



Florida Department of Environmental Protection

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Michael W. Sole
Secretary

July 13, 2009

Sent via Electronic Mail - Received Receipt Requested

jbbadgerow@tecoenergy.com

Mr. Jim Badgerow
Director
Polk Power Station
Tampa Electric Company
P. O. Box 111
Tampa, Florida 33601-0111

Re: Additional Information, File Number 1050233-026-AV
Title V Air Operation Permit Renewal Application
Polk Power Station

Dear Mr. Badgerow:

On May 20, 2009, the Department received a Title V air operation permit renewal application for the subject facility via Electronic Permit Submittal Processing System (EPSAP). Thank you for using the current acid rain form which has an effective date of 03-16-2008. The Polk Power Station is located at 9995 State Route 37 South, Mulberry in Polk County, Florida.

In order to continue processing your application, the Department needs the additional information requested below. Should your response to any of the below items require new calculations, please submit the new calculations, assumptions, reference material and appropriate revised pages of the permit application form.

1. Compliance Testing (Demonstration) Reports/Records. Title V air operation permit renewal applications require a compliance report/record to be attached to the application or a reference may be made to a previously submitted compliance report/record in the application (see item 6. on page 27 of the hard copy of the application form). This information was blank for each emissions unit in the submitted EPSAP version of the application. Please provide the Compliance Testing (Demonstration) Reports/Records for each emissions unit. Simply referencing each compliance test date is adequate and preferred.
2. Risk Management Plan (RMP). As part of this renewal application, a copy of the cover letter submitting the RMP dated June 18, 2004, was provided. This cover letter indicated another RMP would be submitted (renewed) in 5 years. Has a new RMP been submitted? If so, please provide a copy of the transmittal letter.
3. Compliance Plan for Permit No. 1050233-021-AC/PSD-FL-194H. You had requested inclusion of the terms and conditions of Permit No. 1050233-021-AC/PSD-FL-194H, Petcoke Increase Project, in this permit renewal. Has all of the construction and/or the modifications under this permit been completed? Also, has compliance with all terms and conditions of this permit been demonstrated? If not, a compliance plan is required. The compliance plan needs to cite the specific activities not yet complete along with milestones (dates) to complete each specific activity.
4. Flare. In the requested changes document, a request was made to add a "flare" to the emissions unit description of the Solid Fuel Gasification System (E. U. ID No. -006). PSD-FL-194 does not appear to mention a flare. The Technical Evaluation & Preliminary Determination for PSD-FL-194 does however mention "flare stacks" on page 7. Diagrams submitted for the PSD-FL-194 application show a "tailgas thermal oxidizer." The application for PSD-FL-194 cites the "tailgas thermal oxidizer" stack as being

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199 feet high. Is the "flare" you are referring to the same as this previously cited "tailgas thermal oxidizer"?

5. Sulfuric Acid Plant. What type of catalyst is in this sulfuric acid plant? Please provide a copy of the manufacturer's brochure describing the catalyst, e.g., catalyst composition, size & shape.
6. New Applicable Requirements. The Title V air operation permit, permit no. 1050233-016-AV, had been renewed with an effective date of January 1, 2005. Subsequent to this effective date, several new federal regulations have been promulgated by U.S. EPA and adopted by the State of Florida. Some of these new federal regulations may be new applicable requirements for the facility applying to certain types of engines.

New Applicable Requirements - New Source Performance Standards (NSPS) Requirements from 40 Code of Federal Regulations (CFR) 60:

40 CFR 60 Subpart IIII also known as (a.k.a.) NSPS "4-I's" or "CI-ICE"

U.S. EPA promulgated on July 11, 2006, the NSPS for Stationary Compression Ignition (CI) Internal Combustion Engines (ICE) under 40 CFR 60 Subpart IIII. This new NSPS applies to new engines. Florida adopted this regulation by reference soon thereafter at Rule 62-204.800(8)(b)78., Florida Administrative Code (F.A.C.).

40 CFR 60 Subpart JJJJ a.k.a. NSPS "4-J's" or "SI-ICE"

U.S. EPA promulgated on January 18, 2008, the NSPS for Stationary Spark Ignition (SI) Internal Combustion Engines (ICE) under 40 CFR 60 Subpart JJJJ. This new NSPS applies to new engines. Florida adopted this regulation by reference soon thereafter at Rule 62-204.800(8)(b)79., F.A.C.

- a. This facility has proposed insignificant emissions units, e.g., "general purpose engines" and "emergency generators" in Attachment E, items 16. & 17. of the renewal application. Also, "Emergency Generators" and "General Purpose Engines" (Emissions Unit ID Nos. -007 & -008) are listed in Appendix U-1. These new NSPS could therefore apply. Are any engines on-site regulated under these new NSPS?

If not, for each engine on-site please provide key non-applicability descriptors to show that each engine is clearly not subject to these new NSPS, like 'existing,' model year/construction (manufacturer) date, manufacturer name, size of engine, e.g., equivalent brake horsepower (HP), type of engine, etc.

These new federal regulations along with fact sheets are posted on the following U.S. EPA web site:
<http://www.epa.gov/ttn/atw/combust/list.html>.

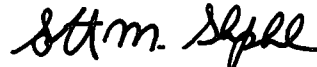
The Department will resume processing your application after receipt of the requested information. Rule 62-4.050(3), Florida Administrative Code (F.A.C.) requires that all applications for a Department Title V air operation permit must be certified by a professional engineer (P.E.) registered in the State of Florida. This requirement also applies to responses to Department requests for additional information of an engineering nature. For any material changes to the application, please include a new certification statement by the responsible official (R.O.).

Rule 62-4.055(1), F.A.C. now requires applicants to respond to requests for information within **ninety (90)** days or provide a written request for an additional period of time to submit the information. The processing of this application is under time constraints due to acid rain requiring this permit to be effective January 1, 2010. A response no later than **October 9, 2009** is appreciated.

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If you should have any questions, please contact me by telephone at 850/921-9532 or by e-mail at Scott.Sheplak@dep.state.fl.us.

Sincerely,



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Mail Station #5505
2600 Blair Stone Road
Tallahassee, FL 32399

copy to: Mr. Joshua D. Ellwein, P.E., TECO: dellwein@tecoenergy.com
Mr. Thomas W. Davis, P.E., ECT: tdavis@ectinc.com
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