

Waiting on PE. SEAL

**Scearce, Lynn**

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**From:** Scearce, Lynn  
**Sent:** Monday, August 22, 2011 2:29 PM  
**To:** Heron, Teresa  
**Subject:** FW: An application was transferred in EPSAP on FDEP-0570039-049-AC/050-AV

Teresa, You have been assigned this project No. 0570039-049-AC/050-AV.

Lynn

-----Original Message-----

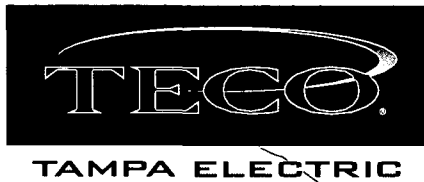
**From:** [EPSAP@dbprod.dep.state.fl.us](mailto:EPSAP@dbprod.dep.state.fl.us) [<mailto:EPSAP@dbprod.dep.state.fl.us>]  
**Sent:** Monday, August 22, 2011 9:50 AM  
**To:** Koerner, Jeff; Walker, Elizabeth (AIR); Linero, Alvaro; DeAngelo, Gregory; Arif, Syed; Holtom, Jonathan; Scearce, Lynn; Friday, Barbara  
**Subject:** An application was transferred in EPSAP on FDEP

An application was transferred to your office in EPSAP for the following facility:

Application Number: 2982  
Facility ID: 0570039  
Facility Name: TAMPA ELECTRIC COMPANY

At your earliest convenience, please log-in to the EPSAP application located at [http://appprod.dep.state.fl.us/epsap\\_eng/default.asp](http://appprod.dep.state.fl.us/epsap_eng/default.asp) to begin the application review process.

POINT		AIRS ID	0570039	STATUS	A	OFFICE	SWH	SW: HILLSBOROUGH
SITE NAME		BIG BEND STATION			COUNTY			HILLSBOROUGH
OWNER/COMPANY		TAMPA ELECTRIC COMPANY						
<b>Project</b>								
AIR Permit #		Project #	049	CRA Reference #				
Permit Office	TAL (HEADQUARTERS)			Agency Action	Pending		OGC	
Project Name	BIG BEND STATION		Desc	Revise Testing conditions (unit 1 and 2)				
Type/Sub/Des	AC / M1	Minor Modification		Logged	08/22/2011			
Received	08/19/2011	Issued		Expires		Application Action	MODIFICATION	
Fee	0.00	Fee Recd		Dele		Override	TITLE V	
<b>Related Party</b>								
Role	APPLICANT		Begin	08/22/2011	End			
Name	BISHOP, RON			Company	TAMPA ELECTRIC COMPANY			
Address	P.O. BOX 111							
City	TAMPA		State	FL	Zip	33601 - 0111	Country	U.S.A.
Phone	813-228-4111		Fax	813-630-7424				
<b>Processors</b>								
Processor	HERON_T		Y	Active	08/22/2011	Inactive		Events



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AUG 15 2011

DIVISION OF AIR  
RESOURCE MANAGEMENT

August 12, 2011

Jeffery F. Koerner, Program Administrator  
Florida Department of Environmental Protection  
Division of Air Resource Management  
Office of Air Permitting and Compliance  
2600 Blair Stone Road, M.S. 5505  
Tallahassee, Florida 32399-2400

Via FedEx  
Airbill No. 7974 0820 0889

**Re: Tampa Electric Company - Big Bend Station**  
**Title V Permit Number 0570039-045-AV**  
**SCCT Permit Limit Correction (EUs-041,-042)**

Dear Mr. Koerner:

This correspondence requests an administrative correction to permit no. 0570039-045-AV pursuant to Rule 62-210.360 F.A.C. A recent review of the permit shows discrepancies between the permitted NO<sub>x</sub> and 40 CFR 63 Subpart KKKK, Standards of Performance for Stationary Combustion Turbines. A discrepancy is also noted between the permitted CO limit and original permit application/vendor supplied data.

Subpart KKKK and permit application reports the NO<sub>x</sub> limits (natural gas and fuel oil) to 2 significant figures (e.g. 25 ppm). The permit application also reports the CO limits (natural gas and fuel oil) to 2 significant figures (e.g. 42 ppm). In contrast, the current permit reports NO<sub>x</sub> limit (e.g. 25.0 ppm) and CO limit (42.0 ppm) to 3 significant figures. This discrepancy is significant, because it unnecessarily imposes a higher degree of precision. Therefore, the Title V permit limits should be appropriately rounded to match the federal and permit application limits. A summary of the discrepancies is shown in Table 1.

**Table 1 – Summary of Subpart KKKK/SIP and Permitted Limits.**

Parameter	SIP/Federal Threshold	Reference	Permitted Threshold	Reference
NO <sub>x</sub>	25 ppm <sub>dv</sub> @15% O <sub>2</sub>	Subpart KKKK	25.0 ppm <sub>dv</sub> @15% O <sub>2</sub>	Condition O.8a(1)
	42 ppm <sub>dv</sub> @15% O <sub>2</sub>	Subpart KKKK	42.0 ppm <sub>dv</sub> @15% O <sub>2</sub>	Condition O.8b(1)
	74 ppm <sub>dv</sub> @15% O <sub>2</sub>	Subpart KKKK	74.0 ppm <sub>dv</sub> @15% O <sub>2</sub>	Condition O.8b(2)
	32 lb/hr	AC application	32.0 lb/hr	Condition O.8a(2)
	51 lb/hr	AC application	51.3 lb/hr	Condition O.8b(3)
CO	21 ppm <sub>dv</sub> @15% O <sub>2</sub>	AC application	21.0 ppm <sub>dv</sub> @15% O <sub>2</sub>	Condition O.9a(1)

TAMPA ELECTRIC COMPANY  
P. O. BOX 111 TAMPA, FL 33601-0111

(813) 228-4111

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TAMPAELECTRIC.COM

CUSTOMER SERVICE:  
HILLSBOROUGH COUNTY (813) 223-0800  
POLK COUNTY (863) 299-0800  
ALL OTHER COUNTIES 1 (888) 223-0800

EPA has published documentation in support of the proposed corrections. EPA (2009)<sup>1</sup> published documentation on the rounding and significant figures for emissions reporting. For example, if the emission standard is 90, 90.357 would be rounded to 90, 90.639 would be rounded to 91, 90.500 would be rounded down to 90 since 90 is even, and 91.500 would be rounded up to 92 since 91 is odd. EPA (1990)<sup>2</sup> also indicates a permit limit of 2 significant figures should be reported to 2 significant figures.

TEC requests the permit limits be revised in Condition O.7 and O.8 in Section III, Subpart O pursuant to Rule 62-210.360 F.A.C. The proposed additions are shown in highlighted italics, while deletions are shown as strikethrough as follows:

**O.7.** Nitrogen Oxide (NO<sub>x</sub>). NO<sub>x</sub> emissions from each unit shall not exceed the following:

- a. When Firing Natural Gas.
  - (1) *25* ~~25.0~~ ppmvd @ 15% oxygen (O<sub>2</sub>) (NSPS) or,
  - (2) *32* ~~32.0~~ lb/hr/SCCT (SIP).
- b. When Firing Ultra Low Sulfur Diesel.
  - (1) *42* ~~42.0~~ ppmvd @ 15% O<sub>2</sub> (SIP) or,
  - (2) *74* ~~74.0~~ ppmvd @ 15% O<sub>2</sub> (NSPS) or,
  - (3) *51* ~~51.3~~ lb/hr/SSCT (SIP).

**O.8.** Carbon Monoxide (CO). CO emissions from each unit shall not exceed the following:

- a. When Firing Natural Gas.
  - (1) *21* ~~21.0~~ ppmvd @ 15% O<sub>2</sub> (SIP) or,
  - (2) 9.1 lb/hr/SCCT (SIP).
- b. When Firing Ultra Low Sulfur Diesel.
  - (1) 5.1 ppmvd @ 15% O<sub>2</sub> (SIP) or,
  - (2) 2.1 lb/hr/SCCT (SIP).

Please contact me at (813) 228-4232 or Byron Burrows at (813) 228-1282, if you have any questions regarding this request.

Sincerely,



Robert A. Velasco, P.E., BCEE, QEP  
Air Programs  
Environmental, Health & Safety

EHS/rk/RAV107

cc: Cindy Zhang-Torres, DEP SW District  
Diana Lee, EPCHC

<sup>1</sup> EPA Office of Enforcement and Compliance Assurance (2009). Memorandum: Issuance of the Clean Air Act National Stack Testing Guidance. Washington, DC: U.S. Government Printing Office.

<sup>2</sup> EPA Office of Air Quality Planning Standards (1990). Memorandum: Performance Test Calculation Guidelines. Research Triangle Park, North Carolina: U.S. Government Printing Office



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AUG 23 2011

DIVISION OF AIR  
RESOURCE MANAGEMENT

August 22, 2001

Jeffery F. Koerner, Program Administrator  
Florida Department of Environmental Protection  
Division of Air Resource Management  
Office of Air Permitting and Compliance  
2600 Blair Stone Road, M.S. 5505  
Tallahassee, Florida 32399-2400

Via FedEx  
Airbill No. 7974 3503 2183

**Re: Tampa Electric Company - Big Bend Station  
Application to Revise Test Conditions (EUs -001-002 -029 -030)  
Permit application No. 2982-1  
Facility ID No. 0570039**

Dear Mr. Koerner:

Tampa Electric Company (TEC) is submitting the PE certification page pursuant to the requirements of Electronic Permit Submittal Application Process (EPSAP) air permit application No. 2982-1 and Rule 61G15-23.003, F.A.C.

Please contact me at (813) 228-4232 or Byron Burrows at (813) 228-1282, if you have any questions regarding the air permit application.

Sincerely,

Robert A. Velasco, P.E., BCEE, QEP  
Air Programs  
Environmental, Health & Safety  
Tampa Electric Company

EHS/rhk/RAV109

Enclosure

c/enc: Diana Lee, SW District  
[lee@epchc.org](mailto:lee@epchc.org)

TAMPA ELECTRIC COMPANY  
P. O. BOX 111 TAMPA, FL 33601-0111

(813) 228-4111

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## Electronic Permit Submittal and Processing System (EPSAP) Professional Engineer Signature Document

"This document is signed and sealed to secure the data in this permit application and any attached files that were submitted electronically as described in Florida Department of Business and Professional Regulation, Board of Professional Engineers, Procedures for Signing and Sealing Electronically Transmitted Plan, Specifications, Reports or other Documents, Rule 61G15-23.003., F.A.C.."

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AUG 23 2011

BUREAU OF  
AIR REGULATION

**EPSAP Application Number:** 2982-1  
**Facility Identification Number:** 0570039  
**Facility Owner/Company Name:** TAMPA ELECTRIC COMPANY

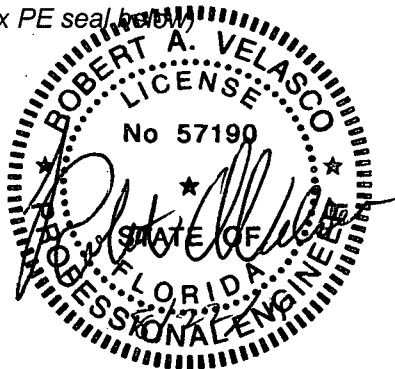
**Purpose of Application:**  
Air construction permit and Title V permit revision, incorporating the proposed project.

**Signature File Created:** 8/18/2011 5:35:27 PM

File Description	Authentication Code
Submitted Application Data	6FE56A801A4A257948E9F63961A8787318BC71D6
Uploaded Facility Documents:	
Application Letter and backup.pdf	A17FDC9FC6CA5C91B1DF8199C6627906C4690111
Unit 1 _ 2 Process Flow Diagram.pdf	12C8659A68ED6E94077556EA005C35E390DA8CD8
This Application Has No Uploaded Emissions Unit Documents.	
Final Signature File	2B633D89387D11700F50F0F8EC24AD27EC7F7AAD

**Professional Engineer (PE):** ROBERT VELASCO License No: 57190

*(sign and affix PE seal below)*



\_\_\_\_\_  
PE Signature

\_\_\_\_\_  
Date

**Application No 2982-1: Revise Test Conditions (EUs -001-002 -029 -030)**

**Professional Engineer Statement:**

- (1) Engineering opinion and information included herein provides reasonable assurance of meeting the requirements of the letter of authorizations 0570039-046-AC and 0570039-048-AC; Title V permit and Rule 62-297(7)(c) F.A.C.;
- (2) Air Construction Permit/Title V permit correction is based on information best available information at the time and is believed to be correct to the best of the Engineer's knowledge;
- (3) Emission information is based on acceptable testing methods and techniques available for estimating or calculating emissions from materials, information and calculations contained in this certification; and
- (4) Seal does not certify or attest to the accuracy of work or information prepared by others who are qualified to perform such services. This includes, but not limited to drawings, specifications, correspondences, personnel communication etc.