	Project#	Type	PSD #	Submittal Date	Batch #
0570099	039	AC AV			

- File Approved For Disposal
- Return File to BAR

- Correspondence
- Intent
- Permit
- Draft
- Amendment
- Application
- OGC
- Proposed

Document Date 10-7-09

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OCT 07 2009



United States Environmental Protection Agency Acid Rain Program

OMB No. 2060-0258

BUREAU OF AIR REGULATION

Phase II NOx Compliance Plan

Page 1 of 2

For more information, see Instructions and refer to 40 CFR 76.9

This submission is: [ ] New [X] Revised

STEP 1 Indicate plant name, State, and ORIS code from NADB, if applicable

Table with 3 columns: Plant Name (Big Bend Station), State (FL), ORIS Code (645)

STEP 2

Identify each affected Group 1 and Group 2 boiler using the boiler ID# from NADB, if applicable. Indicate boiler type: "CB" for cell burner, "CY" for cyclone, "DBW" for dry bottom wall-fired, "T" for tangentially fired, "V" for vertically fired, and "WB" for wet bottom. Indicate the compliance option selected for each unit.

Table with 6 columns for boiler units (BB01 to BB04 and two empty). Each column has ID#, Type, and checkboxes for compliance options.

(a) Standard annual average emission limitation of 0.50 lb/mmBtu (for Phase I dry bottom wall-fired boilers)

(b) Standard annual average emission limitation of 0.45 lb/mmBtu (for Phase I tangentially fired boilers)

(c) EPA-approved early election plan under 40 CFR 76.8 through 12/31/07 (also indicate above emission limit specified in plan)

(d) Standard annual average emission limitation of 0.46 lb/mmBtu (for Phase II dry bottom wall-fired boilers)

(e) Standard annual average emission limitation of 0.40 lb/mmBtu (for Phase II tangentially fired boilers)

(f) Standard annual average emission limitation of 0.68 lb/mmBtu (for cell burner boilers)

(g) Standard annual average emission limitation of 0.86 lb/mmBtu (for cyclone boilers)

(h) Standard annual average emission limitation of 0.80 lb/mmBtu (for vertically fired boilers)

(i) Standard annual average emission limitation of 0.84 lb/mmBtu (for wet bottom boilers)

(j) NOx Averaging Plan (Include NOx Averaging form)

(k) Common stack pursuant to 40 CFR 75.17(a)(2)(i)(A) (check the standard emission limitation box above for most stringent limitation applicable to any unit utilizing stack)

(l) Common stack pursuant to 40 CFR 75.17(a)(2)(i)(B) with NOx Averaging (check the NOx Averaging Plan box and include NOx Averaging form)

Big Bend Station  
Plant Name (from Step 1)

**STEP 2, cont'd.**

BB01 ID#	BB02 ID#	BB03 ID#	BB04 ID#		
WB Type	WB Type	WB Type	T Type		

(m) EPA-approved common stack apportionment method pursuant to 40 CFR 75.17 (a)(2)(i)(C), (a)(2)(iii)(B), or (b)(2)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(n) AEL (include Phase II AEL Demonstration Period, Final AEL Petition, or AEL Renewal form as appropriate)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(o) Petition for AEL demonstration period or final AEL under review by U.S. EPA or demonstration period ongoing	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(p) Repowering extension plan approved or under review	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**STEP 3**  
Read the standard requirements and certification, enter the name of the designated representative, sign &

**Standard Requirements**

General. This source is subject to the standard requirements in 40 CFR 72.9 (consistent with 40 CFR 76.8(e)(1)(i)). These requirements are listed in this source's Acid Rain Permit.

**Special Provisions for Early Election Units**

Nitrogen Oxides. A unit that is governed by an approved early election plan shall be subject to an emissions limitation for NO<sub>x</sub> as provided under 40 CFR 76.8(a)(2) except as provided under 40 CFR 76.8(e)(3)(iii).  
Liability. The owners and operators of a unit governed by an approved early election plan shall be liable for any violation of the plan or 40 CFR 76.8 at that unit. The owners and operators shall be liable, beginning January 1, 2000, for fulfilling the obligations specified in 40 CFR Part 77.  
Termination. An approved early election plan shall be in effect only until the earlier of January 1, 2008 or January 1 of the calendar year for which a termination of the plan takes effect. If the designated representative of the unit under an approved early election plan fails to demonstrate compliance with the applicable emissions limitation under 40 CFR 76.5 for any year during the period beginning January 1 of the first year the early election takes effect and ending December 31, 2007, the permitting authority will terminate the plan. The termination will take effect beginning January 1 of the year after the year for which there is a failure to demonstrate compliance, and the designated representative may not submit a new early election plan. The designated representative of the unit under an approved early election plan may terminate the plan any year prior to 2008 but may not submit a new early election plan. In order to terminate the plan, the designated representative must submit a notice under 40 CFR 72.40(d) by January 1 of the year for which the termination is to take effect. If an early election plan is terminated any year prior to 2000, the unit shall meet, beginning January 1, 2000, the applicable emissions limitation for NO<sub>x</sub> for Phase II units with Group 1 boilers under 40 CFR 76.7. If an early election plan is terminated on or after 2000, the unit shall meet, beginning on the effective date of the termination, the applicable emissions limitation for NO<sub>x</sub> for Phase II units with Group 1 boilers under 40 CFR 76.7.

**Certification**

I am authorized to make this submission on behalf of the owners and operators of the affected source or affected units for which the submission is made. I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment.

Paul L. Carpinone	
Name	
Signature	October 6, 2009
	Date

**Bend Unit 1**

**Sootblowing Emission Results for PM**

Time	4/23/04 12:05	4/23/04 13:31	4/23/04 18:30	6/14/06 12:15	6/14/06 13:43	6/14/06 16:41	5/17/07 7:32	5/17/07 9:25	5/17/07 11:01	5/17/07 7:32	5/17/07 9:25	5/17/07 11:01	2/25/09 13:14			Maximum	Average
Run #	Run 1 - S	Run 2 - S	Run 4 - S	Run 1 - S	Run 2 - S	Run 3 - S	Run 1 - S	Run 2 - S	Run 3 - S	Run 1 - S	Run 2 - S	Run 3 - S	Run 1 - S			0.040	0.023
lb/MMBtu	0.020	0.018	0.021	0.020	0.020	0.020	0.020	0.020	0.020	0.040	0.030	0.030	0.023			0.040	0.023
Opacity (%)	13	12	13	8	6	6	9	8	8	9	8	8	6			13	9

**Non-Sootblowing Emission Results for PM**

Time	04/23/2004 9:50	04/23/2004 14:55	04/23/2004 16:12	6/14/06 8:25	6/14/06 10:47	6/14/06 15:18	5/17/07 12:31	5/17/07 14:05	5/17/07 17:14	5/17/07 12:31	5/17/07 14:05	5/17/07 17:14		2/25/09 10:03	2/25/09 11:40	Maximum	Average
Run #	Run 1	Run 2	Run 3	Run 1	Run 2	Run 3	Run 1	Run 2	Run 3	Run 1	Run 2	Run 3		Run 1	Run 2	0.040	0.022
lb/MMBtu	0.024	0.018	0.019	0.020	0.020	0.020	0.010	0.010	0.020	0.040	0.030	0.020		0.025	0.026	0.040	0.022
Opacity (%)	10	13	13	7	8	6	9	9	9	9	9	9		6	6	13	9

**Bend Unit 2**

**Sootblowing Emission Results for PM**

Time	9/29/05 12:22	9/29/05 15:15	9/29/05 16:45	12/12/05 12:56	12/12/05 14:21	12/12/05 15:50	10/26/06 9:44	10/26/06 12:58	10/26/06 16:10	4/2/08 9:07	4/2/08 12:18	4/2/08 15:21	4/20/09 14:00			Maximum	Average
Run #	Run 1 - S	Run 2 - S	Run 3 - S	Run 1 - S	Run 2 - S	Run 3 - S	Run 1 - S	Run 2 - S	Run 3 - S	Run 1 - S	Run 2 - S	Run 3 - S	Run 3 - S			0.038	0.027
lb/MMBtu	0.020	0.030	0.030	0.030	0.020	0.020	0.017	0.038	0.028	0.030	0.030	0.030	0.030			0.038	0.027
Opacity (%)	5	6	6	1	1	1	9	7	4	11	8	9	4			11	6

**Non-Sootblowing Emission Results for PM**

Time	9/29/05 7:40	9/29/05 10:59	9/29/05 13:49	12/12/05 11:22	12/12/05 17:17	12/12/05 18:38	10/26/06 8:15	10/26/06 11:17	10/26/06 14:41	4/2/08 7:40	4/2/08 10:53	4/2/08 13:48		4/20/09 15:40	4/20/09 17:10	Maximum	Average
Run #	Run 1	Run 2	Run 3	Run 1	Run 2	Run 3	Run 1	Run 2	Run 3	Run 1	Run 2	Run 3		Run 1	Run 2	0.040	0.021
lb/MMBtu	0.01	0.01	0.01	0.020	0.020	0.020	0.018	0.017	0.018	0.030	0.030	0.040		0.030	0.020	0.040	0.021
Opacity (%)	5	6	6	6	1	2	8	7	3	14	9	8		4	5	14	6

**Bend Unit 3**

**Sootblowing Emission Results for PM**

Time	4/5/04 10:12	4/5/04 12:00	4/5/04 13:30	3/8/06 11:57	3/8/06 14:54	3/8/06 17:37	4/5/07 9:15	4/5/07 12:46	4/5/07 15:42	8/27/08 6:42	8/27/08 12:04	8/27/08 13:38	6/3/09 9:52			Maximum	Average
Run #	Run 1 - S	Run 2 - S	Run 3 - S	Run 1 - S	Run 2 - S	Run 3 - S	Run 1 - S	Run 2 - S	Run 3 - S	Run 1 - S	Run 2 - S	Run 3 - S	Run 1 - S			0.020	0.017
lb/MMBtu	0.012	0.018	0.014	0.020	0.010	0.010	0.020	0.020	0.020	0.016	0.019	0.018	0.020			0.020	0.017
Opacity (%)	7	7	8	4	4	4	4	3	3	12	11	11	7			12	7

**Non-Sootblowing Emission Results for PM**

Time	4/5/04 14:54	4/5/04 16:36	4/5/04 18:10	3/8/06 13:27	3/8/06 16:14	3/8/06 18:55	4/5/07 11:07	4/5/07 14:14	4/5/07 17:22	8/27/08 8:54	8/27/08 10:05	8/27/08 15:08		6/3/09 11:34	6/3/09 13:49	Maximum	Average
Run #	Run 1	Run 2	Run 3	Run 1	Run 2	Run 3	Run 1	Run 2	Run 3	Run 1	Run 2	Run 3		Run 2	Run 3	0.030	0.016
lb/MMBtu	0.0165	0.0169	0.0143	0.010	0.020	0.020	0.020	0.010	0.030	0.014	0.007	0.020		0.010	0.010	0.030	0.016
Opacity (%)	9	9	10	5	4	4	3	3	3	11	11	10		6	6	11	7

**Bend Unit 4**

**Sootblowing Emission Results for PM**

Time			11/17/04 13:24		4/25/06 11:54			9/11/07 12:27			4/16/08 10:49			5/21/09 10:54		Maximum	Average
Run #			Run 3 - S		Run 2 - S			Run 2 - S			Run 2 - S			Run 2 - S		0.010	0.008
lb/MMBtu			0.006		0.010			0.008			0.005			0.010		0.010	0.008
Opacity (%)			5		4			4			7			3		7	5

**Non-Sootblowing Emission Results for PM**

Time	11/17/04 8:00	11/17/04 10:53		4/25/06 7:08		4/25/06 12:14	9/11/07 9:45		9/11/07 16:11	4/16/08 7:55		4/16/08 13:27	5/21/09 8:00		5/21/09 13:33	Maximum	Average
Run #	Run 1	Run 2		Run 1		Run 3	Run 1		Run 3	Run 1		Run 3	Run 1		Run 3	0.011	0.008
lb/MMBtu	0.003	0.011		0.01		0.010	0.009		0.008	0.007		0.005	0.010		0.010	0.011	0.008
Opacity (%)	5	5		4		4	4		3	6		7	3		2	7	4

**Tampa Electric Company  
Big Bend Station**

**Big Bend Title V Renewal Application  
PM CAM Plan**

**Professional Engineer Certification**

1. Professional Engineer Name: Byron T. Burrows, P.E.

Registration Number: 53817

2. Professional Engineer Mailing Address...

Organization/Firm: Tampa Electric Company

Street Address: P.O. Box 111

City: Tampa

State: FL

Zip Code: 33601

3. Professional Engineer Telephone Numbers...

Telephone: (813) 228 - 1282

Fax: (813) 228 - 1308

4. Professional Engineer E-mail Address: [btburrows@tecoenergy.com](mailto:btburrows@tecoenergy.com)

5. Professional Engineer Statement:

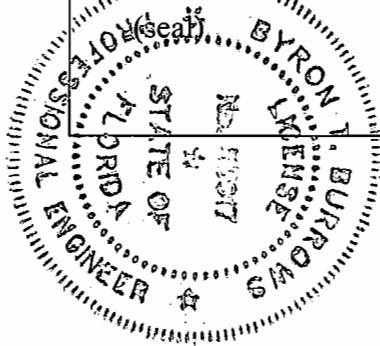
*I, the undersigned, hereby certify that:*

*(1) To the best of my knowledge, the information presented in the Tampa Electric Company (TEC) response to the Departments' request for information regarding the Big Bend Station Title V Renewal Application are true, accurate, and complete based on my review of material provided by TEC engineering and environmental staff; and*

*(2) To the best of my knowledge, any emission estimates reported or relied on in this certification 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 certification.*

Signature

Date



10/6/09





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JUL 14 2008

BUREAU OF AIR REGULATION

Via FedEx  
Airbill No. 7927 2558 9593

July 9, 2008

Ms. Trina Vielhauer  
Florida Department of Environmental Protection  
Division of Air Resource Management  
111 South Magnolia Drive, Suite 4  
Tallahassee, Florida 32301

**Re: Tampa Electric Company  
Big Bend Station  
Title V Permit Renewal Application  
Permit No. 0570039-028-AV**

Dear Ms. Vielhauer:

Tampa Electric Company, the applicant for renewal of the Title V Permit No. 0570039-028-AV, hereby waives the requirement contained in Chapter 62-4.055(5) F.A.C. The previously referred to requirement states that the application for renewal of the permit must be acted upon within 90 days of receipt by the Department of Environmental Protection (DEP). TEC submitted the application on June 6, 2008, and the 90-day period was set to expire on September 4, 2008. Tampa Electric Company (TEC) reserves the ability to amend the application and TEC understands that any incompleteness items and/or revisions contemplated will be communicated by both parties at six months prior to the actual permit expiration date or July 1, 2009. During this period TEC agrees to waive the 90-day period and will submit any revisions to the agency for review.

If you have any questions or comments pertaining to this request, please contact Julie Ward at (813) 228-4740.

Sincerely,

Karen Sheffield  
General Manager – Big Bend Power Station

EHS/rjk/JMW154

cc: Mr. Jonathan Holtom, FDEP  
Mr. Jerry Campbell – EPCHC  
Ms. Deborah Getzoff, FDEP SW District

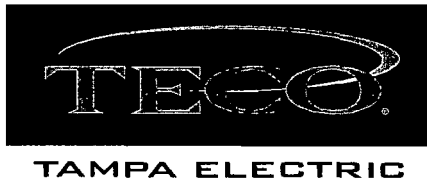
TAMPA ELECTRIC COMPANY  
P. O. BOX 111 TAMPA, FL 33601-0111

(813) 228-4111

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POLK COUNTY (863) 299-0800  
ALL OTHER COUNTIES 1 (888) 223-0800

-file-



RECEIVED

JUN 06 2008

BUREAU OF AIR REGULATION

June 5, 2008

Ms. Trina Vielhauer  
Florida Department of Environmental Protection  
Division of Air Resource Management  
111 South Magnolia Drive, Suite 4  
Tallahassee, Florida 32301

Via FedEx  
Airbill No. 7919 1204 1642

Re: Tampa Electric Company  
Big Bend Station  
Title V Permit Renewal Application  
Permit No. 0570039-028-AV

Dear Ms. Vielhauer:

Tampa Electric Company (TEC) is submitting a request for a renewal of the Big Bend Station Title V Air Operation Permit No. 0570039-028-AV. Pursuant to the requirements of Chapter 62-213.400, F.A.C., the application package contains the Department's *Application for Air Permit - Long Form* and all required supplemental facility and emission unit information.

TEC has identified circumstances within the current Title V Permit that present an opportunity for simplification. TEC believes that these updates, identified in Attachment I, are minor revisions and clarifications as well as additional revisions that TEC has identified. Pursuant to Rule 62-213.420(1)(b)3, F.A.C., if Tampa Electric Company, the applicant, becomes aware of any incorrect or incomplete information the applicant "shall submit corrected or supplementary information to the Department" TEC reserves the ability to amend the application when deemed necessary. Due to the fact that Big Bend Title V Permit is extensive TEC is thoroughly reviewing the operating permit as well as the consent decree and multiple construction permits. TEC will amend the updates made in the enclosed Amendment I and submit any revisions in a timely manner.

Please find enclosed two copies of the permit renewal application signed and sealed.

TEC appreciates the cooperation and consideration of the Department in this requested Title V permit renewal application for Big Bend Station. If you have any questions or comments pertaining to this request, please contact Julie Ward at (813) 228-4740.

Sincerely,

Karen Sheffield  
General Manager - Big Bend Power Station

EHS/rlk/JMW150

Enclosure

c/enc: Ms. Deborah Getzoff, FDEP SW District  
Mr. Jerry Campbell - EPCHC

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POLK COUNTY (863) 299-0800  
ALL OTHER COUNTIES 1 (888) 223-0800

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**Sheplak, Scott**

---

**From:** Friday, Barbara  
**Sent:** Wednesday, June 18, 2008 8:30 AM  
**To:** Sheplak, Scott  
**Subject:** Tampa Electric Company - Big Bend Station Application for Title V Revision

Scott,

The application for the subject Title V Permit Revision that was received on June 6, 2008 has been logged in and the project number is 0570039-039-AV.

Jonathan gave you a copy, I have the original for scanning and to be filed.

Thanks,  
Barbara

6/18/2008

-file-

**Sheplak, Scott**

---

**From:** Sheplak, Scott  
**Sent:** Wednesday, July 30, 2008 3:57 PM  
**To:** 'Lee, Diana'  
**Cc:** Liu, Pwu-Sheng; Holtom, Jonathan  
**Subject:** RE: TECO Big Bend TV Renewal

Diana,

We received an extension (attached) up to July 1, 2009 to process. I do not plan to touch this one until after our priority renewals for this year are done. We will be asking for your input on TECO-Big Bend's compliance status.

Scott

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**From:** Lee, Diana [mailto:Lee@epchc.org]  
**Sent:** Wednesday, July 30, 2008 12:41 PM  
**To:** Sheplak, Scott  
**Cc:** Liu, Pwu-Sheng  
**Subject:** TECO Big Bend TV Renewal

Scott,

I was checking into the status on the review process for TECO's Big Bend TV Renewal. I know we talked last month, but I wanted to see what is the plan for this project and when we should provide you with comments. I don't want to miss the opportunity to comment. I know you wanted us to provide you with some information. Can you please be specific as to what information you want us to look into to be able to help in the processing of this project?

Thanks,  
Diana

**Sheplak, Scott**

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**From:** Sheplak, Scott  
**Sent:** Wednesday, July 30, 2008 3:56 PM  
**To:** 'Lee, Diana'  
**Cc:** Holtom, Jonathan  
**Subject:** FW: TECO - Big Bend

fyi

---

**From:** Sheplak, Scott  
**Sent:** Thursday, July 17, 2008 10:49 AM  
**To:** 'Liu, Pwu-Sheng'  
**Cc:** Holtom, Jonathan  
**Subject:** TECO - Big Bend

The Bureau of Air Regulation within the DEP received the Title V air operation permit renewal in hard copy (2 volume binders) on June 6, 2008. TECO provided a Compliance Report and Plan in Attachment F, certifying compliance with all applicable requirements. The Title V air permit number 0570039-017-AV expires on December 31, 2009.

**Sheplak, Scott**

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**From:** Sheplak, Scott  
**Sent:** Thursday, July 17, 2008 10:49 AM  
**To:** 'Liu, Pwu-Sheng'  
**Cc:** Holtom, Jonathan  
**Subject:** TECO - Big Bend

The Bureau of Air Regulation within the DEP received the Title V air operation permit renewal in hard copy (2 volume binders) on June 6, 2008. TECO provided a Compliance Report and Plan in Attachment F, certifying compliance with all applicable requirements. The Title V air permit number 0570039-017-AV expires on December 31, 2009.