



Florida Department of Environmental Protection

Bob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Charlie Crist
Governor

Jill Kottkamp
Lt. Governor

Michael W. Sole
Secretary

July 9, 2009

Electronic Mail – Received Receipt Requested

Ms. Karen Sheffield, Director-Bayside Power Station
Tampa Electric Company
P.O. Box 111
Tampa, FL 33601-0111

Re: **Request for Additional Information**
Project No. 0570040-027-AV
Tampa Electric Company, H.L. Culbreath Bayside Power Station
Title V Air Operation Permit Renewal

Dear Ms. Sheffield:

On May 20, 2009, the Department received your application for a Title V air operation permit renewal for the above referenced facility. The application is incomplete as submitted. In order to continue processing your application, the Department will need the additional information requested below pursuant to Rule 62-213.420(1)(b)3., Florida Administrative Code (F.A.C.), and Rule 62-4.070(1), F.A.C. Should your response to any of the items below require new calculations, please submit the new calculations, assumptions, reference material and appropriate revised pages of the application form.

1. The current Title V permit identifies the "Retired Unit Exemption" form. Please provide this form for the renewal application or explain why this form is no longer necessary.

Subsection III.A. Combined Cycle Gas Turbines

2. Please provide the manufacturer's performance curves for each of the combined cycle gas turbines.
3. You have requested general changes to current permit Condition III.A.11 specifying CEMS data exclusion for authorized periods of excess emissions. The details of this condition were carefully constructed during initial issuance of this permit. Changes will likely require a concurrent air construction permit revision. Please provide a justification or clarification for each requested change and provide additional information to support your request.
4. You requested that we add EPA Method 320 to the table in current Condition III.A.12. Will this method only be used to determine ammonia emissions?
5. Please provide your rationale for removing the CEMS performance specifications for carbon monoxide (CO) and carbon dioxide (CO₂).

Subsection III.B. Fuel Yard

6. Table B-1 shows several strikethroughs for various emissions points. Are any of the emissions points in operation? Have you submitted Annual Operating Reports for these emissions units? Do any coal piles remain on site?
7. For each of the edited conditions in B.1 to B.10, explain what has been removed and what remains in place.

REQUEST FOR ADDITIONAL INFORMATION

Appendices

8. For Appendix I-1 and Attachment 5, please identify the specific equipment that you currently have on site that meets the criteria specified for "insignificant emissions unit" in paragraph 62-213.300(2)(a), F.A.C. Also, it is not sufficient to list items from Rule 62-210.300(3), F.A.C. that represent categorical exemptions. Rather, for each exempt category, list the equipment that you have and supporting information to document the exemption. Note that internal combustion engines or mobile sources are "unregulated emissions units" and not "insignificant emissions units".

Other

9. Please identify if any of the facility's engines, which are subject to any of the following federal regulations: 40 CFR 60, Subpart IIII, Standards of performance for Stationary Compression Ignition (CI) Internal Combustion Engines; 40 Code of Federal Regulations (CFR) 60, Subpart JJJJ, Standards of Performance for Stationary Spark Ignition (SI) Internal Combustion Engines; and 40 CFR 63, Subpart ZZZZ, National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines. If applicable,
- Please provide the following information for each emission unit subject to an applicable subpart: in-service date, cylinder displacement, and rule applicability.
 - Please identify the standards, operating limits, and monitoring requirements.
10. Attachment 13. Is the "startup" defined in Attachment 13 a warm startup?

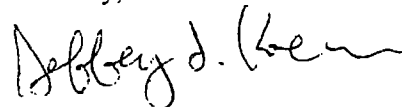
Responsible Official (R.O.) Certification Statement: Rule 62-213.420, F.A.C. requires that all Title V permit applications must be certified by a responsible official. Due to the nature of the information requested in Item numbers 1 through 10 above, your response should be certified by the responsible official. Please complete and submit a new R.O. certification statement page from the long application form, DEP Form No. 62-210.900(1), effective March 16, 2008.

Professional Engineer (P.E.) Certification Statement: Rule 62-4.050(3), F.A.C. requires that all applications for a Department permit must be certified by a professional engineer registered in the State of Florida. This requirement also applies to responses to Department requests for additional information of an engineering nature. As a result, at a minimum your response to Item numbers 1 through 10 above should be certified by a professional engineer registered in the State of Florida. Please complete and submit a new P.E. certification statement page from the long application form, DEP Form No. 62-210.900(1), effective March 16, 2008.

The Department must receive a response from you within 90 days of receipt of this letter, unless you (the applicant) request additional time under Rule 62-213.420(1)(b)5., F.A.C.

If you should have any questions, please call, Tammy McWade, at 850/488-1906 or Jeff Koerner.

Sincerely,



Jeffery F. Koerner, Administrator
New Source Review Section
850/921-9536

REQUEST FOR ADDITIONAL INFORMATION

This letter was sent to the following people by electronic mail with received receipt requested.

Ms. Karen Sheffield, Director-Bayside Power Station (kasheffield@tecoenergy.com)
Ms. Laurie Pence, Environmental Specialist (lapence@tecoenergy.com)
Mr. Ben Willoughby, Coordinator, Safety Health & Environmental (bpwilloughby@tecoenergy.com)
Mr. Byron Burrows, P.E., Manager-Air Programs (btburrows@tecoenergy.com)
Ms. Cindy Zhang-Torres, DEP Southwest District Office (cindy.zhang-torres@dep.state.fl.us)
Ms. Dianna Lee, Hillsborough County EPC (lee@epchc.org)
Mr. Mike Halpin, DEP Siting Office (mike.halpin@dep.state.fl.us)
Ms Ana M. Oquendo, EPA Region 4 (quendo.ana@epa.gov)
Ms. Kathleen Forney, EPA Region 4 (forney.kathleen@epa.gov)
Ms Heather Abrams, EPA Region 4 (abrams.heather@epa.gov)
Ms. Vickie Gibson, DEP BAR Reading File (victoria.gibson@dep.state.fl.us)

JFK/ttm