



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4

ATLANTA FEDERAL CENTER

61 FORSYTH STREET

ATLANTA, GEORGIA 30303-8960

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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

PSD - 301A

0570040-015-AC

Dear Mr. Linero:

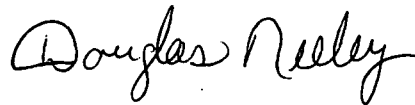
Thank you for sending the prevention of significant deterioration (PSD) permit application for the Tampa Electric Company (TEC) Gannon/Bayside Power Station dated June 25, 2001. The PSD permit application is for a repowering project involving the shutdown of TEC Gannon's coal-fired Units 3 and 4 and the addition of four combined cycle combustion turbines (CTs) with a total nominal generating capacity of approximately 1000 MW (Bayside Units 3 and 4). The combustion turbines proposed for the facility are General Electric (GE), frame 7FA units. As proposed, the CTs would exclusively fire pipeline quality natural gas up to 8,760 hours per year. Total net emissions increases from the proposed project are above the thresholds requiring PSD review for carbon monoxide (CO) and particulate matter (PM/PM₁₀).

Based on our review of the PSD permit application, we have the following comments:

1. On March 30, 2001, the Florida Department of Environmental Protection (FDEP) issued TEC a final PSD permit for a repowering project involving the replacement of TEC Gannon's coal-fired Units 5 and 6 with seven combined cycle CTs (Bayside Units 1 and 2). It is EPA's opinion, given the short time frame between projects, that the current project of repowering Gannon Units 3 and 4 should be combined with the already permitted project of repowering Gannon Units 5 and 6. The net emissions from the combined project should be used to reevaluate applicability of PSD requirements as well as applicability of the 112(g) case-by-case maximum achievable control technology program.
2. According to page 2-9 of the PSD permit application, Gannon Units 3 and 4 will cease operation following "commercial operation" of Bayside Units 3 and 4. In order for the emission decreases achieved by the shutdown of Gannon Units 3 and 4 to be enforceable and available for use in the netting analysis, the emission decreases will have to occur before the end of the shakedown period (no more than 180 days after startup) of the new Bayside Units 3 and 4.

Thank you for the opportunity to comment on the TEC Gannon/Bayside Power Station PSD permit application. If you have any questions regarding these comments, please direct them to either Ms. Katy Forney at 404-562-9130 or Mr. Jim Little of the EPA Region 4 staff at 404-562-9118.

Sincerely,



R. Douglas Neeley
Chief
Air and Radiation Technology Branch
Air, Pesticides and Toxics
Management Division

cc: G. Kallmer ✓
C. Northrup ✓
G. Campbell, EPC ✓
G. Kessel, SWD ✓
S. Todd, TECO ✓
G. Berman, NPS ✓