



TAMPA ELECTRIC
January 21, 2010

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BUREAU OF AIR REGULATION

Ms. Elizabeth Walker
Florida Department of Environmental Protection
Bureau of Air Regulation
2600 Blair Stone Road MS 5505
Tallahassee, FL 32399-2400

Via FedEx
Airbill No. 7932 0116 4962

**Re: Electronic Permit Submittal and Processing System (EPSAP)
Professional Engineer Signature Document
App No.: 2533-1
Bayside AC Permit Changes**

To Whom It May Concern:

Please find included with this letter the appropriate Electronic Permit Submittal and Processing System (EPSAP) Professional Engineer Signature Document for the above referenced permit application.

TEC continues to look forward to working with the Department regarding this permit application.

If you have any questions, please contact me at (813) 228-4457.

Sincerely,

Laurie A. Pence
Environmental Specialist
Environmental, Health & Safety

EHS/rk/LAP477

Enclosure

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

(813) 228-4111

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ALL OTHER COUNTIES 1 (888) 223-0800

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.."

EPSAP Application Number: 2533-1
Facility Identification Number: 0570040
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: 1/21/2010 11:46:28 AM

File Description	Authentication Code
Submitted Application Data	3DD13471411934832DF03B680D59C665BA927E6E
Uploaded Facility Documents:	
Requested Changes to AC Permit Before Roll Into Title V-Tuning.doc	F3145734DB31943B1FCE4CCF442637A849E383BF
This Application Has No Uploaded Emissions Unit Documents.	
Final Signature File	12545FD16967A5FF8E96CB8F70AE3FAADE138EC3

Professional Engineer (PE): BYRON BURROWS License No: 53817

(sign and affix PE seal below)




PE Signature

Date

1/21/10

Florida Department of Environmental Protection

Memorandum

To: Trina Vielhauer, Bureau of Air Regulation 
From: Jeff Koerner, New Source Review Section
Date: July 28, 2010
Subject: Project No. 0570040-028-AC (PSD-FL-301D)
Final Air Construction Permit Revision
Tampa Electric Company, H.L. Culbreath Bayside Power Station
Miscellaneous Revisions, Excess Emissions

The H.L. Culbreath Bayside Power Plant is an existing electrical generating plant located in Hillsborough County at 3602 Port Sutton Road in Tampa, Florida. Permit No. 0570040-019-AC (PSD-FL-301C) for existing combined cycle Units 1 and 2 is being revised to clarify excess emissions during warm and cold steam turbine startups. For the new simple cycle peaking Units 3 through 6, Permit No. 0570040-026-AC is being revised to address the exclusion of carbon monoxide emissions during combustion turbine tuning. These changes are not expected to result in an actual emissions increase and the project is not subject to PSD preconstruction review. The project was processed concurrently with revised Title V air operation Permit No. 0570040-027-AV to incorporate the newly constructed simple cycle peaking units as well as the revised air construction permit conditions. There were no comments on the draft permit and no petitions were filed.

I recommend your approval of the attached Final Permit package.

Attachments

TLV/jfk

FINAL DETERMINATION

PERMITTEE

Tampa Electric Company
P.O. Box 111
Tampa, Florida 33601-0111

PERMITTING AUTHORITY

Florida Department of Environmental Protection (Department)
Division of Air Resource Management
Bureau of Air Regulation, New Source Review Section
2600 Blair Stone Road, MS #5505
Tallahassee, Florida 32399-2400

PROJECT

Air Permit No. 0570040-028-AC (PSD-FL-301D)
Miscellaneous Air Construction Permit Revisions
H.L. Culbreath Bayside Power Station

This project revises several conditions in underlying air construction permits primarily related to authorized excess emissions and reporting requirements.

NOTICE AND PUBLICATION

The Department distributed a draft minor air construction permit package on June 9, 2010. The applicant published the Public Notice in the South Shore News and Tribune (affiliated with The Tampa Tribune) on June 16, 2010. The Department received the proof of publication on June 18, 2010. No requests for administrative hearings or requests for extensions of time to file a petition for administrative hearing were received.

COMMENTS

No comments were received on the Draft Permit.

CONCLUSION

The final action of the Department is to issue the final permit as drafted.



Florida Department of Environmental Protection

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

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

PERMITTEE

Tampa Electric Company
P.O. Box 111
Tampa, Florida 33601-0111

Air Permit No. 0570040-028-AC
H.L. Culbreath Bayside Power Station
ARMS ID No. 0570040
Miscellaneous Permit Revisions

Authorized Representative:
Mr. Frank Busot, Director, Bayside Power Station

PROJECT AND LOCATION

This permit authorizes miscellaneous revisions to previously issued air construction permits. The proposed work will be conducted at the H.L. Culbreath Bayside Power Station, which is an electric generating utility (Standard Industrial Classification No. 4911). The existing power plant is located at 3602 Port Sutton Road, Tampa, in Hillsborough County. UTM Coordinates are Zone 17, 360.1 km East and 3087.5 km North.

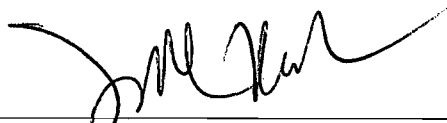
STATEMENT OF BASIS

This air pollution 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.). This project is subject to the general preconstruction review requirements in Rule 62-212.300, F.A.C. and is not subject to the preconstruction review requirements for major stationary sources in Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

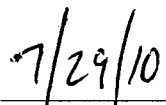
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- Section 2. Administrative Requirements
- Section 3. Emissions Unit Specific Conditions
- Section 4. Appendices

Executed in Tallahassee, Florida



Joseph Kahn, Director
Division of Air Resource Management



(Date)

FINAL PERMIT REVISION


CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Final Air Permit package (including the Final Determination and Final Permit Revision) was sent by electronic mail, or a link to these documents made available electronically on a publicly accessible server, with received receipt requested before the close of business on 7/29/10 to the persons listed below.

- Mr. Frank Busot, TECO, Director, Bayside Power Plant (flbusot@tecoenergy.com)
- Mr. Byron Burrows, TECO, Manager-Air Programs, P.E. (btburrows@tecoenergy.com)
- Ms. Laurie Pence, TECO, Environmental Specialist (lapence@tecoenergy.com)
- Ms. Cindy Zhang-Torres, DEP SWD 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. Katy Forney, U.S. EPA Region 4 (forney.kathleen@epamail.epa.gov)
- Ms. Ana Oquendo, U.S. EPA Region 4 (oquendo.ana@epamail.epa.gov)
- Ms. Victoria Gibson, DEP BAR Reading File (victoria.gibson@dep.state.fl.us)

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated agency clerk, receipt of which is hereby acknowledged.



(Clerk)

7/29/10
(Date)

SECTION 1. GENERAL INFORMATION

FACILITY DESCRIPTION

The existing facility is an electric generating station, which consists of the following emissions units and activities: The H. L. Culbreath Bayside Power Station is an electric power plant consisting of six primary electrical generating units. Unit 1 (EU 020 – 022) is a “3-on-1” combined cycle gas turbine system with a nominal generating capacity of 746 MW, which consists of three gas turbines (169 megawatt (MW) each) and one steam-electrical generator (239 MW). Unit 2 (EU 023 – 026) is a “4-on-1” combined cycle gas turbine system with a nominal generating capacity of 1090 MW, which consists of four gas turbines (169 MW each) and one steam-electrical generator (414 MW). These units fire natural gas as the exclusive fuel and employ selective catalytic reduction (SCR) to reduce emissions of nitrogen oxides (NO_x). Emissions of carbon monoxide (CO) and NO_x are monitored with continuous emissions monitoring systems (CEMS).

Units 3 through 6 (EU 031 - 038) consist of four Pratt & Whitney Model No. FT8-3 SwiftPac® aero-derivative simple cycle combustion turbine-electrical generator sets to operate in simple cycle mode. For each SwiftPac®, two combustion turbines are coupled to one common electrical generator set having a total nominal gross generation capacity of 62 MW. Each unit fires natural gas, controls NO_x emissions with water injection and CO emissions with catalytic oxidation. Emissions of CO and NO_x are monitored with continuous emissions monitoring systems (CEMS).

FACILITY REGULATORY CLASSIFICATION

Title III: The facility is not identified as a major source of hazardous air pollutants (HAP).

Title IV: The gas turbines are subject to Phase II of the acid rain provisions of the Clean Air Act.

Title V: The facility is a Title V major source of air pollution in accordance with Chapter 62-213, Florida Administrative Code (F.A.C.).

PSD: The facility is a major stationary source of air pollution in accordance with Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

NESHAP: The facility operates units subject to National Emissions Standards for Hazardous Air Pollutants (NESHAP) in Part 63, Title 40, Code of Federal Regulations (CFR).

NSPS: The facility operates units subject to New Source Performance Standards (NSPS) in Part 60, Title 40, CFR.

PROPOSED PROJECT

This project revises several conditions in underlying air construction permits primarily related to authorized excess emissions and reporting requirements.

SECTION 2. PERMIT REVISIONS

The following permit conditions are revised as indicated. ~~Strikethrough~~ is used to denote the deletion of text. Double-underlines are used to denote the addition of text.

Permit Being Modified: Permit No. 0570040-019-AC (PSD-FL-301C)

Affected Emissions Units: EU-020 through EU-026

Subsection III.A, Specific Condition 17: This condition is revised as follows.

17. Alternative Standards and CEMS Data Exclusion: As provided by the authority in Rule 62-210.700(5), F.A.C., the above requirements are established in lieu of the provisions of Rule 62-210.700(1), F.A.C. The following permit conditions establish alternative standards or allow the exclusion of monitoring data for specifically defined periods of startup, shutdown, ~~and malfunction and other limited-use operations.~~ These conditions apply only if operators employ the best operational practices to minimize the amount and duration of emissions during such incidents.

a. Definitions: The following terms are defined in Rule 62-210.200, F.A.C. “Shutdown” means the cessation of the operation of an emissions unit for any purpose. “Malfunction” means any unavoidable mechanical and/or electrical failure of air pollution control equipment or process equipment or of a process resulting in operation in an abnormal or unusual manner. “Startup” means the commencement of operation of any emissions unit which has shut down or ceased operation for a period of time sufficient to cause temperature, pressure, chemical or pollution control device imbalances, which result in excess emissions.

ab. Alternative Opacity During Startup and Shutdown. During startup and shutdown, the opacity of the exhaust gases shall not exceed 10%, except for up to ten 6-minute averaging periods in a calendar day during which the opacity shall not exceed 20%. Data for each 6-minute averaging period shall be exclusive from other 6-minute averaging periods.

bc. Low Load Operation. ~~Excluding~~ Except for other authorized periods of low-load operation startup, shutdown, malfunction, DLN tuning, compressor blade drying, and over speed trip tests, each gas turbine may operate below 50% base load providing: the gas turbine is firing natural gas and operating in full dry low-NOx combustion mode; the CO and NOx CEMS are functioning properly during such periods and recording valid emissions data within the span range of the monitors; and the gas turbine remains in compliance with the CO and NOx emissions standards (24-hour block averages).

ed. CEMS Data Exclusion. For the following specified operational periods, CO and NOx emissions data may be excluded from the 24-hour block compliance averages in accordance with the corresponding requirements.

~~(1) Definitions: Rule 62-210.200, F.A.C. “shutdown” is defined as the cessation of the operation of an emissions unit for any purpose. “Malfunction” is defined as any unavoidable mechanical and/or electrical failure of air pollution control equipment or process equipment or of a process resulting in operation in an abnormal or unusual manner. “Startup” is defined as the commencement of operation of any emissions unit which has shut down or ceased operation for a period of time sufficient to cause temperature, pressure, chemical or pollution control device imbalances, which result in excess emissions.~~

~~(12)~~ Standard Gas Turbine/HRSG Startups, Shutdowns, and Malfunctions. For each gas turbine, no more than four 1-hour CEMS emission averages shall be excluded from any 24-hour block compliance average due to standard gas turbine/HRSG startups, shutdowns, and malfunctions (total).

~~(23)~~ Cold Steam Turbine Startup. “Cold steam turbine startup” means a startup after the steam turbine has been offline for 24 hours or more, or the first stage turbine metal temperature is 250° F or less.

SECTION 2. PERMIT REVISIONS

More than one gas turbine may be used to complete a cold steam turbine startup; however, to minimize emissions, no more than one gas turbine per Bayside Unit at a time shall be operated during a cold steam turbine startup. For a given cold steam turbine startup, no more than sixteen 1-hour CEMS emission averages for all participating gas turbines shall be excluded from the 24-hour block compliance averages due to a cold steam turbine startup. In addition For a gas turbine used during a cold steam turbine startup, no more than a total of sixteen 1-hour CEMS emission averages shall be excluded from any 24-hour block compliance average due to any combination of cold steam turbine startups and gas turbine/HRSG startups, shutdowns and malfunctions. In the event of a cold steam turbine startup and gas turbine/HRSG standard startups, shutdowns and/or malfunctions within the same 24-hour period, a total of sixteen 1-hour CEMS emissions averages may be excluded with no more than four of those sixteen 1-hour CEMS emissions averages being excluded due to standard gas turbine/HRSG startups, shutdowns, and/or malfunctions (total). This condition applies only to the gas turbine being used for the cold steam turbine startup. The permittee shall notify the Compliance Authority no later than 24 hours after beginning a cold steam turbine startup. Notification may be by phone, facsimile, email, or letter.

- (3) Warm Steam Turbine Startup: “Warm steam turbine startup” means a startup after the steam turbine has been offline for less than 24 hours and the first stage turbine metal temperature is 250° F or more. More than one gas turbine may be used to complete a warm steam turbine startup; however, to minimize emissions, no more than one gas turbine per Bayside Unit at a time shall be operated during a warm steam turbine startup. For a given warm steam turbine startup, no more than eight 1-hour CEMS emission averages for all participating gas turbines shall be excluded from the compliance averages. For a gas turbine used during a warm steam turbine startup, no more than eight 1-hour CEMS emission averages shall be excluded from any compliance average in a 24-hour block period due to any combination of warm steam turbine startups and gas turbine/HRSG startups, shutdowns and malfunctions. In the event of a warm steam turbine startup and gas turbine/HRSG startups, shutdowns and/or malfunctions within the same 24-hour period, a total of eight 1-hour CEMS emissions averages may be excluded with no more than four of those eight 1-hour CEMS emissions averages being excluded due to gas turbine/HRSG startups, shutdowns, and/or malfunctions (total).
- (4) Steam Turbine Startup Following an Unplanned Forced Outage. “Steam turbine startup following unplanned, forced outage” means startup when the first stage turbine metal temperature is 250° F or more and occurs within 24 hours after either (1) the steam turbine inadvertently trips offline, or (2) the plant is forced to take the steam turbine offline for repair. To minimize emissions, no more than one gas turbine per Bayside Unit shall be operated during a steam turbine startup following an unplanned forced outage. No more than eight 1 hour CEMS emissions averages shall be excluded from the 24 hour block compliance averages due to a steam turbine startup following an unplanned forced outage. In addition, no more than eight 1 hour CEMS emission averages shall be excluded from any 24 hour block compliance average due to steam turbine startups following an unplanned forced outage. In the event of a startup following an unplanned forced outage and standard startups, shutdowns and/or malfunctions within the same 24 hour period, a total of eight 1-hour CEMS emissions averages may be excluded with no more than four of those eight 1-hour CEMS emissions averages being excluded due to standard startups, shutdowns, and malfunctions (total). This condition applies only to the gas turbine being used for steam turbine startup following an unplanned forced outage. The permittee shall notify the Compliance Authority no later than 24 hours after beginning a steam turbine startup following an unplanned forced outage. Notification may be by phone, facsimile, email, or letter and shall include the reason for the unplanned forced outage.
- (4) Other Limited-Use Operations: CEMS data collected during any of the following limited use

SECTION 2. PERMIT REVISIONS

operational periods may be excluded from the compliance averages.

- (a5) *DLN Tuning.* “DLN Tuning” means operating the gas turbine at intermittent loads throughout the full load range in order to adjust and tune the dry low-NOx (DLN) combustion system. DLN tuning shall be conducted in accordance with manufacturer’s recommendations (or industry standards). ~~Emissions data collected during DLN tuning may be excluded from the 24-hour block compliance averages.~~ *{Permitting Note: For example, a major tuning session would occur after combustor change-out.}*
- (b6) *Compressor Blade Drying.* Following a compressor blade wash in accordance with the manufacturer’s recommendations (or industry standards), the permittee may operate a gas turbine at very low loads to heat and dry the compressor blades. *{Permitting Note: A gas turbine would typically operate at approximately 10% of base load or less to perform compressor blade drying.}*
- (c7) *Over Speed Trip Test.* As a periodic maintenance practice, the permittee may perform over speed trip tests in accordance with the manufacturer’s recommendations (or industry standards). ~~Emissions data collected while conducting over speed trip tests may be excluded from the 24-hour block compliance averages.~~ *{Permitting Note: During this test, the gas turbine is operated at full speed, no load (FSNL) for approximately 5 to 6 hours. The unit is gradually accelerated to 110% speed (3960 rpm) to initiate a trip and then coasts down normally. Over speed trip tests are typically performed after a long outage or a major component overhaul.}*

To the extent practicable, the permittee shall minimize the amount and duration of emissions during periods of startup, shutdown, malfunction and other limited-use operations, ~~DLN tuning, compressor blade drying, and over speed trip testing.~~ If a CEMS reports emissions in excess of an emissions standard (24-hour block), the permittee shall notify the Compliance Authority within one working day with a preliminary report of: the nature, extent and duration of the excess emissions; the cause of the excess emissions; and the actions taken to correct the problem. In addition, the Compliance Authority may request a written summary report of the incident. All emissions data allowed for exclusion shall be summarized in the Semiannual CEMS Report required in Condition 0 of this subsection.

- d. *Startup and Shutdown Plan.* The permittee shall maintain on site a “Startup and Shutdown Plan” that describes procedures for startup and shutdown of the Bayside Units.

As provided by the authority in Rule 62-210.700(5), F.A.C., the above requirements are established in lieu of the provisions of Rule 62-210.700(1), F.A.C.

{Permitting Note: The durations for a warm and cold steam turbine startups and a steam turbine startup following an unplanned forced outage are not typical for combined cycle units. The Bayside Units utilize the existing Gannon steam turbines. Operating procedures require one gas turbine to operate at low loads for extended periods to gradually warm the main and hot reheat steam lines to the steam turbine as well as the steam turbine. Some steam lines are in excess of 1700 feet. Such startups are expected to occur infrequently.} [Design; Rules 62-4.130, 62-210.700(5), and 62-212.400 (BACT), F.A.C.; Permit No. PSD-FL-301B]

Subsection III.A, Specific Condition 23: Paragraph (f) of this condition is revised as follows.

- f. *Monitor Availability.* Monitor availability shall not be less than 95% in any calendar quarter. The quarterly Data Assessment Report required in Condition 23e above shall be used to demonstrate monitor availability and shall be reported with the Semiannual CEMS Report. In the event 95% availability is not achieved, the permittee shall provide the Compliance Authority with a report

SECTION 2. PERMIT REVISIONS

identifying the problems in achieving 95% availability and a plan of corrective actions that will be taken to achieve 95% availability. The permittee shall implement the reported corrective actions within the next calendar quarter. Failure to take corrective actions or continued failure to achieve the minimum monitor availability shall be violations of this permit.

Subsection III.A, Specific Condition 25: This condition is revised as follows.

25. **Semiannual CEMS Report:** In addition to the reports required pursuant to 40 CFR 60.7, the permittee shall submit semiannual reports for each gas turbine summarizing the CEMS data and equipment. For each calendar quarter, the report shall include: the 24-hour block compliance averages for each day of operation; the number of 1-hour emission averages excluded from each 24-hour compliance average; the emissions rate of the excluded monitoring data; the reason for excluding monitoring data; the hours of missing data due to monitor downtime; the reason for any monitor downtime; unusual maintenance or repair of the CEMS; and a summary of any RATA tests performed. Based on operational data, the permittee shall also update the general range of ammonia flow rates required to meet NOx emissions limitations over the range of gas turbine load conditions. A report covering operations from January through June shall be submitted by July 30th of each year. A report covering operations from July through December shall be submitted by January 30th of each year. The data assessment report required by Condition 23e shall be submitted in conjunction with the Semiannual CEMS Report. The report due dates may be modified by the Title V permit. [Permit No. PSD-FL-301; Rules 62-4.070(3) and 62-212.400(BACT), F.A.C.]

Permits Being Modified: Permit Nos. 0570040-026-AC

Affected Emissions Units: EU-031 through EU-038

Subsection III, Specific Condition 9: This condition is revised as follows.

9. **Emission Standards:** Emissions from each SCCT peaking unit shall not exceed the following standards.

Pollutant	Emission Standard ^e	Averaging Time	Compliance Method	Basis
NO _x ^a	25.0 ppmvd @ 15% O ₂	4-hr rolling avg. ^f	CEMS	NSPS <u>Subpart KKKK</u>
	32.0 lb/hr/SCCT 56.0 tons/yr/SCCT	3 1-hr runs	<u>Annual RATA</u> <u>Stack Test</u>	Rule 62-4.070(3), F.A.C.
CO ^b	21.0 ppmvd @ 15% O ₂	3-hr rolling avg.	CEMS	ESCPSD Rule 62-212.400(12), F.A.C.
	9.1 lb/hr/SCCT 8.2 tons/yr/SCCT	3 1-hr runs	<u>Annual RATA</u> <u>Stack Test</u>	
VOC ^b	5.1 lb/hr/SCCT	3 1-hr runs	Surrogate is CO One-Time Stack Test	ESCPSD Rule 62-212.400(12), F.A.C.
Visible Emissions	<20 % Opacity	6-minute block	Visible Emissions Test	Rule 62-296.320(4)(b)1., F.A.C.
PM ^c	2 gr S/100 scf of gas	N/A	Recordkeeping Firing pipeline quality natural gas	Vendor data
SO ₂ ^d	2 gr S/100 scf of gas 6 lb/MWhr/SCCT <u>0.06 lb/MMBtu</u>	N/A	Recordkeeping Firing pipeline quality natural gas	ESCPSD Rule 62-212.400(12), F.A.C. <u>NSPS Subpart KKKK</u>

SECTION 2. PERMIT REVISIONS

Pollutant	Emission Standard ^e	Averaging Time	Compliance Method	Basis
SAM ^d	2 gr S/100 scf of gas	N/A	Recordkeeping Firing pipeline quality natural gas	ESCPSD Rule 62-212.400(12), F.A.C.

- a. Continuous compliance with the 4-hr rolling average NO_x standards shall be demonstrated based on data collected by the required Continuous Emissions Monitoring System (CEMS). During an annual Relative Accuracy Test Audit (RATA) on the NO_x CEMS, the permittee shall demonstrate compliance with the individual mass-based (lb/hour) standards. The initial and annual EPA Method 7E or Method 20 tests associated with demonstration of compliance with 40 CFR 60, Subpart KKKK or certification of the CEMS instruments shall also be used to demonstrate compliance with the individual standards for natural gas during the time of those tests.
- b. Continuous compliance with the 3-hour rolling average CO standards shall be demonstrated based on data collected by the required CEMS. ~~The initial and annual EPA Method 10 tests associated with the certification of the CEMS instruments shall also be used to demonstrate compliance with the standard for natural gas.~~ During an annual RATA on the CO CEMS, the permittee shall demonstrate compliance with the individual mass-based (lb/hour) standards. An oxidation catalyst shall be installed on each SCCT peaking unit to minimize the emissions of CO and VOC. CO will be used as a surrogate for VOC emissions as a demonstration of good combustion. For an initial demonstration of compliance with the VOC mass limit, a one-time compliance test using EPA Method 25A, 40 CFR 60, Appendix A, shall be conducted on only one SCCT peaking unit; in addition and optionally, EPA Method 18 may also be performed concurrently with EPA Method 25A to deduct emissions of methane and ethane.
- c. The sulfur fuel specification combined with the efficient combustion design and operation of the gas turbine should minimize PM emissions (PM emissions are a surrogate for PM₁₀ emissions) as well as visible emissions. Compliance with the fuel specifications, CO standards, and visible emissions standards shall serve as indicators of good combustion. Compliance with the fuel specifications shall be demonstrated by keeping records of the fuel sulfur content. Compliance with the visible emissions standard shall be demonstrated by conducting tests in accordance with EPA Method 9.
- d. The fuel sulfur specification effectively limits the potential emissions of SO₂ and sulfuric acid mist (SAM) from each SCCT peaking unit. ~~The application's SO₂ potential emissions are 1.9 lb/hr (0.06 lb/MWhr), based on 2 gr/100 scf of natural gas, equivalent to 0.0055 lb/MMBtu and is much less than the 40 CFR 60, Subpart KKKK standard of 0.060 lb/MMBtu.~~ Compliance with the fuel sulfur specifications shall be the use of pipeline-quality natural gas. *{Permitting Note: Based on the fuel sulfur specification, potential SO₂ emissions are 1.9 lb/hour (0.03 lb/MWhr), which is equivalent to 0.0055 lb/MMBtu and is less than the Subpart KKKK standard of 0.060 lb/MMBtu.}*
- e. The mass emission rate standards are based on a turbine inlet temperature condition of 59 °F, evaporative cooling on, and using the HHV of the fuel. Mass emission rates may be adjusted to actual test conditions in accordance with the performance curves and/or equations on file with the Department.
- f. 40 CFR 60, Subpart KKKK as described in 40 CFR 60.4350(g).

{Permitting Note: In combination with the annual restriction on hours of operation, the above emissions standards effectively limit annual potential emissions from the SCCT peaking units.}

[Rules 62-4.070(3), 62-210.200(Definitions-PTE) and 62-212.400(PSD), F.A.C.; and 40 CFR 60, Subpart KKKK]

SECTION 2. PERMIT REVISIONS

Subsection III, Specific Condition 13: This condition is revised as follows.

13. **Testing Requirements:** Initial tests shall be conducted between 90% and 100% of permitted capacity; otherwise, this permit shall be modified to reflect the true maximum capacity as constructed. Subsequent annual tests shall be conducted between 90% and 100% of permitted capacity in accordance with the requirements of Rule 62-297.310(2), F.A.C. An initial compliance test shall be conducted for each pollutant that is limited. For each run during tests for visible emissions, emissions of CO recorded by the CEMS shall also be reported. Data collected ~~from the reference method~~ during the required CEMS quality assurance relative accuracy test audit (RATA) ~~may substitute for~~ shall be used to demonstrate annual compliance tests ~~for~~ with the NO_x and CO mass-based (lb/hour) standards, ~~provided the owner or operator indicates this intent in the submitted test protocol, and obtains approval prior to testing.~~ If the RATA is conducted at less than permitted capacity, and the data is used for annual compliance, the requirements of ~~Rule 62-297.310(2)(Operating Rate During Testing), F.A.C., still apply.~~ Results of each RATA shall be submitted with the semiannual report. The mass emission rate standards are based on a turbine inlet condition of 59°F and 100 percent full load operation. Mass emission rate may be adjusted from actual test conditions in accordance with the performance curves and/or equations on file with the Department. [Rules 62-297.310(2) and (7)(a), F.A.C.; 40 CFR 60.8; and Appendix D of this permit]

Section IV, Appendix E, Condition 17: This condition is revised as follows.

17. ~~Allowable SIP CO and NO_x Data Exclusion:~~ ~~Provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions are minimized, CO and NO_x CEMS data collected during periods of startup, shutdown and malfunction may be excluded from the 3 hr rolling average and 4 hr rolling average, respectively, for compliance demonstrations only in accordance with the following requirements. All periods of data excluded shall be consecutive for each such episode and only data obtained during the described episodes (startup, shutdown and malfunction) may be excluded. As provided by the authority in Rule 62-210.700(5), F.A.C., the following conditions replace the provisions in Rule 62-210.700(1), F.A.C. Excess CO Emissions Allowed – SIP: If excess CO emissions occur due to startup, shutdown, malfunction or tuning, CEMS data collected during such periods may be excluded from the compliance averages in accordance with the following requirements provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions are minimized. All periods of excluded data shall be consecutive for each such episode and only data obtained during the described episodes (startup, shutdown, malfunction and tuning) may be excluded.~~
- a. *Excess Emissions.* For purposes of SIP-based permit limits, excess emissions data collected during periods of startup, shutdown and malfunction may be excluded as follows:
1. *Startup:* In accordance with the procedures described in the CEMS Data Requirements of this section, no more than the first 10 minutes of CEMS data shall be excluded for each gas turbine startup. For startups of less than 10 minutes in duration, only those minutes attributable to startup shall be excluded.
 2. *Shutdown:* In accordance with the procedures described in the CEMS Data Requirements of this section, no more than the first 10 minutes of CEMS data shall be excluded for each gas turbine shutdown. For shutdowns less than 10 minutes in duration, only those minutes attributable to shutdown shall be excluded.
 3. *Malfunction:* In accordance with the procedures described in the CEMS Data Requirements of this section, no more than 120 minutes of CEMS data shall be excluded in a 24-hour period for each gas turbine due to malfunctions. Within one (±) working day of occurrence, the owner or operator shall notify the Compliance Authority of any malfunction resulting in the exclusion of CEMS data.

SECTION 2. PERMIT REVISIONS

4. Tuning: “Tuning” means adjusting the combustors in accordance with the manufacturer’s recommendations (or industry standards) or modifying the water-to-fuel ratio to affect a change in the post-combustion air emissions. Such tuning sessions are infrequent. Excess CEMS emissions data collected during tuning may be excluded from the compliance averages.

As provided by the authority in Rule 62-210.700(5), F.A.C., the above conditions replace the provisions in Rule 62-210.700(1), F.A.C. All valid emissions data (including data collected during startup, shutdown, malfunction and tuning) shall be used to report annual emissions for the Annual Operating Report. The permittee shall notify the Compliance Authority within one working day of discovering any emissions in excess of a CEMS standard subject to the specified averaging period. All such reasonably preventable emissions shall be included in any CEMS compliance determinations. All valid emissions data (including data collected during startup, shutdown and malfunction) shall be used to report annual emissions for the Annual Operating Report.

- b. *Limiting Data Exclusion*. If the compliance calculation using all valid CEMS emission data (as defined in this Appendix) indicates that the emission unit is in compliance, then no CEMS data shall be excluded from the compliance demonstration.
- c. *Event Driven Exclusion*. The excess emissions must occur due to an underlying event (startup or shutdown). If there is no underlying event, then no data may be excluded.
- d. *Continuous Exclusion*. Data shall be excluded on a continuous basis per event. Data from discontinuous periods shall not be excluded for the same underlying event.
- e. *Reporting Excluded Data*. These procedures for excluding SIP-based excess emissions from compliance calculations are not necessarily the same procedures used for “excess emissions” as defined by federal rules. Semiannual reports required by this permit shall indicate the duration of data excluded from SIP compliance calculations as well as the number of excess emissions as defined in the applicable federal rules.

{Permitting Note: The Excess Emissions Rule at Rule 62-210.700, F.A.C., cannot vary any requirement of a NSPS or NESHAP provision.}

[Rules 62-4.070(3), 62-210.200, 62-210.370(3) and 62-210.700(4), F.A.C.]

Livingston, Sylvia

From: Livingston, Sylvia
Sent: Thursday, July 29, 2010 12:44 PM
To: 'flbusot@tecoenergy.com'
Cc: 'btburrows@tecoenergy.com'; 'lapence@tecoenergy.com'; 'cindy.zhang-torres@dep.state.fl.us'; 'lee@epchc.org'; 'mike.halpin@dep.state.fl.us'; 'forney.kathleen@epamail.epa.gov'; 'oquendo.ana@epamail.epa.gov'; 'victoria.gibson@dep.state.fl.us'; 'jeff.koerner@dep.state.fl.us'; McWade, Tammy; 'elizabeth.walker@dep.state.fl.us'
Subject: TECO - H. L. CULBREATH BAYSIDE POWER STATION; 0570040-028-AC
Attachments: 0570040-028-AC_Signatures.pdf

Dear Sir/ Madam:

Attached is the official **Notice of Final Permit** for the project referenced below. Click on the link displayed below to access the permit project documents and send a "reply" message verifying receipt of the document(s) provided in the link; this may be done by selecting "Reply" on the menu bar of your e-mail software, noting that you can view the documents, and then selecting "Send".

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Click on the following link to access the documents:

http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf_permit_zip_files/0570040.028.AC.F_pdf.zip

Owner/Company Name: TAMPA ELECTRIC COMPANY
Facility Name: H. L. CULBREATH BAYSIDE POWER STATION
Project Number: 0570040-028-AC
Permit Status: FINAL
Permit Activity: CONSTRUCTION
Facility County: HILLSBOROUGH
Processor: Jeff Koerner

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Sylvia Livingston
Division of Air Resource Management (DARM)
Department of Environmental Protection
850/921-9561
sylvia.livingston@dep.state.fl.us

Livingston, Sylvia

From: Pence, Laurie A. [lapence@tecoenergy.com]
Sent: Thursday, July 29, 2010 1:02 PM
To: Livingston, Sylvia
Subject: RE: TECO - H. L. CULBREATH BAYSIDE POWER STATION; 0570040-028-AC

Hi Sylvia. I have received the final AC permit. Since I haven't previously worked on rolling an AC permit into our air operating permit, I was wondering if you knew when we would receive that final permit? Does the final AC permit come first and then the final air operation permit?

Thanks,

Laurie Pence

Environmental Specialist
Environmental, Health & Safety
Tampa Electric Company
P.O. Box 111
Tampa, FL 33601
Office: (813) 228-4457
Fax: (813) 228-1308
lapence@tecoenergy.com

From: Livingston, Sylvia [mailto:Sylvia.Livingston@dep.state.fl.us]
Sent: Thursday, July 29, 2010 12:44 PM
To: Busot, Frank L.
Cc: Burrows, Byron T.; Pence, Laurie A.; Zhang-Torres; lee@ephc.org; Halpin, Mike; forney.kathleen@epamail.epa.gov; oquendo.ana@epamail.epa.gov; Gibson, Victoria; Koerner, Jeff; McWade, Tammy; Walker, Elizabeth (AIR)
Subject: TECO - H. L. CULBREATH BAYSIDE POWER STATION; 0570040-028-AC

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Processor: Jeff Koerner

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Sylvia Livingston
Division of Air Resource Management (DARM)
Department of Environmental Protection
850/921-9561
sylvia.livingston@dep.state.fl.us

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Livingston, Sylvia

From: Koerner, Jeff
Sent: Thursday, July 29, 2010 2:03 PM
To: 'Pence, Laurie A.'
Cc: Livingston, Sylvia
Subject: RE: TECO - H. L. CULBREATH BAYSIDE POWER STATION; 0570040-028-AC

Laurie,

1. If we issue a draft AC with a draft AV, we can issue the final AC separately after either the 14-day (minor) or 30-day (PSD) comment period. After the 30-day public comment period, we send EPA the "proposed" AV permit for the EPA 45-day review. After that, we can issue the final AV permit.
2. If we issue a draft AC with a draft/proposed AV (like we did for this Bayside project), we can issue the final AC separately after either the 14-day (minor) or 30-day (PSD) comment period. However, we must wait at least 45 days after the date of publication to afford EPA their full 45-day review period, which runs concurrently with the 30-day public comment period for such draft/proposed projects.

Once we issue the final AC, the plant may implement the changes as long as you have filed an application to revise the Title V permit in accordance with Rule 62-213.412(2), F.A.C., which states:

"A Title V source may immediately implement such changes after they have been incorporated into the terms and conditions of a new or revised construction permit issued pursuant to Chapter 62-212, F.A.C., and after the source provides to EPA, the Department, each affected state and any approved local air program having geographic jurisdiction over the source, a copy of the source's application for operation permit revision. The Title V source may conform its application for construction permit to include all information required by Rule 62-213.420, F.A.C., in lieu of submitting separate application forms."

So the plant may now implement the changes since we issued the final AC. I believe EPA's 45-day review period is up at the end of July. I will try to get the final AV revision ready for next week.

Thanks!

Jeff Koerner, New Source Review Section
850/921-9536

From: Livingston, Sylvia
Sent: Thursday, July 29, 2010 1:13 PM
To: Koerner, Jeff
Subject: FW: TECO - H. L. CULBREATH BAYSIDE POWER STATION; 0570040-028-AC

Jeff,

Can you help Laurie Pence with this question?

Thanks,
Sylvia

From: Pence, Laurie A. [mailto:lapence@tecoenergy.com]
Sent: Thursday, July 29, 2010 1:02 PM
To: Livingston, Sylvia
Subject: RE: TECO - H. L. CULBREATH BAYSIDE POWER STATION; 0570040-028-AC

Hi Sylvia. I have received the final AC permit. Since I haven't previously worked on rolling an AC permit into our air operating permit, I was wondering if you knew when we would receive that final permit? Does the final AC permit come first and then the final air operation permit?

Thanks,

Laurie Pence

Environmental Specialist
Environmental, Health & Safety
Tampa Electric Company
P.O. Box 111
Tampa, FL 33601
Office: (813) 228-4457
Fax: (813) 228-1308
lapence@tecoenergy.com

From: Livingston, Sylvia [mailto:Sylvia.Livingston@dep.state.fl.us]
Sent: Thursday, July 29, 2010 12:44 PM
To: Busot, Frank L.
Cc: Burrows, Byron T.; Pence, Laurie A.; Zhang-Torres; lee@epchc.org; Halpin, Mike; forney.kathleen@epamail.epa.gov; oquendo.ana@epamail.epa.gov; Gibson, Victoria; Koerner, Jeff; McWade, Tammy; Walker, Elizabeth (AIR)
Subject: TECO - H. L. CULBREATH BAYSIDE POWER STATION; 0570040-028-AC

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Owner/Company Name: TAMPA ELECTRIC COMPANY
Facility Name: H. L. CULBREATH BAYSIDE POWER STATION
Project Number: 0570040-028-AC
Permit Status: FINAL
Permit Activity: CONSTRUCTION
Facility County: HILLSBOROUGH
Processor: Jeff Koerner

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Sylvia Livingston
Division of Air Resource Management (DARM)
Department of Environmental Protection
850/921-9561
sylvia.livingston@dep.state.fl.us

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Livingston, Sylvia

From: Busot, Frank L. [FLBusot@tecoenergy.com]
Sent: Monday, August 02, 2010 3:59 PM
To: Livingston, Sylvia
Cc: Burrows, Byron T.; Pence, Laurie A.; Zhang-Torres; lee@epchc.org; Halpin, Mike; forney.kathleen@epamail.epa.gov; oquendo.ana@epamail.epa.gov; Gibson, Victoria; Koerner, Jeff; McWade, Tammy; Walker, Elizabeth (AIR)
Subject: RE: TECO - H. L. CULBREATH BAYSIDE POWER STATION; 0570040-028-AC
Attachments: Busot Frank.vcf

I have received the notice and I can view the documents.

Thank you,



From: Livingston, Sylvia [mailto:Sylvia.Livingston@dep.state.fl.us]
Sent: Thursday, July 29, 2010 12:44 PM
To: Busot, Frank L.
Cc: Burrows, Byron T.; Pence, Laurie A.; Zhang-Torres; lee@epchc.org; Halpin, Mike; forney.kathleen@epamail.epa.gov; oquendo.ana@epamail.epa.gov; Gibson, Victoria; Koerner, Jeff; McWade, Tammy; Walker, Elizabeth (AIR)
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Facility Name: H. L. CULBREATH BAYSIDE POWER STATION
Project Number: 0570040-028-AC
Permit Status: FINAL
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Facility County: HILLSBOROUGH
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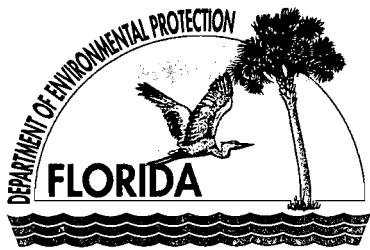
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Division of Air Resource Management (DARM)
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Florida Department of Environmental Protection

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

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

March 30, 2010

Mr. Frank Busot, Director
Bayside Power Station
Tampa Electric Company (TECO)
P.O. Box 111
Tampa, Florida 33601-0111

Re: Project Nos. 0570040-028-AC and 0570040-029-AV
TECO Bayside Power Station
Incorporation of Peaking Units and Revisions to Excess Emissions

Dear Mr. Busot:

We are processing your application for the above referenced projects, which includes incorporating the aero-derivative combustion turbine peaking units into the Title V air operation permit for the Bayside Power Station. On March 26, 2010, we received the Acid Rain Part forms for the Bayside peaking units. On March 30, 2010 we received the CAIR Part forms for the Bayside peaking units. This is a courtesy letter to inform you know that submittal of these forms is considered a substantial modification of the application for these projects and restarts the permitting time clock pursuant to Rule 62-4.050(6), F.A.C. This should not unnecessarily delay your request.

If you have any questions, please give me a call at 850-921-9536.

Sincerely,

Jeffery F. Koerner, Program Administrator
New Source Review Section, Bureau of Air Regulation

This letter was sent electronically to the following people:

cc: Mr. Frank Busot, TECO (flbusot@tecoenergy.com)
Mr. Byron Burrows, TECO (btburrows@tecoenergy.com)
Ms. Laurie Pence, TECO (lapence@tecoenergy.com)
Ms. Cindy Zhang-Torres, DEP Southwest District Office (cindy.zhang-torres@dep.state.fl.us)
Ms. Diana 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 (oquendo.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)

Livingston, Sylvia

From: Livingston, Sylvia
Sent: Tuesday, March 30, 2010 2:37 PM
To: 'flbusot@tecoenergy.com'
Cc: 'btburrows@tecoenergy.com'; 'lapence@tecoenergy.com'; 'zhang-torres@dep.state.fl.us'; 'lee@epchc.org'; Halpin, Mike; 'oquendo.ana@epa.gov'; 'forney.kathleen@epa.gov'; 'abrams.heather@epa.gov'; Gibson, Victoria; Koerner, Jeff; Walker, Elizabeth (AIR)
Subject: TECO Bayside Power Station (0570040-028-AC & 0570040-029-AV)
Attachments: TECO Bayside Power Station.pdf

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Thank you,

Sylvia Livingston
Bureau of Air Regulation
Division of Air Resource Management (DARM)
Department of Environmental Protection
850/921-9506
sylvia.livingston@dep.state.fl.us

Tracking:

Livingston, Sylvia

From: Busot, Frank L. [FLBusot@tecoenergy.com]
Sent: Tuesday, March 30, 2010 3:25 PM
To: Livingston, Sylvia
Cc: Burrows, Byron T.; Pence, Laurie A.
Subject: RE: TECO Bayside Power Station (0570040-028-AC & 0570040-029-AV)
Attachments: Busot Frank.vcf



From: Livingston, Sylvia [mailto:Sylvia.Livingston@dep.state.fl.us]
Sent: Tuesday, March 30, 2010 2:37 PM
To: Busot, Frank L.
Cc: Burrows, Byron T.; Pence, Laurie A.; 'zhang-torres@dep.state.fl.us'; 'lee@epchc.org'; Halpin, Mike; 'oquendo.ana@epa.gov'; 'forney.kathleen@epa.gov'; 'abrams.heather@epa.gov'; Gibson, Victoria; Koerner, Jeff; Walker, Elizabeth (AIR)
Subject: TECO Bayside Power Station (0570040-028-AC & 0570040-029-AV)

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Department of Environmental Protection
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sylvia.livingston@dep.state.fl.us