

**Sheplak, Scott***-file-*

**From:** Ellwein, Joshua D. [jellwein@tecoenergy.com]  
**Sent:** Thursday, March 12, 2009 3:12 PM  
**To:** Holtom, Jonathan; Sheplak, Scott  
**Cc:** Burrows, Byron T.; Tom Davis  
**Subject:** RE: Polk Power Station Fuel Oil Stack Testing

Jonathan/Scott,

I went back and took a look at the 400-hr stack testing exemption rule and this is what I found. 62-297.310(7)3., F.A.C.:

"...In renewing an air operation permit pursuant to sub-subparagraph 62-210.300(2)(a)3.b., c., or d., F.A.C., the Department shall not require submission of emission compliance test results for any emissions unit that, during the year prior to renewal:

...b. In the case of a fuel burning emissions unit, burned liquid and/or solid fuel for a total of no more than 400 hours,"

This same rule citing is quoted in the T-V permit (1050233-022-AV, Condition A.33, pg 17 of 71).

I checked our hours for Polk 1 on fuel oil, and since the last TV permit effective date (1/1/05), we have not run over 400 hours on fuel oil for any year.

2005 - 389 hrs  
2006 - 329 hrs  
2007 - 292 hrs  
2008 - 264 hrs

The PM/PM10 limit for Polk Unit 1 references 62-297, F.A.C. PSD-FL-194, which in turn sets an hourly (30-day rolling avg) emission limit (17 lbs/hr), and the annual limit is based on 10% annual capacity factor: Load (5) \* hrs of operation <= 876 for oil. The limit does exclude background concentrations and sulfuric acid mist (which we do test for annually).

The last stack test done on Unit 1 for PM/PM10 while firing on fuel oil had a test emission average of 14.4 lbs/hr (2002).

It is my interpretation of the rule that Polk Unit 1 is not required to conduct a stack test for PM/PM10 while firing on fuel oil for T-V renewal purposes. Do you agree?

Best Sentiments,

**Joshua D. Ellwein, P.E.**  
Air Programs

3/12/2009



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**Sheplak, Scott***-file-*

**From:** Sheplak, Scott  
**Sent:** Tuesday, August 18, 2009 5:38 PM  
**To:** 'Ellwein, Joshua D.'  
**Subject:** biomass - bahia grass

Jon Holtom spoke with me this afternoon about this. This was a one-time test burn. TECO will need to submit an application for preconstruction review, an air construction (AC) permit request, for the permanent use of biomass - bahia grass. To not delay the processing of this TV permit renewal, we would not want to process such a request concurrently.

If you should have any questions, you may contact me.

Sincerely,

Scott M. Sheplak  
 DEP - Title V Section  
 Mail Station #5505  
 2600 Blair Stone Road  
 Tallahassee, FL 32399

[Scott.Sheplak@dep.state.fl.us](mailto:Scott.Sheplak@dep.state.fl.us).

Telephone 850/921-9532

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**From:** Ellwein, Joshua D. [mailto:[jdellwein@tecoenergy.com](mailto:jdellwein@tecoenergy.com)]  
**Sent:** Monday, August 17, 2009 3:03 PM  
**To:** Sheplak, Scott  
**Subject:** RE: Title V Permit Renewal for Polk Power Station - Emissions Unit Subsection III.A. Reformatting

Does that positive test (no emissions increase) result substantiate the use of biomass at Polk Power Station. Or do we have to apply for a AC to burn biomass at Polk, and then roll that into the TV permit? If so, can we do all of that during this TV renewal?

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**Joshua Ellwein, P.E. | EH&S - Air Programs** | Tampa Electric Company  
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8/19/2009

**From:** Sheplak, Scott [mailto:Scott.Sheplak@dep.state.fl.us]  
**Sent:** Monday, August 17, 2009 2:57 PM  
**To:** Ellwein, Joshua D.  
**Cc:** Burrows, Byron T.; Tom Davis; Holtom, Jonathan  
**Subject:** RE: Title V Permit Renewal for Polk Power Station - Emissions Unit Subsection III.A. Reformatting

Thank you for pointing out this biomass project. I did find the biomass project you reference below (a copy is attached). This was a temporary authorization (test burn) of biomass - bahia grass. This test burn expired on April 30, 2004 (see the 2nd paragraph on page 1 and condition number 9.). I do not think this test burn authorized the permanent use of biomass at the Polk Power Station.

*The Department of Environmental Protection values your feedback as a customer. DEP Secretary Michael W. Sole is committed to continuously assessing and improving the level and quality of services provided to you. Please take a few minutes to comment on the quality of service you received. Simply click on [this link to the DEP Customer Survey](#). Thank you in advance for completing the survey.*

**From:** Ellwein, Joshua D. [mailto:jdellwein@tecoenergy.com]  
**Sent:** Friday, August 14, 2009 3:59 PM  
**To:** Sheplak, Scott  
**Cc:** Burrows, Byron T.; Tom Davis; Holtom, Jonathan  
**Subject:** RE: Title V Permit Renewal for Polk Power Station - Emissions Unit Subsection III.A. Reformatting

Scott-

Here is the information you requested:

- a. In what year did the increase in petcoke blend take place (this affects condition A.21.)?  
 The initial petcoke blend from 100% coal to 60% petcoke / 40% coal was done in 1999 (see response to "b."). Another increase in the petcoke blend to 100% for the purposes of a test burn was done via an AC in 2007 (1050233-019-AC) and construction permit for equipment modification and petcoke increase to 85% in 2008 (1050233-021-AC).
- b. In what year was petcoke originally used? Was the emissions monitoring required for the 5-year period satisfied?  
 The related conditions may now be obsolete and therefore can be removed (see conditions A.27. - A.30.).  
 The initial Title V ( 1050233-008-AV) air operation permit went final on March 19, 1999, and effective on January 1, 2000. The monitoring report was satisfied in 2006.
- c. Thank you for the response dated 07/31/2009 to my request for additional information. You mentioned that compliance with all of the terms and conditions of Permit No. 1050233-021-AC/PSD-FL-194H had not been achieved. This permit requires emissions reporting for the 5-year period beginning "the first full year in which the change occurred." In your response letter, you indicated that this emissions monitoring begins in calendar year (CY) 2009? The 5-year period would then run through CY2013. This is not clear, please clarify. This affects condition A.32. This also affects the above cited emission units.  
 The first full year of petcoke blend increase is 2009. Therefore PSD monitoring and reporting will be calendar years 2009-2013.

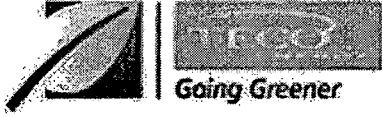
8/19/2009

I also found the AC biomass permit (1050233-013-AC). That is the basis for including up to 5% biomass in this TV. The stack test reports of the biomass AC was submitted to the Department.

Let me know if you need anything else. I appreciate all of the communications. Have a good weekend.

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**Sheplak, Scott**

-file-

**From:** Schroeder, Bill  
**Sent:** Monday, June 15, 2009 4:31 PM  
**To:** Sheplak, Scott  
**Cc:** Henry, Danielle D.  
**Subject:** TECO Polk Power 1050233

Hi Scott:

The review of compliance status you requested.....

Unresolved Citizen Complaints: None  
 Ongoing Enforcement Case(s): None  
 Pending Enforcement Case(s): Yes. See Below  
 Annual Operating Reports Submitted: Yes  
 Statements of Compliance Submitted: Yes  
 Compliance Test/RATA Results In Compliance: Yes, except as below  
 Overdue Compliance Tests/RATAs: None  
 Quarterly Monitor Linearity Audits Performed: Yes. However, data for this calendar year not available due to EDR software change.  
 Quarterly Excess Emissions Reports Submitted: Yes  
 Semiannual Reports Submitted: Yes  
 CAM Excursions Reported: None  
 Annual Inspection Results In Compliance: Yes

Comments:

The two items below were referred for enforcement:

1. The emissions testing of Combustion Turbine 1 (EU 001), completed on December 15, 2008, indicated that the emissions of volatile organic compounds (VOC) exceeded the allowable per Specific Condition A.5. in Permit No. 1050233-016-AV. A repeat of this emissions testing, which was completed on January 15, 2009, indicated that VOC emissions continue to be above permit limits. (TECO had theorized that sampling equipment contamination was at fault; However, analysis of a field blank disproved this.) Final VOC testing, conducted (after an extended plant outage) on April 16, 2009, provided passing results.
2. The emissions testing of the Sulfuric Acid Plant (EU 004), completed on December 10, 2008, indicated that the emissions of sulfuric acid mist (SAM) exceeded the allowable per Specific Condition C.7. in Permit No. 1050233-016-AV. A repeat of this emissions testing, which was completed on January 14, 2009, indicated that the SAM emissions were in compliance with the above permit.

**TEST RESULTS**

<u>EMISSION UNIT ID</u>	<u>DATE</u>	<u>SAM TEST RESULT</u>	<u>SAM ALLOWABLE</u>	<u>VOC TEST RESULT</u>	<u>VOC ALLOWABLE</u>	<u>UNITS LB/HR</u>
CT-1	12/15/2008			41	3	

6/15/2009

1/15/2009	34	3	LB/HR
4/16/2009	0.6	3	LB/HR

<b>SULFURIC ACID</b>	12/10/2008	0.2	0.15	LB SAM/TON 100% H2SO4
	1/14/2009	0.03	0.15	LB SAM/TON 100% H2SO5

If you need any additional information, give me a call.

Take Care

Bill

**William E. Schroeder**

Environmental Engineering Specialist IV  
 Florida Department of Environmental Protection  
 Southwest District  
 Division of Air Resource Management  
 Ph. (813) 632-7600 ext 113  
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Please Note: Florida has a very broad public records law. Most written communications to or from officials regarding state business are public records available to the public and media upon request. Your e-mail communications may therefore be subject to public disclosure.

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**Sheplak, Scott**

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**From:** Ellwein, Joshua D. [jdellwein@tecoenergy.com]  
**Sent:** Wednesday, July 15, 2009 4:07 PM  
**To:** Sheplak, Scott  
**Subject:** Polk Power Station - Sulfuric Acid Plant

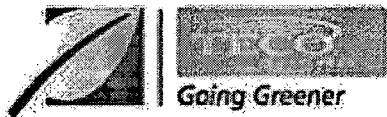
Scott-

In the request for additional information, item 5, you ask: "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."

I can provide you with general information about the catalyst, but the actual material type, size & shape is proprietary and could put TECO at a competitive disadvantage if that information was publically known. At best I can give you a general shape description (e.g. honeycomb) but cannot by any means allow the actual material type to become public domain.

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**Joshua Ellwein, P.E. | EH&S - Air Programs** | Tampa Electric Company  
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Please advise.

7/15/2009



**Sheplak, Scott**

- file -

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**From:** Sheplak, Scott  
**Sent:** Monday, September 28, 2009 1:40 PM  
**To:** 'Oquendo.Ana@epamail.epa.gov'  
**Cc:** 'Forney.Kathleen@epamail.epa.gov'  
**Subject:** Public Notice notification for Draft/Proposed project - parallell review title V permit - Tampa Electric Company, Polk Power Station

We have received proof of publication for the following project:

1050233-026-AV  
Tampa Electric Company, Polk Power Station

They published on 9/14/2009 therefore  
Day 45 = 10/29/2009 (end of the USEPA Region 4 review period)  
Day 55 = 11/08/2009 (Final permit by operation of law).

Sincerely,

Scott M. Sheplak, P.E.  
State of Florida  
Department of Environmental Protection  
Mail Station #5505  
2600 Blair Stone Road  
Tallahassee, FL 32399

850/921-9532  
[Scott.Sheplak@dep.state.fl.us](mailto:Scott.Sheplak@dep.state.fl.us)

**Sheplak, Scott**~~-file-~~

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**From:** Sheplak, Scott  
**Sent:** Wednesday, September 09, 2009 11:31 AM  
**To:** Friday, Barbara  
**Cc:** Walker, Elizabeth (AIR)  
**Subject:** FW: Title V Permit Renewal for Polk Power Station - Reformatting

This is regarding the TECO-Polk Power intent going out.

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**From:** Burrows, Byron T. [mailto:BTBurrows@tecoenergy.com]  
**Sent:** Wednesday, September 09, 2009 11:17 AM  
**To:** Sheplak, Scott; Ellwein, Joshua D.  
**Cc:** Tom Davis; Holtom, Jonathan; Sheffield, Karen A.  
**Subject:** RE: Title V Permit Renewal for Polk Power Station - Reformatting

Scott:

Per our discussion regarding Karen Sheffield being the new Responsible Official for Polk Power Station, I understand that the RO change form is waiting to be signed by Karen (who is on vacation this week). I've copied her on this email (her email address is [kasheffield@tecoenergy.com](mailto:kasheffield@tecoenergy.com)). If you need someone to acknowledge receipt of the intent to issue this week, myself or Paul Carpinone can do so as alternate RO's.

Thanks,

Byron

9/9/2009