TAMPA ELECTRIC

September 1, 2011

Jeffrey 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 7385 6746

Project No: 0570040 - 030 - AV

Re: Tampa Electric Company
H.L. Culbreath Bayside Power Station
Title V Permit Number 0570040-029-AV
SCCT Permit Limit Correction (EUs -031 to -038)
Facility No. 0570040

Dear Mr. Koerner:

This correspondence requests an administrative correction to permit no. 0570040-029-AV pursuant to Rule 62-210.360 F.A.C. A recent review of the permit shows discrepancies between the permitted NO_x and 40 CFR 60 Subpart KKKK, Standards of Performance for Stationary Combustion Turbines. A discrepancy is also noted between the permitted CO limit and original permit application.

Subpart KKKK and permit application reports the NO_x limits to 2 significant figures (e.g. 25 ppm). The permit application also reports the CO limits to 2 significant figures (e.g. 21 ppm). In contrast, the current permit reports NO_x limit (e.g. 25.0 ppm) and CO limit (21.0 ppm) to 3 significant figures. This discrepancy imposes a more stringent limit than what is intended by Subpart KKKK and the permit application. Therefore, the Title V permit limits should be appropriately corrected 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_x	25 ppmdv @15% O_2	Subpart KKKK	25.0 ppmdv @15% O_2	Condition D.8
	32.0 lb/hr	AC application	32.0 lb/hr	Condition D.8
	56.0 lb/hr	AC application	56.0 lb/hr	Condition D.8
CO	21 ppmdv @15% O_2	AC application	21.0 ppmdv @15% O_2	Condition D.8

EPA has published documentation in support of the proposed corrections. EPA (2009)[1] published documentation on the rounding and significant figures for emissions reporting. For example, the

[1] 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.

document indicates 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 to up to 92 since 91 is odd. EPA (1990)[2] also indicates a permit limit of 2 significant figures (e.g. 25 ppm) should be reported to 2 significant figures.

Based on personal communication with Mr. Jonathan Holtom of the FDEP, we understand there is an administrative policy to report all permitted limits to the tenths decimal place regardless of significant figures or instrument precision. This department policy does not conform to any accepted reporting practices and the referenced EPA polices. FDEP should revise this flawed policy to comply with standard practices of reporting engineering and scientific data.

TEC requests the permit limits be revised in Condition D.8, Subpart D in Section III 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:

Pollutant Emission	Standard Averaging	Averaging Time
NO_x	25 ~~25.0~~ ppmvd @ 15% O_2	4-hour rolling avg.
	32 ~~32.0~~ lb/hour	Average of three, 1-hour runs
	56 ~~56.0~~ tons/year	
CO	21 ~~21.0~~ ppmvd @ 15% O_2	3-hour rolling avg.
	9.1 lb/hour	Average of three, 1-hour runs
	8.2 tons/year	

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/rlk/RAV110

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

[2] EPA Office of Air Quality Planning Standards (1990). Memorandum: Performance Test Calculation Guidelines. Research Triangle Park, North Carolina: U.S. Government Printing Office