

Walker, Elizabeth (AIR)

From: Koerner, Jeff
Sent: Friday, July 31, 2009 8:51 AM
To: Velasco, Robert
Cc: Gorrie, Jason; Crellin, William; McWade, Tammy; Walker, Elizabeth (AIR)
Subject: RE: Title V Revision for Hillsborough County RRF

Thanks for the quick response. We were planning on extending the permit.

We're trying to get the air construction permit ready for next week.

Thanks!

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

Thanks.

Jeff

From: Velasco, Robert [mailto:VelascoRA@cdm.com]
Sent: Thursday, July 30, 2009 6:21 PM
To: Koerner, Jeff
Cc: Gorrie, Jason; Crellin, William
Subject: RE: Title V Revision for Hillsborough County RRF

Jeff:

We are requesting a minor modification to the air construction permit not a Title V air permit at this time. In addition, a correspondence letter was forwarded to your attention requesting the air construction permit be extended from December 31, 2009 to March 31, 2010. The reason for this request is to provide sufficient time to incorporate the compliance demonstration testing of Unit 4. The results from this testing, which are necessary to include in the application for Operating Permit, will not be available until October 2009. The requested extension will allow Hillsborough County sufficient time to prepare a complete Title V permit application and meet the General Condition No. 9 of the construction permit.

Best Regards,

Robert A. Velasco P.E. BCEE
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Tel: (813) 262-8868 (direct)
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From: Koerner, Jeff [mailto:Jeff.Koerner@dep.state.fl.us]
Sent: Thursday, July 30, 2009 3:59 PM

To: Velasco, Robert
Cc: Gorrie, Jason (INACTIVE)
Subject: Title V Revision for Hillsborough County RRF

Robert,

Tammy started working on adding the revised PSD air construction permit for Unit 4 into the Title V as requested in your application.

She brought to my attention that the Unit 4 PSD permit has not yet been incorporated. Since construction is not yet complete, the Title V permit must include a compliance plan to identify all items for which the emissions units in the PSD permit for Unit 4 have not demonstrated compliance. This would be pretty much everything. See rule 62-213.405(5), F.A.C.:

62-213.405 Concurrent Processing of Permit Applications.

(5) The Title V air operation permit must contain a **compliance plan** in accordance with the provisions of subsection 62-213.440(2), F.A.C., for **each emissions unit covered by the air construction permit**, reflecting the terms of the construction permit.

My recommendation is that you withdraw the request for a concurrent Title V revision and submit this after you have completed the initial shakedown for all equipment and conducted the compliance tests. At that time, you may discover that you will want “tweaks” to the Title V permit as well as the PSD air construction permit for Unit 4.

Please let us know.

Thanks!

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

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