

Phillips, Cindy

From: Dennis, Ron [DennisR@epchc.org]
Sent: Tuesday, August 24, 2004 12:09 PM
To: Phillips, Cindy
Cc: Harman, Alice
Subject: TECO Big Bend Station - Title V Air Operation Permit Renewal Application (0570039-017-AV)

Cindy,

We have reviewed the TECO Big Bend Station Title V Air Operation Permit Renewal Application (0570039-017-AV) and have the following comments:

1. We don't get the same PM emissions for 008 Fly Ash Silo No. 1 Baghouse and 009 Fly Ash Silo No. 2 Baghouse on Pages EU-008-8 and EU-009-8, respectively. Using the Maximum Dry Standard Flow Rate of 11,470 dscfm in Section 11 of Pages EU-008-4 and EU-009-4 and the Allowable Emissions and Units of 0.03 grains/dscf in Section 3 of Pages EU-008-8 and EU-009-8, we get an Equivalent Allowable Emissions of 2.95 lb/hr or 12.92 tons/year as follows:

$$11,470 \text{ dscfm} \times 0.03 \text{ grains/dscf} \times 60 \text{ min/hr} \times 1 \text{ lb/7,000 grains} = 2.95 \text{ lb/hr or } 12.92 \text{ tons/year}$$

However, in Section 4 on Pages EU-008-8 and EU-009-8, the Equivalent Allowable Emissions is given as 5.16 lb/hr or 22.62 tons/year. Why are TECO's numbers higher?

2. Please include the Tampa Electric Company Big Bend Station Unit 3 Corrective Action Plan EPC Case No. 00-1223CCG0039 as a document in the Attachments section of the permit application.
3. Please incorporate the Corrective Action Plan in Item 2 in the Requested Changes to Current Title V Air Operation Permit in Document II.D.9.

Ron Dennis
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Hillsborough County EPC
Air Management Division