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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)

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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/hk/RAV107

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

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<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