



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4

ATLANTA FEDERAL CENTER  
61 FORSYTH STREET  
ATLANTA, GEORGIA 30303-8960  
JUL 27 2000

RECEIVED

AUG 02 2000

4 APT-ARB

A. A. Linero, P.E.  
Florida Department of Environmental Protection  
Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

BUREAU OF AIR REGULATION

SUBJ: Preliminary Determination and draft PSD Permit for Howard F. Curren Advanced Wastewater Treatment Facility (PSD-FL-291) located in Tampa, Florida

Dear Mr. Linero:

Thank you for sending the preliminary determination and draft prevention of significant deterioration (PSD) permit for the Howard F. Curren (HFC) Advanced Wastewater Treatment (AWT) Facility dated June 19, 2000. The draft PSD permit is for the installation of two natural gas-fired reciprocating engine-driven generators at the existing HFC AWT Facility. The reciprocating engines proposed for the facility are Waukesha 16V-AT27GL engines rated at 4,073 hp each, coupled to a 2.9 MW generator. As proposed, the engines will be allowed to fire natural gas up to 6,500 hours per year. Total emissions from the proposed project are above the threshold requiring PSD review for nitrogen oxides (NO<sub>x</sub>).

Based on our review of the preliminary determination and draft PSD permit, we do not have any additional comments beyond those previously submitted during our review of the PSD permit application and subsequent discussions with the Florida Department of Environmental Protection. If you have any questions, please direct them to either Katy Forney at 404/562-9130 or Jim Little at 404-562-9118.

Sincerely,

R. Douglas Neeley  
Chief

Air and Radiation Technology Branch  
Air, Pesticides and Toxics  
Management Division

cc: J. Kahn  
C. Carlson  
J. Davis, ECT  
R. Mitchell, P.E.  
D. Jorda, TECO  
EPC  
SWD  
NPS



# FAX Cover Sheet

USEPA - Region 4  
61 Forsyth St., SW  
Atlanta, Georgia 30303

- ① Joe  
② File PSD-241  
Tampa  
Curren

TO: AL LINERO

FAX #: 850-922-6979

RE: Howard F. Curren

FROM: Katy Forney  
Air Permits Section, Region 4 USEPA

Phone #: 404-562-9130

Date: 7-27

# of Pages (including cover): 2

COMMENTS:

If this FAX is poorly received, please call  
Katy Forney: 404-562-913





## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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Sincerely,

A handwritten signature in black ink, which appears to read "R. Douglas Neeley", is written over a pre-printed name.

R. Douglas Neeley  
Chief

Air and Radiation Technology Branch  
Air, Pesticides and Toxics  
Management Division



# CITY OF TAMPA

## RECEIVED

Department of Sanitary Sewers

July 5, 2000

JUL 18 2000

Howard F. Curren  
Advanced Wastewater Treatment Plant

### BUREAU OF AIR REGULATION

Mr. Joseph Kahn, P.E.  
Bureau of Air Regulation  
Florida Department of Environmental Protection  
111 South Magnolia Drive, Suite 4  
Tallahassee, FL 32301

Certified Mail 7099 3400 0004 3919 2109

**Re: Comments Pertaining to City of Tampa HFCAWT Draft Permit  
DEP File No. 0570373-009-AC (PSD-FL-291)**

Mr. Kahn:

The City of Tampa has received the Draft permit addressing the construction of two 2.91 MW Waukesha internal combustion engine generators and has the following minor comments:

1. The first sentence in the second paragraph of page one of the BACT Determination and the first sentence on page two of the draft permit list the treatment capacity of the plant as "96 million gallons per day, average daily flow." The City of Tampa requests that these descriptions be clarified to read "96 million gallons per day, annual average daily flow."
2. The City of Tampa requests that FDEP add a statement indicating that the generator capacity is actually 2.91 MW.
3. The Table on page four of the Technical Evaluation lists the potential maximum emissions from the Combustion Chamber as 2.3 tons of NOx per year and 2.0 tons of CO per year. These emissions are actually from the 1998 Annual Operating Report submitted by the City of Tampa. Therefore, the City of Tampa requests that FDEP add a footnote to the Table to reflect this.
4. The first sentence in Section 4.6 on page eight of the Technical Evaluation reads "Annual tests are required for NOx because NOx is subject to a BACT limit and CO emissions are very close to the PSD significance criteria." Since CO tests will be required by the permit, the City of Tampa requests that this sentence be changed to "Annual tests are required for NOx and CO because NOx is subject to a BACT limit and CO emissions are very close to the PSD significance criteria."
5. The second paragraph of section 4.6 on page eight of the Technical Evaluation and Specific Condition 14.(a) of the draft permit do not allow for excess emissions during startup or shutdown. The City of Tampa requests FDEP to allow for 15 minutes of excess emissions during startup and 15 minutes of excess emissions during shutdown.
6. On page three of the draft permit, the first sentence indicates that this project results in significant emissions of NOx, CO and VOC as defined in Table 212.400-2. However, the City of Tampa will be limiting the hours of operation of the two proposed units to 6,500 hours per

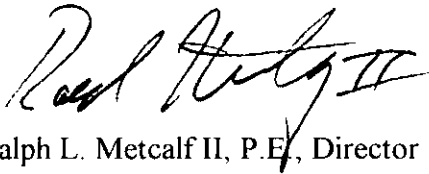
Mr. Joseph Kahn, P.E.  
July 5, 2000

year. This results in NOx being the only pollutant that meets the significance criteria defined in Table 212-400.2. The City of Tampa requests that the Facility Information be changed to reflect this.

Thank you for your help and cooperation in addressing these issues. If you have any further questions, you may contact John Drapp with the City of Tampa at (813) 247-3451 or Shannon Todd with Tampa Electric Company at (813) 641-5125.

Sincerely,

DEPARTMENT OF SANITARY SEWERS

A handwritten signature in black ink, appearing to read "Ralph L. Metcalf II". The signature is fluid and cursive, with the last name "Metcalf" being the most prominent part.

Ralph L. Metcalf II, P.E., Director

c/enc: Gregg Worley, EPA  
John Bunyak, NPS  
Bill Thomas, P.E., SWD  
Steve Pak, Hillsborough County EPC  
Thomas Davis, P.E., ECT  
Shannon Todd, TEC  
Dave Pickard, Plant Administrator  
*J. Kahn*  
*L. Carlson*



# CITY OF TAMPA

Department of Sanitary Sewers

July 5, 2000

FED EX: 8154 4206 5352

Department of Environmental Protection  
Bureau of Air Regulation  
Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

**RECEIVED**

**JUL 06 2000**

ATTENTION: C. H. Fancy, P.E., Chief

RE: DEP File No. 0570373-009-AC, PSD-FL-291  
Howard F. Curren AWT Facility

**BUREAU OF AIR REGULATION**

Mr. Fancy:

Reference your letter dated June 19, 2000, regarding the public notice for the above, we are enclosing the proof of publication, i.e. newspaper affidavit from The Tampa Tribune. Also enclosed is a copy of the ad as it appeared in publication.

Call me at 813/274-8039 if you have any questions or need further information.

Sincerely,

Eric A. Weiss, P.E., Project Manager

EAW/c(dep.ltr)

Enclosures as noted above

xc: TECO File  
Reading File

*G. Kohn*

*SWD*

*EPC*

*EPA*

*NPS*

*C. Carlson*

*J. Davis, ECT*

*Shannon Gold, TEE*

**THE TAMPA TRIBUNE**  
**Published Daily**  
**Tampa, Hillsborough County, Florida**

State of Florida }  
County of Hillsborough } ss.

Before the undersigned authority personally appeared J. Rosenthal, who on oath says that she is Classified Billing Manager of The Tampa Tribune, a daily newspaper published at Tampa in Hillsborough County, Florida; that the attached copy of advertisement being a

LEGAL NOTICE

in the matter of \_\_\_\_\_

PUBLIC NOTICE OF INTENT

was published in said newspaper in the issues of \_\_\_\_\_

JUNE 28, 2000

Affiant further says that the said The Tampa Tribune is a newspaper published at Tampa in said Hillsborough County, Florida, and that the said newspaper has heretofore been continuously published in said Hillsborough County, Florida, each day and has been entered as second class mail matter at the post office in Tampa, in said Hillsborough County, Florida for a period of one year next preceding the first publication of the attached copy of advertisement; and affiant further says that she has neither paid nor promised any person, this advertisement for publication in the said newspaper.

*J. Rosenthal*

Sworn to and subscribed by me, this \_\_\_\_\_ 28 \_\_\_\_\_ day  
of \_\_\_\_\_ JUNE \_\_\_\_\_, A.D. 20\_\_00

Personally Known ☒ or Produced Identification \_\_\_\_\_  
Type of Identification Produced \_\_\_\_\_



OFFICIAL NOTARY SEAL  
SUSIE LEE SLATON  
COMMISSION NUMBER  
CC639424  
MY COMMISSION EXP.  
APRIL 16, 2001

*Susie Lee Slaton*

**RECEIVED**

JUL 06 2000

BUREAU OF AIR REGULATION

## Legals

### PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

DEP File No. 0570373-009-AC,  
PSD-FL-291  
City of Tampa  
Howard F. Curren AWT  
Facility

Hillsborough County

The Department of Environ-  
mental Protection (Depart-  
ment) gives notice of its intent  
to issue an air construction  
permit (PSD permit) to City of  
Tampa, for its Howard F. Cur-  
ren AWT Facility located at  
2700 Maritime Boulevard  
Tampa, Hillsborough County.

The permit is to construct two  
natural gas fired reciprocating  
engine driven generators that  
the applicant has designat-  
ed as engines 7 and 8. The  
applicant's mailing address is:  
Department of Sanitary Sewers,  
City of Tampa, City Hall  
Plaza,

6th Floor, Tampa, Florida

33602. A Best Available Control  
Technology (BACT) determi-  
nation was required for ni-  
trogen oxides pursuant to  
Rule 62-212.400, F.A.C. and 40

CFR 52.21, Prevention of Sig-  
nificant Deterioration (PSD).

Total emissions of pollutants  
shall not exceed the annual  
emission rates in tons per  
year: NOx, 91.0; CO, 96.8;

VOC, 32.5; PM10, 5.8; SO2, 0.5.

This project is not subject to  
review under Section 403.506  
F.S. (Power Plant Siting Act),  
because it provides for no ex-  
pansion in steam generating  
capacity.

An air quality impact analysis  
was conducted. Emissions  
from the facility will not sig-  
nificantly contribute to or  
cause a violation of any state  
or federal ambient air quality  
standards or PSD increment.

The Department will issue the  
final permit with the attached  
conditions unless a response  
received in accordance with  
the following procedures re-  
sults in a different decision or  
significant change of terms or  
conditions.

The Department will accept  
written comments and re-  
quests for public meetings  
concerning the proposed per-  
mit issuance action for a peri-  
od of thirty (30) days from the  
date of publication of this Public  
Notice of Intent to Issue Air  
Construction Permit. Written  
comments and requests for  
public meetings should be pro-  
vided to the Department's Bu-  
reau of Air Regulation at 2600  
Blair Stone Road, Mail Station  
#3505, Tallahassee, FL  
32399-2400. Any written com-  
ments filed shall be made  
available for public inspection.  
If written comments received  
result in a significant change  
in the proposed agency ac-  
tion, the Department shall re-  
vise the proposed permit and  
require, if applicable, another  
Public Notice.

The Department will issue the  
permit with the attached con-  
ditions unless a timely petition  
for an administrative hearing  
is filed pursuant to sections  
120.569 and 120.57 F.S., before  
the deadline for filing a peti-  
tion. The procedures for peti-  
tioning for a hearing are set  
forth below.

Mediation is not available in  
this proceeding.

A person whose substantial  
interests are affected by the  
proposed permitting decision  
may petition for an adminis-  
trative proceeding (hearing)  
under sections 120.569 and  
120.57 of the Florida Statutes.

The petition must contain the  
information set forth below  
and must be filed (received) in  
the Office of General Counsel  
of the Department at 3900  
Commonwealth Boulevard,  
Mail Station #35, Tallahassee,  
Florida, 32399-3000. Petitions  
filed by the permit applicant  
or any of the parties listed  
below must be filed within  
fourteen days of receipt of the  
notice of intent. Petitions filed  
by any persons other than  
those entitled to written no-  
tice under section 120.60(3) of  
the Florida Statutes must be  
filed within fourteen days of  
publication of the public notice  
or within fourteen days of re-

ceipt of this notice of intent,  
whichever occurs first. Under  
section 120.60(3), however,  
any person who asked the De-  
partment for notice of agency  
action may file a petition  
within fourteen days of re-  
ceipt of this notice, regardless  
of the date of publication. A  
petitioner shall mail a copy of  
the petition to the applicant at  
the address indicated above  
at the time of filing. The fail-  
ure of any person to file a  
petition within the appropri-  
ate time period shall consti-  
tute a waiver of that person's  
right to request an adminis-  
trative determination (hear-  
ing) under sections 120.569  
and 120.57 F.S., or to intervene  
in this proceeding and partici-  
pate as a party to it. Any  
subsequent intervention will  
be only at the approval of the  
presiding officer upon the fil-  
ing of a motion in compliance  
with Rule 28-106.205 of the  
Florida Administrative Code.

A petition that disputes the  
material facts on which the  
Department's action is based  
must contain the following in-  
formation: (a) The name and  
address of each agency's file  
or identification number, if  
known; (b) The name, ad-  
dress, and telephone number  
of the petitioner, the name,  
address, and telephone num-  
ber of the petitioner's repre-  
sentative, if any, which shall  
be the address for service  
purposes during the course of  
the proceeding; and an expla-  
nation of how the petitioner's  
substantial interests will be  
affected by the agency deter-  
mination; (c) A statement of  
how and when petitioner re-  
ceived notice of the agency

action or proposed action; (d)

A statement of all disputed  
issues of material fact. If there  
are none, the petition must so  
indicate; (e) A concise state-  
ment of the ultimate facts al-  
leged, including the specific  
facts the petitioner contends  
warrant reversal or modifica-  
tion of the agency's proposed  
action; (f) A statement of the  
specific rules or statutes the  
petitioner contends require  
reversal or modification of the  
agency's proposed action; and  
(g) A statement of the relief  
sought by the petitioner, stat-  
ing precisely the action peti-  
tioner wishes the agency to  
take with respect to the agen-  
cy's proposed action.

A petition that does not dis-  
pute the material facts upon  
which the Department's ac-  
tion is based shall state that  
no such facts are in dispute  
and otherwise shall contain  
the same information as set  
forth above, as required by  
rule 28-106.301.

Because the administrative  
hearing process is designed to  
formulate final agency action,  
the filing of a petition means  
that the Department's final  
action may be different from  
the position taken by it in this  
notice. Persons whose sub-  
stantial interests will be af-  
fected by any such final de-  
cision of the Department on the  
application have the right to  
petition to become a party to  
the proceeding, in accordance  
with the requirements set  
forth above.

A complete project file is  
available for public inspection  
during normal business hours,  
8:00 a.m. to 5:00 p.m., Monday  
through Friday, except legal  
holidays, at:

Dept. of Environmental  
Protection

Bureau of Air Regulation

Suite 4, 111 S. Magnolia Drive

Tallahassee, Florida, 32301

Telephone: 850/488-0114

Fax: 850/722-6979

Air Management Division

Hillsborough County

Environmental Protection

Commission

1410 North 21 Street

Tampa, Florida 33605

Telephone: 813/272-5530

Dept. of Environmental

Protection

Southwest District

3804 Coconut Palm Drive

Tampa, Florida 33619-8218

Telephone: 813/744-4100

The complete project file in-  
cludes the application, techni-  
cal evaluations, draft permit,  
and the information submit-  
ted by the responsible official,  
exclusive of confidential re-  
cords under Section 403.111,  
F.S. Interested persons may  
contact the Administrator,  
New Source Review Section,  
or the Department's review-  
ing engineer for this project,  
Joseph Kahn, P.E., at 111  
South Magnolia Drive, Suite 4,  
Tallahassee, Florida 32301, or  
call 850/488-0114, for addition-  
al information.

3513

6/28/00



## Memorandum

## Florida Department of Environmental Protection

---

TO: Clair Fancy  
THRU: Al Linero *AL FZL AAL*  
FROM: Joe Kahn *JK*  
DATE: June 19, 2000  
SUBJECT: City of Tampa, Howard F. Curren AWT Facility  
DEP File No. 0570373-009-AC, PSD-FL-291

Attached for approval and signature is the intent to issue for an air construction permit (PSD permit). This permit authorizes the city of Tampa to construct two natural gas fired reciprocating engine driven generators that the applicant has designated as engines 7 and 8, at its Curren AWT facility. This is a modification of an existing PSD major facility. The project was subject to PSD and BACT for NOx. BACT will be lean combustion technology. Hours of operation are limited to limit emissions of CO and VOC below PSD significant levels.

I recommend your approval and signature.

June 19, 2000 is day 19 of the 90 day timeclock.

Attachments

/jk