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FEB 12 1999

Mr. C.H. Fancy, P.E.
Chief
Bureau of Air Regulation
Department of Environmental Protection
Division of Air Resource Management
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

BUREAU OF
AIR REGULATION

0576039-003 & 004 AC

SUBJ: Proposed Initial Performance Test Waiver for a Baghouse Used to Control Emissions from the Limestone Handling System at Tampa Electric Company Big Bend Station, Tampa, Florida

Dear Mr. Fancy:

Thank you for your letter of January 26, 1999, in which you asked for a determination regarding whether it would be acceptable to waive the requirement to conduct an initial performance test on the referenced baghouse. This baghouse controls emissions from three conveyor belt transfer points that are subject to Subpart OOO (Standards of Performance for Nonmetallic Mineral Processing Plants). Based upon our review of your letter and the draft construction permit that was provided with it as an enclosure, we have concluded that the Tampa Electric Company (TECO) has not provided enough information to justify waiving the requirement for an initial particulate emission test on the baghouse.

The conveyor belt drop points from which the baghouse in question controls emissions are part of a materials handling system that is used to supply limestone for a flue gas desulfurization (FGD) unit at Big Bend Station. Under the provisions of 40 C.F.R. §60.672(a), the vent from this baghouse is subject to a particulate concentration limit of 0.05 grams per dry standard cubic meter (g/dscm) and an opacity standard of seven percent. According to your letter, TECO has asked that a more stringent opacity limit of five percent be incorporated in the construction permit for its FGD unit and that the requirement to conduct an initial performance test on the baghouse to demonstrate compliance with the concentration limit in 40 C.F.R. §60.672(a)(1) be waived.

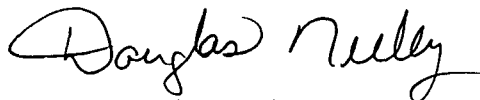
Under the provisions of 40 C.F.R. §60.8(b)(4), the requirement to conduct an initial performance test can be waived in situations where a source owner or operator has demonstrated through other means that an affected facility is in compliance with an applicable standard, and the authority to grant such waivers has been delegated to U.S. Environmental Protection Agency (EPA) Regional Offices by the EPA Administrator. Although a proposal to lower the opacity

limit for the baghouse in question from seven percent to five percent was made in conjunction with the request for a waiver of the initial performance test, the request did not include any information explaining how compliance with the applicable particulate concentration limit of 0.05 g/dscm would be demonstrated without stack testing. Since 40 C.F.R. §60.8(a)(4) identifies such a demonstration as a prerequisite for waiving an initial performance test, we cannot grant a waiver at this time. Although we expect that TECO will be able to meet the applicable particulate concentration limit in Subpart OOO if the baghouse controlling emissions from its limestone handling system is properly installed and operated, conducting a stack test may be the only way to provide adequate assurance that the baghouse is properly installed and operating.

TECO is free to submit additional information in support of its request for an initial test waiver, but the baghouse controlling particulate emissions from the limestone handling system at Big Bend Station is not the type of source for which EPA has typically granted testing waivers in the past. A majority of the initial testing waivers that EPA has previously approved are probably for installations where multiple identical units, such as stationary gas turbines, are located. Because of the precision required to produce gas turbines, units of the same model and size are essentially identical. Since such units are identical, EPA has previously waived the requirement to test all the turbines at a site with multiple units on a case-by case basis if the emissions from a representative sample of turbines at the site are well below the applicable standard. Another category of sources for which we have occasionally waived the requirement to conduct an initial performance test have been situations where emissions from a new facility are ducted to an existing piece of equipment that already controls emissions from other affected facilities. In cases where such a control device has been previously tested, EPA has waived the requirement for new testing on a case-by-case basis if the additional loading at the control device inlet due to a new unit is relatively low and the margin of compliance during the previous testing was high.

If you have any questions about the issues addressed in this letter, please contact Mr. David McNeal of my staff at 404/562-9102.

Sincerely,



R. Douglas Neeley
Chief
Air and Radiation Technology
Branch
Air, Pesticides and Toxics
Management Division