



Department of Environmental Protection

Lawton Chiles
Governor

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Virginia B. Wetherell
Secretary

CERTIFIED MAIL - Return Receipt Requested

November 19, 1996

Mr. John Duff
General Manager
Tampa Electric Company (TEC)
P.O. Box 111
Tampa, Florida 33601-0111

RE: Request for Additional Information Regarding Initial Title V Permit Application
File No. 0570040-002-AV
F. J. Gannon Station, Hillsborough County

Dear Mr. Duff:

Your initial Title V permit application for the F. J. Gannon Station was "timely and complete" for purposes of the initial Title V application submission (see Rule 62-213.420(1)(a)1. and (b)2., F.A.C.).

However, in order to continue processing your permit application, the Department will need the additional information below pursuant to Rule 62-213.420(1)(b)3., F.A.C. and Rule 62-4.070(1), F.A.C. The additional information requested is organized by topic.

Should your response to any of the items below require new calculations, please submit the new calculation, assumptions, reference material and appropriate revised pages of the application form.

Combustion Sources

1. Although your application states that No. 2 fuel oil is used for ignition during start-up for Solid Fuel-Fired Steam Generator Unit Nos. 1 through 3, 5 and 6, the firing of No. 2 fuel oil is not addressed in the current air operation permits for these units. How long has TEC been using No. 2 fuel oil for startup in each unit, and what has been the maximum annual usage of No. 2 fuel oil in each unit? Please submit the Segment (Process/Fuel) Information for No. 2 fuel oil for these emission units as required by DEP Form No. 62-210.900(1) - Instructions (enclosed).

2. On August 16, 1996 and September 17, 1996, inspections conducted by the Environmental Protection Commission of Hillsborough County (EPCHC) indicated

Z 311 902 880



Receipt for Certified Mail

No Insurance Coverage Provided
Do not use for International Mail
(See Reverse)

Sent to	Mr. John Duff
Street and No.	P. O. Box 111
P.O. State and Zip Code	Tampa, Florida 33601-0111
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	

PS Form 3800, March 1993

Is your RETURN ADDRESS completed on the reverse side?

- Complete items 1 and/or 2 for additional services.
- Complete items 3, and 4a & b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):

- Addressee's Address
- Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:

Mr. John Duff
General Manager
Tampa Electric Company (TEC)
P. O. Box 111
Tampa, Florida 33601-0111

4a. Article Number

Z 311 902 880

4b. Service Type

- Registered Insured
- Certified COD
- Express Mail Return Receipt for Merchandise

7. Date of Delivery

11/22/96

5. Signature (Addressee)

6. Signature (Agent)

8. Addressee's Address (Only if requested and fee is paid)

PS Form 3811, December 1991 *U.S. GPO: 1993-352-714

DOMESTIC RETURN RECEIPT

Thank you for using Return Receipt Service.

Mr. John Duff
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fugitive emissions from Solid Fuel-Fired Steam Generator Unit No. 3. Please certify that that the emissions unit is in compliance pursuant to Rule 62-296.320(4)(c), F.A.C. and specific condition number two of air operating permit AO29-255208 or submit a compliance plan pursuant to Rule 62-213.420(3)(j), F.A.C.

Coal Yard and Storage Sources

3. In your application you indicated that there are no emission units subject to Standards of Performance for New Stationary Sources (NSPS). The coal yard appears to be subject to NSPS Subpart-Y. Please explain why the coal yard is not subject to NSPS Subpart Y. If it is subject to the subpart, submit a compliance plan pursuant to Rule 62-213.420(3)(j), F.A.C., or indicate in your response that you are in compliance with Subpart Y.

List of Proposed Exempt Activities

4. 40 CFR 63, Subpart T, "National Emission Standards for Hazardous Air Pollutants (NESHAP), applies if you own or operate a solvent cleaning machine that uses a solvent that contains 5 percent or more by weight of any one of any combination of the following halogenated solvents: Carbon tetrachloride, Chloroform, Perchloroethylene, 1,1,1-Trichloroethane, Trichloroethylene, Methylene chloride. a) Are any of the six solvents being used at this facility? b) If yes, what is the amount of solvent (in gallons) used annually at parts-cleaning and degreasing stations? c) Are buckets, pails, and beakers with capacities greater than 7.6 liters (2 gallons) being used?

5. What is being stored in the inorganic storage tanks with storage capacities greater than 550 gallons?

Miscellaneous

6. Since the Gannon Station is located in a "maintenance area" for ozone, does the vehicle refueling operation dispense more than 20,000 gallons/month gasoline? If so, Stage I vapor control applies.

7. The EPCHC has reported to the Department that TEC is currently adding ammonia and sulfur trioxide (SO₃) to flue gases. The SO₃ is being generated from molten sulfur. These processes are not addressed in any of the current air operation permits. How have these additives been addressed in quantifying emissions from these regulated emissions units? We need to better understand the potential for additional emissions from transportation, storage, handling and combustion of these additives.

Mr. John Duff
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Responsible Official (R.O.) Certification Statement: Rule 62-213.420, F.A.C., requires that all Title V permit applications must be certified by a responsible official. Due to the nature of the information requested above, your response should be certified by the responsible official. Please complete and submit a new R.O. certification statement page from the new long application form DEP form No. 62-210.900, effective March 21, 1996 (enclosed).

Professional Engineer (P.E.) Certification Statement: Rule 62-4.050(3), F.A.C., requires that all applications for a Department permit must be certified by a professional engineer registered in the State of Florida. This requirement also applies to responses to Department requests for additional information of an engineering nature. As a result, your response above should be certified by a professional engineer registered in the State of Florida. Please complete and submit a new P.E. certification statement page from the new long application form, DEP Form No. 62-210.900, effective March 21, 1996 (enclosed).

The Department must receive a response from you within 90 (ninety) days of receipt of this letter, unless you (the applicant) request additional time under Rule 62-213.420(1)(b)6., F.A.C. A copy of your response should be sent to Mr. Richard Kirby at the EPCHC.

For Information Purposes (no response required)

Your Title V application requested that the following products be burned in Solid Fuel-Fired Steam Generator Unit Nos. 1 through 6: petroleum coke/coal blend, tire derived fuel (TDF)/coal blend, and coal/petroleum coke /TDF blend (which includes some paper pellets and yard clippings for Units 1 through 4). Normally, burning of these products results in an increase in emissions and therefore constitutes a modification as defined at Rule 62-210.200, F.A.C. Therefore, any such approval must first be done through preconstruction review (i.e., applying for and receiving an air construction permit). Subsequently, the Title V permit application or permit revision application can be submitted.

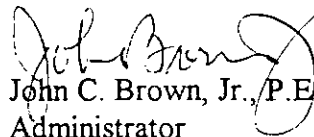
Your Title V application also requested alternate testing procedures for the following: a) demonstrating compliance with SO₂ standard for the Solid Fuel-Fired Steam Generators from using DEP Methods 6, 6A, 6B or 6C to using weekly sampling and fuel analysis or continuous emissions monitoring; b) demonstrating compliance with particulate matter for the Combustion Turbine from using EPA Method 9 annually to using EPA Method 9 once every five years; and c) demonstrating compliance with particulate matter for the six coal bunkers from using EPA Methods 1, 2, 3, 4, 5 and 9 annually at 20% to using EPA Methods 1, 2, 3, 4, 5 and 9 once every five years at 5%.

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Pursuant to Rule 62-297.620, F.A.C., approval of alternate test procedures is necessary before incorporating them into any air operating permit. Requests for alternate procedures should be addressed to Mr. Mike Harley in the Emissions Monitoring Section at the letterhead address at Mail Station 5510.

If you should have any questions, please call Lennon Anderson or me at (904) 488-1344.

Sincerely,


John C. Brown, Jr., P.E.
Administrator
Title V Section

JCB/la


Enclosures

cc: Janice Taylor, TEC
Thomas W. Davis, P.E., ECT
Richard Kirby, EPCHC
Jerry Kissel, SWD

Memorandum

**Florida Department of
Environmental Protection**

TO: Iwan Chorenenko, Director
Air Management Division
Hillsborough County Environmental
Protection Commission

FROM: Bruce Mitchell 

DATE: February 28, 1997

SUBJECT: Response to Request for Additional Information Regarding Initial Title V
Permit Application
F.J. Gannon Station: 0570040-002-AV

Enclosed is Tampa Electric Company's response to the Department's Request for Additional Information. The following changes and additions were made:

- New Responsible Official
- New Professional Engineer
- Additional Segment (Process/Fuel) Information for Units 1-6

Please update your Title V Application. If there are questions, please contact the project engineer, Lennon Anderson, at 904/488-1344 or SC:278-1344.

RBM/la


Enclosures

cc: Jerry Kissell, SWD

Florida Department of
Environmental Protection

Memorandum

TO: Iwan Choronenko, Director
Local Program Air Permitting Administrator

FROM: Bruce Mitchell 

DATE: August 12, 1996

SUBJECT: Completeness Review of an Application Package for a Title V Operation Permit
F. J. Gannon Station: 0570040-002-AV

Enclosed is an application package for a Title V operation permit that is being processed in Tallahassee. Please have someone review the package for completeness and respond in writing by September 9, if you have any comments. Otherwise, no response is required. If there are any questions, please call the project engineer, Lennon Anderson, at 904/488-1344 or SC:278-1344. It is very important to verify the compliance statement regarding the facility. Since we do not have a readily effective means of determining compliance at the time the application was submitted, please advise if you know of any emissions unit(s) that were not in compliance at that time and provide supporting information. Also, do not write on the documents.

If there are any questions regarding this request, please call me or Scott Sheplak at the above number(s).

RBM/bm

Enclosure

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DEC 28 1995

BUREAU OF
AIR REGULATION

Phase II Permit Application

Page 1

For more information, see instructions and refer to 40 CFR 72.30 and 72.31 and Chapter 62-214, F.A.C.

This submission is: New Revised

STEP 1
Identify the source by
plant name, State, and
ORIS code from NADB

Plant Name	F.J. Gannon	FL State	646 ORIS Code
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STEP 2
Enter the boiler ID#
from NADB for each
affected unit, and
indicate whether a
repowering plan is
being submitted for
the unit by entering
"yes" or "no" at
column c. For new
units, enter the re-
quested information
in columns d and e

Compliance Plan				
a	b	c	d	e
Boiler ID#	Unit Will Hold Allowances in Accordance with 40 CFR 72.9(c)(1)	Repowering Plan	New Units Commence Operation Date	New Units Monitor Certification Deadline
GB01	Yes	No		
GB02	Yes	No		
GB03	Yes	No		
GB04	Yes	No		
GB05	Yes	No		
GB06	Yes	No		
	Yes			
	Yes			
	Yes			
	Yes			
	Yes			
	Yes			

STEP 3
Check the box if the
response in column c
of Step 2 is "Yes"
for any unit

For each unit that will be repowered, the Repowering Extension Plan form is included and the Repowering Technology Petition form has been submitted or will be submitted by June 1, 1997.

STEP 4

Read the standard requirements and certification, enter the name of the designated representative, and sign and date

Standard RequirementsPermit Requirements.

- (1) The designated representative of each Acid Rain source and each Acid Rain unit at the source shall:
 - (i) Submit a complete Acid Rain part application (including a compliance plan) under 40 CFR part 72, Rules 62-214.320 and 330, F.A.C. in accordance with the deadlines specified in Rule 62-214.320, F.A.C.; and
 - (ii) Submit in a timely manner any supplemental information that the permitting authority determines is necessary in order to review an Acid Rain part application and issue or deny an Acid Rain permit;
- (2) The owners and operators of each Acid Rain source and each Acid Rain unit at the source shall:
 - (i) Operate the unit in compliance with a complete Acid Rain part application or a superseding Acid Rain part issued by the permitting authority; and
 - (ii) Have an Acid Rain Part.

Monitoring Requirements.

- (1) The owners and operators and, to the extent applicable, designated representative of each Acid Rain source and each Acid Rain unit at the source shall comply with the monitoring requirements as provided in 40 CFR part 75, and Rule 62-214.420, F.A.C.
- (2) The emissions measurements recorded and reported in accordance with 40 CFR part 75 shall be used to determine compliance by the unit with the Acid Rain emissions limitations and emissions reduction requirements for sulfur dioxide and nitrogen oxides under the Acid Rain Program.
- (3) The requirements of 40 CFR part 75 shall not affect the responsibility of the owners and operators to monitor emissions of other pollutants or other emissions characteristics at the unit under other applicable requirements of the Act and other provisions of the operating permit for the source.

Sulfur Dioxide Requirements.

- (1) The owners and operators of each source and each Acid Rain unit at the source shall:
 - (i) Hold allowances, as of the allowance transfer deadline, in the unit's compliance subaccount (after deductions under 40 CFR 73.34(c)) not less than the total annual emissions of sulfur dioxide for the previous calendar year from the unit; and
 - (ii) Comply with the applicable Acid Rain emissions limitations for sulfur dioxide.
- (2) Each ton of sulfur dioxide emitted in excess of the Acid Rain emissions limitations for sulfur dioxide shall constitute a separate violation of the Act.
- (3) An Acid Rain unit shall be subject to the requirements under paragraph (1) of the sulfur dioxide requirements as follows:
 - (i) Starting January 1, 2000, an Acid Rain unit under 40 CFR 72.6(a)(2); or
 - (ii) Starting on the later of January 1, 2000 or the deadline for monitor certification under 40 CFR part 75, an Acid Rain unit under 40 CFR 72.6(a)(3).
- (4) Allowances shall be held in, deducted from, or transferred among Allowance Tracking System accounts in accordance with the Acid Rain Program.
- (5) An allowance shall not be deducted in order to comply with the requirements under paragraph (1)(i) of the sulfur dioxide requirements prior to the calendar year for which the allowance was allocated.
- (6) An allowance allocated by the Administrator under the Acid Rain Program is a limited authorization to emit sulfur dioxide in accordance with the Acid Rain Program. No provision of the Acid Rain Program, the Acid Rain permit application, the Acid Rain permit, or the written exemption under 40 CFR 72.7 and 72.8 and no provision of law shall be construed to limit the authority of the United States to terminate or limit such authorization.
- (7) An allowance allocated by the Administrator under the Acid Rain Program does not constitute a property right.

Nitrogen Oxides Requirements. The owners and operators of the source and each Acid Rain unit at the source shall comply with the applicable Acid Rain emissions limitation for nitrogen oxides.

Excess Emissions Requirements.

- (1) The designated representative of an Acid Rain unit that has excess emissions in any calendar year shall submit a proposed offset plan, as required under 40 CFR part 77.
- (2) The owners and operators of an Acid Rain unit that has excess emissions in any calendar year shall:
 - (i) Pay without demand the penalty required, and pay upon demand the interest on that penalty, as required by 40 CFR part 77; and
 - (ii) Comply with the terms of an approved offset plan, as required by 40 CFR part 77.

Recordkeeping and Reporting Requirements.

- (1) Unless otherwise provided, the owners and operators of the source and each Acid Rain unit at the source shall keep on site at the source each of the following documents for a period of 5 years from the date the document is created. This period may be extended for cause, at any time prior to the end of 5 years, in writing by the Administrator or permitting authority:
 - (i) The certificate of representation for the designated representative for the source and each Acid Rain unit at the source and all documents that demonstrate the truth of the statements in the certificate of representation, in accordance with Rule 62-214.350, F.A.C.; provided that the certificate and documents shall be retained on site at the source beyond such 5-year period until such documents are superseded because of the submission of a new certificate of representation changing the designated representative;
 - (ii) All emissions monitoring information, in accordance with 40 CFR part 75;
 - (iii) Copies of all reports, compliance certifications, and other submissions and all records made or required under the Acid Rain Program; and,

Plant Name (from Step 1)

Recordkeeping and Reporting Requirements (cont.)

(iv) Copies of all documents used to complete an Acid Rain part application and any other submission under the Acid Rain Program or to demonstrate compliance with the requirements of the Acid Rain Program.

(2) The designated representative of an Acid Rain source and each Acid Rain unit at the source shall submit the reports and compliance certifications required under the Acid Rain Program, including those under 40 CFR part 72 subpart I and 40 CFR part 75.

Liability.

- (1) Any person who knowingly violates any requirement or prohibition of the Acid Rain Program, a complete Acid Rain part application, an Acid Rain part, or a written exemption under 40 CFR 72.7 or 72.8, including any requirement for the payment of any penalty owed to the United States, shall be subject to enforcement pursuant to section 113(c) of the Act.
- (2) Any person who knowingly makes a false, material statement in any record, submission, or report under the Acid Rain Program shall be subject to criminal enforcement pursuant to section 113(c) of the Act and 18 U.S.C. 1001.
- (3) No permit revision shall excuse any violation of the requirements of the Acid Rain Program that occurs prior to the date that the revision takes effect.
- (4) Each Acid Rain source and each Acid Rain unit shall meet the requirements of the Acid Rain Program.
- (5) Any provision of the Acid Rain Program that applies to an Acid Rain source (including a provision applicable to the designated representative of an Acid Rain source) shall also apply to the owners and operators of such source and of the Acid Rain units at the source.
- (6) Any provision of the Acid Rain Program that applies to an Acid Rain unit (including a provision applicable to the designated representative of an Acid Rain unit) shall also apply to the owners and operators of such unit. Except as provided under 40 CFR 72.44 (Phase II repowering extension plans), and except with regard to the requirements applicable to units with a common stack under 40 CFR part 75 (including 40 CFR 75.16, 75.17, and 75.18), the owners and operators and the designated representative of one Acid Rain unit shall not be liable for any violation by any other Acid Rain unit of which they are not owners or operators or the designated representative and that is located at a source of which they are not owners or operators or the designated representative.
- (7) Each violation of a provision of 40 CFR parts 72, 73, 75, 77, and 78 by an Acid Rain source or Acid Rain unit, or by an owner or operator or designated representative of such source or unit, shall be a separate violation of the Act.

Effect on Other Authorities. No provision of the Acid Rain Program, an Acid Rain part application, an Acid Rain part, or a written exemption under 40 CFR 72.7 or 72.8 shall be construed as:

- (1) Except as expressly provided in title IV of the Act, exempting or excluding the owners and operators and, to the extent applicable, the designated representative of an Acid Rain source or Acid Rain unit from compliance with any other provision of the Act, including the provisions of title I of the Act relating to applicable National Ambient Air Quality Standards or State Implementation Plans;
- (2) Limiting the number of allowances a unit can hold; *provided*, that the number of allowances held by the unit shall not affect the source's obligation to comply with any other provisions of the Act;
- (3) Requiring a change of any kind in any State law regulating electric utility rates and charges, affecting any State law regarding such State regulation, or limiting such State regulation, including any prudence review requirements under such State law;
- (4) Modifying the Federal Power Act or affecting the authority of the Federal Energy Regulatory Commission under the Federal Power Act; or
- (5) Interfering with or imposing any program for competitive bidding for power supply in a State in which such program is established.

Certification.

I am authorized to make this submission on behalf of the owners and operators of the Acid Rain source or Acid Rain units for which the submission is made. I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment.

Name	Hugh W. Smith	
Signature	<i>Hugh W. Smith</i>	Date 12/19/95

STEP 5 (Optional)
Enter the source AIRS
and FINDS identification
numbers, if known

AIRS	0570040
FINDS	

Florida Department of Environmental Protection

Phase II NO_x Compliance Plan

For more information, see instructions and refer to 40 CFR 76.9

This submission is: New Revised Page of

STEP 1 Indicate plant name, state, and ORIS code from NADE, if applicable.	Tampa Electric Company F.J. Gannon Station Plant Name	FL State	646 ORIS Code
STEP 2	Identify each affected Group 1 and Group 2 boiler using the boiler ID# from NADB, if applicable. Indicate boiler type: "CB" for cell burner, "CY" for cyclone, "DBW" for dry bottom wall-fired, "T" for tangentially fired, "V" for vertically fired, and "WB" for wet bottom. Indicate the compliance option selected for each unit.		

ID#	ID#	ID#	ID#	ID#	ID#
GN03	GN04	GN05	GN06		
Type	Type	Type	Type	Type	Type
CY	CY	WB	WB		

(a) Standard annual average emission limitation of 0.50 lb/mmBtu (for <u>Phase I</u> dry bottom wall-fired boilers)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(b) Standard annual average emission limitation of 0.45 lb/mmBtu (for <u>Phase I</u> tangentially fired boilers)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(c) EPA-approved early election plan under 40 CFR 76.8 through 12/31/07 (also indicate above emission limit specified in plan)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(d) Standard annual average emission limitation of 0.46 lb/mmBtu (for <u>Phase II</u> dry bottom wall-fired boilers)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(e) Standard annual average emission limitation of 0.40 lb/mmBtu (for <u>Phase II</u> tangentially fired boilers)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(f) Standard annual average emission limitation of 0.68 lb/mmBtu (for cell burner boilers)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(g) Standard annual average emission limitation of 0.86 lb/mmBtu (for cyclone boilers)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(h) Standard annual average emission limitation of 0.80 lb/mmBtu (for vertically fired boilers)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(i) Standard annual average emission limitation of 0.84 lb/mmBtu (for wet bottom boilers)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(j) NO _x Averaging Plan (include NO _x Averaging form)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(k) Common stack pursuant to 40 CFR 75.17(a)(2)(i)(A) (check the standard emission limitation box above for most stringent limitation applicable to any unit utilizing stack)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Tampa Electric Company Plant Name (from Step 1) F.J. Gannon Station
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STEP 2, cont'd.

ID#	ID#	ID#	ID#	ID#	ID#
GN03	GN04	GN05	GN06		
Type	Type	Type	Type	Type	Type
CY	CY	WB	WB		

(l) Common stack pursuant to 40 CFR 75.17(a)(2)(i)(B) with NO_x Averaging (check the NO_x Averaging Plan box and include NO_x Averaging Form)

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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(m) EPA-approved common stack apportionment method pursuant to 40 CFR 75.17 (a)(2)(i)(C), (a)(2)(iii)(B), or (b)(2)

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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(n) AEL (include Phase II AEL Demonstration Period, Final AEL Petition, or AEL Renewal form as appropriate)

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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(o) Petition for AEL demonstration period or final AEL under review by U.S. EPA or demonstration period ongoing

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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(p) Repowering extension plan approved or under review

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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STEP 3

Read the standard requirements and certification, enter the name of the designated representative, sign and date.

Standard Requirements

General. This source is subject to the standard requirements in 40 CFR 72.9 (consistent with 40 CFR 76.8(e)(1)(i)). These requirements are listed in this source's Acid Rain Part of its Title V permit.

Special Provisions for Early Election Units

Nitrogen Oxides. A unit that is governed by an approved early election plan shall be subject to an emissions limitation for NO_x as provided under 40 CFR 76.8(a)(2) except as provided under 40 CFR 76.8(e)(3)(iii)

Liability. The owners and operators of a unit governed by an approved early election plan shall be liable for any violation of the plan or 40 CFR 76.8 at that unit. The owners and operators shall be liable, beginning January 1, 2000, for fulfilling the obligations specified in 40 CFR Part 77.

Termination. An approved early election plan shall be in effect only until the earlier of January 1, 2008 or January 1 of the calendar year for which a termination of the plan takes effect. If the designated representative of the unit under an approved early election plan fails to demonstrate compliance with the applicable emissions limitation under 40 CFR 76.5 for any year during the period beginning January 1 of the first year the early election takes effect and ending December 31, 2007, the permitting authority will terminate the plan. The termination will take effect beginning January 1 of the year after the year for which there is a failure to demonstrate compliance, and the designated representative may not submit a new early election plan. The designated representative of the unit under an approved early election plan may terminate the plan any year prior to 2008 but may not submit a new early election plan. In order to terminate the plan, the designated representative must submit a notice under 40 CFR 72.40(c) by January 1 of the year for which the termination is to take effect. If an early election plan is terminated any year prior to 2000, the unit shall meet, beginning January 1, 2000, the applicable emissions limitation for NO_x for Phase II units with Group 1 boilers under 40 CFR 76.7. If an early election plan is terminated on or after 2000, the unit shall meet, beginning on the effective date of the termination, the applicable emissions limitation for NO_x for Phase II units with Group 1 boilers under 40 CFR 76.7.

STEP 3, cont'd.

Certification

I am authorized to make this submission on behalf of the owners and operators of the affected source or affected units for which the submission is made. I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment.

Name Patrick A. Ho	
Signature <i>Patrick A. Ho</i>	Date 12/23/97