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BUREAU OF AIR REGULATION

October 9, 2008

Ms. Trina Vielhauer
Chief, Bureau of Air Regulation
Florida Department of Environmental Protection
111 South Magnolia Avenue, Suite 4
Tallahassee, Florida 32301

Via FedEx
Airbill No. 7927 6637 5319

Re: **Tampa Electric Company**
H.L. Culbreath Bayside Power Station
DEP File 0570040-024-AC
Air Construction Permit Comments
- File # 0570040-026-AC

Dear Ms. Vielhauer:

Tampa Electric Company (TEC) hereby requests minor changes to several conditions of the final permit issued by the Florida Department of Environmental Protection (FDEP) on September 29, 2008. Please consider incorporating the following changes as follows:

1. Page 2 of 14: **Facility Description**, paragraph 3
Please remove the following language since these items do not exist at this facility: "an existing 14 MW SCCT; and an eight million gallon distillate oil storage tank." Bottom of same paragraph – "with distillate fuel oil serving as a backup fuel."
2. Page 2 of 14: **Project Description**
Please revise the second paragraph. The project will not include two emergency generators. Only one has been selected. Please change the language to read: "The project will also include the construction of one 1,000 kilowatt (kW) emergency diesel engine/generator set. Excluding emergency conditions, the diesel engine/generator will be operated for approximately two hours per week (100 hr/yr) for routine testing and maintenance purposes. The emergency diesel engine will be fired with ultra low sulfur diesel (ULSD) fuel oil. Under this proposal, the maximum total ULSD fuel oil usage is 12,700 gallons per year (gal/yr) and entitles them to a categorical exemption in Rule 62-210.300(3)(a)35.d., F.A.C., One or More Emergency Generators Located Within a Single Facility, because they will burn only one fuel type and collectively fire no more than 32,000 gal/yr."

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3. **Page 3 of 14: New Emission Units**

The emission unit ID numbers listed are not consistent with the August 2008 Revised Air Construction Permit Application. Please revise the ID numbers to follow the application. CT3A: Unit ID 028, CT3B: Unit ID 029, etc. The EU description will also need to be corrected to show the use of only one generator instead of two. The EU ID number for the generator should be 036. This will help maintain consistency with the monitoring plans and data already entered into the CAMD. It will also help in distinguishing between units for testing and report submittals.

4. **Page 7 of 14: Emissions Unit Specific Conditions**

The EU ID numbers need to be corrected in the table.

5. **Page 7 of 14: Wet Injection**

This is just a formatting correction. Looks like the Wet Injection paragraph should be marked as item 3 and then all subsequent numbers will need to be corrected.

6. **Page 8 of 14: Emissions And Testing Requirements**

The permit states that a one time stack test is required for PM and SO₂ on any one SCCT unit. This has not been previously required by FDEP for other recently permitted natural gas-fired CTs. We request that the language resemble the recent AC permits given to JEA Greenland Energy Center or FPL West County Unit 3.

7. **Page 8 of 14: Emissions And Testing Requirements**

Please correct the typographical error on the SO₂ limit. Per the application the SO₂ emissions from each SCCT is 1.9 lb/hr. Therefore, the SO₂ emission from the two SCCT's serving a single 62 MW generator is 3.8 lb/hr. Therefore the appropriate limit is $(3.8 \text{ lb/hr}) / (62 \text{ MW}) = 0.06 \text{ lb/MWh}$.

8. **Page 10 of 14: Initial Compliance Demonstration for CO, PM, VOC and Visible Emissions:**

We request Method 18 as an optional method to be used in conjunction with RM 25A for the VOC stack test.

9. **Page 11 of 14: Continuous Compliance**

Condition 17 states that "within 45 days of conducting any RATA on a CEMS, the permittee shall submit a report to the Compliance Authority summarizing results of the RATA." TEC would like to request that the RATA results be submitted with the semi-annual report as is now the requirement in the Title V Bayside permit. With the new XML EDR format beginning in 2009, the RATA test results will be submitted electronically as soon as the data becomes available. Therefore, the agency will no longer have to wait until the end of the quarter to receive the data within the EDR. TEC requests the language to read "The permittee shall submit a report to the Compliance Authority summarizing results of the RATA with the semi-annual report."

10. Page 12 of 14: **Reporting And Recordkeeping Requirements**

Under the Monitoring of Capacity: section the first sentence mentions "operating rate". Please change this to read "heat input". It would help to clarify what to report.

11. Page 13 of 14: **Excess Emissions Reporting:**

Under section *b. SIP Quarterly Report*: Please change this report to semi-annual frequency to be consistent with the rules. Another section of this permit requires submittal of the Data Assessment Reports with the Semi-Annual Report. This will also make it consistent with the current Title V permit for Bayside Power Station.

12. Page E-4: **Section IV. Appendix E**

Under 17. Data Exclusion Procedures for SIP Compliance: TEC would like to incorporate more detail into the excess emissions procedure. The current language does not clearly explain how excess emissions for startup/shutdown or malfunction are to be handled. We have language in our Polk Power Station permit for Units 4 & 5 that is appropriate to have included in this permit. The Polk permit allows for exclusions at the clock-minute level to compare with the 2-hour data exclusion limit. We are requesting to have 10 minutes worth of data allowed for exclusion per startup and shutdown. Also, the permit does not mention any data exclusion for tuning as our current Bayside permit shows. Please include tuning as a specific data exclusion event. We request the following language in Appendix E, Condition 17:

Allowable NOx Data Exclusions: Provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions are minimized, NOx continuous monitoring data collected during periods of startup, shutdown, and malfunction may be excluded from the 24-hr block compliance demonstrations only in accordance with the following requirements. All periods of data excluded shall be consecutive for each such episode and only data obtained during the described episodes (startup, shutdown, malfunction, and tuning) may be excluded. As provided by the authority in Rule 62-210.700(5), F.A.C., the following conditions replace the provisions in Rule 62-210.700(1), F.A.C.

a. *Startup*: In accordance with the procedures described in the Standard Continuous Monitoring Requirements of this section, no more than the first 10 minutes of CEMS data shall be excluded for each gas turbine startup. For startups of less than 10 minutes in duration, only those minutes attributable to startup shall be excluded.

b. *Shutdown*: In accordance with the procedures described in the Standard Continuous Monitoring Requirements of this section, no more than the first 10 minutes of CEMS data shall be excluded for each gas turbine shutdown. For shutdowns less than 10 minutes in duration, only those minutes attributable to shutdown shall be excluded.

Ms. Trina Vielhauer

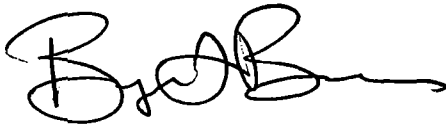
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c. *Malfunction*: In accordance with the procedures described in the Standard Continuous Monitoring Requirements of this section, no more than 120 minutes of CEMS data shall be excluded in a 24-hour period for each gas turbine due to malfunctions. Within one (1) working day of occurrence, the owner or operator shall notify the Compliance Authority of any malfunction resulting in the exclusion of CEMS data.

TEC appreciates the cooperation and consideration of the Department in this requested AC permit revision for the Bayside Power Station. Your expeditious processing of this request would be appreciated. Please contact Laurie Pence or me at (813) 228-1282 if you have any questions or comments regarding this submittal.

Sincerely,

A handwritten signature in black ink, appearing to read 'Byron Burrows', with a long horizontal flourish extending to the right.

Byron Burrows, P.E. BCEE
Manager – Air Programs
Environmental, Health & Safety

EHS/rlk/LAP397

cc: Ms. Mara Grace Nasca, FDEP SW
Mr. Bruce Mitchell, FDEP
Mr. Sterlin Woodard, EPCHC