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ENVIRONMENTAL PROTECTION COMMISSION
of Hillsborough County

FAX Transmittal Sheet

DATE: 2/12/98

TO: Joe Kahn

FAX Phone: Speed Voice Phone: 278 1344

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FROM: Rick Kirby
(Circle applicable section below)

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ROGER P. STEWART

MEMORANDUM

DATE: February 12, 1999

TO: Joseph Kahn, P.E.

FROM: *RK* Richard C. Kirby, IV, P.E.

SUBJECT: TECO Big Bend, 0570039-003-AC and 0570039-004-AC, Units 1 & 2 FGD System

I have reviewed the subject draft document and found it to be very thoroughly researched and well written. Please include the following comments in your review.

1. The technical evaluation states the material handling operations are subject to the 0.05 gr/dscf standard of NSPS, Subpart 000. Section 1-3.61 Rules of the Environmental Protection Commission (EPC) of Hillsborough County requires new and existing PME sources in the county to comply with Particulate Matter RACT, Rule 62-296.700, F.A.C. This rule requires emissions not to exceed 0.03 gr/dscf.
2. In the technical evaluation, and later in the permit, it is stated that the PME test required by NSPS, Subpart 000 may be waived if the facility complies with 5% opacity and EPA approves. EPC has no objection to this waiver if EPA agrees.
3. Please include Environmental Protection Commission (EPC) of Hillsborough County in all reporting/submittal requirements of the following conditions:

Specific Condition No. 1 Page 5 of 16

Specific Condition No. 24 Page 9 of 16

Specific Condition No. 7 Page 12 of 16

Specific Condition No. 12 Page 13 of 16

4. Please reword the following conditions to replace "or approved local program" with Environmental Protection Commission (EPC) of Hillsborough County.

Specific Condition No. 21 Page 8 of 16

Specific Condition No. 26 Page 9 of 16

Specific Condition No. 27 Page 9 of 16



Joseph Kahn, P.E.

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5. On Page 14 of 16 under description, add Rules 1-3.61, Rules of the Environmental Protection Commission (EPC) of Hillsborough County and 62-296.700, F.A.C.
6. In Specific Condition No. 16 on Page 14 of 16 PME RACT Rule, 62-296.711, F.A.C. should be specified. Also, please add the 0.03 gr/dscf standard where appropriate.
7. Specific Condition No. 20(a)(1) on Page 15 of 16 should read 0.05 gr/dscf.

Attached is a copy of Section 1-3.61, Rules of the Environmental Protection Commission (EPC) of Hillsborough County. Thanks for the opportunity to provide comments.

mjh

**RULES OF THE
ENVIRONMENTAL PROTECTION COMMISSION
OF HILLSBOROUGH COUNTY**

**CHAPTER 1-3
AIR POLLUTION**

PART 1

- 1-3.10 Statement of Intent
- 1-3.11 Declarations of Legislative Findings
- 1-3.12 Definitions

PART 2

- 1-3.20 Circumvention Prohibited
- 1-3.21 Permits Required
- 1-3.22 Prohibitions
- 1-3.23 Necessary Precautions
- 1-3.24 Public Notification
- 1-3.25 Excess Emissions

PART 3

- 1-3.30 Ambient Air Quality Standards
- 1-3.31 (Reserved)
- 1-3.32 Designation of Air Pollution Status

PART 4

- (Reserved)

PART 5

- 1-3.50 New Source Review

PART 6

- 1-3.60 Emission Limits and Performance Standards
- 1-3.61 Particulate Emissions
- 1-3.62 Visible Emissions
- 1-3.63 Specific Source Emissions

PART 7

- 1-3.70 Source Sampling and Monitoring

PART 8

- (Reserved)

PART 3**1-3.30 AMBIENT AIR QUALITY STANDARDS**

1. Standards established in Section 62-204, F.A.C., are adopted and hereby incorporated by reference.
2. Sampling and analysis of contaminants in this section shall be performed in accordance with the State of Florida Department of Environmental Protection "State-Wide Quality Assurance Plan, January 1985".

1-3.32 DESIGNATION OF AIR POLLUTION STATUS OF AREA

Designations of Hillsborough County pursuant to Section 62-204, F.A.C. regarding the ambient standards of Section 1-3.30 above and Prevention of Significant Deterioration areas, are hereby adopted by reference.

PART 4 (Reserved)**PART 5****1-3.50 NEW SOURCE REVIEW**

Provisions contained in Chapter 62-212, F.A.C., pertinent to Hillsborough County, are adopted and hereby incorporated by reference.

PART 6**1-3.60 EMISSION LIMITING AND PERFORMANCE STANDARDS**

Provisions contained in Chapters 62-204 and 62-296, F.A.C., pertinent to Hillsborough County, are adopted and hereby incorporated by reference, except for Sections 62-296.320(4)(b)2. and 62-296.513(1)(c), F.A.C., and except as may be modified herein.

1-3.61 PARTICULATE EMISSIONS

The particulate emission limits under RACT in Section 62-296.700, F.A.C., shall apply to all new and existing emission units. In situations where the particulate emission limits under RACT, pursuant to Section 62-296.700, F.A.C., are less restrictive than process weight limits pursuant to Section 62-296.320, F.A.C., process weight limits shall apply, except as provided in Section 62-296.700(3), F.A.C.

1-3.62 VISIBLE EMISSIONS

Visible emissions in Hillsborough County from a single source or combination of sources sharing a common discharge point shall not have an opacity greater than 20% except as otherwise specifically provided in these rules. The ability to comply with all other standards does not relieve a source from this 20% opacity standard.

1-3.63 SPECIFIC SOURCE EMISSIONS

Emissions for the following specific sources shall have the following limits in Hillsborough County regardless of provisions otherwise contained in this rule or in Chapters 62-200 - 297 F.A.C.: