



November 19, 1996

**RECEIVED**

NOV 25 1996

BUREAU OF  
AIR REGULATION

Mr. John C. Brown, P.E.  
Administrator-Title V Programs  
MS 5505  
Florida Department of Environmental Protection  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

**Via FedEx Airbill No. 7748636276**

**Re: Tampa Electric Company  
Polk Power Station  
AIRS No. 0530233  
Title V Permit Application**

Dear Mr. Brown:

Tampa Electric Company (TEC) is in receipt of the Polk Power Station Title V applications your office returned. We have reviewed these applications and believe the latest version of ELSA (1.3.b) has been used. Therefore, enclosed please find the four (4) previously submitted copies of the electronic Title V permit application signed and sealed for the above referenced facility in accordance with 62-4.050 and 62-213.420, F.A.C. Also enclosed for your use, is one (1) hard copy of the Title V application for this source.

In addition, we spoke with Mr. Ed Svec of your office and have agreed the best course of action is to re-submit these applications. This will enable the Department and TEC to concurrently view these electronic forms to resolve any issues regarding the electronic submittal.

Please address any comments or concerns to me, as follows:

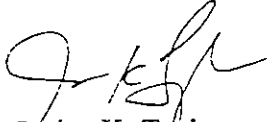
Tampa Electric Company  
Janice K. Taylor  
Senior Engineer  
P.O. Box 111  
Tampa, FL 33601-0111

Phone No. (813) 641-5039  
Fax No. (813) 641-5081

Mr. John C. Brown, P.E.  
November 19, 1996  
Page 2 of 2

Thank you in advance for your consideration in this matter.

Sincerely,



Janice K. Taylor  
Senior Engineer  
Environmental Planning

Enclosures

c: Mr. Bruce Mitchell-FDEP  
Mr. Ed Svec-FDEP

EP/gra/JKT777



# Department of Environmental Protection

Lawton Chiles  
Governor

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

Virginia B. Wetherell  
Secretary

October 28, 1996

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Thomas W. Reese  
Attorney at Law  
2951 61st Avenue South  
St. Petersburg, Florida 33712

Dear Mr. Reese:

RE: Request for Tampa Electric Company's Renewal Dates for Air Permits and Notification of Any Proposed Title V Air Operation Permitting Action

Thank you for your letter of October 8, which requested the renewal dates for Tampa Electric Company's Power Plants. A copy of a permitting history is enclosed for you for the Big Bend facility, the Gannon facility, and the Hookers Point facility. In each of these, you will find the current expiration date for the affected permits. In addition, Rule 62-210.300(2)(a)3.a., F.A.C., extended operation permits for Title V sources subject to Rule 62-213.420(1)(a)1., F.A.C., to 60 days after the due date. Specifically, the due date for these Acid Rain sources was June 15, 1996, pursuant to Rule 62-213.420(1)(a)1.a., F.A.C. The applications for these facilities were received on June 14, 1996. Because of the timely submittal of the initial applications and the initial sufficiency reviews were considered complete, the initial applications were allowed to default to complete 60 days after the June 14 submittal, which was September 12, and Rule 62-213.420(1)(b)2., F.A.C., extended any existing valid permit. The extension of the permits lasts until final agency action is taken on the applications. Copies of the rule citations are enclosed.

The Tampa Electric Company's Polk Power Station facility's construction permit, No. PSD-FL-194, has been extended by amendment (PSD-FL-194A) and expires on June 30, 2000. A copy of the permit extension is enclosed.

Since I specifically work for the Title V Section within the Bureau of Air Regulation, I am assuming that you only desire notification of any proposed agency action regarding the Title V operation permits for the facilities referenced in the preceding paragraph. If this is not accurate, please advise. We have already placed your name on the "to be copied" list in the three proposed Title V permits' Notice of Agency Action documents; and, we will do the same for the Polk Power Station project when it is processed. Therefore, the Department's notification will be mailed to you, the applicant, and others on the same day.

*"Protect, Conserve and Manage Florida's Environment and Natural Resources"*

Thomas W. Reese Letter  
October 28, 1996  
Page 2 of 3

If you desire notification of any proposed air permitting action outside of the Title V Section's, then it is requested that you notify each air permitting authority that might receive and process such a request from the Tampa Electric Company. The following air permitting authorities that might also be involved with the Tampa Electric Company, now and in the future, are:

Department of Environmental Protection  
Division of Air Resources Management  
Bureau of Air Regulation  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Telephone: 904/488-1344  
Fax: 904/922-6979

Contacts: C. H. Fancy, Bureau Chief  
A. A. Linero, P.E. Administrator, New Source Review Section

\*\*\*\*\*

Department of Environmental Protection  
Southwest District  
Air Resources Management  
3804 Coconut Palm Drive  
Tampa, Florida 33619-821

Telephone: 813/744-6100  
Fax: 813/744-6084

Contacts: W. C. Thomas, District Air Program Administrator  
G. J. Kissel, P.E. III, Air Permitting Section

\*\*\*\*\*

Hillsborough County Environmental Protection Commission  
Air Management Division  
1410 North 21st Street  
Tampa, Florida 33605

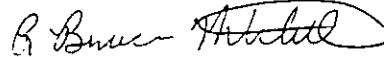
Telephone: 813/272-5530  
Fax: 813/272-5605

Contacts: Iwan Choronenko, Director  
Jerry Campbell, P.E., Assistant Director

Thomas W. Reese Letter  
October 28, 1996  
Page 3 of 3

I hope that your requests have been answered by this letter and enclosures. If not, please give me a call at 904/488-1344 or write to me at the above letterhead address.

Sincerely,



R. Bruce Mitchell  
Environmental Administrator  
Title V Section-Bureau of Air Regulation

RBM/m

Enclosures

cc: C. H. Fancy, BAR  
A. A. Linero, BAR  
Patricia Comer, Esq., DEP  
W. C. Thomas, SWD  
G. J. Kissel, SWD  
I. Choronenko, HCEPC  
J. Campbell, HCEPC

THOMAS W. REESE  
ATTORNEY AT LAW  
2951 61ST AVENUE SOUTH  
ST. PETERSBURG, FLORIDA 33712.

(813) 867-8228  
FAX (813) 867-2259

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OCT 11 1996

BUREAU OF  
AIR REGULATION

October 8, 1996

Bruce Mitchell  
Division of Air Resource Management  
Permitting and Standards Section  
Department of Environmental Regulation  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

Re: TECO Power Plant Air Permit Renewal Dates

Dear Mr. Mitchell:

Would you please advise me of the air permit renewal dates for each of TECO's power plant plants, especially including each of the Big Bend and Gannon Units.

Also, would you please provide me with actually timely notice of any proposed DEP agency action on any TECO power plant air permits.

Very truly yours,

*Thomas W. Reese*  
Thomas W. Reese

cc: Howard Rhodes, Div. Dir.  
Bill Thomas, SW Dist. Off.  
Jerry Campbell, HCEPC



## Appendix H-1, Permit History/ID Number Changes

Tampa Electric Company  
Big Bend

[DRAFT/PROPOSED/FINAL] Permit No.: 0570039-002-AV  
Facility ID No.: 0570039

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**Permit History (for tracking purposes):**

<u>E.U.</u>	<u>ID No</u>	<u>Description</u>	<u>Permit No.</u>	<u>Issue Date</u>	<u>Expiration</u> <u>Date</u>	<u>Extended Date</u>	<u>Revised Date(s)</u>
	-001	Unit 1 Coal Fired Boiler	AO29-219924	11/24/92	12/01/97		
	-002	Unit 2 Coal Fired Boiler	AO29-179912	11/19/90	10/18/95	08/14/96	
	-003	Unit 3 Coal Fired Boiler	AO29-179911	08/29/90	08/30/95	08/14/96	
	-004	Unit 4 Coal Fired Boiler	PSD-FL-040	11/14/81			
	-005	Combustion Turbine #2	AO29-174596	03/14/90	03/09/95	08/14/96	
	-006	Gas Turbine #3	AO29-174611	05/08/90	04/27/95	08/14/96	
	-007	Gas Turbine #1	AO29-160257	01/19/90	07/07/94		
	-008	Unit #1 & #2 Flyash Silo	AO29-160255	01/19/90	12/22/94		
	-009	Fly Ash Silo for Unit #3	AO29-161082	10/16/91	07/07/94		
	-010	Big Bend Coal Yard	PSD-FL-040	11/14/81			
	-011	Truck Unloading of Limestone	PSD-FL-040	11/14/81			
	-012	Limestone Silo A w/2 baghouses	PSD-FL-040	11/14/81			
	-013	Limestone Silo B w/2 baghouses	PSD-FL-040	11/14/81			
	-014	Flyash Silo for Unit #4	PSD-FL-040	11/14/81			
	-015	Unit 1 Coal Bunker w/Rotoclone	AO29-163788	10/06/89	06/30/94		
	-016	Unit 2 Coal Bunker w/Rotoclone	AO29-163788	10/06/89	06/30/94		
	-017	Unit 3 Coal Bunker w/Rotoclone	AO29-163788	10/06/89	06/30/94		
	-018	Fly Ash Silo for Unit #3	AO29-161082	10/16/91	07/07/94		
	-019	Big Bend Station Unit #1 & #2	AO29-160255	01/19/90	12/22/94		

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**(if applicable) ID Number Changes (for tracking purposes):**

From: Facility ID No.: 40H1IL290039

To: Facility ID No.: 0570039

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## Appendix H-1, Permit History/ID Number Changes

Tampa Electric Company  
F. J. Gannon

[DRAFT/PROPOSED/FINAL] Permit No.: 0570040-002-AV  
Facility ID No.: 0570040

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### Permit History (for tracking purposes):

<u>ID No</u>	<u>Description</u>	<u>Permit No.</u>	<u>Issue Date</u>	<u>Expiration Date</u>	<u>Extended Date</u>	<u>Revised Date(s)</u>
-001	Steam Generator	AO29-204434	1/31/92	1/31/97		10/11/94
-002	Boiler	AO29-189206	2/7/91	2/6/96	8/14/96	
-003	Coal Fired Boiler	AO29-172179	4/26/90	4/19/95	8/14/96	10/11/94
-004	Coal Fired Boiler	AO29-255208	12/2/94	10/14/99		
-005	Coal Fired Boiler	AO29-203511	1/1/92	1/1/97		
-006	Coal Fired Boiler	AO29-203512	2/15/92	2/15/97		
-007	Gas Turbine	AO29-252615	8/31/94	8/31/99		
-008	Boiler	AO29-216480	4/23/93	9/12/97		
-009	Economizer Ash Silo	AO29-218858	8/29/89	11/6/97		
-010	Fly Ash Silo	AO29-250137	7/20/94	7/12/99		2/6/95
-011	Fly Ash Silo	AO29-250140	7/20/94	7/12/99		2/6/95
-012	Pug Mill & Truck Loading	AO29-250137	7/20/94	7/12/99		2/6/95
-013	Unit 1 Coal Bunker w/Rotoclone	AO29-250139	7/20/94	7/12/99		2/6/95
-014	Unit 2 Coal Bunker w/Rotoclone	AO29-250139	7/20/94	7/12/99		2/6/95
-015	Unit 3 Coal Bunker w/Rotoclone	AO29-250139	7/20/94	7/12/99		2/6/95
-016	Unit 4 Coal Bunker w/Rotoclone	AO29-250139	7/20/94	7/12/99		2/6/95
-017	Unit 5 Coal Bunker w/Rotoclone	AO29-250139	7/20/94	7/12/99		2/6/95
-018	Unit 6 Coal Bunker w/Rotoclone	AO29-250139	7/20/94	7/12/99		2/6/95

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### (if applicable) ID Number Changes (for tracking purposes):

From: Facility ID No.: 40HIL290040

To: Facility ID No.: 0570040

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## Appendix H-1, Permit History/ID Number Changes

Tampa Electric Company  
Hooker's Point

[DRAFT/PROPOSED/FINAL] Permit No.: 0570038-001-AV  
Facility ID No.: 0570038

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### Permit History (for tracking purposes):

E.U.

<u>ID No.</u>	<u>Description</u>	<u>Permit No.</u>	<u>Issue Date</u>	<u>Expiration Date</u>	<u>Extended Date</u>	<u>Revised Date(s)</u>
-001	Oil-Fired Boiler #1	AO29-203001	12/19/91	12/01/96		
-002	Oil-Fired Boiler #2	AO29-203000	12/19/91	12/01/96		
-003	Oil-Fired Boiler #3	AO29-202999	12/19/91	12/01/96		
-004	Oil-Fired Boiler #4	AO29-202998	12/19/91	12/01/96		
-005	Oil-Fired Steam Generator #6	AO29-202997	12/19/91	12/01/96		

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### (if applicable) ID Number Changes (for tracking purposes):

From: Facility ID No.: 40HIL290038

To: Facility ID No.: 0570038

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DEP 1996 STATIONARY SOURCES - GENERAL REQUIREMENTS 62-210

(v) Cyclic, branched, or linear completely methylated siloxanes

(w) Acetone

(x) Perfluorocarbon compounds which fall into these classes:

1. Cyclic, branched, or linear, completely fluorinated alkanes;

2. Cyclic, branched, or linear, completely fluorinated ethers with no unsaturations;

3. Cyclic, branched, or linear, completely fluorinated tertiary amines with no unsaturations; and

4. Sulfur containing perfluorocarbons with no unsaturations and with sulfur bonds only to carbon and fluorine.

(310) "Waste-to-Energy Facility" - A facility that uses an enclosed device using controlled combustion to thermally break down solid, liquid or gaseous combustible solid waste to an ash residue that contains little or no combustible material, and that produces electricity, steam, or other energy as a result. The term does not include facilities that primarily burn fuels other than solid waste, even if the facilities also burn some solid waste as a fuel supplement. The term also does not include facilities that burn vegetative, agricultural, or silvicultural wastes, bagasse, clean dry wood, methane or other landfill gas, wood fuel derived from construction or demolition debris, or waste tires, alone or in combination with fossil fuel. For the purposes of Rule 62-296.416, F.A.C., the term does not include facilities that primarily burn biohazardous or hazardous waste and industrial boilers that burn pelletized paper waste as a supplemental fuel.

(311) "Waxy, Heavy Pour Crude Oil" - A crude oil with a pour point of 50 degrees or higher as determined by the American Society for Testing and Materials Standard D97-66, "Test for Pour Point of Petroleum Oils". A copy of the above referenced document is available from the American Society for Testing and Materials, 1916 Race Street, Philadelphia, PA 19103, and may be examined at the Department's Tallahassee office.

(312) "Yard Trash" - Vegetative matter resulting from landscaping and yard maintenance operations which includes materials such as tree and shrub trimmings, grass clippings, palm fronds, trees and tree stumps.

Specific Authority 403.061, FS.

Law Implemented 403.021, 403.031, 403.061, 403.087, FS.

History -- Formerly 17-2.100; Amended 2-9-93, 11-28-93, Formerly 17-210.200, Amended 11-23-94, 4-18-95, 1-2-96, 3-13-96, 3-21-96, 8-15-96.

62-210.300 Permits Required. The owner or operator of any emissions unit which emits or can reasonably be expected to emit any air pollutant shall obtain an appropriate permit from the Department prior to beginning construction, modification, or initial or continued operation of the emissions unit unless exempted pursuant to Department rule or statute. All emissions limitations, controls, and other requirements imposed by such permits shall be at least as stringent as any applicable limitations and requirements contained in or

DEP 1996 STATIONARY SOURCES - GENERAL REQUIREMENTS 62-210

enforceable under the State Implementation Plan (SIP) or that are otherwise federally enforceable. Issuance of a permit does not relieve the owner or operator of any emissions unit from complying with applicable emission limiting standards or other requirements of the air pollution rules of the Department, or any other applicable requirements under federal, state, or local law.

(1) Air Construction Permits. An air construction permit shall be obtained by the owner or operator of any proposed new or modified facility or emissions unit prior to the beginning of construction or modification, in accordance with all applicable provisions of this chapter, Chapter 62-212 and Chapter 62-4, F.A.C. The construction permit shall be issued for a period of time sufficient to allow construction or modification of the facility or emissions unit and operation while the new or modified facility or emissions unit is conducting tests or otherwise demonstrating initial compliance with the conditions of the construction permit.

(2) Air Operation Permits. Upon expiration of the air operation permit for any existing facility or emissions unit, subsequent to construction or modification and demonstration of initial compliance with the conditions of the construction permit for any new or modified facility or emissions unit, or as otherwise provided in this chapter or Chapter 62-213, the owner or operator of such facility or emissions unit shall obtain a renewal air operation permit, an initial air operation permit, or an administrative correction or revision of an existing air operation permit, whichever is appropriate, in accordance with all applicable provisions of this chapter, Chapter 62-213 (if the facility is a Title V source), and Chapter 62-4, F.A.C.

(a) Minimum Requirements for All Air Operation Permits. At a minimum, a permit issued pursuant to this subsection shall:

1. Specify the manner, nature, volume and frequency of the emissions permitted, and the applicable emission limiting standards or performance standards, if any;

2. Require proper operation and maintenance of any pollution control equipment by qualified personnel, where applicable in accordance with the provisions of any operation and maintenance plan required by the air pollution rules of the Department.

3. Contain an effective date stated in the permit which shall not be earlier than the date final action is taken on the application and be issued for a period, beginning on the effective date, as provided below.

a. The operation permit for an emissions unit which is in compliance with all applicable rules and in operational condition, and which the owner or operator intends to continue operating, shall be issued or renewed for a five-year period, except that, for Title V sources subject to Rule 62-213.420(1)(a)1., F.A.C., operation permits shall be extended until 60 days after the due date for submittal of the facility's Title V permit application as specified in Rule 62-213.420(1)(a)1., F.A.C.

b. Except as provided in Rule 62-210.300(2)(a)3.d., F.A.C., the operation permit for an emissions unit which has been shut down for six months or more

permit may include such emissions unit in the initial application, provided the requirements of Rule 62-213.420(3)(k), F.A.C., are met.

(b) Complete Application.

1. Any applicant for a Title V permit, permit revision or permit renewal must submit an application on form number 62-210.900(1), which must include all the information specified by Rule 62-213.420(3), F.A.C., except that an application for permit revision must contain only that information related to the proposed change. The applicant shall include information concerning fugitive emissions and stack emissions in the application. Each application for permit, permit revision or permit renewal shall be certified by a responsible official in accordance with Rule 62-213.420(4), F.A.C.

2. For those applicants submitting initial permit applications pursuant to Rule 62-213.420(1)(a)1., F.A.C., a complete application shall be an application that substantially addresses all the information required by the application form number 62-210.900(1), and such applications shall be deemed complete within sixty days of receipt of a signed and certified application unless the Department notifies the applicant of incompleteness within that time. For all other applicants, the applications shall be deemed complete sixty days after receipt, unless the Department, within sixty days after receipt of a signed application for permit, permit revision or permit renewal, requests additional documentation or information needed to process the application. An applicant making timely and complete application for permit, or timely application for permit renewal as described by Rule 62-4.090(1), F.A.C., shall continue to operate the source under the authority and provisions of any existing valid permit or Florida Electrical Power Plant Siting Certification, provided the applicant complies with all the provisions of Rule 62-213.420(1)(b)3. and 4., F.A.C. Failure of the Department to request additional information within sixty days of receipt of a properly signed application shall not impair the Department's ability to request additional information pursuant to Rule 62-213.420(1)(b)3. and 4., F.A.C.

3. For those permit applications submitted pursuant to the provisions of Rule 62-213.420(1)(a)1., F.A.C., the Department shall notify the applicant if the Department becomes aware at any time during processing of the application that the application contains incorrect or incomplete information. The applicant shall submit the corrected or supplementary information to the Department within ninety days unless the applicant has requested and been granted additional time to submit the information. Failure of an applicant to submit corrected or supplementary information requested by the Department within ninety days or such additional time as requested and granted shall render the application incomplete.

4. For all applications other than those addressed at Rule 62-213.420(1)(b)3., F.A.C., should the Department become aware, during processing of any application that the application contains incorrect information, or should the Department become aware, as a result of comment from an

affected State, an approved local air program, EPA, or the public that additional information is needed to evaluate the application, the Department shall notify the applicant within 30 days. When an applicant becomes aware that an application contains incorrect or incomplete information, the applicant shall submit the corrected or supplementary information to the Department. If the Department notifies an applicant that corrected or supplementary information is necessary to process the permit, and requests a response, the applicant shall provide the information to the Department within ninety days of the Department request unless the applicant has requested and been granted additional time to submit the information or, the applicant shall, within ninety days, submit a written request that the Department process the application without the information. Failure of an applicant to submit corrected or supplementary information requested by the Department within ninety days, or such additional time as requested and granted, or to demand in writing within ninety days that the application be processed without the information shall render the application incomplete. Nothing in this section shall limit any other remedies available to the Department.

5. All Department requests for additional information shall conform to the requirements of Rule 62-4.055(2), (3), and (4), F.A.C.

6. The Department shall grant requests for additional time to submit supplemental or corrected information as follows:

a. Each source requesting additional time must make a written request prior to the due date for receipt of the

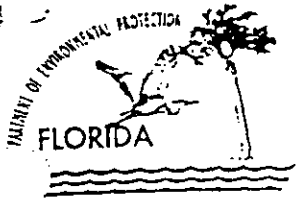
information and must specify the number of additional days requested;

b. The Department shall grant up to sixty additional days to any source operating in compliance with the terms and conditions of the source's existing valid permit without the need to show cause;

c. The Department shall grant additional time beyond sixty days or to sources not operating in compliance with existing valid permits only after the source demonstrates good cause. Good cause shall mean any unforeseen situation outside the control of the source such as labor strikes, acts of war, extraordinary or sudden and unexpected acts of nature or accidents beyond the control of the source. If the Department has required, in the request for additional or corrected information, that the source undertake specific testing or investigation, good cause shall also include the requirement to complete any required tests or investigation that cannot be completed within 150 days, so long as the source specifies the expected date of completion in its demonstration of good cause and so long as the estimated time requested is for the work required.

(2) Confidential Information. Whenever an applicant submits information under a claim of confidentiality pursuant to Section 403.111, F.S., the applicant shall also submit a copy of all such information and claim directly to EPA.

(3) Standard Application Form and Required Information. Applications shall be submitted under this chapter on forms provided by the Department and adopted by reference in Rule 62-210.900(1), F.A.C. The information as described in Rule 62-210.900(1), F.A.C., shall be included for the Title V source and each emissions



# Department of Environmental Protection

Lawton Chiles  
Governor

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

Virginia B. Wetherell  
Secretary

February 28, 1995

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. G. F. Anderson  
Tampa Electric Company  
P. O. Box 111  
Tampa, Florida 33601-0111

Dear Mr. Anderson:

RE: Amendment for a Modification to the Auxiliary Boiler  
and Expiration Date Extension  
PSD-FL-194(A)

The Department received your requests of May 12 and June 9, 1994, to modify the auxiliary boiler by increasing the heat input rate, which will require changing some existing specific conditions, and to extend the expiration date of the PSD permit referenced below. The permit is amended as shown:

Permit No. PA-92-32, PSD-FL-194, Tampa Electric Company.

Current Expiration Date: June 1, 1996

New Expiration Date: June 30, 2000

The Department is also modifying the specific conditions as follows:

## E. Auxiliary Boiler

The maximum heat input to the auxiliary boiler shall not exceed ~~49-5~~ 120.0 MMBtu/hr when firing No. 2 fuel oil with 0.05 percent maximum sulfur content by weight. All fuel consumption must be continuously measured and recorded for the auxiliary boiler.

## G. Fugitive Dust

Fugitive dust emissions during the construction period shall be minimized by covering or watering dust generation areas. Particulate matter emissions from the coal handling equipment shall be controlled by enclosing all coal storage, conveyors and conveyor

transfer points (except those directly associated with the coal stacker/reclaimer for which an enclosure is operationally infeasible). Fugitive emissions shall be tested as specified in Condition No. J. Inactive coal storage shall be shaped, compacted, and oriented to minimize wind erosion. Water sprays or chemical wetting agents and stabilizers shall be applied to uncovered storage piles, roads, handling equipment, etc. during dry periods and, as necessary, to all facilities to maintain an opacity of less than or equal to five percent. When adding, moving or removing coal from the coal pile, an opacity of 20 percent is allowed.

H. Emission Limits

1. The maximum allowable emissions from the IGCC combustion turbine, when firing syngas and low sulfur fuel oil, in accordance with the BACT determination, shall not exceed the following:

Pollutant	Fuel	Basis	Emissions Limitations	
			7F CT Postdemonstration Period	lb/hr
NO <sub>x</sub>	Oil	42 ppmvd	311	N/A
	Syngas	25 ppmvd	222.5	2,644
			220.25	1,032.9

I. Auxiliary Boiler Operation

Normal operation of the auxiliary boiler shall be limited to a maximum of ~~2,000~~ 3,000 hours per year and only during periods of startup and shutdown of the IGCC unit, or when steam from the IGCC unit's heat recovery steam generator is unavailable. The auxiliary boiler may operate continuously (i.e. 8,760 hrs/yr) in the standby mode. The following emission limitations shall apply:

1. NO<sub>x</sub> emissions shall not exceed ~~0.16~~ 0.10 lbs/MMBtu for oil firing.
2. Sulfur dioxide emissions shall be limited by firing low sulfur oil with a maximum sulfur content of 0.05 percent by weight.
3. Visible emissions shall not exceed 20 percent opacity (6-minute average) (except for one six-minute period per hour during which opacity shall not exceed 27 percent), while burning low sulfur fuel oil.

## L. Monitoring Requirements

### 1. IGCC Combustion Turbine

A continuous emission monitoring system (CEMS) shall be installed, operated and maintained in accordance with 40 CFR 60, Appendix F, for the combined cycle unit to monitor nitrogen oxides and a diluent gas (CO<sub>2</sub> or O<sub>2</sub>). The applicant shall request that this condition of certification be amended to reflect the Federal Acid Rain Program requirements of 40 CFR 75, if applicable, when those requirements become effective within the state.

1- a Each CEMS shall meet the performance specifications of 40 CFR 60, Appendix B.

2- b CEMS data shall be recorded and reported in accordance with Rule Chapter 62-297.500, F.A.C.; 40 CFR 60; and 40 CFR 75, if applicable. The record shall include periods of startup, shutdown, and malfunction.

3- c A malfunction means any sudden and unavoidable failure of air pollution control equipment or process equipment to operate in a normal or usual manner. Failures that are caused entirely or in part by poor maintenance, careless operation or any other preventable upset condition, or preventable equipment breakdown shall not be considered malfunctions.

4- d The procedures under 40 CFR 60.13 shall be followed for installation, evaluation, and operation of all CEMS.

5- e For purposes of the reports required under this permit, excess emissions are defined as any calculated average emission concentration, as determined pursuant to Condition No. H.4 herein, which exceeds the applicable emission limits in Condition No. H.1.

### 2. Auxiliary Boiler

A CEMS shall be installed, operated and maintained in accordance with 40 CFR 60, Appendix F, for the auxiliary boiler to monitor nitrogen oxides emissions and in accordance with 40 CFR 60.13 to monitor opacity.

a. The CEMS shall meet the performance specifications of 40 CFR 60, Appendix B.

Mr. G. F. Anderson  
February 28, 1995  
Page 4 of 4

b. CEMS data shall be recorded and reported in accordance with Rule 62-297.500, F.A.C., and 40 CFR 60. The record shall include periods of startup, shutdown and malfunction.

c. A malfunction means any sudden and unavoidable failure of air pollution control equipment or process equipment to operate in a normal or usual manner. Failures that are caused entirely or in part by poor maintenance, careless operation or any other preventable upset condition or preventable equipment breakdown shall not be considered malfunctions.

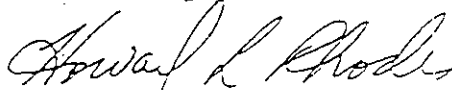
d. The procedures under 40 CFR 60.13 shall be followed for installation, evaluation, and operation of the CEMS.

N. Applicable Requirements

The project shall comply with all the applicable requirements of Chapters 62-212 and 62-4, F.A.C., and 40 CFR 60, Subparts A, D<sub>b</sub> and GG.

A copy of this letter shall be attached to the above mentioned permit, No. PSD-FL-194(A), and shall become a part of the permit.

Sincerely,



Howard L. Rhodes  
Director  
Division of Air Resources  
Management

HLR/sa/b

cc: B. Thomas, SWD  
J. Harper, EPA  
J. Bunyak, NPS  
H. Owen, PPS  
T. Davis, P.E., ECT

COMMISSION

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TELEPHONE (813) 272-7104

M E M O R A N D U M

DATE: September 30, 1996

TO: John Brown, P.E., FDEP

FROM: Alice H. Harman *AH*

THRU: *RK* Richard C. Kirby, IV, P.E.  
Jerry Campbell, P.E.

SUBJECT: Tampa Electric Company, Gannon Title V

The referenced application has been reviewed by EPC engineering staff. A facility inspection was performed on September 17, 1996. Marty Costello of your office was present during the inspection. Based on our review and inspection we offer the following comments:

1. TECO should make a statement of the method(s) used for demonstration compliance for each applicable rule requirement. per 40 CFR 70.5(c)(9)ii and Rule 62-213.420(3)(g).
2. Comment #1 of Rick Kirby's memo regarding the Big Bend Station applies to this facility as well.
3. 40 CFR 75 requires CEM data to be reported quarterly to the Administrator (EPA). Since EPC is the lead agency in determining compliance, we request that this same data be supplied to this office.
4. TECO has requested that compliance with emissions limits be demonstrated through CEM data or fuel analyses, and that this take the place of stack testing. EPC supports the use of CEMs for compliance demonstration. We do not have the same comfort level with fuel sampling. This is based on the variable nature of fuels. i.e., coal from multiple sources, tire derived fuel, and pet coke. Also, we do not have a method for auditing fuel sampling, therefore, we do not have assurance on fuel.



5. TECO has classified fuel handling as one emission unit. They are currently trying several alternate fuels at their facilities. These will have different potential emissions. Because of this it is important to differentiate between the different solid fuels. There should be a throughput limitation based on the type of fuel and supporting calculations.
6. TECO currently has several requests for alternate fuel burning. Only those fuels which have been granted authorization shall be included in the Title V permit. Also, TECO has listed supplemental fuel consisting of used oil materials and the firing of non-hazardous boiler cleaners. These fuels and cleaners need to be quantified for emissions since they have not been included in previous permits.
7. During our inspection of August 16, 1996, significant fugitive emissions were observed coming from Unit #3. TECO should explain corrective actions and provide a maintenance plan to address fugitives in the future.
8. TECO is currently adding ammonia and  $\text{SO}_3$  to flue gases. These processes should be thoroughly explained and effects on emissions quantified.
9. TECO uses molten sulfur to generate  $\text{SO}_3$ . They should fully describe the process and units, quantify emissions, and explain why no permit was obtained prior to installation of the system.
10. Multiple emission points are grouped as a single emission unit in the application for some operations (i.e., coal yard, gypsum handling, etc.). Since each emission point will require testing it is to our advantage and TECO's to list each emission point separately as an emission unit. Our current record keeping system, ARMS, allows input of a certain test only once per emission unit. For example, we would only be able to enter one Method 9 for the coal yard when there are multiple drop points requiring testing. From TECO's standpoint a VE violation at one drop point would put the entire coal yard in violation if it is listed as one unit. It should also be noted that the emission units, as grouped by TECO in the application, do not match the units currently listed in ARMS.
11. In the application, several emission units are listed with visible emissions requested allowables of 20% except for one six minute period during which opacity shall not exceed 27% (Rule 62-296.406). Hillsborough County has a local rule, 1-3.63(d) which limits fossil fuel steam generators to 20% opacity except for excess emissions and except for any two minute period in any hour which opacity to 40% is allowed.

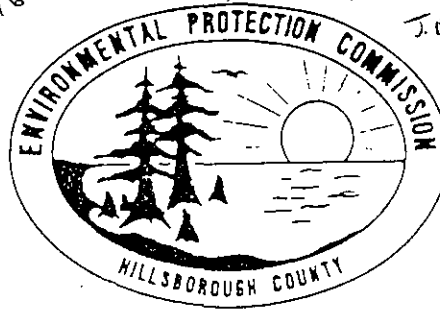
John Brown, P.E., FDEP  
September 30, 1996  
Page 3

12. Rule 1-3.63(c), Rules of the Environmental Protection Commission of Hillsborough County limits emissions from fossil fuel steam generators to 1.1 pound SO<sub>2</sub> per million Btu heat input when liquid fuel is burned. Since the application includes the burning of used oil and non-hazardous boiler chemical cleaning waste. TECO should provide assurance that the above standard will be met while burning these liquid fuels.

bm

COMMISSION  
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BUREAU OF  
AIR REGULATION

MEMORANDUM

DATE: September 30, 1996

TO: John Brown, P.E., FDEP

FROM: *RK* Richard C. Kirby, IV, P.E. THRU: Jerry Campbell, P.E.

SUBJECT: Tampa Electric Company, Big Bend Station Title V

The referenced application has been reviewed by EPC engineering staff. A facility inspection was performed on September 16, 1996. Marty Costello of your office was present during most of the inspection. Based on our review and inspection offer the following comments:

1. The sulfur dioxide standards for Units #1, 2, and 3 in Rule 62-296.405(1)(c)2.b., F.A.C., are not practically enforceable. The multiple standards refer to a group limit of 31.5 TPH on a 3-hour average not to exceed a 6.5 pounds per MMBTU over two hours, and finally a 25 TPH limitation on all three units for a 24-hour average. There is no reasonable way for our inspectors to determine compliance with the convoluted standards, and consequently they would fail any PTE or practically enforceable test. We acknowledge these are in the SIP and did somehow get approved by the EPA over a decade ago. Criteria for standards was different then and we believe Title V anticipated this type of cleanup. We also understand that Title V is not a program for promulgating new standards. However, because these standards are unenforceable and can not be put in a Title V permit, we strongly recommend that they be converted (not strengthened or weakened) to an enforceable form. Since all these units have CEMs, perhaps we should look for a pound per MMBTU over a set averaging time as reported by their continuous instrumentation. TECO could drop the less effective annual stack testing and fuel sampling programs, and the public would be better protected.
2. On June 6, 1994, during an EPC inspection, a ship repair facility (GC Services, a TECO Transport Company) was found operating along side the Big Bend Station coal yard. TECO previously provided information regarding this operation

following an inspection done on December 6, 1994. During that inspection, EPC was informed that the operations would be included in the Title V application and permit for the power plant. That information is not included.

3. TECO should make a statement of the method(s) used for demonstration compliance for each applicable rule requirement per 40 CFR 70.5(c)(9)ii and Rule 62-213.420(3)(g).
4. 40 CFR 75 requires CEM data to be reported quarterly to the Administrator (EPA). Since EPC is the lead agency in determining compliance, we request that this same data be supplied to our office.
5. TECO has requested that compliance with emissions limits be demonstrated through CEM data or fuel analyses, and that this take the place of stack testing. EPC supports the use of CEMs for compliance demonstration. We do not have the same comfort level with fuel sampling. This is based on the variable nature of fuels, i.e., coal from multiple sources, and pet coke. In addition, we do not have a method for auditing fuel sampling, therefore we do not have assurance on fuel analysis testing.
6. TECO has classified fuel handling as one emission unit. They are currently trying several alternate fuels at their facilities. These will have different potential emissions. Because of this, it is important to differentiate between the different solid fuels. There should be a throughput limitation based on the type of fuel and supporting calculations. The coal headed for the Polk County facility should be included as well.
7. During our inspection, significant fugitive emissions were observed coming from Big Bend #2 furnace. TECO should explain corrective actions and provide a maintenance plan to address fugitives from this unit as well as the other three in the future.
8. TECO is currently adding ammonia and SO<sub>3</sub> to flue gases. These processes should be thoroughly explained and the effects on emissions quantified.
9. TECO uses molten sulfur to generate SO<sub>3</sub> for flue gas conditioning. They should fully describe the storage, process, and units, quantify emissions, and explain why no permit was obtained prior to installation of the system.
10. Multiple emission points are grouped as a single emission unit in the application for some operations (i.e., coal yard, gypsum handling, etc.). Since each emission point will require testing it is to our advantage and TECO's to list each

emission point separately as an emission unit. Our current record keeping system, ARMS, allows input of a certain test only once per emission unit. For example, we would only be able to enter one Method 9 for the coal yard when there are multiple drop points requiring testing. From TECO's standpoint a VE violation at one drop point would put the entire coal yard in violation if it is listed as one unit. It should also be noted that the emission units, as grouped by TECO in the application, do not match the units currently listed in ARMS.

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bm