


Florida Department of Environmental Protection

Memorandum

TO: Trina Vielhauer, Chief - Bureau of Air Regulation
FROM: Jeff Koerner, Air Permitting North Program 
DATE: October 9, 2006
SUBJECT: Draft Air Permit No. 1050233-019-AC
Tampa Electric Company, Polk Power Station
100% Petroleum Coke Trial Burn, Revised Draft Permit

Attached for your review is a revised "Intent to Issue Permit" package, including the following revised documents:

- Written Intent to Issue Permit and Public Notice Package;
- Technical Evaluation and Preliminary Determination;
- Revised Draft Permit; and
- P.E. Certification

On August 15, 2006, we issued a draft permit package authorizing a trial burn period for the plant gasify and fire up to 100% petroleum coke in the existing IGCC unit. The Department understood that the proposed coal/petroleum coke blends would continue to meet the existing permitted maximum sulfur content of 3.5% by weight. On August 28, 2006, the applicant filed an extension of time in which to file a petition on this draft permit. On September 18, 2006, the applicant provided comments indicating that the plant intends to gasify and fire coal/petroleum coke blends of up to 6% sulfur by weight during the trial period. The comments included the following additional details:

- Currently, the existing sulfuric acid plant is not fully utilized and operates at only 55% of the permitted sulfuric acid production capacity.
- Although there will be no physical changes to the scrubbing and filtration of the syngas process, any operational changes will aim at optimizing acid gas removal.
- Compliance with all other permit limits will be ensured by adjusting operation of the sulfuric acid plant and acid gas removal system as well as reducing the gasifier load if necessary.
- Additional performance testing for SAM and SO₂ emissions will demonstrate the impacts of the higher sulfur fuel blends.

The purpose of the trial period is to fully test the capabilities of existing equipment with the higher sulfur fuel blends. Information will be gathered to determine operational changes that must be implemented as well as physical changes that may be necessary for permanent firing of these fuels. The additional information provided adequately supports the request for the temporary approval of higher sulfur fuel blends during the trial period and provides reasonable assurance of compliance with the existing permit standards. Therefore, I recommend withdrawing the original draft permit package and replacing it with the attached revised draft permit package.

Attachments

P.E. CERTIFICATION STATEMENT

PERMITTEE

Tampa Electric Company
Polk Power Station
P.O. Box 111
Tampa, FL 33601

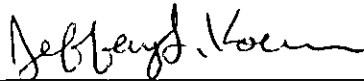
Air Permit No. 1050233-019-AC
Polk Power Station, IGCC System
Trial Burn of Up to 100% Petroleum Coke
Polk County, Florida

PROJECT DESCRIPTION

The Polk Power Station operates an existing integrated gasification and combined cycle (IGCC) system consisting of a combined cycle combustion turbine, a solid fuel handling system, a solid fuel gasification plant, and a sulfuric acid plant. Currently, the IGCC system fires syngas in the combined cycle combustion turbine produced from gasifying a blend of coal/petroleum coke with up to 60% petroleum coke and a maximum sulfur content of 3.5% by weight. The applicant proposes a temporary trial period to gasify various petroleum coke/coal blends of up to 100% petroleum coke with a maximum sulfur content of 6.0% by weight. For trial burn blends greater than 80% petroleum coke, a flux will be injected to help gasify the residual mineral matter from the petroleum coke.

The purpose of the temporary trial period is to fully test the capabilities of the existing equipment with the higher sulfur fuel blends. Information will be gathered to determine operational changes that must be implemented as well as physical changes that may be necessary for the permanent firing of these fuel blends. Aside from the higher sulfur fuel blends authorized during the trial period, the plant must comply with all other existing permit restrictions. Emissions are not expected to increase as a result of the temporary project. Emissions will be monitored by conducting stack tests and collecting continuous emissions monitoring data during each of the trial burns to determine any changes in emissions. The temporary project is not subject to PSD preconstruction review.

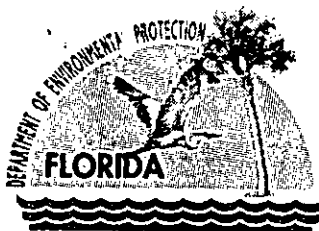
I HEREBY CERTIFY that the air pollution control engineering features described in the above referenced application and subject to the proposed permit conditions provide reasonable assurance of compliance with applicable provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 62-4 and 62-204 through 62-297. However, I have not evaluated and I do not certify aspects of the proposal outside of my area of expertise (including, but not limited to, the electrical, mechanical, structural, hydrological, geological, and meteorological features).



Jeffery F. Koerner, P.E.
Registration Number: 49441

10-9-06

(Date)



Jeb Bush
Governor

Department of Environmental Protection

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

Colleen M. Castille
Secretary

October 9, 2006

{Sent by Electronic Mail – Electronic Receipt Requested}

Mr. Mark J. Hornick, General Manager
Tampa Electric Company
Polk Power Station
P.O. Box 111
Tampa, FL 33601

Re: Revised Draft Permit No. 1050233-019-AC
Tampa Electric Company – Polk Power Station
Trial Burn of 100% Petroleum Coke on IGCC Unit 1

Dear Mr. Hornick:

On August 15, 2006, the Department issued a draft permit package regarding your request for a trial period to gasify and fire coal/petroleum coke blends with to 100% petroleum coke in the existing integrated gasification combined cycle system at the Polk Power Station. On August 28, 2006, the Department received your request for an extension of time in which to file a petition to provide sufficient time in which to resolve issues regarding the draft permit. On September 18, 2006, the Department received comments on the draft permit and additional information to support several requests. Based on your requests and additional information provided, the Department withdraws its previous intent to issue permit (dated August 15, 2006) and gives notice of its intent to issue this revised air permit to the applicant as attached. The revised package replaces the previously issued documents and includes the following revised documents: "Technical Evaluation and Preliminary Determination", "Revised Draft Permit", "Written Notice of Intent to Issue Revised Air Permit", and "Public Notice of Intent to Issue Air Permit".

The "Technical Evaluation and Preliminary Determination" summarizes the Permitting Authority's technical review of the application and provides the rationale for making the preliminary determination to issue a Draft Permit. The proposed "Draft Permit" includes the specific conditions that regulate the emissions units covered by the proposed project. The "Written Notice of Intent to Issue Air Permit" provides important information regarding: the Permitting Authority's intent to issue an air permit for the proposed project; the requirements for publishing a Public Notice of the Permitting Authority's intent to issue an air permit; the procedures for submitting comments on the Draft Permit; the process for filing a petition for an administrative hearing; and the availability of mediation. The "Public Notice of Intent to Issue Air Permit" is the actual notice that you must have published in the legal advertisement section of a newspaper of general circulation in the area affected by this project.

If you have any questions, please contact the Project Engineer, Jeff Koerner, at 850/921-9536.

Sincerely,

Trina Vielhauer, Chief
Bureau of Air Regulation

Enclosures

"More Protection, Less Process"

Printed on recycled paper.

U.S. Postal Service
CERTIFIED MAIL RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)

7000 1670 0013 3110 0819



Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	

Postmark
Here

Mr. Mark J. Hornick
General Manager
Polk Power Station
Tampa Electric Company
P.O. Box 111
Tampa, Florida 33601-0111

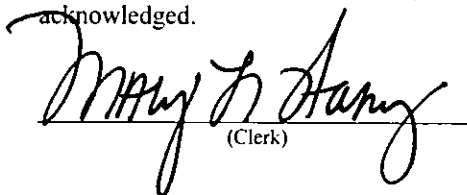
CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this revised "Notice of Intent to Issue Air Permit" package (including the revised Written Notice of Intent to Issue Air Permit, the revised Public Notice of Intent to Issue Air Permit, the revised Technical Evaluation and Preliminary Determination, and the revised Draft Permit) was sent by electronic mail before the close of business on 10/10/06 to the persons listed below.

Mr. Mark Hornick, TECO (MJHORNICK@TECOENERGY.COM)
Mr. Byron Burrows, TECO (BTBURROWS@TECOENERGY.COM)
Mr. Joshua Ellwein, TECO (JDELLWEIN@TECOENERGY.COM)
Mr. Thomas Davis, ECT (TDAVIS@ECTINC.COM)
Ms. Mara Nasca, SWD Office (MARA.NASCA@DEP.STATE.FL.US)
Mr. Gregg Worley, EPA Region 4 (WORLEY.GREGG@EPAMAIL.EPA.GOV)

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated agency clerk, receipt of which is hereby acknowledged.


(Clerk)

10/10/06
(Date)

PUBLIC NOTICE OF INTENT TO ISSUE AIR PERMIT

Florida Department of Environmental Protection
Draft Air Permit No. 1050233-019-AC
Tampa Electric Company – Polk Power Station
Polk County, Florida

Applicant: The applicant for this project is the Tampa Electric Company. The applicant's authorized representative is Mark Hornick, General Manager – Polk Power Station. The mailing address is P.O. Box 111, Tampa, FL 33601.

Facility Location: The Tampa Electric Company operates Polk Power Station, which is located 9995 State Route 37 South, in Polk County Florida.

Project: The Polk Power Station operates an existing integrated gasification and combined cycle (IGCC) system consisting of a combined cycle combustion turbine, a solid fuel handling system, a solid fuel gasification plant, and a sulfuric acid plant. Currently, the IGCC system fires syngas in the combined cycle combustion turbine produced from gasifying a blend of coal/petroleum coke with up to 60% petroleum coke and a maximum sulfur content of 3.5% by weight. The applicant proposes a temporary trial period to gasify various petroleum coke/coal blends of up to 100% petroleum coke with a maximum sulfur content of 6.0% by weight. For trial burn blends greater than 80% petroleum coke, a flux will be injected to help gasify the residual mineral matter from the petroleum coke.

The purpose of the temporary trial period is to fully test the capabilities of the existing equipment with the higher sulfur fuel blends. Information will be gathered to determine operational changes that must be implemented as well as physical changes that may be necessary for the permanent firing of these fuel blends. Aside from the higher sulfur fuel blends authorized during the trial period, the plant must comply with all other existing permit restrictions. Emissions are not expected to increase as a result of the temporary project. Emissions will be monitored by conducting stack tests and collecting continuous emissions monitoring data during each of the trial burns to determine any changes in emissions.

Permitting Authority: Applications for air construction permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4, 62-210, and 62-212 of the Florida Administrative Code (F.A.C.). The proposed project is not exempt from air permitting requirements and an air permit is required to perform the proposed work. The Bureau of Air Regulation is the Permitting Authority responsible for making a permit determination for this project. The Permitting Authority's physical address is: 111 South Magnolia Drive, Suite #4, Tallahassee, Florida. The Permitting Authority's mailing address is: 2600 Blair Stone Road, MS #5505, Tallahassee, Florida 32399-2400. The Permitting Authority's telephone number is 850/488-0114.

Project File: A complete project file is available for public inspection during the normal business hours of 8:00 a.m. to 5:00 p.m., Monday through Friday (except legal holidays), at address indicated above for the Permitting Authority. The complete project file includes the Draft Permit, the Technical Evaluation and Preliminary Determination, the application, and the information submitted by the applicant, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Permitting Authority's project review engineer for additional information at the address or phone number listed above.

Notice of Intent to Issue Air Permit: The applicant has provided reasonable assurance that operation of proposed equipment will not adversely impact air quality and that the project will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297, F.A.C. The Permitting Authority will issue a Final Permit in accordance with the conditions of the proposed Draft Permit unless a timely petition for an administrative hearing is filed under Sections 120.569 and 120.57, F.S. or unless public comment received in accordance with this notice results in a different decision or a significant change of terms or conditions.

Comments: The Permitting Authority will accept written comments concerning the proposed Draft Permit for a period of fourteen (14) days from the date of publication of this Public Notice. Written comments must be provided to the Permitting Authority at the above address. Any written comments filed will be made available for public inspection. If written comments received result in a significant change to the Draft Permit, the Permitting Authority shall revise the Draft Permit and require, if applicable, another Public Notice.

Petitions: A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed with (received by) the Department's Agency Clerk in the Office of General Counsel of the Department of Environmental Protection at 3900 Commonwealth Boulevard, Mail Station

(Public Notice to be Published in the Newspaper)

PUBLIC NOTICE OF INTENT TO ISSUE AIR PERMIT

#35, Tallahassee, Florida 32399-3000. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S. must be filed within fourteen (14) days of publication of this Public Notice or receipt of a written notice, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Permitting Authority for notice of agency action may file a petition within fourteen (14) days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the Permitting Authority's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address and telephone number of the petitioner; the name address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial rights will be affected by the agency determination; (c) A statement of how and when the petitioner received notice of the agency action or proposed action; (d) A statement of all disputed issues of material fact. If there are none, the petition must so state; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and, (g) A statement of the relief sought by the petitioner, stating precisely the action the petitioner wishes the agency to take with respect to the agency's proposed action. A petition that does not dispute the material facts upon which the Permitting Authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Permitting Authority's final action may be different from the position taken by it in this Public Notice of Intent to Issue Air Permit. Persons whose substantial interests will be affected by any such final decision of the Permitting Authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation: Mediation is not available for this proceeding.

WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT (REVISED)

*In the Matter of an
Application for Air Permit by:*

Tampa Electric Company
P.O. Box 111
Tampa, FL 33601

Authorized Representative:
Mark J. Hornick, General Manager

Air Permit No. 1050233-019-AC
Facility ID No. 1050233
Polk Power Station, IGCC System
Trial Burn of Up to 100% Petroleum Coke
Polk County, Florida

Facility Location: The Tampa Electric Company operates Polk Power Station, which is located at 9995 State Route 37 South in Polk County, Florida.

Project: The applicant proposes a temporary trial period to gasify a coal/petroleum coke blend with up to 100% petroleum coke and fire the resulting syngas in the existing integrated gasification combined cycle (IGCC) system. Details of the project are provided in the application and the enclosed "Technical Evaluation and Preliminary Determination".

Permitting Authority: Applications for air construction permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4, 62-210, and 62-212 of the Florida Administrative Code (F.A.C.). The proposed project is not exempt from air permitting requirements and an air permit is required to perform the proposed work. The Bureau of Air Regulation is the Permitting Authority responsible for making a permit determination for this project. The Permitting Authority's physical address is: 111 South Magnolia Drive, Suite #4, Tallahassee, Florida. The Permitting Authority's mailing address is: 2600 Blair Stone Road, MS #5505, Tallahassee, Florida 32399-2400. The Permitting Authority's telephone number is 850/488-0114.

Project File: A complete project file is available for public inspection during the normal business hours of 8:00 a.m. to 5:00 p.m., Monday through Friday (except legal holidays), at address indicated above for the Permitting Authority. The complete project file includes the Draft Permit, the Technical Evaluation and Preliminary Determination, the application, and the information submitted by the applicant, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Permitting Authority's project review engineer for additional information at the address or phone number listed above.

Notice of Intent to Issue Permit: For the project described above, the Permitting Authority withdraws its previous intent to issue permit (dated August 15, 2006) and gives notice of its intent to issue a revised air permit to the applicant. The applicant has provided reasonable assurance that operation of proposed equipment will not adversely impact air quality and that the project will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297, F.A.C. The Permitting Authority will issue a Final Permit in accordance with the conditions of the proposed Draft Permit unless a timely petition for an administrative hearing is filed under Sections 120.569 and 120.57, F.S. or unless public comment received in accordance with this notice results in a different decision or a significant change of terms or conditions.

Public Notice: Pursuant to Section 403.815, F.S. and Rules 62-110.106 and 62-210.350, F.A.C., you (the applicant) are required to publish at your own expense the enclosed "Public Notice of Intent to Issue Air Permit" (Public Notice). The Public Notice shall be published one time only as soon as possible in the legal advertisement section of a newspaper of general circulation in the area affected by this project. The newspaper used must meet the requirements of Sections 50.011 and 50.031, F.S. in the county where the activity is to take place. If you are uncertain that a newspaper meets these requirements, please contact the Permitting Authority at above address or phone number. Pursuant to Rule 62-110.106(5), F.A.C., the applicant shall provide proof of publication to the Permitting Authority at the above address within seven (7) days of publication. Failure to publish the notice and provide proof of publication may result in the denial of the permit pursuant to Rule 62-110.106(11), F.A.C.

Comments: The Permitting Authority will accept written comments concerning the proposed Draft Permit for a period of fourteen (14) days from the date of publication of the Public Notice. Written comments must be provided to the Permitting Authority at the above address. Any written comments filed will be made available for public inspection. If written comments received result in a significant change to the Draft Permit, the Permitting Authority shall revise the Draft Permit and require, if applicable, another Public Notice.

WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT (REVISED)

Petitions: A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed with (received by) the Department's Agency Clerk in the Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. Petitions filed by the applicant or any of the parties listed below must be filed within fourteen (14) days of receipt of this Written Notice of Intent to Issue Air Permit. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S., must be filed within fourteen (14) days of publication of the attached Public Notice or within fourteen (14) days of receipt of this Written Notice of Intent to Issue Air Permit, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Permitting Authority for notice of agency action may file a petition within fourteen (14) days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the Permitting Authority's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner; the name, address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of how and when each petitioner received notice of the agency action or proposed action; (d) A statement of all disputed issues of material fact. If there are none, the petition must so state; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and, (g) A statement of the relief sought by the petitioner, stating precisely the action the petitioner wishes the agency to take with respect to the agency's proposed action. A petition that does not dispute the material facts upon which the Permitting Authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Permitting Authority's final action may be different from the position taken by it in this Written Notice of Intent to Issue Air Permit. Persons whose substantial interests will be affected by any such final decision of the Permitting Authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation: Mediation is not available in this proceeding.

Executed in Tallahassee, Florida.



Trina Vielhauer, Chief
Bureau of Air Regulation

Harvey, Mary

From: System Administrator
To: Koerner, Jeff; Adams, Patty; Gibson, Victoria
Sent: Tuesday, October 10, 2006 12:16 PM
Subject: ~~Delivered: REVISED DRAFT PERMIT NO. 1050233-019-AC - TAMPA ELECTRIC COMPANY~~
- POLK COUNTY

Your message

To: MJHORNICK@TECOENERGY.COM; BTBURROWS@TECOENERGY.COM; JDELLWEIN@TECOENERGY.COM; TDAVIS@ECTINC.COM;
Nasca, Mara; worley.gregg@epa.gov
Cc: Koerner, Jeff; Adams, Patty; Gibson, Victoria
Subject: REVISED DRAFT PERMIT NO. 1050233-019-AC - TAMPA ELECTRIC COMPANY - POLK COUNTY
Sent: 10/10/2006 12:16 PM

was delivered to the following recipient(s):

Koerner, Jeff on 10/10/2006 12:16 PM
Adams, Patty on 10/10/2006 12:16 PM
Gibson, Victoria on 10/10/2006 12:16 PM

Harvey, Mary

From: System Administrator
To: Nasca, Mara
Sent: Tuesday, October 10, 2006 12:16 PM
Subject: Delivered:REVISED DRAFT PERMIT NO. 1050233-019-AC - TAMPA ELECTRIC COMPANY
- POLK COUNTY

Your message

To: MJHORNICK@TECOENERGY.COM; BTBURROWS@TECOENERGY.COM; JDELLWEIN@TECOENERGY.COM; TDAVIS@ECTINC.COM;
Nasca, Mara; worley.gregg@epa.gov
Cc: Koerner, Jeff; Adams, Patty; Gibson, Victoria
Subject: REVISED DRAFT PERMIT NO. 1050233-019-AC - TAMPA ELECTRIC COMPANY - POLK COUNTY
Sent: 10/10/2006 12:16 PM

was delivered to the following recipient(s):

Nasca, Mara on 10/10/2006 12:16 PM

Harvey, Mary

From: Exchange Administrator
Sent: Tuesday, October 10, 2006 12:17 PM
To: Harvey, Mary
Subject: Delivery Status Notification (Relay)

Attachments: ATT169817.txt; REVISED DRAFT PERMIT NO. 1050233-019-AC - TAMPA ELECTRIC COMPANY - POLK COUNTY



ATT169817.txt (470 B) REVISED DRAFT PERMIT NO. 10502..

This is an automatically generated Delivery Status Notification.

Your message has been successfully relayed to the following recipients, but the requested delivery status notifications may not be generated by the destination.

TDAVIS@ECTINC.COM

Harvey, Mary

From: Mailer-Daemon@ectinc.com
Sent: Tuesday, October 10, 2006 12:21 PM
To: Harvey, Mary
Subject: Confirm: 'REVISED DRAFT PERMIT NO. 1050233-019-AC - TAMPA ELECTRIC COMPANY - POLK COUNTY' received

A message which requested delivery confirmation recently arrived at this server. This server honors all delivery confirmation requests whether generated from local mail traffic or from mail received via an outside source (such as SMTP/POP).

Message-ID: <19B6D66EAAA71D479AE9408FB93EDDDD1C1AE9@tlhexsmb1.floridadep.net>
To : tdavis@ectinc.com
From : Mary.Harvey@dep.state.fl.us
Subject : REVISED DRAFT PERMIT NO. 1050233-019-AC - TAMPA ELECTRIC COMPANY - POLK COUNTY
Date : Tue, 10 Oct 2006 12:15:52 -0400

Receiving Domain: ectinc.com

Harvey, Mary

From: Nasca, Mara
To: Harvey, Mary
Sent: Tuesday, October 10, 2006 12:23 PM
Subject: Read: REVISED DRAFT PERMIT NO. 1050233-019-AC - TAMPA ELECTRIC COMPANY - POLK COUNTY

Your message

To: MJHORNICK@TECOENERGY.COM; BTBURROWS@TECOENERGY.COM; JDELLWEIN@TECOENERGY.COM; TDAVIS@ECTINC.COM; Nasca, Mara; worley.gregg@epa.gov
Cc: Koerner, Jeff; Adams, Patty; Gibson, Victoria
Subject: REVISED DRAFT PERMIT NO. 1050233-019-AC - TAMPA ELECTRIC COMPANY - POLK COUNTY
Sent: 10/10/2006 12:16 PM

was read on 10/10/2006 12:23 PM.

Harvey, Mary

From: Koerner, Jeff
To: Harvey, Mary
Sent: Tuesday, October 10, 2006 12:26 PM
Subject: Read: REVISED DRAFT PERMIT NO. 1050233-019-AC - TAMPA ELECTRIC COMPANY - POLK COUNTY

Your message

To: MJHORNICK@TECOENERGY.COM; BTBURROWS@TECOENERGY.COM; JDELLWEIN@TECOENERGY.COM; TDAVIS@ECTINC.COM; Nasca, Mara; worley.gregg@epa.gov
Cc: Koerner, Jeff; Adams, Patty; Gibson, Victoria
Subject: REVISED DRAFT PERMIT NO. 1050233-019-AC - TAMPA ELECTRIC COMPANY - POLK COUNTY
Sent: 10/10/2006 12:16 PM

was read on 10/10/2006 12:26 PM.

Harvey, Mary

From: Joshua Ellwein [jdelwein@tecoenergy.com]
Sent: Tuesday, October 10, 2006 2:00 PM
To: Harvey, Mary
Subject: Re: REVISED DRAFT PERMIT NO. 1050233-019-AC - TAMPA ELECTRICCOMPANY - POLK COUNTY

We are in receipt of this email notification.

-----Original Message-----

From: "Harvey, Mary" <Mary.Harvey@dep.state.fl.us>
To: Mara Nasca <Mara.Nasca@dep.state.fl.us> TDAVIS@ECTINC.COM worley.gregg@epa.gov Mark Hornick <mjhornick@tecoenergy.com> Joshua Ellwein <jdelwein@tecoenergy.com> Byron Burrows <btburrows@tecoenergy.com>
CC: Jeff Koerner <Jeff.Koerner@dep.state.fl.us> Patty Adams <Patty.Adams@dep.state.fl.us> Victoria Gibson <Victoria.Gibson@dep.state.fl.us> Creation Date: 10/10 12:15 pm
Subject: REVISED DRAFT PERMIT NO. 1050233-019-AC - TAMPA ELECTRIC COMPANY - POLK COUNTY

Dear Sir/Madam:

Please send a "reply" message verifying receipt of the attached document(s); this may be done by selecting "Reply" on the menu bar of your e-mail software and then selecting "Send". We must receive verification of receipt and your reply will preclude subsequent e-mail transmissions to verify receipt of the document(s).

The document(s) may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible.

The document is in Adobe Portable Document Format (pdf). Adobe Acrobat Reader can be downloaded for free at the following internet site:
<http://www.adobe.com/products/acrobat/readstep.html>.

The Bureau of Air Regulation is issuing electronic documents for permits, notices and other correspondence in lieu of hard copies through the United States Postal System, to provide greater service to the applicant and the engineering community. Please advise this office of any changes to your

e-mail address or that of the Engineer-of-Record.

I Thank you,

DEP, Bureau of Air Regulation

Harvey, Mary

From: EPA Postmaster automated message [postmaster@epamail.epa.gov]
Sent: Tuesday, October 10, 2006 12:17 PM
To: Harvey, Mary
Subject: Delivery Notification: Message successfully forwarded

Attachments: ATT169854.txt; ATT169854.txt



ATT169854.txt (796 B)



ATT169854.txt (2 KB)

This report relates to a message you sent with the following header fields:

Message-id: <19B6D66EAAA71D479AE9408FB93EDDDD1C1AE9@tlhexsmb1.floridadep.net>
Date: Tue, 10 Oct 2006 12:15:52 -0400
From: "Harvey, Mary" <Mary.Harvey@dep.state.fl.us>
To: MJHORNICK@TECOENERGY.COM, BTBURROWS@TECOENERGY.COM, JDELLWEIN@TECOENERGY.COM, TDAVIS@ECTINC.COM, "Nasca, Mara" <Mara.Nasca@dep.state.fl.us>, worley.gregg@epamail.epa.gov
Subject: REVISED DRAFT PERMIT NO. 1050233-019-AC - TAMPA ELECTRIC COMPANY - POLK COUNTY

Your message has been successfully relayed to the recipients

Recipient address: worley.gregg@mseive.epa.gov
Original address: worley.gregg@epa.gov
Reason: Message successfully relayed to a system that does not support receipts
Diagnostic code: dns;mseive02.rtp.epa.gov (TCP|134.67.208.33|3910|134.67.221.150|25) (mseive02.rtp.epa.gov ESMTTP Postfix) smtp;250 Ok
Remote system: dns;mseive02.rtp.epa.gov (TCP|134.67.208.33|3910|134.67.221.150|25) (mseive02.rtp.epa.gov ESMTTP Postfix)

on a remote system that does not support the generation of successful delivery receipts. This does NOT mean that your message has actually been placed in the recipients' mailboxes; merely that it has passed through a part of the message transport infrastructure. In the event of a nondelivery you should expect to receive a nondelivery notification; in the event of successful delivery, however, you are unlikely to receive a positive confirmation of delivery.

**REVISED TECHNICAL EVALUATION
&
PRELIMINARY DETERMINATION**

APPLICANT

Tampa Electric Company
Polk Power Station
ARMS Facility ID No. 1050233

Polk County, Florida

PROJECT

Revised Draft Permit No. 1050233-019-AC
100% Petroleum Coke Trial Burn
Integrated Combined Cycle (IGCC) Unit

PERMITTING AUTHORITY

Florida Department of Environmental Protection
Division of Air Resource Management
Bureau of Air Regulation
Air Permitting North Program



October 9, 2006

{Filename: 1050233-019-AC - TEPD}

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

1. GENERAL PROJECT INFORMATION

Facility Description and Location

The Polk Power Station is an existing electrical generating plant (SIC No. 4911) located at 9995 State Route 37 South in Polk County, Florida. The power plant consists of the following equipment: a nominal 260 MW combined cycle combustion turbine, a solid fuel handling system, a solid fuel gasification plant, a sulfuric acid plant, an auxiliary boiler, and two nominal 165 MW simple cycle gas turbines. The combined cycle combustion turbine, solid fuel handling system, solid fuel gasification plant, and sulfuric acid plant form an integrated gasification combined cycle (IGCC) system. Currently, the IGCC system fires syngas in the combined cycle combustion turbine produced from gasifying a blend of coal/petroleum coke with up to 60% petroleum coke and a maximum sulfur content of 3.5% by weight. The UTM coordinates are Zone 17, 402.45 km East, and 3067.35 km North.

Regulatory Categories

Title III: The existing facility is not a major source of hazardous air pollutants (HAP).

Title IV: The existing facility has units subject to the acid rain provisions of the Clean Air Act.

Title V: The existing facility is a Title V major source of air pollution in accordance with Chapter 213, F.A.C.

PSD: The existing facility is a PSD-major facility in accordance with Rule 62-212.400, F.A.C.

NSPS: The existing facility operates units subject to the New Source Performance Standards of 40 CFR 60.

Project Description

For the IGCC unit, the applicant proposes a temporary trial period to produce and fire syngas from a blend of coal/petroleum coke with up to 100% petroleum coke and a maximum sulfur content of up to 6.0% by weight. The purpose of the trial period is to fully test the capabilities of the existing equipment with the higher sulfur fuel blends. Information will be gathered to determine operational changes that must be implemented as well as physical changes that may be necessary for permanent firing of these fuels. Aside from the higher sulfur fuel blends authorized during the trial period, the plant must comply with all other permit restrictions. The applicant proposes the following schedule for each trial burn scenario. Each trial burn shall be completed in no more than 28 days.

Trial Burn	Coal/Petroleum Coke Fuel Blends	
	% Petroleum Coke	% Sulfur by Wt.
Trial 1	65-75	3.5 - 6.0
Trial 2	75-85	4 - 6.0
Trial 3	85-95	4 - 6.0
Trial 4	95-100	4 - 6.0

For blends with approximately 80% petroleum coke or higher, some mineral matter from the petroleum coke remains after the gasification process. This mineral matter has a much higher melting point. It does not completely melt and flow out of the gasifier under normal operating conditions. For high petroleum coke blends, a flux must be introduced into the gasifier to ensure proper and safe operation of the system. The flux has a lower melting point and melted flux will surround the

petroleum coke's unmelted mineral matter to partially dissolve and entrain it. The entrained mineral matter is now able to flow through the gasifier and exit under normal gasifier operating conditions. The flux may be any mineral matter that will melt in the gasifier under normal operating temperatures and conditions to promote flow. Examples of flux materials include sand, soil, and coal ash from conventional boilers.

Processing Schedule

- 03/02/06 Received application for a minor source air pollution construction permit;
- 03/27/06 Requested additional information;
- 07/07/06 Received additional information;
- 08/15/06 Issued initial draft permit package;
- 08/28/06 Received applicant's request for extension of time in which to file a petition; and
- 09/18/06 Received applicant's comments and additional supporting information.

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

2. APPLICABLE REGULATIONS

State Regulations

This project is subject to the applicable environmental laws specified in Section 403 of the Florida Statutes (F.S.). The Florida Statutes authorize the Department of Environmental Protection to establish rules and regulations regarding air quality as part of the Florida Administrative Code (F.A.C.). This project is subject to the applicable rules and regulations defined in the following Chapters of the Florida Administrative Code: 62-4 (Permitting Requirements); 62-204 (Ambient Air Quality Requirements, PSD Increments, and Federal Regulations Adopted by Reference); 62-210 (Permits Required, Public Notice, Reports, Stack Height Policy, Circumvention, Excess Emissions, and Forms); 62-212 (Preconstruction Review, PSD Review and BACT, and Non-attainment Area Review and LAER); 62-213 (Title V Air Operation Permits for Major Sources of Air Pollution); 62-296 (Emission Limiting Standards); and 62-297 (Test Methods and Procedures, Continuous Monitoring Specifications, and Alternate Sampling Procedures).

PSD Applicability - General

The Department regulates major air pollution sources in accordance with Florida's Prevention of Significant Deterioration (PSD) program, as approved by the EPA in Florida's State Implementation Plan and defined in Rule 62-212.400, F.A.C. A PSD review is required in areas currently in attainment with the state and federal Ambient Air Quality Standards (AAQS) or areas designated as "unclassifiable" for a given pollutant. A new facility is considered "major" with respect to PSD if it emits or has the potential to emit: 250 tons per year or more of any regulated air pollutant; or 100 tons per year or more of any regulated air pollutant and the facility belongs to one of the 28 PSD Major Facility Categories defined in Rule 62-210.200, F.A.C.; or 5 tons per year of lead.

For new projects at existing PSD-major facilities, each regulated pollutant is reviewed for PSD applicability based on emissions thresholds known as the Significant Emission Rates defined in Rule 62-210.200, F.A.C. Pollutant emissions from the project exceeding these rates are considered "significant" and the applicant must employ the Best Available Control Technology (BACT) to minimize emissions of each such pollutant and evaluate the air quality impacts. Although a facility may be "major" with respect to PSD for only one regulated pollutant, it may be required to install BACT controls for several "significant" regulated pollutants.

PSD Applicability - Project

The Polk Power Station is an existing PSD-major facility located in Polk County, which is an area that is currently in attainment with, or designated as unclassifiable for, each pollutant with a state or federal Ambient Air Quality Standard (AAQS). The applicant estimates that the project will not result in any increases in emissions from carbon monoxide (CO), nitrogen oxides (NO_x), particulate matter (PM/PM₁₀), sulfuric acid mist (SAM), sulfur dioxide (SO₂), volatile organic compounds (VOC) or any trace metals. To verify this claim the following monitoring methods will be used to determine emissions for baseline conditions and during each trial burn scenario:

- Combustion Turbine (EU-001): CO and SAM emissions will be determined by stack tests. CO emissions shall serve as a surrogate for VOC emissions. NO_x and SO₂ emissions will be determined with the existing CEMS. PM emissions are not expected to increase since the coal/petroleum coke blends will be converted to syngas. There is no current PM emissions standard, but there is a visible emissions standard. Therefore, visible emissions observations will be conducted.
- Sulfuric Acid Plant (EU-004): SAM and SO₂ emissions will be determined by stack tests. Visible emissions observations will also be conducted.
- Fuel Analysis: The sulfur content of the coal, petroleum coke, and blended fuels will be determined. Proximate and ultimate analyses will be determined for the blended fuels.
- Flux: If flux is used in the gasifier, the following shall be identified: type of flux (i.e., sand, soil, coal ash, etc.), percent of flux used per feed material, rate of flux feed, amount of flux for the given trial burn period, and composition of the flux by proximate and ultimate analyses (including mercury content).

Aside from the higher blended fuel sulfur contents, the project must comply with the existing requirements of the Title V air operation permit. The primary concern is for SAM and SO₂ emissions, due to the higher sulfur content of the petroleum coke being gasified and fired for the trial burns. Currently, the existing sulfuric acid plant is not fully utilized and operates at only 55% of the permitted sulfuric acid production capacity (77,640 tons/year of 100% sulfuric acid). Compliance will be demonstrated with the permitted production limit; however, for the trial burn, it is recognized that the actual hourly

sulfuric acid production rate may exceed the maximum hourly rate identified in the Title V permit (8.90 tons/hour of 100% sulfuric acid) due to the higher sulfur fuel blends. Although there will be no physical changes to the scrubbing and filtration of the syngas process, any operational changes will aim at optimizing acid gas removal. Compliance will be ensured by adjusting operation of the sulfuric acid plant and acid gas removal system as well as reducing the gasifier load, if necessary. Therefore, it is reasonable to conclude that the project will not result in PSD-significant emissions increases and is not subject to PSD preconstruction review.

3. DRAFT PERMIT CONDITIONS

The draft permit authorizes the requested trial burn scenarios and includes the following primary requirements.

- For a period of 12 months from issuance of this permit, the permittee is authorized to begin and complete a test program to gasify a blend of coal/petroleum coke up to 100% petroleum coke and fire the syngas in IGCC Unit 1 (EU-001).
- Upon first fire of a coal/petroleum coke blend of more than 40%/60%, the permittee shall have 210 calendar days to complete all trial burn scenarios. Testing must be completed prior to the expiration date of this permit.
- During the trial burn, the permittee is authorized to gasify a blend of coal/petroleum coke up to 100% petroleum coke. The permittee is authorized to add a flux (i.e., sand, soil, coal ash, etc.) to ensure proper operation of the gasifier.
- During the trial burn, the permittee may fire syngas produced from the blend of coal/petroleum coke up to 100% petroleum coke in IGCC Unit 1 (EU-001).
- During the trial burn, the maximum sulfur content of the coal/petroleum coke blend shall not exceed 6.0% by weight.
- Each trial burn shall be completed in no more than 28 calendar days.
- During the trial burn, the permittee is authorized to gasify and fire a blend of coal/petroleum coke up to 100% petroleum coke in addition to the currently authorized fuels.
- Baseline and trial burn emissions from the combustion turbine (EU-001) shall be determined by: stack tests for CO, SAM, VOC and visible emissions; and by CEMS for NO_x and SO₂ emissions.
- Baseline and trial burn emissions from the sulfuric acid plant (EU-004) shall be determined by stack tests for SAM, SO₂ and visible emissions.
- The composition of coal, petroleum coke, and blended fuels gasified (including sulfur contents) shall be determined by proximate and ultimate analyses.
- If flux is used in the gasifier, identify the type of flux (i.e., sand, soil, coal ash, etc.), percent of flux used per feed material, the rate of flux feed, the amount of flux for the given trial burn period, and the composition of the flux by proximate and ultimate analyses (including mercury content).
- Unless otherwise specified by this temporary permit, the permittee shall comply with all specific conditions of the current Title V air operation permit during the trial burn. The trial burn shall cease as soon as possible if the plant is unable to comply with any of the Title V permit conditions due to the trial burn.
- Provide proper notifications and stack test reports.
- Provide a final report summarizing the trial burn project.

4. PRELIMINARY DETERMINATION

The Department makes a preliminary determination that the proposed, temporary project will comply with all applicable state and federal air pollution regulations as conditioned by the draft permit. This determination is based on a technical review of the complete application, reasonable assurances provided by the applicant, and the conditions specified in the draft permit. No air quality modeling analysis is required because the project does not result in a significant increase in emissions. Jeff Koerner is the project engineer responsible for reviewing the application and drafting the permit. Additional details of this analysis may be obtained by contacting the project engineer at the Department's Bureau of Air Regulation at Mail Station #5505, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400.

PERMITTEE:

Tampa Electric Company
P.O. Box 111
Tampa, FL 33601

Authorized Representative:

Mark J. Hornick, General Manager

Air Permit No. 1050233-019-AC Polk Power Station Facility ID No. 1050233 SIC No. 4911 Permit Expires: <i>{1 year from issuance}</i>

PROJECT AND LOCATION

This permit authorizes a temporary trial period to gasify up to 100% petroleum coke with up to 6% sulfur by weight and fire the resulting syngas in the existing integrated gasification combined cycle (IGCC) system at the Polk Power Station, which is located at 9995 State Route 37 South in Polk County, Florida.

STATEMENT OF BASIS

This air pollution construction permit is issued under the provisions of Chapter 403 of the Florida Statutes (F.S.), and Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297 of the Florida Administrative Code (F.A.C.) and Title 40, Part 60 of the Code of Federal Regulations. The permittee is authorized to install the proposed equipment in accordance with the conditions of this permit and as described in the application, approved drawings, plans, and other documents on file with the Department.

CONTENTS

- Section 1. General Information
- Section 2. Administrative Requirements
- Section 3. Emissions Units Specific Conditions
- Section 4. Appendices

(DRAFT)

Joseph Kahn, P.E., Director
Division of Air Resource Management

(Date)

DRAFT PERMIT

SECTION 1. GENERAL REQUIREMENTS

FACILITY AND PROJECT DESCRIPTION

The Polk Power Station is an existing electrical generating plant consisting of the following equipment: a nominal 260 MW combined cycle combustion turbine (Unit 1), a solid fuel handling system, a solid fuel gasification plant, a sulfuric acid plant, an auxiliary boiler, and two nominal 165 MW simple cycle gas turbines (Units 2 and 3). The combined cycle combustion turbine, solid fuel handling system, solid fuel gasification plant, and sulfuric acid plant form an integrated gasification combined cycle (IGCC) system. Currently, the IGCC system fires syngas in the combined cycle combustion turbine produced from gasifying a blend of coal/petroleum coke with up to 60% petroleum coke and a maximum sulfur content of 3.5% by weight.

This draft permit authorizes a temporary period to gasify a blend of coal/petroleum coke with up to 100% petroleum coke and a maximum sulfur content of up to 6.0% by weight and fire the syngas in the existing combustion turbine. The purpose of the trial period is to fully test the capabilities of the existing equipment with the higher sulfur fuel blends. Information will be gathered to determine operational changes that must be implemented as well as physical changes that may be necessary for the permanent firing of these fuel blends. Aside from the higher sulfur fuel blends authorized during the trial period, the plant must comply with all other existing permit restrictions. The following existing emissions units are affected by this project.

ID	Emission Unit Description
001	Unit 1 - Integrated gasification combined cycle (IGCC) combustion turbine rated at 260 MW
004	Sulfuric Acid Plant
005	Solid Fuel Handling System
006	Solid Fuel Gasification Plant

REGULATORY CLASSIFICATION

Title III: The existing facility is not a major source of hazardous air pollutants (HAP).

Title IV: The existing facility has units subject to the acid rain provisions of the Clean Air Act.

Title V: The existing facility is a Title V major source of air pollution in accordance with Chapter 213, F.A.C.

PSD: The existing facility is a PSD-major facility in accordance with Rule 62-212.400, F.A.C.

NSPS: The existing facility operates units subject to the New Source Performance Standards of 40 CFR 60.

RELEVANT DOCUMENTS

The following relevant documents are not a part of this permit, but helped form the basis for this permitting action: the permit application and additional information received to make it complete; the draft permit package including the Department's Technical Evaluation and Preliminary Determination; publication and comments; and the Department's Final Determination.

SECTION 2. ADMINISTRATIVE REQUIREMENTS

1. Permitting Authority: The Bureau of Air Regulation of the Florida Department of Environmental Protection is the Permitting Authority for this facility. The Bureau of Air Regulation's mailing address is 2600 Blair Stone Road (MS #5505), Tallahassee, Florida 32399-2400.
2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Southwest District Office at 13051 N. Telecom Parkway, Temple Terrace, FL 33637-0926.
3. Appendices: The following Appendices are attached as part of this permit: Appendix A (Citation Format); and Appendix B (General Conditions); and Appendix C (Common Conditions).
4. Applicable Regulations, Forms and Application Procedures: Unless otherwise indicated in this permit, the construction and operation of the subject emissions unit shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of: Chapter 403 of the Florida Statutes (F.S.); Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296, and 62-297 of the Florida Administrative Code (F.A.C.); and Title 40, Part 60 of the Code of Federal Regulations (CFR), adopted by reference in Rule 62-204.800, F.A.C. The terms used in this permit have specific meanings as defined in the applicable chapters of the Florida Administrative Code. The permittee shall use the applicable forms listed in Rule 62-210.900, F.A.C. and follow the application procedures in Chapter 62-4, F.A.C. Issuance of this permit does not relieve the permittee from compliance with any applicable federal, state, or local permitting or regulations. [Rules 62-204.800, 62-210.300 and 62-210.900, F.A.C.]
5. New or Additional Conditions: For good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time. [Rule 62-4.080, F.A.C.]
6. Modifications: The permittee shall notify the Compliance Authority upon commencement of construction. No emissions unit or facility subject to this permit shall be constructed or modified without obtaining an air construction permit from the Department. Such permit shall be obtained prior to beginning construction or modification. [Rules 62-210.300(1) and 62-212.300(1)(a), F.A.C.]
7. Title V Permit: This temporary permit authorizes the permittee to conduct testing and gather information. The information may later be used to support an air construction permit and Title V air operation permit revision authorizing the project on a permanent basis. [Rules 62-4.030, 62-4.050, 62-4.220, and Chapter 62-213, F.A.C.]

DRAFT

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

A. Combustion Turbine Unit 1, Sulfuric Acid Plant, and Solid Fuel Gasification Plant

This section of the permit addresses the following emissions units.

ID	Emission Unit Description
001	Unit 1 - Integrated gasification combined cycle (IGCC) combustion turbine rated at 260 MW
004	Sulfuric Acid Plant
005	Solid Fuel Handling System
006	Solid Fuel Gasification Plant

TEMPORARY TRIAL BURN

- Trial Burn Authorization:** For a period of 12 months from issuance of this permit, the permittee is authorized to begin and complete a test program to gasify a blend of coal/petroleum coke up to 100% petroleum coke and fire the syngas in the combustion turbine (EU-001). [Application No. 1050233-019-AC; Rule 62-4.070(3), F.A.C.]
- Testing Timeframe:** Upon first fire of a coal/petroleum coke blend of more than 40%/60%, the permittee shall have 210 calendar days to complete all trial burn scenarios. Testing must be completed prior to the expiration date of this permit. [Application No. 1050233-019-AC; Rule 62-4.070(3), F.A.C.]
- Solid Fuel Gasification Plant:** During the trial burn, the permittee is authorized to gasify a blend of coal/petroleum coke up to 100% petroleum coke. The permittee is authorized to add a flux (i.e., sand, soil, coal ash, etc.) to ensure proper operation of the gasifier. [Application No. 1050233-019-AC]
- Combustion Turbine:** During the trial burn, the permittee may fire syngas produced from the blend of coal/petroleum coke with up to 100% petroleum coke in combustion turbine (EU-001). [Application No. 1050233-019-AC]

EMISSIONS AND PERFORMANCE REQUIREMENTS

- Permitted Capacity:** During the trial burn, the fuel firing rates and heat input rates shall not exceed the permitted capacities specified in the current Title V air operation permit. [Application No. 1050233-019-AC; Rule 62-210.200(PTE), F.A.C.] *{Permitting Note: Condition C.1 of the current Title V permit limits sulfuric acid production to 77,640 tons/year of 100% sulfuric acid. A corresponding permitting note in Condition C.1 identifies the maximum hourly rate as 8.90 tons/hour as indicated in the application for permit. For the trial burn, it is recognized that the identified maximum hourly rate may exceed 8.90 tons/hour of 100% sulfuric acid for the higher sulfur fuel blends.}*
- Authorized Fuel:** During the trial burn, the permittee is authorized to gasify and fire a blend of coal/petroleum coke up to 100% petroleum coke in addition to the currently authorized fuels. [Application No. 1050233-019-AC; Rule 62-210.200(PTE), F.A.C.]
- Sulfur Content:** During the trial burn, the maximum sulfur content of the coal/petroleum coke blend shall not exceed 6.0% by weight. [Rules 62-4.070(3) and 62-210.200(PTE), F.A.C.]
- Permit Requirements:** Unless otherwise specified by this temporary permit, the permittee shall comply with all specific conditions of the current Title V air operation permit during the trial burn. The trial burn shall cease as soon as possible if the plant is unable to comply with any of the Title V permit conditions due to the trial burn. [Application No. 1050233-019-AC; Rule 62-4.070(3), F.A.C.]

EMISSIONS PERFORMANCE TESTING

- Testing - Baseline:** The permittee shall conduct stack tests on combustion turbine Unit 1 (EU-001) to establish representative baseline emissions for carbon monoxide (CO), sulfuric acid mist (SAM), and visible emissions. Baseline emissions of nitrogen oxides (NOx) and sulfur dioxide (SO₂) shall be determined with data from the existing continuous emissions monitoring systems (CEMS). The permittee shall conduct performance tests on the sulfuric acid plant (EU-004) to establish representative baseline emissions for SAM, SO₂ and visible emissions. Baseline testing shall be conducted while gasifying and firing a coal/petroleum coke blend and sulfur content representative of current operations. [Rule 62-4.070(3), F.A.C.]

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

A. Combustion Turbine Unit 1, Sulfuric Acid Plant, and Solid Fuel Gasification Plant

10. **Testing - Trial Burn:** The permittee shall conduct emissions and performance testing for each of the following scenarios:

Trial Burn	Coal/Petroleum Coke Fuel Blends	
	% Petroleum Coke	% Sulfur by Wt.
Trial 1	65-75	3.5 - 6.0
Trial 2	75-85	4 - 6.0
Trial 3	85-95	4 - 6.0
Trial 4	95-100	4 - 6.0

- a. Each trial burn shall be completed in no more than 28 calendar days.
- b. Fuel blends consist of coal and petroleum coke. For fuel blends with a petroleum coke content above approximately 80%, the permittee is authorized to add a flux (i.e., sand, soil, coal ash, etc.) to ensure proper operation of the gasifier. If flux is used in the gasifier, identify the type of flux, percent of flux used per feed material, the rate of flux feed, the amount of flux for the given trial burn period, and the proximate and ultimate analyses (including mercury content) of the flux.
- c. Coal will be blended with petroleum coke at varying ratios resulting in a range of blended fuel sulfur contents. The maximum sulfur content of petroleum coke and the coal/petroleum coke blends shall not exceed 6.0% by weight.
- d. An analysis of the syngas fired in the combustion turbine (EU-001) shall be conducted.
- e. For each trial burn, the permittee shall conduct emissions tests on the combustion turbine (EU-001) for CO, SAM, and visible emissions. Tests shall be conducted at permitted capacity. The existing continuous emissions monitoring systems (CEMS) shall be used to determine NOx and SO₂ emissions.
- f. During each trial burn, the permittee shall conduct emissions tests on the sulfuric acid plant (EU-004) for SAM and SO₂ emissions. Tests shall be conducted concurrently with the tests for the combustion turbine (EU-001).
- g. During each trial burn and each emissions test, the permittee shall monitor and record the following information: the ratio of coal to petroleum coke; the coal sulfur content; the petroleum coke sulfur content; the blended fuel sulfur content; heat input rate to the combustion turbine (EU-001); the sulfuric acid production rate (EU-004); and the blended fuel and petroleum coke feed rate to the solid fuel gasification plant (EU-006).

[Application No. 1050233-019-AC; Rules 62-4.070(3) and 62-297.310(7)(a)1, F.A.C.]

11. **Trial Notification:** At least 15 days prior to baseline emissions testing, the permittee shall notify the Compliance Authority of the scheduled tests in writing. At least 15 days prior to firing any coal/petroleum coke blend with a petroleum coke content of more than 60%, the permittee shall provide a schedule for the emissions and performance testing of the trial burns. The permittee shall provide the Compliance Authority with an updated schedule as necessary. Notifications shall be provided by letter, fax, or email. [Rules 62-4.070(3) and 62-297.310(7)(a)9, F.A.C.]

12. **Test Methods:** Tests shall be performed in accordance with the following reference methods as necessary.

Method	Description of Method and Comments
1-4	Traverse Points, Velocity and Flow Rate, Gas Analysis, and Moisture Content
6C	Determination of Sulfur Dioxide Emissions from Stationary Sources (Instrumental)
8, 8A, 8B, or 320	Determination of Sulfuric Acid Mist
9	Visible Emissions
10	Determination of Carbon Monoxide Emissions from Stationary Sources



SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

A. Combustion Turbine Unit 1, Sulfuric Acid Plant, and Solid Fuel Gasification Plant

The existing continuous emissions monitoring systems (CEMS) shall be used to determine the emissions whenever possible. Tests shall also be conducted in accordance with applicable requirements specified in Section 4, Appendix C of this permit. The above methods are described in 40 CFR 60, Appendix A, and adopted by reference in Rule 62-204.800, F.A.C. [Rules 62-4.070(3), 62-204.800 and 62-297.100, F.A.C.; 40 CFR 60, Appendix A]

RECORDS AND REPORTS

13. **Operational Data:** During all trial burns, the permittee shall monitor NO_x and SO₂ emissions using the continuous emissions monitoring systems (CEMS). Prior to conducting the trial burns, the permittee shall ensure that each CEMS is currently meeting all QA/QC requirements and providing valid emissions data. [Rule 62-4.070(3), F.A.C.]
14. **Stack Test Reports:** The permittee shall prepare and submit stack test reports within 45 days of completing the last emissions test required for each trial burn scenario. All reports shall be submitted to the Compliance Authority and the Permitting Authority. [Rule 62-297.310(8), F.A.C.]
15. **Final Summary Report:** Within 90 days of completing the final emissions test for the last trial burn, the permittee shall prepare and submit a report summarizing the emissions and performance of the IGCC system during the authorized trial burns for the coal/petroleum coke blends. The report shall include, but not limited to, the following information.
 - a. For each baseline emissions stack test and each emissions stack test conducted during a trial burn, identify:
 - 1) Average ratio of coal to petroleum coke being gasified;
 - 2) The fuel sulfur contents of coal, petroleum coke, and blended fuels being gasified;
 - 3) The proximate and ultimate analyses of the blended fuels being gasified;
 - 4) Amounts of coal, petroleum coke, and blended fuels being gasified;
 - 5) Analysis of syngas fired in the combustion turbine (EU-001);
 - 6) Heat input rate to the combustion turbine (EU-001) and sulfuric acid production from the sulfuric acid plant (EU-004);
 - 7) Tested emissions data for the combustion turbine (EU-001) and the sulfuric acid plant (EU-004); and
 - 8) CEMS emissions data.
 - b. For each trial burn period, identify:
 - 1) Duration in days;
 - 2) Average ratio of coal to petroleum coke being gasified;
 - 3) Sulfur contents of coal, petroleum coke, and blended fuels being gasified;
 - 4) Amounts of coal, petroleum coke, and blended fuels being gasified;
 - 5) Heat input rate to the combustion turbine (EU-001) and sulfuric acid production from the sulfuric acid plant (EU-004);
 - 6) CEMS emissions data;
 - 7) Calculated emissions from the combustion turbine (EU-001) and the sulfuric acid plant (EU-004) during the given trial burn period; and
 - 8) If flux is used in the gasifier, identify the type of flux (i.e., sand, soil, coal ash, etc.), percent of flux used per feed material, the rate of flux feed, the amount of flux for the given trial burn period, and the proximate and ultimate analyses (including mercury content) of the flux.
 - c. For the total trial burn period, identify:
 - 1) Amounts of coal, petroleum coke, and blended fuels being gasified;

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

A. Combustion Turbine Unit 1, Sulfuric Acid Plant, and Solid Fuel Gasification Plant

- 2) Heat input rate to the combustion turbine (EU-001) and sulfuric acid production from the sulfuric acid plant (EU-004);
- 3) Total calculated emissions from the combustion turbine (EU-001) and the sulfuric acid plant (EU-004);
- 4) Comparison of short term and long term baseline emissions to trial burn emissions for each unit;
- 5) Performance of flux used in the gasifier and conclusions;
- 6) Evaluation of the increased petroleum coke usage on the fuel handling system and associated process equipment and effects;
- 7) Summary of the performance of the combustion turbine (EU-001), the sulfuric acid plant (EU-004), and the gasification plant (EU-006);
- 8) Summary of any startups, shutdowns or malfunctions experienced during trial burn period;
- 9) Summary of any operational adjustments to the combustion turbine (EU-001), the sulfuric acid plant (EU-004), and/or the gasification plant (EU-006); and
- 10) Potential physical modifications that may be necessary to accommodate the increased petroleum coke blend.

[Rule 62-4.070(3), F.A.C.]

DRAFT PERMIT

SECTION 4. APPENDICES
CONTENTS

- Appendix A. Citation Formats
- Appendix B. General Conditions
- Appendix C. Common Conditions

Revised Draft - Preliminary

SECTION 4. APPENDIX A
CITATION FORMATS

The following examples illustrate the format used in the permit to identify applicable permitting actions and regulations.

REFERENCES TO PREVIOUS PERMITTING ACTIONS

Old Permit Numbers

Example: Permit No. AC50-123456 or Air Permit No. AO50-123456

Where: "AC" identifies the permit as an Air Construction Permit
"AO" identifies the permit as an Air Operation Permit
"123456" identifies the specific permit project number

New Permit Numbers

Example: Permit Nos. 099-2222-001-AC, 099-2222-001-AF, 099-2222-001-AO, or 099-2222-001-AV

Where: "099" represents the specific county ID number in which the project is located
"2222" represents the specific facility ID number
"001" identifies the specific permit project
"AC" identifies the permit as an air construction permit
"AF" identifies the permit as a minor federally enforceable state operation permit
"AO" identifies the permit as a minor source air operation permit
"AV" identifies the permit as a Title V Major Source Air Operation Permit

PSD Permit Numbers

Example: Permit No. PSD-FL-317

Where: "PSD" means issued pursuant to the Prevention of Significant Deterioration of Air Quality
"FL" means that the permit was issued by the State of Florida
"317" identifies the specific permit project

RULE CITATION FORMATS

Florida Administrative Code (F.A.C.)

Example: [Rule 62-213.205, F.A.C.]

Means: Title 62, Chapter 213, Rule 205 of the Florida Administrative Code

Code of Federal Regulations (CFR)

Example: [40 CFR 60.7]

Means: Title 40, Part 60, Section 7

SECTION 4. APPENDIX B
GENERAL CONDITIONS

The permittee shall comply with the following general conditions from Rule 62-4.160, F.A.C.

1. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.
2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.
3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey and vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit is not a waiver or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.
4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.
5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.
6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.
7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents (as may be required by law and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:
 - a. Have access to and copy and records that must be kept under the conditions of the permit;
 - b. Inspect the facility, equipment, practices, or operations regulated or required under this permit, and,
 - c. Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:
 - a. A description of and cause of non-compliance; and
 - b. The period of noncompliance, including dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by Sections 403.73 and 403.111, Florida

SECTION 4. APPENDIX B
GENERAL CONDITIONS

Statutes. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.
11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 62-4.120 and 62-730.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.
12. This permit or a copy thereof shall be kept at the work site of the permitted activity.
13. This permit also constitutes:
 - a. Determination of Best Available Control Technology (Not Applicable);
 - b. Determination of Prevention of Significant Deterioration (Not Applicable); and
 - c. Compliance with New Source Performance Standards (Not Applicable).
14. The permittee shall comply with the following:
 - a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
 - b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application or this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.
 - c. Records of monitoring information shall include:
 - 1) The date, exact place, and time of sampling or measurements;
 - 2) The person responsible for performing the sampling or measurements;
 - 3) The dates analyses were performed;
 - 4) The person responsible for performing the analyses;
 - 5) The analytical techniques or methods used; and
 - 6) The results of such analyses.
15. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

SECTION 4. APPENDIX C
COMMON CONDITIONS

Unless otherwise specified in applicable permits, the following conditions apply to all emissions units and activities at the facility.

EMISSIONS AND CONTROLS

1. **Plant Operation - Problems:** If temporarily unable to comply with any of the conditions of the permit due to breakdown of equipment or destruction by fire, wind or other cause, the permittee shall notify each Compliance Authority as soon as possible, but at least within one working day, excluding weekends and holidays. The notification shall include: pertinent information as to the cause of the problem; steps being taken to correct the problem and prevent future recurrence; and, where applicable, the owner's intent toward reconstruction of destroyed facilities. Such notification does not release the permittee from any liability for failure to comply with the conditions of this permit or the regulations. [Rule 62-4.130, F.A.C.]
2. **Circumvention:** The permittee shall not circumvent the air pollution control equipment or allow the emission of air pollutants without this equipment operating properly. [Rule 62-210.650, F.A.C.]
3. **Unconfined Particulate Emissions:** During the construction period, unconfined particulate matter emissions shall be minimized by dust suppressing techniques such as covering and/or application of water or chemicals to the affected areas, as necessary. [Rule 62-296.320(4)(c), F.A.C.]

TESTING REQUIREMENTS

4. **Required Number of Test Runs:** For mass emission limitations, a compliance test shall consist of three complete and separate determinations of the total air pollutant emission rate through the test section of the stack or duct and three complete and separate determinations of any applicable process variables corresponding to the three distinct time periods during which the stack emission rate was measured; provided, however, that three complete and separate determinations shall not be required if the process variables are not subject to variation during a compliance test, or if three determinations are not necessary in order to calculate the unit's emission rate. The three required test runs shall be completed within one consecutive five-day period. In the event that a sample is lost or one of the three runs must be discontinued because of circumstances beyond the control of the owner or operator, and a valid third run cannot be obtained within the five-day period allowed for the test, the Secretary or his or her designee may accept the results of two complete runs as proof of compliance, provided that the arithmetic mean of the two complete runs is at least 20% below the allowable emission limiting standard. [Rule 62-297.310(1), F.A.C.]
5. **Operating Rate During Testing:** Testing of emissions shall be conducted with the emissions unit operating at permitted capacity. Permitted capacity is defined as 90 to 100 percent of the maximum operation rate allowed by the permit. If it is impractical to test at permitted capacity, an emissions unit may be tested at less than the maximum permitted capacity; in this case, subsequent emissions unit operation is limited to 110 percent of the test rate until a new test is conducted. Once the unit is so limited, operation at higher capacities is allowed for no more than 15 consecutive days for the purpose of additional compliance testing to regain the authority to operate at the permitted capacity. [Rule 62-297.310(2), F.A.C.]
6. **Calculation of Emission Rate:** For each emissions performance test, the indicated emission rate or concentration shall be the arithmetic average of the emission rate or concentration determined by each of the three separate test runs unless otherwise specified in a particular test method or applicable rule. [Rule 62-297.310(3), F.A.C.]
7. **Test Procedures:** Tests shall be conducted in accordance with all applicable requirements of Chapter 62-297, F.A.C.
 - a. **Required Sampling Time.** Unless otherwise specified in the applicable rule, the required sampling time for each test run shall be no less than one hour and no greater than four hours, and the sampling time at each sampling point shall be of equal intervals of at least two minutes. The minimum observation period for a visible emissions compliance test shall be thirty (30) minutes. The observation period shall include the period during which the highest opacity can reasonably be expected to occur.
 - b. **Minimum Sample Volume.** Unless otherwise specified in the applicable rule or test method, the minimum sample volume per run shall be 25 dry standard cubic feet.
 - c. **Calibration of Sampling Equipment.** Calibration of the sampling train equipment shall be conducted in accordance with the schedule shown in Table 297.310-1, F.A.C.

[Rule 62-297.310(4), F.A.C.]

SECTION 4. APPENDIX C
COMMON CONDITIONS

8. Determination of Process Variables

- a. *Required Equipment.* The owner or operator of an emissions unit for which compliance tests are required shall install, operate, and maintain equipment or instruments necessary to determine process variables, such as process weight input or heat input, when such data are needed in conjunction with emissions data to determine the compliance of the emissions unit with applicable emission limiting standards.
- b. *Accuracy of Equipment.* Equipment or instruments used to directly or indirectly determine process variables, including devices such as belt scales, weight hoppers, flow meters, and tank scales, shall be calibrated and adjusted to indicate the true value of the parameter being measured with sufficient accuracy to allow the applicable process variable to be determined within 10% of its true value.

[Rule 62-297.310(5), F.A.C.]

9. Sampling Facilities: Sampling facilities include sampling ports, work platforms, access to work platforms, electrical power, and sampling equipment support. All stack sampling facilities must meet any Occupational Safety and Health Administration (OSHA) Safety and Health Standards described in 29 CFR Part 1910, Subparts D and E. For purposes of the temporary trial burn, the permittee may install temporary stack sampling facilities in accordance with Rule 62-297.310(6), F.A.C. [Rule 62-297.310(6), F.A.C.]

10. Test Notification: The owner or operator shall notify the Department, at least 15 days prior to the date on which each formal compliance test is to begin, of the date, time, and place of each such test, and the test contact person who will be responsible for coordinating and having such test conducted for the owner or operator. [Rule 62-297.310(7)(a)9, F.A.C.]

11. Special Compliance Tests: When the Department, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in a Department rule or in a permit issued pursuant to those rules is being violated, it shall require the owner or operator of the emissions unit to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to the Department. [Rule 62-297.310(7)(b), F.A.C.]

12. Test Reports: The owner or operator of an emissions unit for which a compliance test is required shall file a report with the Department on the results of each such test. The required test report shall be filed with the Department as soon as practical but no later than 45 days after the last sampling run of each test is completed. The test report shall provide sufficient detail on the emissions unit tested and the test procedures used to allow the Department to determine if the test was properly conducted and the test results properly computed. As a minimum, the test report, other than for an EPA or DEP Method 9 test, shall provide the following information:

1. The type, location, and designation of the emissions unit tested.
2. The facility at which the emissions unit is located.
3. The owner or operator of the emissions unit.
4. The normal type and amount of fuels used and materials processed, and the types and amounts of fuels used and material processed during each test run.
5. The means, raw data and computations used to determine the amount of fuels used and materials processed, if necessary to determine compliance with an applicable emission limiting standard.
6. The type of air pollution control devices installed on the emissions unit, their general condition, their normal operating parameters (pressure drops, total operating current and GPM scrubber water), and their operating parameters during each test run.
7. A sketch of the duct within 8 stack diameters upstream and 2 stack diameters downstream of the sampling ports, including the distance to any upstream and downstream bends or other flow disturbances.
8. The date, starting time and duration of each sampling run.
9. The test procedures used, including any alternative procedures authorized pursuant to Rule 62-297.620, F.A.C. Where optional procedures are authorized in this chapter, indicate which option was used.
10. The number of points sampled and configuration and location of the sampling plane.

SECTION 4. APPENDIX C
COMMON CONDITIONS

11. For each sampling point for each run, the dry gas meter reading, velocity head, pressure drop across the stack, temperatures, average meter temperatures and sample time per point.
12. The type, manufacturer and configuration of the sampling equipment used.
13. Data related to the required calibration of the test equipment.
14. Data on the identification, processing and weights of all filters used.
15. Data on the types and amounts of any chemical solutions used.
16. Data on the amount of pollutant collected from each sampling probe, the filters, and the impingers, are reported separately for the compliance test.
17. The names of individuals who furnished the process variable data, conducted the test, analyzed the samples and prepared the report.
18. All measured and calculated data required to be determined by each applicable test procedure for each run.
19. The detailed calculations for one run that relate the collected data to the calculated emission rate.
20. The applicable emission standard and the resulting maximum allowable emission rate for the emissions unit plus the test result in the same form and unit of measure.
21. A certification that, to the knowledge of the owner or his authorized agent, all data submitted are true and correct. When a compliance test is conducted for the Department or its agent, the person who conducts the test shall provide the certification with respect to the test procedures used. The owner or his authorized agent shall certify that all data required and provided to the person conducting the test are true and correct to his knowledge.

[Rule 62-297.310(8), F.A.C.]

RECORDS AND REPORTS

13. Records Retention: All measurements, records, and other data required by this permit shall be documented in a permanent, legible format and retained for at least five (5) years following the date on which such measurements, records, or data are recorded. Records shall be made available to the Department upon request. [Rules 62-4.160(14) and 62-213.440(1)(b)2, F.A.C.]
14. Annual Operating Report: The permittee shall submit an annual report that summarizes the actual operating rates and emissions from this facility. Annual operating reports shall be submitted to the Compliance Authority by March 1st of each year. [Rule 62-210.370(2), F.A.C.]

Adams, Patty

From: Joshua Ellwein [jdelwein@tecoenergy.com]
Sent: Tuesday, October 10, 2006 4:53 PM
To: Adams, Patty
Subject: Re: Revised Draft Permit No. 1050233-019-AC - Tampa Electric Company, Polk County

-----Original Message-----

From: "Adams, Patty" <Patty.Adams@dep.state.fl.us>
To: Mara Nasca <Mara.Nasca@dep.state.fl.us> TDAVIS@ECTINC.COM worley.gregg@epa.gov Mark Hornick <mjhornick@tecoenergy.com> Joshua Ellwein <jdelwein@tecoenergy.com> Byron Burrows <btburrows@tecoenergy.com>
CC: Jeff Koerner <Jeff.Koerner@dep.state.fl.us> Victoria Gibson <Victoria.Gibson@dep.state.fl.us> Creation Date: 10/10 4:50 pm
Subject: Revised Draft Permit No. 1050233-019-AC - Tampa Electric Company, Polk County

Dear Sir/Madam:

Please send a "reply" message verifying receipt of the attached document(s); this may be done by selecting "Reply" on the menu bar of your e-mail software and then selecting "Send". We must receive verification of receipt and your reply will preclude subsequent e-mail transmissions to verify receipt of the document(s).

The document(s) may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible.

The document is in Adobe Portable Document Format (pdf). Adobe Acrobat Reader can be downloaded for free at the following internet site:
<http://www.adobe.com/products/acrobat/readstep.html>.

The Bureau of Air Regulation is issuing electronic documents for permits, notices and other correspondence in lieu of hard copies through the United States Postal System, to provide greater service to the applicant and the engineering community. Please advise this office of any changes to your

e-mail address or that of the Engineer-of-Record.

Thank you,

DEP, Bureau of Air Regulation

Adams, Patty

From: Tom Davis [tdavis@ectinc.com]
Sent: Tuesday, October 10, 2006 5:12 PM
To: Adams, Patty
Subject: RE: Revised Draft Permit No. 1050233-019-AC - Tampa Electric Company, Polk County

From: Adams, Patty [mailto:Patty.Adams@dep.state.fl.us]
Sent: Tuesday, October 10, 2006 4:51 PM
To: MJHORNICK@TECOENERGY.COM; BTBURROWS@TECOENERGY.COM; JDELLWEIN@TECOENERGY.COM; TDAVIS@ECTINC.COM; Nasca, Mara; worley.gregg@epa.gov
Cc: Koerner, Jeff; Gibson, Victoria
Subject: Revised Draft Permit No. 1050233-019-AC - Tampa Electric Company, Polk County

Dear Sir/Madam:

Please send a "reply" message verifying receipt of the attached document(s); this may be done by selecting "Reply" on the menu bar of your e-mail software and then selecting "Send". We must receive verification of receipt and your reply will preclude subsequent e-mail transmissions to verify receipt of the document(s).

The document(s) may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible.

The document is in Adobe Portable Document Format (pdf). Adobe Acrobat Reader can be downloaded for free at the following internet site: <http://www.adobe.com/products/acrobat/readstep.html>.

The Bureau of Air Regulation is issuing electronic documents for permits, notices and other correspondence in lieu of hard copies through the United States Postal System, to provide greater service to the applicant and the engineering community. Please advise this office of any changes to your e-mail address or that of the Engineer-of-Record.

Thank you,

DEP, Bureau of Air Regulation

Adams, Patty

From: Mark Hornick [mjhornick@tecoenergy.com]
Sent: Thursday, October 12, 2006 10:31 AM
To: Adams, Patty
Subject: Re: Revised Draft Permit No. 1050233-019-AC - Tampa Electric Company, Polk County

Mark Hornick
General Manager
Polk Power Station
Tampa Electric Company
863 428-5988
mjhornick@tecoenergy.com

>>> "Adams, Patty" <Patty.Adams@dep.state.fl.us> 10/10/2006 4:50:46 PM
>>>

Dear Sir/Madam:

Please send a "reply" message verifying receipt of the attached document(s); this may be done by selecting "Reply" on the menu bar of your e-mail software and then selecting "Send". We must receive verification of receipt and your reply will preclude subsequent e-mail transmissions to verify receipt of the document(s).

The document(s) may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible.

The document is in Adobe Portable Document Format (pdf). Adobe Acrobat Reader can be downloaded for free at the following internet site:
<http://www.adobe.com/products/acrobat/readstep.html>.

The Bureau of Air Regulation is issuing electronic documents for permits, notices and other correspondence in lieu of hard copies through the United States Postal System, to provide greater service to the applicant and the engineering community. Please advise this office of any changes to your e-mail address or that of the Engineer-of-Record.

Thank you,

DEP, Bureau of Air Regulation

Adams, Patty

From: Harvey, Mary
Sent: Tuesday, October 10, 2006 12:16 PM
To: MJHORNICK@TECOENERGY.COM; BTBURROWS@TECOENERGY.COM;
JDELLWEIN@TECOENERGY.COM; TDAVIS@ECTINC.COM; Nasca, Mara; worley.gregg@epa.gov
Cc: Koerner, Jeff; Adams, Patty; Gibson, Victoria
Subject: REVISED DRAFT PERMIT NO. 1050233-019-AC - TAMPA ELECTRIC COMPANY - POLK COUNTY
Attachments: 1050233-019-AC-D.zip

Dear Sir/Madam:

Please send a "reply" message verifying receipt of the attached document(s); this may be done by selecting "Reply" on the menu bar of your e-mail software and then selecting "Send". We must receive verification of receipt and your reply will preclude subsequent e-mail transmissions to verify receipt of the document(s).

The document(s) may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible.

The document is in Adobe Portable Document Format (pdf). Adobe Acrobat Reader can be downloaded for free at the following internet site: <http://www.adobe.com/products/acrobat/readstep.html>.

The Bureau of Air Regulation is issuing electronic documents for permits, notices and other correspondence in lieu of hard copies through the United States Postal System, to provide greater service to the applicant and the engineering community. Please advise this office of any changes to your e-mail address or that of the Engineer-of-Record.

I Thank you,

DEP, Bureau of Air Regulation

Harvey, Mary

From: Byron Burrows [btburrows@tecoenergy.com]
Sent: Tuesday, October 10, 2006 6:28 PM
To: Harvey, Mary
Subject: Re: REVISED DRAFT PERMIT NO. 1050233-019-AC - TAMPA ELECTRICCOMPANY - POLK COUNTY

Document received. Thank you.
Byron Burrows
Manager, Air Programs
Ph 813.228.1282
Mob 813.230.3445
From BlackBerry

-----Original Message-----

From: "Harvey, Mary" <Mary.Harvey@dep.state.fl.us>
To: Mara Nasca <Mara.Nasca@dep.state.fl.us> TDAVIS@ECTINC.COM worley.gregg@epa.gov Mark Hornick <mjhornick@tecoenergy.com> Joshua Ellwein <jdellwein@tecoenergy.com> Byron Burrows <btburrows@tecoenergy.com>
CC: Jeff Koerner <Jeff.Koerner@dep.state.fl.us> Patty Adams <Patty.Adams@dep.state.fl.us> Victoria Gibson <Victoria.Gibson@dep.state.fl.us> Creation Date: 10/10 12:15 pm
Subject: REVISED DRAFT PERMIT NO. 1050233-019-AC - TAMPA ELECTRIC COMPANY - POLK COUNTY

Dear Sir/Madam:

Please send a "reply" message verifying receipt of the attached document(s); this may be done by selecting "Reply" on the menu bar of your e-mail software and then selecting "Send". We must receive verification of receipt and your reply will preclude subsequent e-mail transmissions to verify receipt of the document(s).

The document(s) may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible.

The document is in Adobe Portable Document Format (pdf). Adobe Acrobat Reader can be downloaded for free at the following internet site:
<http://www.adobe.com/products/acrobat/readstep.html>.

The Bureau of Air Regulation is issuing electronic documents for permits, notices and other correspondence in lieu of hard copies through the United States Postal System, to provide greater service to the applicant and the engineering community. Please advise this office of any changes to your

e-mail address or that of the Engineer-of-Record.

I Thank you,

DEP, Bureau of Air Regulation