



Jeb Bush
Governor

Department of Environmental Protection

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Colleen M. Castille
Secretary

NOTICE OF FINAL TITLE V AIR OPERATION PERMIT REVISION

In the Matter of an
Application for Permit Revision/Renewal by:

Ms. Karen A. Sheffield
General Manager
Tampa Electric Company
6944 US HWY 41
Apollo Beach, FL 33572-9200

FINAL Permit Project No.: 0570039-017-AV
Big Bend Station
Hillsborough County

Enclosed is the FINAL Permit, No. 0570039-017-AV, for the Title V Air Operation Revision/Renewal for the Big Bend Station located at Big Bend Road, North Ruskin, Hillsborough County. The purpose of this permit is to incorporate the changes approved in air construction permit 0570039-016-AC, which is simultaneously processed with this revision; to make some administrative corrections; and to revise and renew the existing Title V permit.

This permit revision is issued pursuant to Chapter 403, Florida Statutes (F.S.). There were no comments received from Region 4, U.S. EPA, regarding the PROPOSED Permit.

Any party to this order (permit revision) has the right to seek judicial review of the permit revision pursuant to Section 120.68, F.S., by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the Department in the Legal Office; and, by filing a copy of the Notice of Appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The Notice of Appeal must be filed within 30 (thirty) days from the date this Notice is filed with the Clerk of the Department of Environmental Protection.

Executed in Tallahassee, Florida.

Trina L. Vielhauer, Chief
Bureau of Air Regulation

TLV/clp

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Ms. Karen A. Sheffield
 General Manager
 Tampa Electric Company
 6944 US HWY 41
 Apollo Beach, Florida 33572-9200

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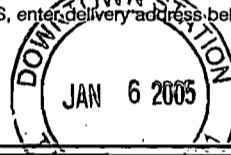
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See Reverse for Instructions

FINAL Permit Project No.: 0570039-017-AV
Big Bend Station
Hillsborough County

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this NOTICE OF FINAL TITLE V AIR OPERATION PERMIT REVISION (including the FINAL Determination and the FINAL Permit) was sent by certified mail before the close of business on 12/30/04 to the person listed or as otherwise noted:

Ms. Karen A. Sheffield, R.O.

The undersigned duly designated deputy agency clerk hereby certifies that a copy of this NOTICE OF FINAL TITLE V AIR OPERATION PERMIT REVISION was sent by U.S. Mail before the close of business on 12/30/04 to the persons listed or as otherwise noted:

Mr. Gregory M. Nelson, D.R. (Tampa Electric Company)
Mr. Thomas W. Davis, P.E. (E-mail) (ECT)
Ms. Laura Crouch, TEC (E-mail)
Mr. Jerry Campbell, EPCHC (E-mail)
Mr. Jerry Kissel, FDEP-SWD (E-mail)
USEPA, Region 4 (INTERNET E-mail Memorandum)

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to §120.52(7), Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.

Barbara J. Friday 12/30/04
(Clerk) (Date)

FINAL Determination

Title V Air Operation Permit Revision/Renewal
FINAL Permit Project No.: 0570039-017-AV
Tampa Electric Company
Big Bend Station
Page 1 of 1

I. Comments.

No comments were received from the USEPA during their 45 day review period of the PROPOSED Permit. Day 45 is December 30, 2004.

II. Conclusion.

In conclusion, the permitting authority hereby issues the FINAL Permit.

STATEMENT OF BASIS

Tampa Electric Company
Big Bend Station
Facility ID No.: 0570039
Hillsborough County

Title V Air Operation Permit Revision/Renewal
FINAL Permit Project No.: 0570039-017-AV

The initial Title V Air Operation Permit No. 0570039-002-AV became final on December 28, 2000, and effective on January 1, 2001. Subsequently, Title V Air Operation Permits Nos. 0570039-010-AV and 0570039-013-AV revised the initial permit. This Title V Air Operation Permit Revision/Renewal is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, 62-213, and 62-214. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents, attached hereto or on file with the permitting authority, in accordance with the terms and conditions of this permit.

The purpose of this permit is: to incorporate the changes approved in air construction permit 0570039-016-AC, which is simultaneously processed with this revision; to make some administrative corrections; and to revise the existing Title V permit.

TEC Big Bend is a nominal 2,028 MW electric generation facility. This facility consists of four steam boilers (Units Nos. 1 through 4); four steam turbines; three simple-cycle combustion turbines (CT Nos. 1, 2, and 3); solid fuels, fly ash, limestone, gypsum, slag, and bottom ash storage and handling facilities, and fuel oil storage tanks. Units No. 1, 2, 3, and 4 have nominal maximum heat inputs of 4037, 3996, 4115 and 4330 million BTU per hour, respectively. Units No. 1 through 4 are fired with coal and with petcoke in a mixture with coal up to 20.0% petcoke/80.0% coal (by weight), or a coal blended with coal residual generated from the Polk Power Station, or a coal/petroleum coke blend further blended with coal residual generated from the Polk Power Station. The combustion turbines are fired with No. 2 distillate fuel oil. In addition, there is a ship surface coating operation.

Also included in this permit are miscellaneous unregulated emissions units and insignificant emissions units and/or activities.

Based on the initial Title V permit application received June 14, 1996, and the renewal application received June 28, 2004, this facility is a major source of hazardous air pollutants (HAPs).

The following descriptions and conditions established in the initial Title V Air Operation Permit, No. 0570039-002-AV, and the previous Title V Air Operation Permit Revisions, Nos. 0570039-010-AV and 0570039-013-AV, are changed as follows. Additions are highlighted, and deletions are shown by strikethroughs. Rationale for change is shown in [brackets].

Table of Contents. [Pages renumbered.]

Placard Page.

1. [Additional applicable requirements.] The following attachments were added to the "Referenced attachments made a part of this permit" on the placard page:

~~APPENDIX C.A.M~~

~~EPA letter of approval of two plans for control of particulate matter, dated June 19, 2003~~

2. [Submission of updated information] The following attachments were updated as follows:

DOCUMENT III.I.36-PROCEDURES FOR STARTUP AND SHUTDOWN UNITS 1-4

DOCUMENT III.I.47 - OPERATION AND MAINTENANCE PLAN (version dated June 2004 7/18/97)

I. Subsection A. Facility Description. [Corrections to clarify the overview of the facility's operation have been made]:

Overview of the facility's operation:

Solid fuel is unloaded from ship/barge into the solid fuel yard, the blending bins or directly to the tripper room via belt conveyors. Solid fuel from the piles is loaded onto belt conveyors using a rail mounted or mobile reclaimer. The solid fuel is then belt conveyed to the blending bins tower, which consists of six storage bins, where the solid fuel may be blended for use at the plant, or transloaded into trucks for shipment off site. ~~From the solid fuel yard conveyors, the solid fuel is screw conveyed into the bins.~~ Particulate matter (PM) emissions from the conveyors in the solid fuel yard blending bins are controlled by 3 4 rotoclones, one at the conveyor drop and one for every 2 bins. ~~PM emissions from the screw conveyor are controlled by the fourth rotoclone.~~ Blending bins can either ~~Each has 2 hoppers, which feed the transloader, or solid fuel can be~~ are conveyed, via 2 parallel belts (T1, T2) to 2 crushers (each belt has a crusher), or diverted directly to the tripper room. PM emissions from the 2 crushers and transfer tower are controlled by 2 rotoclones.

~~From the tripper room solid fuel yard, the solid fuel is conveyed to the tripper room where 2 trippers bunker the solid fuels into 4 solid fuel bunkers. Each unit has its own respective bunker. Solid fuel samples are taken every 15 minutes during bunking, and composited for analysis.~~ From the bunkers, the solid fuel is gravity fed into 14 crushers mills, and then gravity fed into the boilers. There are 3 ball mills tall crushers, each for Unit Nos. 1 – 3, and 5 bowl mills crushers for Unit No. 4. From the mills crushers, the solid fuel is pneumatically fed into classifiers, two for each mill on Unit Nos. 1-3 and one for each mill on Unit No. 4 crusher for a total of 238 classifiers, and then into the respective boiler.

PM emissions from Boiler Nos. 1- 4 are controlled by individual Electrostatic Precipitators (ESPs). Unit Nos. 1- 4 PM emissions are controlled by an ESP, and the SO₂ emissions are controlled by an FGD scrubber systems. When Unit Nos. 1-3 burns petroleum coke, the exhaust gases, following particulate matter removal by the units' s ESPs, will be routed to the inlet of the Unit No. 4 flue gas desulfurization (FGD) system scrubber. In the this integrated mode, Unit No. 3 will meet the same sulfur dioxide emissions limitations as Unit No. 4. The FGD scrubber will continue to treat the exhaust gas from Unit No. 4. The FGD scrubber outlet stream, consisting of the combined Unit No. 3 and Unit No. 4 treated exhaust, will then be split and discharged through stacks CS002 and CS003.

Fly ash from Units No. 1 and No. 2 is vented into Fly Ash Silo #1 which is controlled by a baghouse. Fly ash from Unit No. 3 is vented into Silo #2, which can also receive fly ash from Units No. 1 and 2, while fly ash from Unit No. 4 is vented into Silo #3. The fly ash from each silo is then loaded into trucks and transported off site, while the bottom ash from Unit No. 4 is conveyed across Big Bend Road south of the Big Bend facility to a settling pond. Each fly ash silo is controlled by a baghouse.

The byproduct gypsum is conveyed to the east side of the plant for dewatering diverting and transporting off site. Limestone is unloaded to an underground hopper conveyor belt system to the limestone storage building on the east side of the by-product gypsum area. ~~Particulate matter emissions from the limestone trucks unloading is controlled by a baghouse.~~ From the storage building, limestone is belt conveyed into 2 3 storage silos and then gravity fed into the mill room. ~~Two~~ Three rotary mills grind the limestone and mix it with water to form a slurry that is stored in 2 3 storage tanks for use in the FGD. The slurry is then pumped to the 4 reaction tanks of Units 1- 4 scrubbers that are located directly south of and adjacent to the absorption towers of the FGD scrubber. ~~Gypsum is sold and transported offsite and can be stored south of Big Bend Road prior to offsite removal.~~ Most of the by-product gypsum is wallboard grade, however, gypsum that is produced during start-up, shutdown or upset conditions is de-watered and belt conveyed across the street to the southeast of the plant for drying and transportation off site.

There are 3-combustion turbines (CT) manufactured by Westinghouse. They are all fired on No. 2 fuel oil. Unit CT No. 1 is near the plant and Unit CT Nos. 2 and 3 are on the north side of the property. There is a large No. 2 fuel oil storage tank near Unit CT Nos. 2 and 3 and a small day tank near Unit CT No. 1.

I. Subsection B. Summary of Emissions Unit ID Nos. and Brief Descriptions.

- [Descriptions of Emissions Units 26 and 28 clarified as follows:]
 - 026 Fly Ash Handling and Storage Fugitive Emissions from Unit Nos. 1-3 (all except silos)
 - 028 Fly Ash Handling System Fugitive Emissions from Unit No. 4.
- [Unit No. 4 Coal Bunker, formerly included in Emission Unit 31, has been given its own identification of Emission Unit 39, for consistency with the coal bunkers for Units Nos. 1-3.]
039 Unit No. 4 Coal Bunker
- [Emissions Units 24 and 31 have been deleted. These emissions units are duplicates of emissions units already addressed in Emissions Units 20, 15, 16, 17, and newly created 39.]
 - 024 Limestone Handling Conveyor LE to South Storage Silo with Baghouse
 - 031 Cyclone collectors for bunkers (FH-059 through FH-062)

I. Subsection C. Relevant Documents. The following Documents were added to the list of relevant documents on file with the permitting authority:

Big Bend Generating Station Best Operating Practices for Particulate Matter, dated September 2001
Big Bend Generating Station Best Available Control Technology for Particulate Matter, revised October 2002

II.4. [Change of address]:

Prevention of Accidental Releases (Section 112(r) of CAA).

a. The permittee shall submit its Risk Management Plan (RMP) to the Chemical Emergency Preparedness and Prevention Office (CEPPO) RMP Reporting Center when, and if, such requirement becomes applicable. Any Risk Management Plans, original submittals, revisions or updates to submittals, should be sent to:

RMP Reporting Center
Post Office Box 3346
Merrifield, VA 22116-3346
Telephone: 703/816-4434
P.O. Box 1515
Lanham-Seabrook, Maryland 20703-1515
Telephone: 301/429-5018

and,

b. The permittee shall submit to the permitting authority Title V certification forms or a compliance schedule in accordance with Rule 62-213.440(2), F.A.C. [40 CFR 68]

III.A.2. [format change]:

b. Other operation:

i) In addition to the fuels allowed to be burned during normal operation, each unit may also burn new No. 2 fuel during startup, shutdown, flame stabilization, and during the start of a mill on an already operating unit.

ii) Evaporation of up to 150,000 gallons per year, total at the facility, is allowed of non-hazardous, but potentially HAP-emitting, mineral acid solution boiler chemical cleaning waste which was generated on site.

III. A.7. [Revision of particulate limit based on Consent Final Judgment and Consent Decree.] Except as provided in Specific Condition No. A.11., the particulate matter emission rate for each unit shall not exceed

~~0.1~~ 0.03 pounds per million BTU heat input. {Permitting note: The averaging time for the emissions standard in this condition shall be equal to the cumulative run time required by the specified test method.} [Rule 62-296.405(1)(b), F.A.C.; Consent Final Judgment (DEP vs. TEC) dated December 6, 1999; Consent Decree (U.S. Vs. TEC) dated February 29, 2000; and EPA letter of approval of two plans (BOP and BACT) for control of particulate matter dated June 19, 2003]

III. A.8. [Revision of particulate limits based on Consent Final Judgment and Consent Decree.]

i. Unit Particulate Matter Emission Limits: Based on the maximum permitted heat input rates listed in Specific Condition A.1., the maximum permitted particulate matter annual emission rate for each unit is as follows:

<u>Unit No.</u>	<u>tons/yr</u>
1	530 4768
2	525 4750
3	541 4802

In the event that a maximum permitted heat input rate for a unit is reduced, the maximum annual permitted particulate matter emission rate for that unit shall also be reduced accordingly.

[Rule 62-296.700(4)(b)1., F.A.C.; Consent Final Judgment (DEP vs. TEC) dated December 6, 1999; Consent Decree (U.S. Vs. TEC) dated February 29, 2000; and EPA letter of approval of two plans (BOP and BACT) for control of particulate matter dated June 19, 2003]

III.A.16. [Deletion of obsolete petcoke fuel sulfur content monitoring condition after 2005. SO₂ emissions are measured directly using continuous monitoring systems (CEMS), however, the permittee must submit on an annual basis through 2005, data demonstrating that removal of the sulfur content limit in the petroleum coke fired did not result in a significant increase in the representative actual annual emission of any regulated pollutant. (See Specific Condition III.A.2.)]

Petcoke Sulfur Content: Until January 1, 2006, The owner or operator shall measure the sulfur content of representative samples of all petcoke received using appropriate ASTM methods to demonstrate compliance with the sulfur content limit of this permit. [Permit Nos. 0570039-003-AC & 0570039-004-AC]

III.A.26. [Deletion of obsolete petcoke fuel sulfur content recordkeeping condition after 2005. SO₂ emissions are measured directly using continuous monitoring systems (CEMS), however, the permittee must submit on an annual basis through 2005, data demonstrating that removal of the sulfur content limit in the petroleum coke fired did not result in a significant increase in the representative actual annual emission of any regulated pollutant. (See Specific Condition III.A.2.)]

Records of Petcoke Sulfur Content: Until January 1, 2006, The owner or operator shall maintain records of petcoke sampling and analysis results performed as required by Specific Condition A.16. of this section. [Rule 62-4.070(3), F.A.C., and permit nos. 0570039-003-AC & 0570039-004-AC]

III.A.29. [Correction of typographical error]:

For Unit Nos. 1-3, gravimetric instrument data verifying that the 20.0% maximum petroleum coke content by weight has not been exceeded shall be maintained for two years and submitted to the Department and the EPCHC with each annual operating report. Also to be maintained and available for inspection shall be a record of operation showing the date, fuel used, mode of operation (integrated/non-integrated), and the duration of all startups, shutdowns and malfunctions.

[Rule 62-4.070(3), F.A.C.]

III.A.30. [Deletion of obsolete data reporting condition after 2005.]

Until January 1, 2006, For Unit No. 3, TEC shall maintain and submit to the Department and the EPCHC, on an annual basis for a period of 5 years from the date the unit begins firing petroleum coke, data demonstrating that the operational change of firing petcoke did not result in an emissions increase.

[Rule 62-4.070(3), F.A.C.]

III.A.32. [Clarification.] Continuous Emission Monitoring Network and Alarms:

To demonstrate compliance with emission limits that are protective of AAQS, data inputs will consist of hourly CEM data from the SO₂, flow, and CO₂ monitors for Units 1-3 at Big Bend Station. TEC will use CEM data from common stack CS0W1 and/or CS001 to represent combined unit compliance with the emission limitations for each Unit 1 and Unit 2. When Unit 3 is operated in the integrated mode, TEC will use apportioned CEM data from both common stacks CS002 and CS003 to represent individual unit compliance with the emission limitations for Unit 3. In the event any monitor fails, TEC will comply with 40 CFR 75, Subpart D – Missing Data Substitution Procedures.

[Applicant request.]

[New applicable requirements.] **III.A.34.** These emissions units are subject to 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, including the October 4, 2000 amendment.

[Permit No. 0570039-014-AC]

[New applicable requirements.] **III.A.35.** The first in a series of equipment installed pursuant to the Consent Final Judgment and Consent Decree for the purposes of NO_x requirements contained therein include:

- a. Steam Generator Units No. 1 – 3 are equipped with Low NO_x burners (LNB);
- b. Steam Generators Units 1 and 2 are equipped with coal and air flow monitoring equipment;
- c. Steam Generator Unit 2 is equipped with a neural network system that monitors the following parameters: excess O₂ bias, force draft fan balance bias, mill outlet temperature bias, rating damper bias, and mill bypass damper bias.

[Permit No. 0570039-014-AC]

[New applicable requirements.] **III.A.36.** Units 1, 2, and 3 shall be operated using the Low NO_x burners and in accordance with the operational procedures that have been developed to minimize NO_x emissions.

[Permit No. 0570039-014-AC]

[New applicable requirements.] **III.A.37.** These emissions units are subject to the Compliance Assurance Monitoring requirements contained in the attached APPENDIX CAM.

III. Subsection B. Description. [Clarification added.]

As an option, Unit No. 3 exhaust gas, following particulate matter removal by the unit's ESP, will be routed to the inlet of the Unit No. 4 flue gas desulfurization (FGD) system scrubber. In this integrated mode, Unit No. 3 will meet the same sulfur dioxide emissions limitations as Unit No. 4. The FGD scrubber will continue to treat the exhaust gas from Unit No. 4. The FGD scrubber outlet stream, consisting of the combined Unit No. 3 and Unit No. 4 treated exhaust, will then be split and discharged through stacks CS002 and CS003. Stack CS002 does *not* include a recirculation duct to return exhaust gas to the inlet of the FGD scrubber. Continuous opacity monitoring systems (COMS) will be located at the outlet of Unit No. 3 and Unit No. 4 ESPs. Continuous SO₂ and CO₂ emissions monitoring systems (CEMS) will be located in stacks CS002 and CS003. Continuous NO_x emissions monitoring systems (CEMS) will be located in the inlet ducts of each unit. These monitoring systems will be used to determine compliance with all current applicable requirements.

III.B.2. Methods of Operation - Fuels. [Format change and clarification added to condition B.2.b. Condition B.2.d. deleted per permit 0570039-016-AC; Coal washing requirement made redundant by inclusion of 90% SO₂ reduction requirement found in condition B.7.]

a. Normal operation: The fuel fired in Unit No. 4 shall consist of coal, or a coal/petroleum coke blend containing a maximum of 20% petroleum coke by weight, or coal blended with coal residual generated from the Polk Power Station, or a coal/petroleum coke blend further blended with coal residual generated from the Polk Power Station. In any case, the petroleum coke content of any fuel blend shall not

exceed 20% by weight. The vanadium content of the petroleum coke fired shall not exceed 2660 ppm vanadium. The ash content of the petroleum coke fired shall not exceed 0.76% by weight on a dry basis. The permittee shall maintain and submit to the Department, and to the Environmental Protection Commission of Hillsborough County, on an annual basis for the years 2001, 2002, 2003, 2004, and 2005 data demonstrating that removal of the sulfur content limit and the revision of the vanadium content limit in the petroleum coke fired did not result in a significant increase in the representative actual annual emissions of any regulated pollutant.

b. Other operation:

i. In addition to the fuels allowed to be burned during normal operation, Unit No. 4 may also burn new No. 2 fuel during startup, shutdown, flame stabilization and during the start of an additional solid fuel mill pulverizer on an already operating unit.

ii. Evaporation of up to 150,000 gallons per year, total at the facility, is allowed of non-hazardous, but potentially HAP-emitting, mineral acid solution boiler chemical cleaning waste which was generated on site.

c. Coal shall not be burned in Unit No. 4 unless both the electrostatic precipitator and limestone scrubber are operating properly.

d. ~~[Reserved] Coal burned in Unit No. 4 shall be washed before it is transported to the plant site. TEC shall maintain records of all coal washing and preparation activities for any coal which is to be fired in Big Bend Unit No. 4. These reports shall be submitted to the Department on a quarterly basis.~~

e. TEC shall maintain a daily log of the amounts and types of fuels used and copies of fuel analyses containing information on sulfur content, ash content and heating values.

f. Beneficiated, or refined, coal residual: The total amount of beneficiated, or refined, coal residual fired at Big Bend Station (all Unit Nos. 1-4 combined) shall be limited to 500 tons per day.

The beneficiated, or refined, coal residual results from using the beneficiated process, described in permit application 0570039-012-AC, to wash and screen the raw coal residual to remove fines and oversized materials. This beneficiation process shall be performed at Polk Power Station, not Big Bend Station.

g. Raw coal residual: The total amount of raw coal residual fired at Big Bend Station (all Unit Nos. 1-4 combined) shall be limited to 200 tons per day. The raw coal residual is a by-product of the gasification of coal at the Polk Power Station. At the time of the issuance of permit 0570039-012-AC on October 4, 2001, there were approximately 100,000 tons of raw coal residual stored at Polk Power Station. Once this raw coal residual pile has been fired, TEC shall only fire raw coal residual in the event of a significant beneficiation process malfunction. TEC shall document all beneficiation process malfunctions and record the amount of raw coal residual, if any, fired at Big Bend Station. These records should be kept on site at Big Bend and made readily available to the Department and the Environmental Protection Commission of Hillsborough County upon request.

h. No coal residual shall be fired in any Unit when the corresponding scrubber is not in operation. [Rules 62-4.070(3), 62-4.160(2), 62-210.200, and 62-213.440(1), F.A.C.; PSD-FL-040; Power Plant Siting Certification PA 79-12; Permit No. 0570039-012-AC; Permit No. 0570039-016-AC]

III. B.5.i. [Revision of particulate limits based on Consent Final Judgment and Consent Decree.]

Unit Particulate Matter Emission Limits:

a. Particulate matter emissions from Unit No. 4 shall not exceed ~~0.03~~ 0.01 lb/million Btu heat input. This standard applies at all times except during periods of startup, shutdown, or malfunction. [Rule 62-204.800(7)(b)2., F.A.C.; 40 CFR 60.42a(a); 40 CFR 60.46a(a); 40 CFR 60.46a(c); Consent Final Judgment (DEP vs. TEC) dated December 6, 1999; Consent Decree (U.S. Vs. TEC) dated February 29, 2000; and EPA letter of approval of two plans (BOP and BACT) for control of particulate matter dated June 19, 2003]

b. Based on the maximum permitted heat input rate listed in Specific Condition B.1., particulate matter emissions from Unit No. 4 shall not exceed ~~429.9~~ 43.3 lbs/hour, ~~3448~~ 1039 lbs/day, and ~~569.0~~ 189.7 tons/year.

[PSD-FL-040 and Rule 62-296.700(4)(b)1., F.A.C.; Consent Final Judgment (DEP vs. TEC) dated December 6, 1999; Consent Decree (U.S. Vs. TEC) dated February 29, 2000; and EPA letter of approval of two plans (BOP and BACT) for control of particulate matter dated June 19, 2003]

III. B. 12. [Correction to cross-reference.]

During emergency conditions in the principal company, an affected facility with a malfunctioning flue gas desulfurization system may be operated if sulfur dioxide emissions are minimized by:

- (1) Operating all operable flue gas desulfurization system modules, and bringing back into operation any malfunctioned module as soon as repairs are completed,
- (2) Bypassing flue gases around only those flue gas desulfurization system modules that have been taken out of operation because they were incapable of any sulfur dioxide emission reduction or which would have suffered significant physical damage if they had remained in operation, and
- (3) Operating a *spare* flue gas desulfurization system module. The Department or EPCHC may at their discretion require TEC within 60 days of notification to demonstrate spare module capability. To demonstrate this capability, the owner or operator must demonstrate compliance with the appropriate requirements of specific conditions ~~B.5.~~ and B.7. for any period of operation lasting from 24 hours to 30 days when:

- (i) Any one flue gas desulfurization module is not operated,
 - (ii) The affected facility is operating at the maximum heat input rate,
 - (iii) The fuel fired during the 24-hour to 30-day period is representative of the type and average sulfur content of fuel used over a typical 30-day period, and
 - (iv) TEC has given the Department or EPCHC at least 30 days notice of the date and period of time over which the demonstration will be performed.
- [Rule 62-204.800(7)(b)2., F.A.C.; 40 CFR 60.46a(d)]

III.B.19. [Clarifications to monitoring configuration.]

TEC shall calibrate, maintain, and operate a continuous monitoring system, and record the output of the system, for measuring the oxygen and/or carbon dioxide content of the flue gases at each location where sulfur dioxide or nitrogen oxides emissions are monitored. The sulfur dioxide, nitrogen dioxide, oxygen and/or carbon dioxide, and opacity monitoring devices shall meet the applicable requirements of Section 62-214, F.A.C., 40 CFR 60.47a., and 40 CFR 75.). The opacity monitor shall be placed in the duct work between the electrostatic precipitator and the FGD scrubber. ~~When Units 3 and 4 are operating in the integrated mode (Unit 3 flue gases routed through the Unit 4 FGD system),~~ The continuous monitoring system will measure sulfur dioxide emissions at the inlet of each unit and outlet of the Unit 4 FGD system and from the Unit 3 stack (CS002) and Unit 4 stack (CS003), while emissions of nitrogen oxides, oxygen and/or carbon dioxide, and opacity shall be measured in the Units 3 and 4 ducts prior to the FGD system. When Unit 4 is operating and Unit 3 is not operating in the integrated mode, the continuous monitoring system will measure only Unit 4's inlet duct and stack for SO₂ emissions. The emissions of nitrogen oxides and opacity shall be measured in the Unit 4 duct prior to the FGD system. The emissions of carbon dioxide and sulfur dioxide are both measured in the inlet and outlet ducts.

[Rule 62-204.800(7)(b)2., F.A.C.; 40 CFR 60.47a(d); Power Plant Siting Certification PA 79-12D]

III.B.28. [Applicant request to eliminate references to optional fuel pretreatment. Deleted per permit 0570039-016-AC]

TEC shall determine compliance with the SO₂ standards in specific condition B.7. as follows:

- (1) The percent of potential SO₂ emissions (%P_s) to the atmosphere shall be computed using the following equation:

$$\%P_s = \frac{[(100 - \%R_f)(100 - \%R_g)]}{100}$$

where:

- ~~%R_f~~ = percent of potential SO₂ emissions, percent.
~~%R_f~~ = ~~percent reduction from fuel pretreatment, percent.~~
%R_g = percent reduction by SO₂ control system, percent.

~~(2) [Reserved.] The procedures in Method 19 may be used to determine percent reduction (%R_p) of sulfur by such processes as fuel pretreatment (physical coal cleaning, hydrodesulfurization of fuel oil, etc.), coal pulverizers, and bottom and flyash interactions. This determination is optional.~~

(3) The procedures in Method 19 shall be used to determine the percent SO₂ reduction (%R_g of any SO₂ control system. Alternatively, a combination of an "as fired" fuel monitor and emission rates measured after the control system, following the procedures in Method 19, may be used if the percent reduction is calculated using the average emission rate from the SO₂ control device and the average SO₂ input rate from the "as fired" fuel analysis for 30 successive boiler operating days.

(4) The appropriate procedures in Method 19 shall be used to determine the emission rate.

(5) The continuous monitoring systems specified in conditions B.17. and B.19. shall be used to determine the concentrations of SO₂ and CO₂ or O₂.

[Rule 62-204.800(7)(b)2., F.A.C.; 40 CFR 60.48a (c); 40 CFR 60.43a; 40 CFR 60.47a(b) and (d); 40 CFR 60 Appendix A, Method 19; Applicant request: 0570039-016-AC]

III.B.35. [Coal washing requirement made redundant by inclusion of 90% SO₂ reduction requirement found in condition B.7. Applicant request to eliminate references to fuel pretreatment. Deleted per permit 0570039-016-AC]

~~[Reserved.] If fuel pretreatment credit is claimed toward the sulfur dioxide emission standards in specific condition B.7. TEC shall submit a signed statement:~~

~~—(1) Indicating what percentage cleaning credit was taken for the calendar quarter, and whether the credit was determined in accordance with the provisions of specific condition B.28. and Method 19 (Appendix A of 40 CFR 60); and~~

~~—(2) Listing the quantity, heat content, and date each pretreated fuel shipment was received during the previous quarter; the name and location of the fuel pretreatment facility; and the total quantity and total heat content of all fuels received at the affected facility during the previous quarter.~~

~~[Rule 62-204.800(7)(b)2., F.A.C.; 40 CFR 60.49a(e), 40 CFR 60.48a(e)]~~

[New applicable requirements.] **III.B.66.** These emissions units are subject to 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, including the October 4, 2000 amendment.

[Permit No. 0570039-014-AC]

[New applicable requirements.] **III.B.67.** The first in a series of equipment installed pursuant to the Consent Final Judgment and Consent Decree for the purposes of NO_x requirements contained therein include:

- a. Steam Generator Unit No. 4 is equipped with Low NO_x burners (LNB).
- b. Steam Generator No. 4 is equipped with separate overfire air (SOFA).

[Permit No. 0570039-014-AC]

[New applicable requirements.] **III.B.68.** Unit 4 shall be operated using the Low NO_x burners and in accordance with the operational procedures that have been developed to minimize NO_x emissions.

[Permit No. 0570039-014-AC]

[New applicable requirements.] **III.B.69.** Unit 4 shall be operated using the Separate Overfire Air System (SOFA) and in accordance with the operational procedures that have been developed to minimize NO_x emissions.

[Permit No. 0570039-014-AC]

[New applicable requirements.] **III.B.70.** These emissions units are subject to the Compliance Assurance Monitoring requirements contained in the attached APPENDIX CAM.

III. Subsection D. Descriptions. [Clarifications to descriptions.]

Fly Ash Silo No. 2 handles fly ash from Steam Generator Units Nos. 1, 2, and/or 3. Fly ash is pneumatically conveyed in a series of pipes from the individual unit precipitators (Units 1, 2, and/or 3, only two units at any time) to the silo for temporary storage. Fly ash from Silo No. 2 is discharged in either a

wet or dry state. From the silo, the dry fly ash is gravity fed by tubing into closed tanker trucks and transported to an off-site consumer. The wet fly ash is processed through a pugmill and then unloaded into a dump truck to be transported to an off-site consumer. Particulate emissions generated during silo loading operation and from the tanker truck loadout chutes are controlled by a 20,081 DSCFM Flex Kleen, Model No. 84 UDTR-640 baghouse in addition to reasonable precautions.

III.D.1. [Reformatting of permitted loading rate language for Fly Ash Silo No. 2 to be consistent with the format with loading rate language for Fly Ash Silo No. 1. Also, permitting note deleted because operation during testing information already contained in condition D.1. and loading rate limits in federally enforceable construction permit.]

Capacity. The maximum permitted loading rate for all Fly Ash Silo No. 1 processes combined is 44.5 tons per hour. The maximum permitted loading rate for all Fly Ash Silo No. 2 processes combined is 44.5 tons per hour. For Fly Ash Silo No. 2, the maximum permitted loading rate is the simultaneous maximum transfer of flyash from boiler Units 1, 2, and 3. Separate testing of emissions from each unit shall be conducted with each emissions unit operation at 90 to 100 percent of the maximum permitted capacity heat input rate. If it is impractical to test at permitted capacity, an emissions unit may be tested at less than the maximum minimum permitted capacity; in this case, subsequent emissions unit operation is limited to 110 percent of the test rate load until a new test is conducted. Once the unit is so limited, operation at higher capacities is allowed for no more than 15 consecutive days for the purpose of additional compliance testing to regain the authority to operate at the permitted capacity.

[AC29-194516; AO29-161082; Rule 62-4.160(2), and Rule 62-297.310(2), F.A.C.]

~~{Permitting note: The material loading limitations have been placed in each permit to identify the capacity of each emissions unit for the purposes of confirming that emissions testing is conducted within 90 to 100 percent of the emissions unit's rated capacity (or to limit future operation to 110 percent of the test load), to establish appropriate emission limits and to aid in determining future rule applicability. Regular recordkeeping is not required for material loading. Instead the owner or operator is expected to determine material loading whenever the emission testing is required, to demonstrate at what percentage of the rated capacity that the emissions unit was tested. Rule 62-297.310(5), F.A.C., included in the permit, requires measurement of process variables for emission tests. Material loading demonstrations may be based on best engineering evaluation of the operating requirements necessary to achieve 90 to 100 percent of the rated loading, unless such operating conditions are otherwise specified by permit condition.}~~

III.D.10. [Applicant request to remove the word "completely" from condition III.D.10.d since the truck loading valve is not normally operated completely open.]

Compliance testing for the silo and tanker truck loading operations shall be conducted under the following conditions:

- a. All conveyance hoppers will be operational during the test.
- b. All fly ash will be directed to the silo, no reinjection of fly ash to the boiler systems will occur during the test.
- c. The boilers shall operate at the maximum capability of this unit under normal operating conditions during the test.
- d. Two tanker trucks shall be loaded during the test. The loading valve shall be completely open to allow 90%-100% of the maximum loading rate during testing filling. Position of the valve during testing shall be recorded.
- e. The visible emission test shall be at least 30 minutes in duration and the period of time during which truck loading occurred indicated on the test report.

[Rules 62-4.070(3) and 62-297.310, F.A.C.]

III. Subsection E. Description. [Clarification of description.]

Fly Ash Silo No. 3 handles fly ash from Steam Generator Unit No. 4. Also, fly ash may be pneumatically conveyed from tanker trucks to Silo No. 3. Particulate matter emissions are controlled by a 1,200 DSCFM

Flex Kleen Model 84-WRTC-80-II-G baghouse. The wet flyash ~~may be~~ is processed through a pugmill and then unloaded into a dump truck.

III. Subsection F. Limestone Handling and Storage [Revised per permit 0570039-016-AC.]
This section addresses the following Regulated Emissions Units:

<u>E.U. ID No.</u>	<u>Brief Description</u>
-011	Truck/Railcar Limestone Unloading Receiving Hopper with baghouse
-012	Limestone Silo A with 2 baghouses
-013	Limestone Silo B with 2 baghouses
-023	Limestone Handling Conveyor LB to Conveyor LC with baghouse, Limestone Handling Conveyor LD to Conveyor LE with baghouse
-024	Limestone Handling Conveyor LE to South Storage Silo with baghouse, Limestone Handling Conveyor LE to North Storage Silo with baghouse
-025	Limestone Storage and Handling Fugitive Emissions

Descriptions

~~Particulate matter emissions from the truck and railcar unloading of limestone are controlled by a Mikro-Pulsaire Model 400S12TR baghouse. Particulate matter emissions generated by the transfer of limestone from Handling Conveyor LB to Conveyor LC are controlled by a Sternvent Model DKED18003 baghouse. Particulate matter emissions generated by the transfer of limestone from Handling Conveyor LD to Conveyor LE are controlled by a Sternvent Model DKED 18003 baghouse. Particulate matter emissions generated by the transfer of limestone from Handling Conveyor LE to the South Storage Silo are controlled by a Flex Kleen Model 58-BVBC-36-II-G baghouse. Particulate matter emissions generated by the transfer of limestone from Handling Conveyor LE to the North Storage Silo are controlled by a Flex Kleen Model 58-BVBC-36-II-G baghouse.~~

III. F.1. [Clarification of process.]

Total combined particulate matter emissions from the limestone handling ~~hoppers/conveyors~~ shall not exceed 0.65 lb/hr. Visible emissions are limited to 5% opacity. Compliance testing for particulate matter emissions is not required provided the opacity limit is maintained.

[PSD-FL-040; Power Plant Siting Certification PA 79-12]

III.F.4. [Revised per permit 0570039-016-AC.]

The limestone handling ~~receiving hopper~~, conveyor transfer points and silos shall be maintained at negative pressures with the exhaust vented to a control system(s).

[PSD-FL-040]

III.F.5. [Clarification that annual VE test is not required for fugitive emissions.] Tampa Electric will perform an annual VE test on ~~E.U. ID Nos. 011, 012, 013, and 023~~ to satisfy the periodic monitoring requirements of these conditions. In addition, the system pressure will be monitored quarterly to assess that the system is operating under negative pressure.

[USEPA objection resolution.]

III. Subsection G. Coal Bunkers with Roto-Clones [Removal of Unit No. 4 Coal Bunker from E.U. 031 to make new E.U. 039 for Unit No. 4 Coal Bunker for consistency with format for Unit 1-3 Coal Bunkers.]

This section addresses the following Regulated Emissions Units:

<u>E.U. ID No.</u>	<u>Brief Description</u>
-015	Unit No. 1 Coal Bunker with Roto-Clone
-016	Unit No. 2 Coal Bunker with Roto-Clone
-017	Unit No. 3 Coal Bunker with Roto-Clone
-039	Unit No. 4 Coal Bunker with Roto-Clone

Descriptions

These emission units are Steam Generator Units Nos. 1-4 Coal Bunkers with an exhaust fan/cyclone collector (Roto-Clone) controlling dust emission from each unit's respective bunker. Two moving transfer stations via their respective conveyor belts route coal through enclosed chutes to the various bunkers. Coal Bunkers 1-4 are each equipped with a 9400 ACFM American Air Filter (AAF) Company Type D Roto-Clone to abate dust emissions during ventilation. A number of vent pipes convey fresh air from each bunker to a Roto-Clone during particulate matter removal. Particulate matter removed by the Roto-Clones is returned to the coal bunkers via a hopper and return line. Unit No. 1 Coal Bunker is situated west of Unit No. 2 Coal Bunker. Unit No. 3 Coal Bunker is situated east of Unit No. 2 Coal Bunker. Unit No. 4 Coal Bunker is located east of Unit No. 3.

III.G.4. [Equipment clarification.]

Since a source of less than 1 TPY is exempt from particulate matter RACT provisions, the maximum allowable particulate emissions shall not exceed 0.99 tons per year from each rotoclone exhaust. Also maximum allowable particulate matter emissions shall not exceed 0.48 lbs/hr from each cyclone exhaust.

[AO29-163788 to escape RACT]

III.Subsection H. Solid Fuel Yard [Deletion of redundant EU 031, and clarification of descriptions.]

This section addresses the following Regulated Emissions Units:

<u>E.U. ID No.</u>	<u>Brief Description</u>
-010	Solid Fuel Yard, Fugitive Emissions
-029	Cyclone collectors for fuel blending bins (FH-032 through FH-035)
-030	Cyclone collectors for fuel crushers (FH-048 and FH-049)
-031	Cyclone collectors for bunkers (FH-059 through FH-062)

Descriptions

Solid fuel is unloaded from ship/barge into the Solid fuel yard, the blending bins or directly to the tripper room via belt conveyors. Solid fuel from the piles is loaded onto belt conveyors using a rail mounted or mobile reclaimers. The solid fuel is then belt conveyed to the blending bins tower, which consists of six storage bins, where the solid fuel may be blended for use at the plant, or transloaded into trucks for shipment off site. From the solid fuel yard conveyors, the solid fuel is screw conveyed into the bins. Particulate matter (PM) emissions from the conveyors in the blending bins solid fuel yard are controlled by 3-4 rotoclones, one at the conveyor drop, and one for every 2 bins. PM emissions from the screw conveyor are controlled by the fourth rotoclone. Blending bins can either Each has 2 hoppers, which feed the transloader, or solid fuel can be conveyed, via 2 parallel belts (T1, T2) to 2 crushers (each belt has a crusher), or diverted directly to the tripper room. PM emissions from the 2 crushers and transfer tower are controlled by 2 rotoclones.

From the tripper room solid fuel yard, the solid fuel is conveyed to the tripper room where 2 trippers bunker the solid fuels into 4 solid fuel bunkers. Each unit has its own respective bunker. Solid fuel samples are taken every 15 minutes during bunking, and composited for analysis. From the bunkers, the solid fuel is gravity fed into 14 mills crushers, and then gravity-fed into the boilers. There are 3 ball mills tall crushers, each for Unit Nos. 1 - 3, and 5 bowl mills crushers for Unit No. 4. From the mills crushers, the solid fuel is pneumatically fed into classifiers, two for each crusher mill on Unit Nos. 1-3 and one for each mill on Unit No. 4 for a total of 238 classifiers, and then into the respective boilers.

III. Subsection L. Limestone Handling System for FGD System for Units 1 & 2 [Clarification of description.]

Description

New Components of the limestone handling system to provide limestone for the new FGD system. The components are Silo C and its related rotary unloader, belt feeder and wet ball mill, and reversible belt conveyors LF and LG. Conveyors LF and LG replace an existing bifurcated chute which feeds from conveyor LE to silos A and B. Particulate emissions from drops from limestone handling conveyors LE, LF and LG and the silo C belt feeder are controlled by a baghouse: American Air Filter Fabripulse - Model B, size 12-72-1155. Particulate emissions from displaced air in silo C will be controlled by a baghouse: American Air Filter Fabripak, size 6-16-132. The new wet ball mill is a wet process with no expected particulate emissions.

III.L.6. [Update of specific condition numbering.]

Visible Emissions Tests in Lieu of Stack Tests, Emissions Unit 020: After passing the initial test required by specific condition ~~L.9. 21 of this section~~, the owner or operator is permitted to comply with the visible emission limit of specific condition ~~L.4. 16~~ and the testing requirement of specific condition ~~L.5. 17 of this section~~ in lieu of regularly demonstrating compliance with the limitations of 40 CFR 60.672(a)(1) and (2) and the particulate matter limitation of specific condition ~~L.4. 16 of this section~~. If the Department has reason to believe that the particulate weight emission limit of 40 CFR 60.672(a)(1) or the particulate matter limitation of specific condition ~~L.4. 16 of this section~~ is not being met, it shall require compliance be demonstrated by the test method specified by 40 CFR 60.675. [Rules 62-4.070(3) and 62-297.620(4), F.A.C.]

III.L.7. [Update of specific condition numbering.] Records of Maintenance: The owner or operator shall make and maintain records of maintenance on the enclosures and baghouses sufficient to demonstrate compliance with the operating procedures requirements of specific condition ~~L.3. 15 of this section~~. [Rule 62-4.070(3), F.A.C.]

III.L.8. [Update of specific condition numbering.]

Pursuant to 40 CFR 60.672 Standard for Particulate Matter:

[Note: The requirements of 40 CFR 60.672(a)(1) and (2) apply to emissions unit 020, and the requirements of 40 CFR 60.672(f) apply to emissions unit 021.]

- (a) No owner or operator shall cause to be discharged into the atmosphere from any transfer point on belt conveyors or from any other affected facility any stack emissions which:
- (1) Contain particulate matter in excess of 0.05 g/dscm; and
 - (2) Exhibit greater than 7 percent opacity.

[Note: The emission limit of specific condition ~~L.4. 16 of this section~~ is more stringent than the limitation of 40 CFR 60.672(a)(2).]

- (f) No owner or operator shall cause to be discharged into the atmosphere from any baghouse that controls emissions from only an individual, enclosed storage bin, stack emissions which exhibit greater than 7 percent opacity.

[Note: The emission limit of specific condition ~~L.4. 16 of this section~~ is more stringent than the limitation of 40 CFR 60.672(f). See the note for that condition.]

III.L.9. [Update of specific condition numbering.]

Pursuant to 40 CFR 60.675 Test Methods and Procedures:

- (a) In conducting the performance tests required in 40 CFR 60.8, the owner or operator shall use as reference methods and procedures the test methods in appendix A of 40 CFR 60 or other methods and procedures as specified in this section, except as provided in 40 CFR 60.8(b).

(b) The owner or operator shall determine compliance with the particulate matter standards in 40 CFR 60.672(a) as follows:

(1) Method 5 or Method 17 shall be used to determine the particulate matter concentration. The sample volume shall be at least 1.70 dscm (60 dscf). For Method 5, if the gas stream being sampled is at ambient temperature, the sampling probe and filter may be operated without heaters. If the gas stream is above ambient temperature, the sampling probe and filter may be operated at a temperature high enough, but no higher than 121 °C (250 °F), to prevent water condensation on the filter.

(2) Method 9 and the procedures in 40 CFR 60.11 shall be used to determine opacity. [Note: The owner or operator is required to demonstrate compliance with the particulate matter emission limitation of 40 CFR 60.672(a)(1) by performing and passing an initial particulate matter test in accordance with the requirements of this section, unless such requirement is waived by the US Environmental Protection Agency. No subsequent regular annual particulate matter testing is required. The owner or operator is permitted to comply with the visible emission limit of specific condition ~~L.4.16 of this section~~ in lieu of regularly demonstrating compliance with the limitations of 40 CFR 60.672(a)(1) and (2). See also specific condition ~~L.6.18 of this section.~~]

(c) (2) In determining compliance with the opacity of stack emissions from any baghouse that controls emissions only from an individual enclosed storage bin under 40 CFR 60.672(f) of this subpart, using Method 9, the duration of the Method 9 observations shall be 1 hour (ten 6-minute averages).

[Note: The initial Method 9 test duration for emissions unit 021 is one hour pursuant to 40 CFR 60.675(c)(2), while the initial Method 9 test duration for emissions unit 020 is 3 hours pursuant to 40 CFR 60.11(b). Subsequent annual Method 9 tests shall be conducted for 30 minutes for emissions units 020 and 021.]

(g) If, after 30 days notice for an initially scheduled performance test, there is a delay (due to operational problems, etc.) in conducting any rescheduled performance test required in this section, the owner or operator of an affected facility shall submit a notice to the Administrator at least 7 days prior to any rescheduled performance test.

III.M.5. [Update of specific condition numbering.] Visible Emissions Tests in Lieu of Stack Tests:

The owner or operator is permitted to comply with the visible emission limit of specific condition ~~M.3.25~~ and the testing requirement of specific condition ~~M.4.26~~ of this section in lieu of regularly demonstrating compliance with the particulate matter limitation of specific condition ~~M.3.25~~ of this section. If the Department has reason to believe that the particulate matter limitation of specific condition ~~M.3.25~~ of this section is not being met, it shall require compliance be demonstrated by conducting a particulate matter test in accordance with EPA Method 5 specified at 40 CFR 60 Appendix A. [Rules 62-4.070(3) and 62-297.620(4), F.A.C.]

III.M.6. Records of Maintenance: [Edited for consistency.] The owner or operator shall make and maintain records of maintenance on the baghouse sufficient to demonstrate compliance with the operating procedures requirements of specific condition ~~M.2. of this section.~~ [Rule 62-4.070(3), F.A.C.]

IV. Updates were made to the Phase II Acid Rain Part as needed.

Appendix CAM. CAM Plans were added for Boiler Units 1-4.

Friday, Barbara

To: gmnelson@tecoenergy.com; 'tdavis@ectinc.com'; lrcrouch@tecoenergy.com; Waters, Jason; campbell@epchc.org

Cc: Phillips, Cindy

Subject: FINAL Title V Permit Renewal No.: 0570039-017-AV - Tampa Electric Company - Big Bend Station

Attached for your records is a zip file which contains the FINAL Title V Permit Renewal and associated documents.

If I may be of further assistance, please feel free to contact me.

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