From: <u>Velasco, Robert A.</u>
To: <u>Heron, Teresa</u>

Subject: RE: Current Bayside Permit in Word

Date: Wednesday, March 06, 2013 11:09:08 AM

### thanks

Best Regards,

(Rob) Robert A. Velasco, P.E., BCEE, QEP EHS Air Programs Tampa Electric Company P.O. Box 111 Tampa, FL 33601

Phone: (813) 228-4232 Cell: (813) 417-9524 Fax: (813) 228-1308

www.tampaelectric.com/environmental/

From: Heron, Teresa [mailto:Teresa.Heron@dep.state.fl.us]

Sent: Wednesday, March 06, 2013 8:14 AM

**To:** Velasco, Robert A.

Subject: RE: Current Bayside Permit in Word

## Attached.

Please take a few minutes to share your comments on the service you received from the department by clicking on this link <u>DEP Customer Survey</u>.

From: Velasco, Robert A. [mailto:RAVelasco@tecoenergy.com]

Sent: Tuesday, March 05, 2013 4:27 PM

To: Scearce, Lynn Cc: Heron, Teresa

Subject: Current Bayside Permit in Word

Lynn:

Can I obtain the current Bayside permit (0570040-029-AV) in word format? Thanks.

Best Regards,

(Rob) Robert A. Velasco, P.E., BCEE, QEP EHS Air Programs Tampa Electric Company P.O. Box 111 Tampa, FL 33601 Phone: (813) 228-4232 Cell: (813) 417-9524 Fax: (813) 228-1308

www.tampaelectric.com/environmental/

From: <u>Velasco, Robert A.</u>
To: <u>Heron, Teresa</u>

Subject: RE: TEC Bayside Preliminary DRAFT package
Date: Friday, March 08, 2013 10:29:33 AM
Attachments: 0570040-032-AC Draft TEC 3-8-13.docx

0570040-033-AV - DRAFT Permit Revision TEC 3-8-13.doc

### Teresa:

Our redlined comments to projects -0033 AV and -032 AC are shown attached. Please contact me if you have any disagreements with our comments. I will be out of the office next week (Mon, Tues, Wed only) and will return on Thursday and Friday. In the meantime, call Laurie Pence if you have any questions (813-228-4457).

## Best Regards,

(Rob) Robert A. Velasco, P.E., BCEE, QEP EHS Air Programs Tampa Electric Company P.O. Box 111 Tampa, FL 33601

Phone: (813) 228-4232 Cell: (813) 417-9524 Fax: (813) 228-1308

www.tampaelectric.com/environmental/

From: Heron, Teresa [mailto:Teresa.Heron@dep.state.fl.us]

Sent: Monday, March 04, 2013 3:06 PM

To: Velasco, Robert A.

**Subject:** TEC Bayside Preliminary DRAFT package

Mr. Velasco:

Here are some draft preliminary documents for the concurrent revision of the AC and AV for Bayside.

Please let me know if you have any comments or suggestions.

I will get back with you on Thursday afternoon. We are planning to send the official draft package by next Friday or Monday.

Call me anytime or send back the documents with your revisions.



Thanks,
Teresa Heron, Engineer
Permitting and Compliance Section
Division of Air Resource Management - DEP
Florida Department of Environmental Protection
Phone 850/717-9082
teresa.heron@dep.state.fl.us

Please take a few minutes to share your comments on the service you received from the department by clicking on this link <u>DEP Customer Survey</u>.

 From:
 Velasco, Robert A.

 To:
 Heron, Teresa

 Cc:
 Arif, Syed

Subject: (Archived w/ Attachments) RE: Comments to the Title V

**Date:** Thursday, March 14, 2013 5:48:03 PM

Attachments: <u>image001.gif</u>

image002.jpg

Bayside consent decree requirements.docx

#### Teresa:

Tampa Electric Company (TEC) has the following comments:

- 1. Paragraphs 26, and 27 and 28 of the consent decree are the specific requirements related to Gannon and repowering of the Bayside Facility. TEC believes these requirements have been satisfied as shown attached. Therefore, we request that the consent decree reference be deleted from the permit similar to the Bend Title V permit (-060AC and -061AV).
- 2. We would like to retain the emissions point sources in the Title permit as shown below. Even though none of these activities exist, we would like to preserve our right to utilize these activities in the future, if necessary. The current plan is to utilize a manual water suppression system (as necessary) to control fugitive emissions. TEC believes this approach provides reasonable assurance of meeting the 20% opacity requirement in the permit.

Emission Point Description	ID No.	Throughput TPH	Control Method	Efficiency
Fuel storage pile	FH-022/023 a & b	NA	Manual water suppression	50%
Dozer operations of storage piles	FH-044	NA	Manual water suppression	50%
Truck unloading - auxiliary	AH-001	400	Manual water suppression	85%
Storage pile	AH-002	400	Manual water suppression	90%
Truck dump to flux storage pile	OMH-001	NA	Manual water suppression	85%
Flux storage pile maintenance	ОМН-002	NA	Manual water suppression	50%
Flux storage pile	OMH-003	NA	Manual water suppression	50%

Best Regards,

(Rob) Robert A. Velasco, P.E., BCEE, QEP EHS Air Programs Tampa Electric Company P.O. Box 111 Tampa, FL 33601

Phone: (813) 228-4232 Cell: (813) 417-9524 Fax: (813) 228-1308

www.tampaelectric.com/environmental/

From: Heron, Teresa [mailto:Teresa.Heron@dep.state.fl.us]

Sent: Tuesday, March 12, 2013 9:18 AM

**To:** Velasco, Robert A.

Subject: Comments to the Title V

Hi Robert:

The majority of your new comments are accepted except for:

- 1. References to the EPA/TEC Consent Decree related to Gannon/Bayside will not be deleted until we research this document and determine that all the requirements are met; just as we did in Big Bend projects 060-AC and 061-AV. A separate request for this new permitting action is needed which can be submitted with your next renewal application.
- 2. We are not clear about the fuel yard activities and your request to delete the Dust Suppression System since it does not exist. The Table and the remaining emissions points clearly indicate the dust suppressant system as the control method. Please explain how the fuel yard is now and what is the actual method of control for these points.

Emission Point Description	ID No.	Throughput TPH	Control Method	Efficiency
Fuel storage pile	FH-022/023 a & b	NA	DS	50%
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Storage pile	AH-002	400	DS/E	90%
Truck dump to flux storage pile	OMH-001	NA	DS	85%
Flux storage pile maintenance	OMH-002	NA	DS	50%
Flux storage pile	OMH-003	NA	DS	50%

We appreciate the time you took in reviewing the preliminary draft.

# dep\_logo

Thanks,
Teresa Heron, Engineer
Permitting and Compliance Section
Division of Air Resource Management - DEP
Florida Department of Environmental Protection
Phone 850/717-9082
teresa.heron@dep.state.fl.us

Did you know that the Department may not require you to submit a Title V fee for the 2012 calendar year? To learn more, please visit us online at the following web address: <a href="https://www.title5feeholiday.com">www.title5feeholiday.com</a>



Please take a few minutes to share your comments on the service you received from the department by clicking on this link <u>DEP Customer Survey</u>.

From: Velasco, Robert A.

To: Heron, Teresa

Subject: RE: Comments to the Title V

Date: Friday, March 15, 2013 1:17:05 PM

Teresa:

The only other suggested comment (for EU-008) is:

- (2) Dust Suppression System A manual water dust suppression system as necessary
- (a) Quarterly inspection of system for water leaks.
- (b) Quarterly inspection of spray nozzles.

The pumps, tanks, etc., that make-up the dust suppression system undergo normal maintenance including lubrication, flushing, and draining.

Please confirm.

Best Regards,

(Rob) Robert A. Velasco, P.E., BCEE, QEP EHS Air Programs Tampa Electric Company P.O. Box 111 Tampa, FL 33601

Phone: (813) 228-4232 Cell: (813) 417-9524 Fax: (813) 228-1308

www.tampaelectric.com/environmental/

From: Heron, Teresa [mailto:Teresa.Heron@dep.state.fl.us]

Sent: Friday, March 15, 2013 10:12 AM

**To:** Velasco, Robert A.

Subject: RE: Comments to the Title V

Robert:

Any other changes to Section B, Emission Unit 008 Conditions?

I still see some references to coal and dust suppressant techniques in some conditions. If you want more changes, please send them as soon as you can.

Thanks,

Teresa

From: Velasco, Robert A. [mailto:RAVelasco@tecoenergy.com]

**Sent:** Thursday, March 14, 2013 5:47 PM

To: Heron, Teresa Cc: Arif, Syed

Subject: RE: Comments to the Title V

Teresa:

Tampa Electric Company (TEC) has the following comments:

- 1. Paragraphs 26, and 27 and 28 of the consent decree are the specific requirements related to Gannon and repowering of the Bayside Facility. TEC believes these requirements have been satisfied as shown attached. Therefore, we request that the consent decree reference be deleted from the permit similar to the Bend Title V permit (-060AC and -061AV).
- 2. We would like to retain the emissions point sources in the Title permit as shown below. Even though none of these activities exist, we would like to preserve our right to utilize these activities in the future, if necessary. The current plan is to utilize a manual water suppression system (as necessary) to control fugitive emissions. TEC believes this approach provides reasonable assurance of meeting the 20% opacity requirement in the permit.

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Flux storage pile maintenance	OMH-002	NA	Manual water suppression	50%
Flux storage pile	OMH-003	NA	Manual water suppression	50%

Best Regards,

(Rob) Robert A. Velasco, P.E., BCEE, QEP EHS Air Programs Tampa Electric Company P.O. Box 111 Tampa, FL 33601

Phone: (813) 228-4232

Cell: (813) 417-9524 Fax: (813) 228-1308

www.tampaelectric.com/environmental/

From: Heron, Teresa [mailto:Teresa.Heron@dep.state.fl.us]

Sent: Tuesday, March 12, 2013 9:18 AM

To: Velasco, Robert A.

Subject: Comments to the Title V

Hi Robert:

The majority of your new comments are accepted except for:

- 1. References to the EPA/TEC Consent Decree related to Gannon/Bayside will not be deleted until we research this document and determine that all the requirements are met; just as we did in Big Bend projects 060-AC and 061-AV. A separate request for this new permitting action is needed which can be submitted with your next renewal application.
- 2. We are not clear about the fuel yard activities and your request to delete the Dust Suppression System since it does not exist. The Table and the remaining emissions points clearly indicate the dust suppressant system as the control method. Please explain how the fuel yard is now and what is the actual method of control for these points.

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Flux storage pile maintenance	OMH-002	NA	DS	50%
Flux storage pile	OMH-003	NA	DS	50%

We appreciate the time you took in reviewing the preliminary draft.



Thanks,

Teresa Heron, Engineer
Permitting and Compliance Section
Division of Air Resource Management - DEP
Florida Department of Environmental Protection
Phone 850/717-9082
teresa.heron@dep.state.fl.us

Did you know that the Department may not require you to submit a Title V fee for the 2012 calendar year? To learn more, please visit us online at the following web address: <a href="www.title5feeholiday.com">www.title5feeholiday.com</a>

FEE HOLIDAY

Please take a few minutes to share your comments on the service you received from the department by clicking on this link <u>DEP Customer Survey</u>.

From: <u>Velasco, Robert A.</u>

To: <u>Friday, Barbara</u>; <u>Busot, Frank L.</u>

Cc: Burrows, Byron T.; Boatwright, Kelley M.; "lee@epchc.org"; "Oquendo, Ana"; "Hazziez.natasha@epa.gov";

"forney.kathleen@epa.gov"; "ceron.heather@epa.gov"; Scearce, Lynn; Arif, Syed; Heron, Teresa

Subject: RE: 0570040-032-AC /PSD-FL-301E (Draft) and 0570040-033-AV, Draft/Proposed Revision, (Parallel Review) ,

TEC, Bayside Power Station

**Date:** Tuesday, March 19, 2013 12:54:45 PM

#### Barbara:

Tampa Electric has confirmed access to the above referenced document.

Best Regards,

(Rob) Robert A. Velasco, P.E., BCEE, QEP EHS Air Programs Tampa Electric Company P.O. Box 111

Tampa, FL 33601

Phone: (813) 228-4232 Cell: (813) 417-9524 Fax: (813) 228-1308

www.tampaelectric.com/environmental/

From: Friday, Barbara [mailto:Barbara.Friday@dep.state.fl.us]

Sent: Tuesday, March 19, 2013 11:36 AM

To: Busot, Frank L.

**Cc:** Burrows, Byron T.; Velasco, Robert A.; Boatwright, Kelley M.; 'lee@epchc.org'; 'Oquendo, Ana'; 'Hazziez.natasha@epa.gov'; 'forney.kathleen@epa.gov'; 'ceron.heather@epa.gov'; Friday, Barbara;

Scearce, Lynn; Arif, Syed; Heron, Teresa

Subject: 0570040-032-AC /PSD-FL-301E (Draft) and 0570040-033-AV, Draft/Proposed Revision,

(Parallel Review), TEC, Bayside Power Station

# Dear Mr. Busot:

Attached is the official **Notice of Draft Air Construction Permit and a Draft/Proposed Title V Permit** for the projects referenced below. Click on the link displayed below to access the permit project documents and reply back verifying receipt of the documents provided in the links.

Note: We must receive verification that you are able to access the documents. Your immediate reply will preclude subsequent e-mail transmissions to verify accessibility of the document(s).

Click on the following links to access the permit project documents for 0570040-032-AC and 0570040-033-AV:

## Draft:

http://ARM-

PERMIT2K.dep.state.fl.us/adh/prod/pdf permit zip files/0570040.032.AC.D pdf.zip

Draft/Proposed:

http://ARM-

PERMIT2K.dep.state.fl.us/adh/prod/pdf permit zip files/0570040.033.AV.D pdf.zip

Click on the following link to access the permit project documents:

http://ARM-

PERMIT2K.dep.state.fl.us/adh/prod/pdf permit zip files/0570040.033.AV.P pdf.zip

Attention: Teresa Heron

Owner/Company Name: TAMPA ELECTRIC COMPANY

Facility Name: H. L. CULBREATH BAYSIDE POWER STATION

Project Number: 0570040-032-AC/0570040-033-AV

Permit Status: DRAFT CONSTRUCTION/DRAFT-PROPOSED

Permit Activity: PERMIT REVISION Facility County: HILLSBOROUGH

If you have any problems opening the documents or would like further information, please contact the Florida Department of Environmental Protection, Office of Permitting and Compliance.

# Barbara Friday

Office of Permitting and Compliance (OPC)
Division of Air Resource Management – DEP
2600 Blair Stone Road, Mail Stop 5505

**P**hone: **8**50-**7**17-**9**095

Please take a few minutes to share your comments on the service you received from the department by clicking on this link <u>DEP Customer Survey</u>

 From:
 Velasco, Robert A.

 To:
 Heron, Teresa

 Cc:
 Arif, Syed

Subject: (Archived w/ Attachments) Addition Permit Comments: 0570040-033-AV - SOB 3-22-13 (comments).pdf,

0570040-032-AC Draft 3-22-13 (comments).pdf, 0570040-033-AV - DRAFT Permit Revision 3-22-

13(comments).pdf

**Date:** Thursday, March 21, 2013 6:05:02 PM

**Attachments:** <u>0570040-033-AV - SOB 3-22-13 (comments).pdf</u>

0570040-032-AC Draft 3-22-13 (comments).pdf

0570040-033-AV - DRAFT Permit Revision 3-22-13(comments).pdf

### Teresa:

Tampa Electric Company (TEC) has reviewed the draft air construction permit and proposed draft Title V permit. TEC has identified several administrative errors/comments that are too significant to address during the public comment period. Therefore, TEC is requesting that the Department make the permit revisions and reissue the draft permits. These suggested revisions (shown in green highlights) are shown attached.

Please review and contact me if you have guestions.

Best Regards,

(Rob) Robert A. Velasco, P.E., BCEE, QEP EHS Air Programs Tampa Electric Company P.O. Box 111 Tampa, FL 33601

Phone: (813) 228-4232 Cell: (813) 417-9524 Fax: (813) 228-1308

www.tampaelectric.com/environmental/

From: Velasco, Robert A. To: Heron, Teresa

Subject: RE: Addition Permit Comments: 0570040-033-AV - SOB 3-22-13 (comments).pdf, 0570040-032-AC Draft 3-22-

13 (comments).pdf, 0570040-033-AV - DRAFT Permit Revision 3-22-13(comments).pdf

Date: Friday, March 22, 2013 4:41:40 PM Attachments: 0570040-032-AC Draft RAV 3-22-13.docx

0570040-033-AV - SOB RAV 3-22-13.doc

#### Teresa:

A few minor edits shown in pink:

**AC** permit

Section 10 - p5 of 10

**SOB** 

Condition A.11 - p3 of 10

**AV** permit

Not comments

Best Regards,

(Rob) Robert A. Velasco, P.E., BCEE, QEP

**EHS Air Programs** 

Tampa Electric Company

P.O. Box 111

Tampa, FL 33601

Phone: (813) 228-4232 Cell: (813) 417-9524 Fax: (813) 228-1308

www.tampaelectric.com/environmental/

----Original Message-----

From: Heron, Teresa [mailto:Teresa.Heron@dep.state.fl.us]

Sent: Friday, March 22, 2013 2:57 PM

To: Velasco, Robert A.

Subject: RE: Addition Permit Comments: 0570040-033-AV - SOB 3-22-13 (comments).pdf,

0570040-032-AC Draft 3-22-13 (comments).pdf, 0570040-033-AV - DRAFT Permit Revision 3-22-

13(comments).pdf

Rob:

Attached find the 2 permits and the SOB. The new changes are in green right but they will be changed to yellow in the official revised draft.

## Thanks, Teresa

\_\_\_\_\_

----Original Message-----

From: Velasco, Robert A. [mailto:RAVelasco@tecoenergy.com]

Sent: Friday, March 22, 2013 2:33 PM

To: Heron, Teresa Cc: Arif, Syed

Subject: RE: Addition Permit Comments: 0570040-033-AV - SOB 3-22-13 (comments).pdf,

0570040-032-AC Draft 3-22-13 (comments).pdf, 0570040-033-AV - DRAFT Permit Revision 3-22-

13(comments).pdf

Teresa:

Before issuing a revised draft, please forward copies for review.

Best Regards,

(Rob) Robert A. Velasco, P.E., BCEE, QEP EHS Air Programs Tampa Electric Company P.O. Box 111

Tampa, FL 33601

Phone: (813) 228-4232 Cell: (813) 417-9524 Fax: (813) 228-1308

www.tampaelectric.com/environmental/

----Original Message-----

From: Heron, Teresa [mailto:Teresa.Heron@dep.state.fl.us]

Sent: Friday, March 22, 2013 1:07 PM

To: Velasco, Robert A.

Cc: Arif, Syed

Subject: FW: Addition Permit Comments: 0570040-033-AV - SOB 3-22-13 (comments).pdf, 0570040-032-AC Draft 3-22-13 (comments).pdf, 0570040-033-AV - DRAFT Permit Revision 3-22-

13(comments).pdf

Rob:

Except for the proposed new language (addition & deletion) to conditions B.3 and B.4; the majority of the other revisions are minor and they could have been taken care during the public notice period. However, because some of the documents were corrupted during the conversion to PDF, the draft package will be rescinded and replaced with a new revised Draft package.

Thank so much for your comments.

Teresa

Please take a few minutes to share your comments on the service you received from the department by clicking on this link. Copy the url below to a web browser to complete the DEP survey: http://survey.dep.state.fl.us/?refemail=Teresa.Heron@dep.state.fl.us

----Original Message-----

From: Velasco, Robert A. [mailto:RAVelasco@tecoenergy.com]

Sent: Thursday, March 21, 2013 6:04 PM

To: Heron, Teresa Cc: Arif, Syed

Subject: Addition Permit Comments: 0570040-033-AV - SOB 3-22-13 (comments).pdf, 0570040-

032-AC Draft 3-22-13 (comments).pdf, 0570040-033-AV - DRAFT Permit Revision 3-22-

13(comments).pdf

Teresa:

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Please review and contact me if you have questions.

Best Regards,

(Rob) Robert A. Velasco, P.E., BCEE, QEP EHS Air Programs Tampa Electric Company P.O. Box 111

Tampa, FL 33601

Phone: (813) 228-4232 Cell: (813) 417-9524 Fax: (813) 228-1308

www.tampaelectric.com/environmental/

From: <u>Velasco, Robert A.</u>
To: <u>Heron, Teresa</u>

Subject: RE: TEC Bayside Preliminary DRAFT package Date: Monday, March 04, 2013 3:26:36 PM

### Teresa:

Thanks for providing the draft permits. I'll send our comments by COB Thursday.

Best Regards,

(Rob) Robert A. Velasco, P.E., BCEE, QEP EHS Air Programs Tampa Electric Company P.O. Box 111 Tampa, FL 33601

Phone: (813) 228-4232 Cell: (813) 417-9524 Fax: (813) 228-1308

www.tampaelectric.com/environmental/

From: Heron, Teresa [mailto:Teresa.Heron@dep.state.fl.us]

Sent: Monday, March 04, 2013 3:06 PM

**To:** Velasco, Robert A.

Subject: TEC Bayside Preliminary DRAFT package

Mr. Velasco:

Here are some draft preliminary documents for the concurrent revision of the AC and AV for Bayside.

Please let me know if you have any comments or suggestions.

I will get back with you on Thursday afternoon. We are planning to send the official draft package by next Friday or Monday.

Call me anytime or send back the documents with your revisions.



Thanks,

Teresa Heron, Engineer
Permitting and Compliance Section
Division of Air Resource Management - DEP
Florida Department of Environmental Protection
Phone 850/717-9082
teresa.heron@dep.state.fl.us

Please take a few minutes to share your comments on the service you received from the department by clicking on this link <u>DEP Customer Survey</u>.