

BIG BEND STATION

SELECTIVE CATALYTIC REDUCTION

**UNIT 3 NO_x EMISSIONS CONTROL
SYSTEM RETROFIT PROJECT**

**APPLICATION FOR TITLE V
AIR OPERATION PERMIT REVISION**

Prepared for:



TAMPA ELECTRIC
Tampa, Florida

Prepared by:

ECT

Environmental Consulting & Technology, Inc.

**3701 Northwest 98th Street
Gainesville, Florida 32606**

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OCT 03 2008

BUREAU OF AIR REGULATION

ECT No. 061154-0100

October 2008

INTRODUCTION

The Tampa Electric Company (TEC) Big Bend Station located in Apollo Beach, Hillsborough County, Florida, is a nominal 2,028 megawatt (MW) electric generation facility. The Big Bend Station consists of four solid fuel-fired steam boiler/steam turbine generator units (Units 1 through 4), three simple-cycle combustion turbines (Combustion Turbine Nos. 1, 2, and 3), solid fuel, fly ash, bottom ash, limestone, lime, gypsum, and slag storage and handling facilities; a once-through cooling water system; fuel oil storage tanks; water treatment facilities; and ancillary support equipment. Solid fuels combusted in Units 1 through 4 include coal, petroleum coke (petcoke), and coal combustion products generated at the TEC Big Bend or Polk Power Stations. The simple-cycle combustion turbines are fired with distillate fuel oil.

TEC recently constructed and placed in operation a selective catalytic reduction (SCR) system for nitrogen oxides (NO_x) control at Big Bend Station Unit 3. An air construction permit was required prior to the commencement of construction of the Unit 3 SCR project, per Rule 62-212.300(1)(a), Florida Administrative Code (F.A.C.). TEC submitted an air construction permit application to the Florida Department of Environmental Protection (FDEP) in June 2005. In response to this application, FDEP issued an air construction permit (No. 0570039-~~022-AC~~) on November 10, 2005, authorizing the construction and initial operation of Unit 3 SCR. The Unit 3 SCR air construction permit expires on December 31, 2008.

Operation of the Big Bend Station is presently authorized by FDEP Final Permit No. 0570039-028-AV issued with a revision effective date of November 19, 2007, and an expiration date of December 31, 2009. The Compliance Authority for this permit is the Environmental Protection Commission of Hillsborough County (EPCHC).

Unit 3 is subject to the Acid Rain Program (ARP) and is equipped with a NO_x continuous emissions monitoring system (CEMS) in accordance with the requirements of 40 Code of Federal Regulations (CFR) Part 75. With respect to the requirements of 40 CFR Part 64

(Compliance Assurance Monitoring [CAM]), the Unit 3 Part 75 NO_x CEMS also satisfies CAM requirements pursuant to 40 CFR Section 64.3(d)(2)(iv).

Condition No. A.10.1 of the Unit 3 SCR air construction permit requires the submittal of a Title V operating permit revision application to the Bureau of Air Regulation in accordance with Chapter 62-213, F.A.C., Rule 62-213.420(1)(a)3., F.A.C., states that a Title V source which contains an emission unit that commences operation or is modified shall submit an application for a permit revision at least 90 days prior to expiration of the unit's air construction permit, but no later than 180 days after the emissions unit commences operation. Initial startup of Unit 3 SCR occurred on April 24, 2008. Accordingly, the application for a Title V revision for Unit 3 SCR is due at least by October 2, 2008 (90 days prior to air construction permit expiration), but no later than October 21, 2008 (180 days after commencement of operation).

This permit application submittal, using DEP Form No. 62-210.900(1), *Application for Air Permit-Long Form, Effective 3/16/06*, constitutes TEC's application to revise Title V Final Permit Revision No. 0570039-028-AV to incorporate the appropriate terms and conditions of Unit 3 SCR Air Construction Permit No. 0570039-022-AC pursuant to the requirements of Chapter 62-213, F.A.C.



Department of Environmental Protection

Division of Air Resource Management

APPLICATION FOR AIR PERMIT - LONG FORM

I. APPLICATION INFORMATION

Air Construction Permit – Use this form to apply for an air construction permit:

- For any required purpose at a facility operating under a federally enforceable state air operation permit (FESOP) or Title V air operation permit;
- For a proposed project subject to prevention of significant deterioration (PSD) review, nonattainment new source review, or maximum achievable control technology (MACT);
- To assume a restriction on the potential emissions of one or more pollutants to escape a requirement such as PSD review, nonattainment new source review, MACT, or Title V;
- To establish, revise, or renew a plantwide applicability limit (PAL).

Air Operation Permit – Use this form to apply for:

- An initial federally enforceable state air operation permit (FESOP); or
- An initial, revised, or renewal Title V air operation permit.

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To ensure accuracy, please see form instructions.

Identification of Facility

1. Facility Owner/Company Name: Tampa Electric Company	
2. Site Name: Big Bend Station	
3. Facility Identification Number: 0570039	
4. Facility Location...: Street Address or Other Locator: 13031 Wyandotte Road City: Apollo Beach County: Hillsborough Zip Code: 33572	
5. Relocatable Facility? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	6. Existing Title V Permitted Facility? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

Application Contact

1. Application Contact Name: Andrew (Thuy) Nguyen	
2. Application Contact Mailing Address... Organization/Firm: Tampa Electric Company Street Address: 702 North Franklin Street City: Tampa State: FL Zip Code: 33602	
3. Application Contact Telephone Numbers... Telephone: (813) 228-4654 ext. Fax: (813) 228-1308	
4. Application Contact E-mail Address: atnguyen@tecoenergy.com	

Application Processing Information (DEP Use)

1. Date of Receipt of Application:	3. PSD Number (if applicable):
2. Project Number(s): 037-AV	4. Siting Number (if applicable):

APPLICATION INFORMATION

Purpose of Application

This application for air permit is being submitted to obtain: (Check one)

Air Construction Permit

- Air construction permit.
- Air construction permit to establish, revise, or renew a plantwide applicability limit (PAL).
- Air construction permit to establish, revise, or renew a plantwide applicability limit (PAL), and separate air construction permit to authorize construction or modification of one or more emissions units covered by the PAL.

Air Operation Permit

- Initial Title V air operation permit.
- Title V air operation permit revision.
- Title V air operation permit renewal.
- Initial federally enforceable state air operation permit (FESOP) where professional engineer (PE) certification is required.
- Initial federally enforceable state air operation permit (FESOP) where professional engineer (PE) certification is not required.

Air Construction Permit and Revised/Renewal Title V Air Operation Permit (Concurrent Processing)

- Air construction permit and Title V permit revision, incorporating the proposed project.
- Air construction permit and Title V permit renewal, incorporating the proposed project.

Note: By checking one of the above two boxes, you, the applicant, are requesting concurrent processing pursuant to Rule 62-213.405, F.A.C. In such case, you must also check the following box:

- I hereby request that the department waive the processing time requirements of the air construction permit to accommodate the processing time frames of the Title V air operation permit.

APPLICATION INFORMATION

Application Comment

Operation of the Tampa Electric Company (TEC) Big Bend Station is currently authorized by Florida Department of Environmental Protection (FDEP) Final Title V Air Operation Permit No. 0570039-028-AV issued with a revision effective date of November 19, 2007 and an expiration date of December 31, 2009.

TEC recently constructed and placed in operation a selective catalytic reduction (SCR) system for nitrogen oxides (NO_x) control at Big Bend Station Unit 3. Initial startup of Unit 3 SCR occurred on April 24, 2008. Compliance testing, as required by Air Construction Permit No. 0570039-022-AC, Condition No. A.19. (testing for ammonia [NH₃] slip), was conducted on June 18, 2008. The initial NH₃ slip emissions performance testing demonstrated that Unit 3 SCR was operating in compliance with the NH₃ slip emission limit specified by Condition A.17. As required by Conditions A.22. and A.23., reports of the initial performance testing were submitted to the FDEP Southwest District Office and Environmental Protection Commission of Hillsborough County (EPCHC) on August 1, 2008. On-going compliance with the NO_x emission limit specified in Condition No. A.16. is confirmed using the Unit 3 continuous emissions monitoring system (CEMS) on a heat input weighted 30-day rolling average as required by Condition No. A.21.

✓ NH₃ compliance
✓ NO_x compliance

This permit application submittal, using DEP Form No. 62-210.900(1), Application for Air Permit – Long Form, Effective 3/16/06, constitutes TEC’s application to revise Title V FINAL Permit Revision No. 0570039-028-AV to incorporate the appropriate terms and conditions of Unit 3 SCR Air Construction Permit No. 0570039-022-AC pursuant to the requirements of Chapter 62-213, F.A.C.

APPLICATION INFORMATION

Owner/Authorized Representative Statement NOT APPLICABLE

Complete if applying for an air construction permit or an initial FESOP.

1. Owner/Authorized Representative Name :
2. Owner/Authorized Representative Mailing Address... Organization/Firm: Street Address: City: State: Zip Code:
3. Owner/Authorized Representative Telephone Numbers... Telephone: () - ext. Fax: () -
4. Owner/Authorized Representative E-mail Address:
5. Owner/Authorized Representative Statement: <i>I, the undersigned, am the owner or authorized representative of the corporation, partnership, or other legal entity submitting this air permit application. To the best of my knowledge, the statements made in this application are true, accurate and complete, and any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. I understand that a permit, if granted by the department, cannot be transferred without authorization from the department.</i> <div style="display: flex; justify-content: space-between;"><div style="width: 45%;"><hr style="border: 0; border-top: 1px solid black; margin-bottom: 5px;"/><p>Signature</p></div><div style="width: 45%;"><hr style="border: 0; border-top: 1px solid black; margin-bottom: 5px;"/><p>Date</p></div></div>

APPLICATION INFORMATION

Application Responsible Official Certification

Complete if applying for an initial, revised, or renewal Title V air operation permit or concurrent processing of an air construction permit and revised or renewal Title V air operation permit. If there are multiple responsible officials, the “application responsible official” need not be the “primary responsible official.”

1. Application Responsible Official Name: Ms. Karen Sheffield, General Manager
2. Application Responsible Official Qualification (Check one or more of the following options, as applicable): <input checked="" type="checkbox"/> For a corporation, the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit under Chapter 62-213, F.A.C. <input type="checkbox"/> For a partnership or sole proprietorship, a general partner or the proprietor, respectively. <input type="checkbox"/> For a municipality, county, state, federal, or other public agency, either a principal executive officer or ranking elected official. <input type="checkbox"/> The designated representative at an Acid Rain source, CAIR source, or Hg Budget source.
3. Application Responsible Official Mailing Address... Organization/Firm: Tampa Electric Company Street Address: P.O. Box 111 City: Tampa State: FL Zip Code: 33601-0111
4. Application Responsible Official Telephone Numbers... Telephone: (813) 228-4111 ext. Fax: (813) 630-7121
5. Application Responsible Official E-mail Address: kasheffield@tecoenergy.com
6. Application Responsible Official Certification: <i>I, the undersigned, am a responsible official of the Title V source addressed in this air permit application. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof and all other applicable requirements identified in this application to which the Title V source is subject. I understand that a permit, if granted by the department, cannot be transferred without authorization from the department, and I will promptly notify the department upon sale or legal transfer of the facility or any permitted emissions unit. Finally, I certify that the facility and each emissions unit are in compliance with all applicable requirements to which they are subject, except as identified in compliance plan(s) submitted with this application.</i> <i>Karen Sheffield</i> Signature Date <u>10/02/08</u>

APPLICATION INFORMATION

Professional Engineer Certification

1. Professional Engineer Name: **Thomas W. Davis**
Registration Number: **36777**

2. Professional Engineer Mailing Address...
Organization/Firm: **Environmental Consulting & Technology, Inc.**
Street Address: **3701 Northwest 98th Street**
City: **Gainesville** State: **FL** Zip Code: **32606-5004**

3. Professional Engineer Telephone Numbers...
Telephone: **(352) 332 - 0444** ext. Fax: **(352) 332-6722**

4. Professional Engineer E-mail Address: **tdavis@ectinc.com**

5. Professional Engineer Statement:
I, the undersigned, hereby certify, except as particularly noted herein, that:*

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

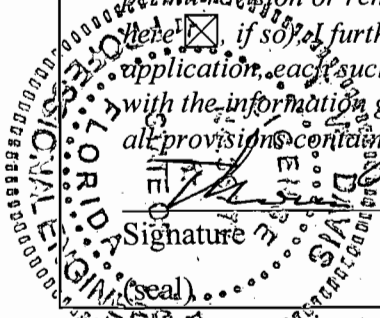
(2) *To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions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

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

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

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

Thomas W. Davis
Signature _____ Date 9/30/08



Attach any exception to certification statement.

FACILITY INFORMATION

Facility Regulatory Classifications

Check all that would apply *following* completion of all projects and implementation of all other changes proposed in this application for air permit. Refer to instructions to distinguish between a “major source” and a “synthetic minor source.”

1. <input type="checkbox"/> Small Business Stationary Source	<input type="checkbox"/> Unknown
2. <input type="checkbox"/> Synthetic Non-Title V Source	
3. <input checked="" type="checkbox"/> Title V Source	
4. <input checked="" type="checkbox"/> Major Source of Air Pollutants, Other than Hazardous Air Pollutants (HAPs)	
5. <input type="checkbox"/> Synthetic Minor Source of Air Pollutants, Other than HAPs	
6. <input checked="" type="checkbox"/> Major Source of Hazardous Air Pollutants (HAPs)	
7. <input type="checkbox"/> Synthetic Minor Source of HAPs	
8. <input checked="" type="checkbox"/> One or More Emissions Units Subject to NSPS (40 CFR Part 60)	
9. <input type="checkbox"/> One or More Emissions Units Subject to Emission Guidelines (40 CFR Part 60)	
10. <input checked="" type="checkbox"/> One or More Emissions Units Subject to NESHAP (40 CFR Part 61 or Part 63)	
11. <input type="checkbox"/> Title V Source Solely by EPA Designation (40 CFR 70.3(a)(5))	
12. Facility Regulatory Classifications Comment:	
<p>The following NSPS (40 CFR Part 60) regulations apply to the Big Bend Station:</p> <p>NSPS for Electric Utility Steam Generating Units for Which Construction is Commenced After September 18, 1978 [40 CFR Part 60 Subpart Da] applies to EU ID 004.</p> <p>NSPS for Nonmetallic Mineral Processing Plants [40 CFR Part 60 Subpart OOO] applies to EU IDs 020 and 021.</p> <p>The following NESHAPS (40 CFR Parts 61 or 63) regulations apply to the Big Bend Station:</p> <p>NESHAPS for Shipbuilding and Ship Repair (Surface Coating) [40 CFR Part 63 Subpart II] applies to EU ID 035.</p> <p>NESHAPS for Stationary Reciprocating Internal Combustion Engines [40 CFR Part 63 Subpart ZZZZ] applies to Big Bend Station emergency IC engines >500 horsepower.</p>	

FACILITY INFORMATION

List of Pollutants Emitted by Facility

1. Pollutant Emitted	2. Pollutant Classification	3. Emissions Cap [Y or N]?
NOX	A	N
SO2	A	Y
CO	A	N
PM10	A	Y
PM	A	Y
SAM (Sulfuric Acid Mist)	A	N
VOC	A	N
PB	B	N
H106 (Hydrogen Chloride)	A	N
H107 (Hydrogen Fluoride)	A	N
H133 (Nickel Compounds)	A	N
HAPS (Total HAPs)	A	N

FACILITY INFORMATION

C. FACILITY ADDITIONAL INFORMATION

Additional Requirements for All Applications, Except as Otherwise Stated

1. Facility Plot Plan: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Previously Submitted, Date: June 2008
2. Process Flow Diagram(s): (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Previously Submitted, Date: June 2008
3. Precautions to Prevent Emissions of Unconfined Particulate Matter: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Previously Submitted, Date: June 2008

Additional Requirements for Air Construction Permit Applications **NOT APPLICABLE**

1. Area Map Showing Facility Location: <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable (existing permitted facility)
2. Description of Proposed Construction, Modification, or Plantwide Applicability Limit (PAL): <input type="checkbox"/> Attached, Document ID: _____
3. Rule Applicability Analysis: <input type="checkbox"/> Attached, Document ID: _____
4. List of Exempt Emissions Units: <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable (no exempt units at facility)
5. Fugitive Emissions Identification: <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable
6. Air Quality Analysis (Rule 62-212.400(7), F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable
7. Source Impact Analysis (Rule 62-212.400(5), F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable
8. Air Quality Impact since 1977 (Rule 62-212.400(4)(e), F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable
9. Additional Impact Analyses (Rules 62-212.400(8) and 62-212.500(4)(e), F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable
10. Alternative Analysis Requirement (Rule 62-212.500(4)(g), F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable

FACILITY INFORMATION

C. FACILITY ADDITIONAL INFORMATION (CONTINUED)

Additional Requirements for FESOP Applications **NOT APPLICABLE**

1. List of Exempt Emissions Units:
 Attached, Document ID: _____ Not Applicable (no exempt units at facility)

Additional Requirements for Title V Air Operation Permit Applications

1. List of Insignificant Activities: (Required for initial/renewal applications only)
 Attached, Document ID: _____ Not Applicable (revision application)
2. Identification of Applicable Requirements: (Required for initial/renewal applications, and for revision applications if this information would be changed as a result of the revision being sought)
 Attached, Document ID: See Air Construction Permit No. 0570039-022-AC
 Not Applicable (revision application with no change in applicable requirements)
3. Compliance Report and Plan: (Required for all initial/revision/renewal applications)
 Attached, Document ID: _____ Not Applicable
Note: A compliance plan must be submitted for each emissions unit that is not in compliance with all applicable requirements at the time of application and/or at any time during application processing. The department must be notified of any changes in compliance status during application processing.
4. List of Equipment/Activities Regulated under Title VI: (If applicable, required for initial/renewal applications only)
 Attached, Document ID: _____
 Equipment/Activities Onsite but Not Required to be Individually Listed
 Not Applicable
5. Verification of Risk Management Plan Submission to EPA: (If applicable, required for initial/renewal applications only)
 Attached, Document ID: _____ Not Applicable
6. Requested Changes to Current Title V Air Operation Permit:
 Attached, Document ID: _____ Not Applicable

FACILITY INFORMATION

C. FACILITY ADDITIONAL INFORMATION (CONTINUED) N/A

Additional Requirements for Facilities Subject to Acid Rain, CAIR, or Hg Budget Program

1. Acid Rain Program Forms: Acid Rain Part Application (DEP Form No. 62-210.900(1)(a)): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Previously Submitted, Date: <u>June 2008</u> <input type="checkbox"/> Not Applicable (not an Acid Rain source) Phase II NO _x Averaging Plan (DEP Form No. 62-210.900(1)(a)1.): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Previously Submitted, Date: <u>6/28/04</u> <input type="checkbox"/> Not Applicable New Unit Exemption (DEP Form No. 62-210.900(1)(a)2.): <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date: _____ <input checked="" type="checkbox"/> Not Applicable
2. CAIR Part (DEP Form No. 62-210.900(1)(b)): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Previously Submitted, Date: <u>May 2008</u> <input type="checkbox"/> Not Applicable (not a CAIR source)
3. Hg Budget Part (DEP Form No. 62-210.900(1)(c)): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Previously Submitted, Date: <u>May 2008</u> <input type="checkbox"/> Not Applicable (not a Hg Budget unit)

Additional Requirements Comment

EMISSIONS UNIT INFORMATION

Section [1] of [1]

A. GENERAL EMISSIONS UNIT INFORMATION

Title V Air Operation Permit Emissions Unit Classification

1. Regulated or Unregulated Emissions Unit? (Check one, if applying for an initial, revised or renewal Title V air operation permit. Skip this item if applying for an air construction permit or FESOP only.)
- The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit.
- The emissions unit addressed in this Emissions Unit Information Section is an unregulated emissions unit.

Emissions Unit Description and Status

1. Type of Emissions Unit Addressed in this Section: (Check one)
- This Emissions Unit Information Section addresses, as a single emissions unit, a single process or production unit, or activity, which produces one or more air pollutants and which has at least one definable emission point (stack or vent).
- This Emissions Unit Information Section addresses, as a single emissions unit, a group of process or production units and activities which has at least one definable emission point (stack or vent) but may also produce fugitive emissions.
- This Emissions Unit Information Section addresses, as a single emissions unit, one or more process or production units and activities which produce fugitive emissions only.

2. Description of Emissions Unit Addressed in this Section:
Unit No. 3 Steam Generator – SCR Project

3. Emissions Unit Identification Number: **EU ID 003**

4. Emissions Unit Status Code: A	5. Commence Construction Date: 11/17/07	6. Initial Startup Date: 04/24/08	7. Emissions Unit Major Group SIC Code: 49
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8. Federal Program Applicability: (Check all that apply)

- Acid Rain Unit
- CAIR Unit
- Hg Budget Unit

9. Package Unit:

Manufacturer: **Riley-Stoker**

Model Number:

10. Generator Nameplate Rating: **445 MW**

11. Emissions Unit Comment:

EMISSIONS UNIT INFORMATION

Section [1] of [1]

Emissions Unit Control Equipment/Method: Control 1 of 3

1. Control Equipment/Method Description: Low-NOx Burners (LNB)
2. Control Device or Method Code: 205

Emissions Unit Control Equipment/Method: Control 2 of 4

1. Control Equipment/Method Description: Selective Catalytic Reduction (SCR)
2. Control Device or Method Code: 139

Emissions Unit Control Equipment/Method: Control 3 of 4

1. Control Equipment/Method Description: Electrostatic Precipitator (ESP)
2. Control Device or Method Code: 010

Emissions Unit Control Equipment/Method: Control 4 of 4

1. Control Equipment/Method Description: Flue Gas Desulfurization (FGD)
2. Control Device or Method Code: 042

Emissions Unit Control Equipment/Method: Control ___ of ___

1. Control Equipment/Method Description:
2. Control Device or Method Code:

EMISSIONS UNIT INFORMATION

Section [1] of [1]

C. EMISSION POINT (STACK/VENT) INFORMATION

(Optional for unregulated emissions units.)

Emission Point Description and Type

1. Identification of Point on Plot Plan or Flow Diagram: BB-003		2. Emission Point Type Code: 1	
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking: N/A			
4. ID Numbers or Descriptions of Emission Units with this Emission Point in Common: N/A			
5. Discharge Type Code: V	6. Stack Height: 490 feet	7. Exit Diameter: 24.0 feet	
8. Exit Temperature: 150°F	9. Actual Volumetric Flow Rate: 1,211,600 acfm	10. Water Vapor: %	
11. Maximum Dry Standard Flow Rate: dscfm		12. Nonstack Emission Point Height: feet	
13. Emission Point UTM Coordinates... Zone: East (km): North (km):		14. Emission Point Latitude/Longitude... Latitude (DD/MM/SS) Longitude (DD/MM/SS)	
15. Emission Point Comment:			

EMISSIONS UNIT INFORMATION

Section [1] of [1]

D. SEGMENT (PROCESS/FUEL) INFORMATION

Segment Description and Rate: Segment 1 of 5

1. Segment Description (Process/Fuel Type): Coal		
2. Source Classification Code (SCC): 1-01-002-01		3. SCC Units: Tons Burned
4. Maximum Hourly Rate: 187.00	5. Maximum Annual Rate: 1,638,518.0	6. Estimated Annual Activity Factor: N/A
7. Maximum % Sulfur: 3.71	8. Maximum % Ash: 10.70	9. Million Btu per SCC Unit: 22
10. Segment Comment: Fuel heat content (Field 9) based on nominal coal heat content of 11,000 Btu/lb.		

Segment Description and Rate: Segment 2 of 5

1. Segment Description (Process/Fuel Type): Coal/Petroleum coke blend consisting of 20% maximum petroleum coke by weight.		
2. Source Classification Code (SCC): 1-01-002-01		3. SCC Units: Tons Burned
4. Maximum Hourly Rate: 178.10	5. Maximum Annual Rate: 1,560,494.0	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur: 4.20	8. Maximum % Ash: 8.80	9. Million Btu per SCC Unit: 23
10. Segment Comment: Data provided based on 80/20 weight percent blend of coal/petroleum coke, as received. Sulfur content (Field 7) based on 3.71% S for coal and 6.0% S for petroleum coke. Ash content (Field 8) based on 10.7% ash for coal and 1.0% ash for petroleum coke. Data provided in Fields 4, 5 and 9 based on nominal heating values of 11,000 and 13,750 Btu/lb for coal and petroleum coke, respectively.		

EMISSIONS UNIT INFORMATION

Section [1] of [1]

D. SEGMENT (PROCESS/FUEL) INFORMATION (CONTINUED)

Segment Description and Rate: Segment 3 of 5

1. Segment Description (Process/Fuel Type): Distillate (No. 2) Fuel Oil burned during startup, shutdown, flame stabilization and start of a mill only.		
2. Source Classification Code (SCC): 1-01-005-01		3. SCC Units: Thousands Gallons Burned
4. Maximum Hourly Rate: 24.00	5. Maximum Annual Rate: 2,112.0	6. Estimated Annual Activity Factor: N/A
7. Maximum % Sulfur: 0.50	8. Maximum % Ash:	9. Million Btu per SCC Unit: 136
10. Segment Comment: Fuel heat content (Field 9) based on average fuel heat content of 136,280 Btu/gal.		

Segment Description and Rate: Segment 4 of 5

1. Segment Description (Process/Fuel Type): Raw Coal Residual		
2. Source Classification Code (SCC): 1-01-002-01		3. SCC Units: Tons Burned
4. Maximum Hourly Rate: *	5. Maximum Annual Rate: 73,000	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur: 1.43	8. Maximum % Ash: 57.7	9. Million Btu per SCC Unit: 6.1
10. Segment Comment: *Firing of raw coal residual is limited to 200 tons per day total for Units 1-4. Maximum annual coal residual rate (Field 9) is the total for Units 1-4.		

EMISSIONS UNIT INFORMATION

Section [1] of [1]

D. SEGMENT (PROCESS/FUEL) INFORMATION (CONTINUED)

Segment Description and Rate: Segment 5 of 5

1. Segment Description (Process/Fuel Type): Beneficiated Coal Residual		
2. Source Classification Code (SCC): 1-01-002-01		3. SCC Units: Tons Burned
4. Maximum Hourly Rate: *	5. Maximum Annual Rate: 182,500.0	6. Estimated Annual Activity Factor: N/A
7. Maximum % Sulfur: 1.45	8. Maximum % Ash: 35.4	9. Million Btu per SCC Unit: 17.95
10. Segment Comment: * Firing of beneficiated coal residual is limited to 500 tons per day for Units No. 1-4. Maximum annual coal residual rate (Field 5) is the total for Units No. 1-4. Sulfur, ash and heat contents are on a dry basis.		

EMISSIONS UNIT INFORMATION

Section [1] of [1]

E. EMISSIONS UNIT POLLUTANTS

List of Pollutants Emitted by Emissions Unit

1. Pollutant Emitted	2. Primary Control Device Code	3. Secondary Control Device Code	4. Pollutant Regulatory Code
PM	010	042	EL
SO2	042		EL
CO			NS
NOX	205	139	EL
PM10	010	042	NS
VOC			NS
PB			NS
H106 (Hydrogen Chloride)			NS
H107 (Hydrogen Fluoride)			NS
H133 (Nickel Compounds)			NS
HAPS (Total HAPS)			NS

**F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION –
POTENTIAL, FUGITIVE, AND ACTUAL EMISSIONS**
(Optional for unregulated emissions units.)

Complete a Subsection F1 for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V operation permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

Potential, Estimated Fugitive, and Baseline & Projected Actual Emissions

1. Pollutant Emitted: PM		2. Total Percent Efficiency of Control: 99.7%	
3. Potential Emissions: 123.5 lb/hour 541 tons/year		4. Synthetically Limited? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year			
6. Emission Factor: 0.03 lb/MMBtu Reference: Allowable emission rate		7. Emissions Method Code: 0	
8.a. Baseline Actual Emissions (if required): tons/year N/A		8.b. Baseline 24-month Period: N/A From: To:	
9.a. Projected Actual Emissions (if required): tons/year N/A		9.b. Projected Monitoring Period: N/A <input type="checkbox"/> 5 years <input type="checkbox"/> 10 years	
10. Calculation of Emissions:			
11. Potential, Fugitive, and Actual Emissions Comment: FINAL Permit Revision No.: 0570039-028-AV, Conditions A.7 and A.8. Excess PM emissions, up to 0.3 lb/MMBtu, are allowed per Condition A.11. Unit 3 is also subject to the applicable requirements contained in Consent Final Judgment (DEP vs. TEC) dated December 6, 1999; and the Consent Decree (U.S. vs. TEC) dated February 29, 2000, as amended.			

**F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -
ALLOWABLE EMISSIONS**

Complete Subsection F2 if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.

Allowable Emissions Allowable Emissions 1 of 3

1. Basis for Allowable Emissions Code: RULE	2. Future Effective Date of Allowable Emissions: N/A
3. Allowable Emissions and Units: 0.03 lb/MMBtu	4. Equivalent Allowable Emissions: 123.5 lb/hour 541 tons/year
5. Method of Compliance: Annual Compliance Test in accordance with EPA Reference Method 17, 5, 5B or 5F.	
6. Allowable Emissions Comment (Description of Operating Method): Rule 62-296.405(1)(b), F.A.C. FINAL Permit Revision No.: 0570039-028-AV, Condition A.7.	

Allowable Emissions Allowable Emissions 2 of 4

1. Basis for Allowable Emissions Code: OTHER	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units: N/A	4. Equivalent Allowable Emissions: N/A lb/hour 541 tons/year
5. Method of Compliance: Annual Compliance Test in accordance with EPA Reference Method 17, 5, 5B or 5F.	
6. Allowable Emissions Comment (Description of Operating Method): FINAL Permit Revision No.: 0570039-028-AV, Condition A.8.i.	

**F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -
ALLOWABLE EMISSIONS**

Complete Subsection F2 if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.

Allowable Emissions Allowable Emissions 3 of 3

1. Basis for Allowable Emissions Code: OTHER	2. Future Effective Date of Allowable Emissions: N/A
3. Allowable Emissions and Units: N/A	4. Equivalent Allowable Emissions: N/A lb/hour 2,767 tons/year
5. Method of Compliance: Annual Compliance Test in accordance with EPA Reference Method 17, 5, 5B or 5F.	
6. Allowable Emissions Comment (Description of Operating Method): Annual Emission Limit for Units 1-4 combined. Rule 62-212.400(2)(g), F.A.C. & Permit No. 0570039-012-AC. FINAL Permit Revision No.: 0570039-028-AV, Condition A.8.ii.	

Allowable Emissions Allowable Emissions of

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

**F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -
ALLOWABLE EMISSIONS**

Complete Subsection F2 if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.

Allowable Emissions Allowable Emissions 1 of 3

1. Basis for Allowable Emissions Code: RULE	2. Future Effective Date of Allowable Emissions: N/A
3. Allowable Emissions and Units: 6.5 lb/MMBtu (2-hour average)	4. Equivalent Allowable Emissions: 26,747.5 lb/hour N/A tons/year
5. Method of Compliance: SO₂ Continuous Emissions Monitoring System	
6. Allowable Emissions Comment (Description of Operating Method): Rule 62-296.405(1)(c)2.b., F.A.C. FINAL Permit Revision No.: 0570039-028-AV, Condition A.9.i.a.	

Allowable Emissions Allowable Emissions 2 of 3

1. Basis for Allowable Emissions Code: RULE	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units: N/A	4. Equivalent Allowable Emissions: 63,000 lb/hour (3-hour avg.) N/A tons/year 50,000 lb/hour (24-hour avg.) N/A tons/year
5. Method of Compliance: SO₂ Continuous Emissions Monitoring System	
6. Allowable Emissions Comment (Description of Operating Method): Hourly emission rates for Units 1, 2 and 3 combined. Rule 62-296.405(1)(c)2.b., F.A.C. FINAL Permit Revision No.: 0570039-028-AV, Condition A.9.i.a.	

**F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -
ALLOWABLE EMISSIONS**

Complete Subsection F2 if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.

Allowable Emissions Allowable Emissions 3 of 3

1. Basis for Allowable Emissions Code: OTHER	2. Future Effective Date of Allowable Emissions: N/A
3. Allowable Emissions and Units: N/A	4. Equivalent Allowable Emissions: N/A lb/hour 71,810 tons/year
5. Method of Compliance: SO₂ Continuous Emissions Monitoring System	
6. Allowable Emissions Comment (Description of Operating Method): Annual allowable emissions limit for Units 1 - 4 combined. Rule 62-212.400(2)(g), F.A.C. & Permit No. 0570039-012-AC. FINAL Permit Revision No.: 0570039-028-AV, Condition A.9.ii.	

Allowable Emissions Allowable Emissions of

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

**F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -
ALLOWABLE EMISSIONS**

Complete Subsection F2 if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: RULE	2. Future Effective Date of Allowable Emissions: N/A
3. Allowable Emissions and Units: 0.12 lb/MMBtu	4. Equivalent Allowable Emissions: 494 lb/hour 2,163.7 tons/year
5. Method of Compliance: NO_x Continuous Emissions Monitoring System	
6. Allowable Emissions Comment (Description of Operating Method): Air Construction Permit No. 0570039-022-AC, Condition A.16	

Allowable Emissions Allowable Emissions of

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

EMISSIONS UNIT INFORMATION

Section [1] of [1]

G. VISIBLE EMISSIONS INFORMATION

Complete Subsection G if this emissions unit is or would be subject to a unit-specific visible emissions limitation.

Visible Emissions Limitation: Visible Emissions Limitation 1 of 4

1. Visible Emissions Subtype: VE20	2. Basis for Allowable Opacity: <input checked="" type="checkbox"/> Rule <input type="checkbox"/> Other
3. Allowable Opacity: Normal Conditions: 20 % Exceptional Conditions: 27 % Maximum Period of Excess Opacity Allowed: 6 min/hour	
4. Method of Compliance: Continuous Opacity Monitor System (COMS)	
5. Visible Emissions Comment: Visible emissions cannot exceed 27% for more than one 6-minute period per hour. Rule 62-296.405(1)(a), F.A.C. FINAL Permit Revision No.: 0570039-028-AV, Condition A.6.	

Visible Emissions Limitation: Visible Emissions Limitation 2 of 4

1. Visible Emissions Subtype: VE60	2. Basis for Allowable Opacity: <input checked="" type="checkbox"/> Rule <input type="checkbox"/> Other
3. Allowable Opacity: Normal Conditions: % Exceptional Conditions: 60 % Maximum Period of Excess Opacity Allowed: 60 min/hour	
4. Method of Compliance: Continuous Opacity Monitor System (COMS)	
5. Visible Emissions Comment: Excess emissions during boiler cleaning and load change shall not exceed 3 hours in any 24-hour period. Rule 62-210.700(3), F.A.C. FINAL Permit Revision No.: 0570039-028-AV, Condition A.11.(3)	

EMISSIONS UNIT INFORMATION

Section [1] of [1]

G. VISIBLE EMISSIONS INFORMATION

Complete Subsection G if this emissions unit is or would be subject to a unit-specific visible emissions limitation.

Visible Emissions Limitation: Visible Emissions Limitation **3** of **4**

1. Visible Emissions Subtype: VE	2. Basis for Allowable Opacity: <input checked="" type="checkbox"/> Rule <input type="checkbox"/> Other
3. Allowable Opacity: Normal Conditions: 20 % Exceptional Conditions: 100 % Maximum Period of Excess Opacity Allowed: See Comments min/hour	
4. Method of Compliance: Continuous Opacity Monitor System (COMS)	
5. Visible Emissions Comment: VE emissions can exceed 60% opacity for no more than 4 six-minute periods during the 3-hour excess emission period allowed during boiler cleaning and load change. Rule 62-210.700(3), F.A.C. FINAL Permit Revision No.: 0570039-028-AV, Condition A.11.(3)	

Visible Emissions Limitation: Visible Emissions Limitation **4** of **4**

1. Visible Emissions Subtype: *	2. Basis for Allowable Opacity: <input checked="" type="checkbox"/> Rule <input type="checkbox"/> Other
3. Allowable Opacity: Normal Conditions: % Exceptional Conditions: * % Maximum Period of Excess Opacity Allowed: * min/hour	
4. Method of Compliance: Continuous Opacity Monitor System (COMS)	
5. Visible Emissions Comment: * Best operational practices to minimize excess emissions and duration resulting from startup or shutdown. Rule 62-210.700(2), F.A.C. FINAL Permit Revision No.: 0570039-028-AV, Condition A.11.(2)	

EMISSIONS UNIT INFORMATION

Section [1] of [1]

H. CONTINUOUS MONITOR INFORMATION

Complete Subsection H if this emissions unit is or would be subject to continuous monitoring.

Continuous Monitoring System: Continuous Monitor 1 of 5

1. Parameter Code: EM	2. Pollutant(s): OPACITY
3. CMS Requirement:	<input checked="" type="checkbox"/> Rule <input type="checkbox"/> Other
4. Monitor Information... Manufacturer: Monitor Labs Model Number: 560 Serial Number: 5600448	
5. Installation Date: 15-Nov-1993	6. Performance Specification Test Date: 15-Nov-1993
7. Continuous Monitor Comment: Rule 62-296.405(1)(f)1.a, F.A.C. FINAL Permit Revision No.: 0570039-028-AV, Condition A.23. Stack BB-003.	

Continuous Monitoring System: Continuous Monitor 2 of 5

1. Parameter Code: EM	2. Pollutant(s): SO2
3. CMS Requirement:	<input checked="" type="checkbox"/> Rule <input type="checkbox"/> Other
4. Monitor Information... Manufacturer: Thermo Environmental Corporation Model Number: 43C Serial Number: 78956-390	
5. Installation Date: 01-Jan-2008	6. Performance Specification Test Date: 01-Jan-2008
7. Continuous Monitor Comment: Rule 62-296.405(1)(f)1.b, F.A.C. 40 CFR Part 75 (Acid Rain Program) Stack BB-003.	

EMISSIONS UNIT INFORMATION

Section [1] of [1]

H. CONTINUOUS MONITOR INFORMATION (CONTINUED)

Continuous Monitoring System: Continuous Monitor 3 of 5

1. Parameter Code: EM	2. Pollutant(s): NOx
3. CMS Requirement: <input checked="" type="checkbox"/> Rule <input type="checkbox"/> Other	
4. Monitor Information... Manufacturer: Thermo Environmental Corporation Model Number: 42C Serial Number: 42C-78153-388	
5. Installation Date: 15-Nov-1993	6. Performance Specification Test Date: 15-Nov-1993
7. Continuous Monitor Comment: Rule 62-296.405(1)(f)1.c, F.A.C. 40 CFR Part 75 (Acid Rain Program) Stack BB-003.	

Continuous Monitoring System: Continuous Monitor 4 of 5

1. Parameter Code: FLOW	2. Pollutant(s): Volumetric Flow Rate
3. CMS Requirement: <input checked="" type="checkbox"/> Rule <input type="checkbox"/> Other	
4. Monitor Information... Manufacturer: Monitor Labs Model Number: 150 Serial Number: 1500095	
5. Installation Date: 01-Jan-2008	6. Performance Specification Test Date: 01-Jan-2008
7. Continuous Monitor Comment: 40 CFR Part 75 (Acid Rain Program) Stack BB-003.	

EMISSIONS UNIT INFORMATION

Section [1] of [1]

I. EMISSIONS UNIT ADDITIONAL INFORMATION

Additional Requirements for All Applications, Except as Otherwise Stated

1. Process Flow Diagram: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Previously Submitted, Date: June 2005
2. Fuel Analysis or Specification: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Previously Submitted, Date: June 2008
3. Detailed Description of Control Equipment: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Previously Submitted, Date: June 2005
4. Procedures for Startup and Shutdown: (Required for all operation permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Previously Submitted, Date: June 2008 Not Applicable (construction application)
5. Operation and Maintenance Plan: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Previously Submitted, Date: June 2008 <input type="checkbox"/> Not Applicable
6. Compliance Demonstration Reports/Records: <input type="checkbox"/> Attached, Document ID: _____ Test Date(s)/Pollutant(s) Tested: _____ <input checked="" type="checkbox"/> Previously Submitted, Date: 08/01/2008 Test Date(s)/Pollutant(s) Tested: 06/18/2008, NH₃ Slip <input type="checkbox"/> To be Submitted, Date (if known): _____ Test Date(s)/Pollutant(s) Tested: _____ <input type="checkbox"/> Not Applicable Note: For FESOP applications, all required compliance demonstration records/reports must be submitted at the time of application. For Title V air operation permit applications, all required compliance demonstration reports/records must be submitted at the time of application, or a compliance plan must be submitted at the time of application.
7. Other Information Required by Rule or Statute: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable

pass
✓

EMISSIONS UNIT INFORMATION

Section [1] of [1]

I. EMISSIONS UNIT ADDITIONAL INFORMATION (CONTINUED)

Additional Requirements for Air Construction Permit Applications NOT APPLICABLE

1. Control Technology Review and Analysis (Rules 62-212.400(10) and 62-212.500(7), F.A.C.; 40 CFR 63.43(d) and (e)): <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable
2. Good Engineering Practice Stack Height Analysis (Rules 62-212.400(4)(d) and 62-212.500(4)(f), F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable
3. Description of Stack Sampling Facilities: (Required for proposed new stack sampling facilities only) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable

Additional Requirements for Title V Air Operation Permit Applications

1. Identification of Applicable Requirements: <input type="checkbox"/> Attached, Document ID: See Air Construction Permit No. 0570039-022-AC
2. Compliance Assurance Monitoring: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
3. Alternative Methods of Operation: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
4. Alternative Modes of Operation (Emissions Trading): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable

Additional Requirements Comment