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BUREAU OF AIR REGULATION

Ms. Teresa Heron
Florida Department of Environmental Protection
Division of Air Resource Management
111 South Magnolia, Suite 4
Tallahassee, Florida 32301

Via Email Notification
teresa.heron@dep.state.fl.us

**Re: Tampa Electric Company
Big Bend Station
Permit No. 0570039-018-AC
Transloading Project Modification Comments**

Dear Ms. Heron:

Tampa Electric Company (TEC) has received the air construction permit for the transloading project modification at Big Bend Station. This correspondence is intended to provide TEC's comments to that air construction permit to the Department of Environmental Protection (Department). For your convenience, TEC has enclosed a strikethrough version of the transloading project modification air construction permit.

If you have any further questions regarding this matter, please contact me at (813) 228-4408.

Sincerely,

(No Electronic Signature Available)

Shelly Castro
Environmental Engineer - Air Programs
Environmental, Health & Safety

EHS/tlk/SSC242

Enclosure

c: Mr. Al Linero - FDEP
Mr. Jason Waters - FDEP SW
Mr. Buck Oven - FDEP
Mr. Scott Sheplak - FDEP
Mr. Sterlin Woodard - EPCHC

PERMITTEE:

Tampa Electric Company (TEC)
Big Bend Power Station
Big Bend Road
Tampa, Florida 33572

File No.	0570039-018-AC
Project	Transloading Project Modification
SIC No.	4911
ARMS No.	Solid Fuel Yard Emissions Unit 010
Expires:	July 31, 2006

Authorized Representative:
Karen Sheffield, General Manager

PROJECT AND LOCATION:

This is an Air Construction Permit to allow the transloading of coal, petcoke and slag to off site facilities. Emissions points associated with this operation are: (a) the transfer of coal, petcoke or slag from a storage pile by front-end loaders to trucks, and (b) coal, petcoke, or slag truck travel on the facility paved and unpaved roads. This operation is conducted at the facility's Solid Fuel Yard. This Emission Unit is located at the Big Bend Power Plant, Big Bend Road, Tampa, Hillsborough County. UTM coordinates are: Zone 17; 361.9 km E; 3075 km N.

STATEMENT OF BASIS:

This construction permit is issued under the provisions of Chapter 403 of the Florida Statutes (F.S.), and Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297 of the Florida Administrative Code (F.A.C.). The above named permittee is authorized to modify the facility in accordance with the conditions of this permit and as described in the application, approved drawings, plans, and other documents on file with the Department of Environmental Protection (Department).

Attached appendices made a part of this permit:

Appendix GC Construction Permit General Conditions
Appendix C Common Permit Conditions

Michael G. Cooke, Director
Division of Air Resource Management

SECTION I. FACILITY INFORMATION

1.0 FACILITY DESCRIPTION

TEC Big Bend is a nominal 1998 MW electric generation facility. This facility consists of four steam boilers (Units Nos. 1 through 4) fired with solid fuels and controlled by individual EPS and a flue gas desulfurization system; four steam turbines; three simple-cycle combustion turbines (CT Nos. 1, 2, and 3) fired with No.2 fuel oil; storage and handling facilities for solid fuels, fly ash, limestone, gypsum, slag, and bottom ash; fuel oil storage tanks and ancillary equipment. There are ongoing nitrogen oxides (NO_x) control projects for Units 3 and 4 pursuant to a Consent Final Judgement (CFJ) between TEC and the Department and a Consent Decree (CD) between TEC and the United States Environmental Protection Agency (EPA).

This permit addresses only two additional emissions points at the Solid Fuel Yard Facility.

SOLID FUEL YARD DESCRIPTION: Solid fuel (coal, petcoke, slag, and coal residual from the Polk Power Station) 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, 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. Particulate matter (PM) emissions from the conveyors in the blending bins are controlled by 4 rotoclones, one at the conveyor drop, and one for every 2 bins. Blending bins can either 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. Coal residual from Polk Power Station is received by truck and placed in a building, where it is conveyed to the unit tripper room.

From the tripper room, 2 trippers bunker the solid fuels into 4 solid fuel bunkers. Each unit has its own respective bunker. From the bunkers, the solid fuel is gravity fed into 14 mills, and then fed into the boilers. There are 3 ball mills, each for Unit Nos. 1 – 3, and 5 bowl mills for Unit No. 4. From the mills, 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 for a total of 23 classifiers, and then into the respective boilers.

Proposed Project

Coal, petcoke, or slag will be brought in by barge at infrequent intervals and transferred to Transfer Station T2 using existing conveyors. From Station T2, the transloaded materials will be transferred to storage piles located in the fuel yard using a combination of existing conveyors. The coal, petcoke, and slag will then be loaded into truck using front-end loaders for off-site shipment.

The only new additional emissions points associates with this operation are: (a) the transfer of coal, petcoke from a storage pile by front-end loaders to trucks and (b) coal, petcoke, or slag truck travel on Big Bend paved and unpaved roads. All other coal, petcoke or slag handling activities will use existing equipment (e.g., conveyor belts, storage pile stackout, and dozer operations on storage piles). The coal or petcoke will be treated with a chemical surfactant prior to arriving at the Big Bend Station, the slag has minimal dust potential due to its glassine properties and therefore does not need to be treated with a chemical surfactant.

2.0 REGULATORY CLASSIFICATION

The facility, Big Bend Station Power Plant, is classified as a Major or Title V Source of air pollution because emissions of at least one regulated air pollutant, such as particulate matter (PM/PM₁₀), sulfur dioxide (SO₂), nitrogen oxides (NO_x), carbon monoxide (CO), or volatile organic compounds (VOC) exceeds 100 tons per year (TPY).

This facility is within an industry included in the list of the 28 Major Facility Categories per Table 62-212.400-1, F.A.C. Because emissions are greater than 100 TPY for at least one criteria pollutant, the facility is also a Major Facility with respect to Rule 62-212.400, Prevention of Significant Deterioration (PSD).

SECTION I. FACILITY INFORMATION

This facility is located in an area (Hillsborough County) designated "unclassifiable" for SO₂, "maintenance" for Ozone (O₃), and lead (Pb), in the "area of influence" of Hillsborough County particulate matter (PM) maintenance area, and "attainment" for all the other criteria pollutants (Rule 62-204.360, F.A.C.).

This facility is also subject to the provisions of Title IV, Acid Rain, Clean Air Act as amended in 1990.

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

3.0 PERMIT SCHEDULE

- 00/00/00 Notice of Intent published in the _____
- 00/00/00 Distributed Intent to Issue Permit
- 09/02/05 Application deemed complete
- 12/06/04 Received Application

4.0 RELEVANT DOCUMENTS:

The documents listed below are the basis of the permit. They are specifically related to this permitting action, but not all are incorporated into this permit. These documents are on file with the Department.

- 12-06-04: Date of Receipt of Application (waiver of the air construction permit processing time)
- 01-20-05: DEP Incompleteness Letter for both Title V and Air Construction Permit requests
- 04-19-05: Received TEC request to extend the response deadline to May 31, 2005
- 05-31-05: Received TEC Response to Incompleteness Letter
- 06-28-05: DEP e-mail confirming telephone conversation of 6/27/05
- 07-01-05: DEP Application Status Letter
- 07-11-05: TEC e-mail requesting removal of the CO limit.
- 09-02-05: TEC e-mail and letter requesting to withdraw the Title V application.
- 09-02-05: Air Construction application complete

- Title V Permit, 0570039-017-AV, effective January 1, 2005.

SECTION II. ADMINISTRATIVE REQUIREMENTS

GENERAL AND ADMINISTRATIVE REQUIREMENTS

1. Permitting Authority: The Permitting Authority for this project is the Florida Department of Environmental Protection's Bureau of Air Regulation located at 2600 Blair Stone Road, MS #5505, Tallahassee, Florida 32399-2400 and phone number 850/488-0114.
2. Compliance Authority: All documents related to reports, tests, and notifications should be submitted to the DEP Southwest District office (DEPSW), 3804 Coconut Palm Drive, Tampa, Florida 33619 and phone number 813/744-6100 and the Environmental Protection Commission of Hillsborough County (EPCHC), 3629 Queen Palm Dr, Tampa, Florida 33619-1309, and phone number 813/627-2600.
3. General Conditions: The owner and operator are subject to, and shall operate under the attached General Conditions listed in *Appendix GC* of this permit. General Conditions are binding and enforceable pursuant to Chapter 403, F.S. [Rule 62-4.160, F.A.C.]
4. Applicable Regulations, Forms and Application Procedures: Unless otherwise indicated in this permit, the construction and operation of this project shall be in accordance with the capacities and specifications stated in the application. This facility is subject to all applicable provisions of: Chapter 1-3.62 Rules of the Environmental Protection Commission of Hillsborough County (EPCHC); Chapter 403, F.S.; Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296, and 62-297, F.A.C.; 40 CFR 60; and 40 CFR 63. The permittee shall use the applicable forms listed in Rule 62-210.900, F.A.C. and follow the application procedures in Chapter 62-4, F.A.C. Issuance of this permit does not relieve the facility owner or operator from compliance with any applicable federal, state, or local permitting or regulations. [Rules 62-204.800, 62-210.300 and 62-210.900, F.A.C.]
5. Permit Expiration: For good cause, the permittee may request that this air construction permit be extended. Such a request shall be submitted to the Department's Bureau of Air Regulation at least sixty (60) days prior to the expiration of this permit. [Rules 62-4.070(4), 62-4.080, and 62-210.300(1), F.A.C.]
6. Completion of Construction: Construction on the Solid Fuel Yard is complete. On-going construction activities include the necessary activities for the transloading operations described in this permit. *The permit expiration date is July 31, 2006.*
7. New or Additional Conditions: For good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time. [Rule 62-4.080, F.A.C.]
8. Modifications: No emissions unit or facility subject to this permit shall be constructed or modified without obtaining an air construction permit from the Department. Such permit shall be obtained prior to beginning construction or modification. [Rules 62-210.300(1) and 62-212.300(1)(a), F.A.C.]
9. Title V Permit: An application for a revision of the Title V operation permit pursuant to Chapter 62-213, F.A.C., must be submitted to the Department's Bureau of Air Quality Regulation to incorporate the specific conditions of this Air Construction Permit. [Chapter 62-213, F.A.C.]

SECTION III. EMISSION UNIT(S) SPECIFIC CONDITIONS

This section addresses the following emissions points in the Solid Fuel Yard:

<u>E.U. ID No.</u>	<u>Brief Description:</u>
-010	Emissions points PET-01, COAL-01, SLAG-01, and PET/COAL/SLAG-02a, 02b and 3a, 3b

1.0 ESSENTIAL POTENTIAL TO EMIT (PTE) PARAMETERS

- 1.1 Permitted Capacity. The maximum transloading rate for each material shall not exceed 150,000 tons per year (142 tons per hour) for coal, petcoke and slag. The maximum throughput rate of the Solid Fuel Yard shall not exceed 4,000 tons per hour on a 24-hr average (1,428,030 tons per year).
[Rules 62-4.160(2), and 62-210.200 (PTE), F.A.C. and AC29-114676]

2.0 OPERATING REQUIREMENTS

- 2.1 Hours of Operation. The solid fuel yard is allowed to operate continuously, i.e., 8,760 hours/year.
[Rules 62-4.160(2) and 62-210.200, F.A.C., P.T.E.]

3.0 EMISSION LIMITATIONS AND STANDARDS

- 3.1 Visible Emissions. Visible emissions generated by fugitive or unconfined particulate matter from this transloading operation (emissions points PET-01, COAL-01, SLAG-01, and PET/COAL/SLAG-02a, 02b and 3a, 3b) shall not exceed 20% opacity.
[Rule 62-296.320(4)(b)1, F.A.C.]

4.0 TEST METHODS AND PROCEDURES

- 4.1 Test Methods and Frequency: The test method for visible emissions shall be determined using EPA Method 9, adopted and incorporated by reference in Rule 62-204.800, F.A.C., and referenced in Chapter 62-297, F.A.C. Initial and annual testing is required. A VE test shall be performed in each new emissions point.
[Rules 62-204.800, 62-297.310(7)(a)4., and 62-297.400, F.A.C.]

5.0 REASONABLE ASSURANCES

- 5.1 Controls: All controls associated with the transfer points (i.e., the enclosures and dust suppression) shall be maintained to the extent that the capture efficiencies credited will be achieved. Reasonable precautions to prevent unconfined emissions of particulate matter shall be in accordance with Rule 62-296.320(4).F.A.C
[Rule 62-4.070(3), and Rule 62-296.320(4) (c) F.A.C.]

6.0 REPORTS AND RECORDS

- 6.1 Duration: All reports and records required by this permit shall be kept for at least (5) years from the date the information was recorded. [62-4.160(14)(b), F.A.C.]

7.0 OTHER REQUIREMENTS

- 7.1 Applicable Permit Requirements: This permit (transloading coal, petcoke, and slag to off-site facilities) does not supersede or change any applicable requirement of previous construction/operation permits for the Solid Fuel Yard or for any other emission unit at the Facility.