

October 23, 2014

David L. Read, P.E.
Permitting Section 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

E-Mail Notification

David.Read@dep.state.fl.us

RE: Tampa Electric Company - Big Bend Station Self Unloader Project Request to Separate Air Construction Permit Permit No. 0570039-076-AC Title V Permit No. 0570039-067-AV Facility ID No. 0570039

Dear Mr. Read:

Tampa Electric Company ("TEC") is requesting a separate air construction permit (Permit No. 0570039-076-AC) for the self unloader project. TEC requests to retain the PM CPMS project in the concurrent air construction permit(Permit No. 0570039-071-AC)/Title V Renewal permit application(Permit No. 0570039-072-AV).

On October 16, 2014, the Florida Department of Environmental Protection requested additional information on the self unloader project. The request included a process description of the four new hoppers and applicable opacity limit. A description of the process and opacity applicability is discussed below.

Self-Unloading Project Description

The current permit currently authorizes self-unloading fugitive emissions as transfer point FH-005. This project involves minor modifications to allow self-unloading of 3 different types of vessels: Energy Enterprise; Florida Enterprise; and MS Enterprise. The Energy and Florida Enterprise are specified to offload with a covered boom conveyor. The Energy Enterprise consists of a large, articulating boom conveyor that off loads directly into the existing Dravo hopper. Florida Enterprise consists of smaller, non-articulating conveyor system that discharges to a receiving and transfer hoppers mounted on the Dravo hopper. The Dravo and transfer hoppers contain angled chutes that discharge immediately above the existing D1 conveyor. This allows the material to slide down to the conveyor rather than simply dropping and creating fugitive emissions. The last vessel, MS Enterprise, consists of four (4) crane or clam shell unloaders and four (4) separate hoppers. Each crane will unload into a designed hopper.

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Similarly, these hoppers contain angled chutes that discharge immediately above the existing D1 conveyor to prevent fugitive emissions.

Applicable Opacity

The existing hopper and transfer points (FH-001 to FH-005) are permitted under the 20% general opacity pursuant to Rule 62-296.320(4)(b)1., F.A.C. The Dravo Unloader will be taken out of service and demolished but the Dravo hopper system will maintain in service. The demolition will remove two additional transfer points (FH-002 and FH-003). The existing self unloader transfer point (FH-005) and Dravo hopper (FH-004) will remain in the permit. Energy Enterprise and Florida Enterprise vessels will use these two existing transfer points to unload solid fuel. The 4 new hoppers will be used for the MS Enterprise vessel. These new hoppers will be also subject to the 20% opacity since the crane will be moving in relation to the mobile hoppers. As a best management practice, the tip of each boom conveyor on the Florida Enterprise and Energy Enterprise will include a dispersant spray system to wet the material prior to discharging into the hopper. This is considered a preventative measure to further minimize fugitive emissions. A summary of the self-unloader type and transfer points is shown in the **Table 1**. Drawings of the 4 new hoppers are shown in **Attachment A**.

Table 1. Self-Unloader Type and Transfer Point Summary

Transfer Point	Vessel	Self-Unloading Type	Rule Applicability
Existing FH-004	Energy Enterprise	Articulating Boom*	20% general opacity
Existing FH-004 & FH-005	Florida Enterprise	Non-Articulating Boom*	20% general opacity
New FH-005A	MS Enterprise	Clam Shell Crane Loader	20% general opacity
New FH-005B	MS Enterprise	Clam Shell Crane Loader	20% general opacity
New FH-005C	MS Enterprise	Clam Shell Crane Loader	20% general opacity
New FH-005D	MS Enterprise	Clam Shell Crane Loader	20% general opacity

^{*}equipped with dust suppressant at converyor boom

Please contact me at (813) 228-4232, if you have any questions or comments.

Sincerely,

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

EHS/iym/RAV249 Request for Separate AC permit - Self Unloading

Attachment A MS Enterprise Hopper Drawings





