

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION

**NOTICE OF ADMINISTRATIVELY CORRECTED TITLE V AIR OPERATION PERMIT**

In the Matter of a Request for Administrative Correction:

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

Project No.: 1050233-011-AV  
Administrative Correction to Permit No.: 1050233-001-AV  
Polk Power Station  
Polk County

Enclosed is an ADMINISTRATIVELY CORRECTED page to Title V Air Operation Permit, No.: 1050233-001-AV, for the operation of the Polk Power Station located at 9995 State Route 37 South, Mulberry, Polk County. This correction is issued pursuant to Rule 62-210.360, Florida Administrative Code (F.A.C.), and Chapter 403, Florida Statutes (F.S.). This change is made at the applicant's request dated March 28, 2002, to allow the use of open-ended trucks in addition to bottom-discharge trucks at the solid fuel handling system. This corrective action does not alter the effective dates of the existing permit.

The Department of Environmental Protection (Department) will consider the above-noted action final unless a timely petition for an administrative hearing is filed pursuant to Sections 120.569 and 120.57, F.S. Mediation under Section 120.573, F.S., will not be available for this proposed action.

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 (received) by the Agency Clerk in the Department's Office of General Counsel, MS #35, 3900 Commonwealth Boulevard, Tallahassee, Florida 32399-3000 (Telephone: 850/488-9314, Fax: 850/487-4938). Petitions filed by the permit applicant or any of the parties listed below must be filed within 14 (fourteen) days of receipt of this notice. Petitions filed by any other person must be filed within 14 (fourteen) days of receipt of this proposed action. A petitioner must 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 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 indicate;
- (e) A concise statement of the ultimate facts alleged, as well as the rules and statutes which entitle the petitioner to relief;
- (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 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 notice. 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.

In addition to the above, a person subject to regulation has a right to apply to the Department for a variance from or waiver of the requirements of particular rules, on certain conditions, under Section 120.542, F.S. The relief provided by this state statute applies only to state rules, not statutes, and not to any federal regulatory requirements. Applying for a variance or waiver does not substitute or extend the time for filing a petition for an administrative hearing or exercising any other right that a person may have in relation to the action proposed in this notice.

The application for a variance or waiver is made by filing a petition with the Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. The petition must specify the following information:

- (a) The name, address, and telephone number of the petitioner;
- (b) The name, address, and telephone number of the attorney or qualified representative of the petitioner, if any;
- (c) Each rule or portion of a rule from which a variance or waiver is requested;
- (d) The citation to the statute underlying (implemented by) the rule identified in (c) above;

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- (e) The type of action requested;
- (f) The specific facts that would justify a variance or waiver for the petitioner;
- (g) The reason why the variance or waiver would serve the purposes of the underlying statute (implemented by the rule); and,
- (h) A statement whether the variance or waiver is permanent or temporary and, if temporary, a statement of the dates showing the duration of the variance or waiver requested.

The Department will grant a variance or waiver when the petition demonstrates both that the application of the rule would create a substantial hardship or violate principles of fairness, as each of those terms is defined in Section 120.542(2), F.S., and that the purpose of the underlying statute will be or has been achieved by other means by the petitioner.

Persons subject to regulation pursuant to any federally delegated or approved air program should be aware that Florida is specifically not authorized to issue variances or waivers from any requirements of any such federally delegated or approved program. The requirements of the program remain fully enforceable by the Administrator of the United States Environmental Protection Agency and by any person under the Clean Air Act unless and until the Administrator separately approves any variance or waiver in accordance with the procedures of the federal program.

Any party to this order (permit) has the right to seek judicial review of it under Section 120.68, F.S., by the filing of a Notice of Appeal, under Rule 9.110 of the Florida Rules of Appellate Procedure, with the Clerk of the Department in the Office of General Counsel, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida, 32399-3000; and, by filing a copy of the Notice of Appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The Notice of Appeal must be filed within thirty days from the date this notice is filed with the Clerk of the permitting authority.

Executed in Tallahassee, Florida.

C. H. Fancy, P.E., Chief  
Bureau of Air Regulation

**CERTIFICATE OF SERVICE**

The undersigned duly designated deputy agency clerk hereby certifies that this NOTICE OF ADMINISTRATIVELY CORRECTED PERMIT (including the corrected page(s)) was sent by certified mail (\*) and copies were mailed by U.S. Mail before the close of business on 5/14/02 to the person(s) listed or as otherwise noted:

Mark J. Hornick\*  
Jim Cleary, DEP SWD  
U.S. EPA, Region 4 (INTERNET E-mail Memorandum)

Clerk Stamp

**FILING AND ACKNOWLEDGMENT FILED**, on this date, pursuant to §120.52(7), Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.

(Clerk) 5/14/02 (Date)

7000 0520 0020 9371 2950

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

Mr. Mark J. Hornick

Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
<b>Total Postage &amp; Fees</b>	<b>\$</b>

Postmark  
Here

Recipient's Name (Please Print Clearly) (To be completed by mailer)

Mr. Mark J. Hornick

Street, Apt. No., or PO Box No.

P. O. Box 111

City, State, ZIP+4

Tampa, Florida 33601-0111

PS Form 3800, February 2000

See Reverse for Instructions

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1. Section III. Emissions Unit(s) and Conditions.

Subsection D. This section addresses the following emissions unit(s).

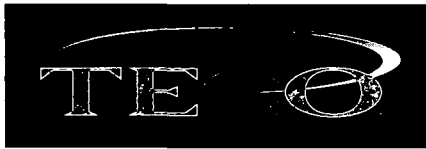
<u>E.U.</u>	<u>Brief Description</u>
<u>ID No.</u> -005	Solid Fuel Handling System

**FROM:** The solid fuel handling system consists of a bottom unloading station where water/surfactant spray is applied to the incoming fuel as needed for dust control. The system also includes enclosed conveying systems, rubber skirted drop points from bins, two fuel silos with an associated baghouse, a fuel surge bin with associated baghouse, and two rod mill crushers for slurry production.

Solid fuel is received by truck and is bottom unloaded to the fuel unloading bin. Fugitive emissions are controlled by water spray with surfactant applied at the unloading bin as needed. Fuel is conveyed via enclosed conveyor from the unloading bin to the fuel storage silos. The transfer points from the bin to the belts are rubber skirted. Fugitive emissions from the fuel silos are controlled by an associated baghouse. Fuel is then reclaimed from the silos via enclosed conveyors to the surge bin inside the slurry preparation building. Fugitive emissions from the surge bin are controlled by an associated baghouse. Fuel and water are then mixed in the rod mill crushers to produce a coal slurry.

**TO:** The solid fuel handling system consists of an unloading station where water/surfactant spray is applied to the incoming fuel as needed for dust control. The system also includes enclosed conveying systems, rubber skirted drop points from bins, two fuel silos with an associated baghouse, a fuel surge bin with associated baghouse, and two rod mill crushers for slurry production.

Solid fuel is received by truck and unloaded to the fuel unloading bin. Fugitive emissions are controlled by water spray with surfactant applied at the unloading bin as needed. Fuel is conveyed via enclosed conveyor from the unloading bin to the fuel storage silos. The transfer points from the bin to the belts are rubber skirted. Fugitive emissions from the fuel silos are controlled by an associated baghouse. Fuel is then reclaimed from the silos via enclosed conveyors to the surge bin inside the slurry preparation building. Fugitive emissions from the surge bin are controlled by an associated baghouse. Fuel and water are then mixed in the rod mill crushers to produce a coal slurry.



TAMPA ELECTRIC

RECEIVED

MAR 29 2002

BUREAU OF AIR REGULATION

March 28, 2002

Mr. Scott M. Sheplak, P.E.  
Florida Department of Environmental Protection  
Division of Air Resource Management  
111 South Magnolia Drive, Suite 4  
Tallahassee, Florida 32301

Via FedEx  
Airbill No. 7927 1516 8983

Re: Polk Power Station  
Operating Permit  
Administrative Amendment  
DEP File No. 1050233-009-AV

Project No. : 1050233-011-AV

Dear Mr. Sheplak:

Tampa Electric Company (TEC) respectfully requests an administrative amendment to the Title V operating permit (Final Permit Revision Number 1050233-008-AV, PSD-FL-194) for Polk Power Station (PPS). TEC requests amendment to Section III, Subsection D, Emission Unit 0005: Solid Fuel Handling System to allow for the use of open-end trucks in addition to the already permitted bottom-discharge trucks. This process change will allow for more operational flexibility for the materials handling system at PPS and will not increase the nature or character of emissions from this operation. Based on our review, this process change is not characterized as a modification. However, per the discussion between Laura Crouch and yourself on February 21, 2002, TEC is submitting a letter request for an administrative amendment to incorporate appropriate language into our Title V permit for PPS to specifically allow for our requested operational flexibility. The discussion indicated that permit application forms are not needed for this task. TEC wishes to begin operations according to this change as soon as possible.

**PROCESS DETAILS**

PPS currently receives solid fuel using bottom-discharge trucks that unload into the fuel unloading bin. Based on changing business conditions, PPS proposes to use both open-end and bottom-discharge trucks for coal delivery.

The use of open-end trucks is not expected to cause an increase in particulate emissions. In fact, unloading using open-end trucks has an emission factor that is considerably less than the mid-range of emission factors for bottom loading, as summarized in Table 1. PPS uses a water spray with a chemical surfactant to control particulate emissions. Thus, because of the precautions taken at PPS to reduce particulate emissions and the available emission factors for these

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operations, the use of open-end trucks in addition to bottom-discharge trucks is not expected to affect the nature and character of emissions.

**Table 1. AP-42 References to fugitive dust emissions (total suspended particulate; TSP) from process similar to those at PPS.**

Process	Emissions	Citation	Reference
Bottom-discharge truck coal unloading	0.005 to 0.066 lb/ton TSP	AP-42, Chapter 11, Section 9: Western Surface Coal Mining	July 1998, Table 11.9-4, page 10
Open-end truck coal unloading	0.007 lb/ton TSP	AP-42, Chapter 11, Section 9: Western Surface Coal Mining	July 1998, Table 11.9-4, page 11
Water spray / chemical surfactant wetting	Up to 90% reduction TSP	AP-42, Chapter 13, Section 2.4.4: Aggregate Handling and Storage Piles, Controls	January 1995, page 4

#### REGULATORY APPLICABILITY

Coal unloading activities at PPS are subject to the specific regulations and Title V permit conditions summarized in Table 2.

**Table 2. Applicable requirements for the solid fuel handling system at PPS.**

Regulation	Citation	Requirement	Comment
40 CFR 60 Subpart Y – Standards of Performance for Coal Preparation Plants	40 CFR 60.252(c)	“...shall not cause to be discharged into the atmosphere...gasses which exhibit 20 percent opacity or greater.”	Because of minimal emissions and use of water spray abatement, this process is inherently in compliance with the 20% opacity limit.
PSD Permit Specific Condition G: Fugitive dust	PSD-FL-194(G)	Method of Operation: Particulate matter emissions to be controlled by water sprays or chemical wetting agents, as necessary, to maintain opacity below 5%.	Specific Condition D.1, requested process change will not affect the applicability of this condition, nor adversely affect the ability to meet the 5% opacity limit.

<b>Regulation</b>	<b>Citation</b>	<b>Requirement</b>	<b>Comment</b>
Potential to Emit	Rule 62-210.200(203) F.A.C.	Solid fuel handling can operate continuously (i.e. 8760 hours per year)	Specific Condition D.2. Requested change does not affect potential emissions.
PSD Permit Specific Condition G: Fugitive dust	PSD-FL-194(G)	Visible emissions from solid fuel handling shall be less than or equal to 5%	Specific Condition D.3. See comment for Condition D.1.
40 CFR 60 Subpart Y – Standards of Performance for Coal Preparation Plants, and Test Methods and Procedures	40 CFR 60 254(b)(2), and 60-297.401(9) F.A.C.	EPA Method 9 is to be used for visible emissions compliance determination	Specific Condition D.4. Requested change does not affect compliance demonstration method.
PSD-FL-194 Compliance Testing	62-297.310(7) F.A.C.	Annual compliance testing for visible emissions is required	Specific Condition D.5
PSD-FL-194 Record Keeping	62-213.440 F.A.C.	Records must be maintained for 5 years	Specific Conditions D.6
PSD-FL-194 Reporting	62-213.440 F.A.C., and 62-297.310(8) F.A.C.	Test reports must be submitted to DEP within 45 days	Specific Conditions D.7

The current permit condition of 5% visible emissions is more stringent than applicable NSPS requirements of 20% visible emissions. Based on TEC's review of the applicable requirements, no changes to the specific conditions are required. The next section of this letter details TEC's proposed permit process description changes to effect this process change.

#### **REQUEST FOR ADMINISTRATIVE AMENDMENT**

TEC submits this letter as a formal request for the FDEP to administratively amend the PPS Title V permit. Per the conversation between Laura Crouch and yourself of February 21, 2002, this letter request is sufficient to process this request (i.e., permit forms are not required). TEC proposes that the following language be substituted in Section III, Subsection D, E.U. ID No. - 005 Solid Fuel Handling System:

Mr. Scott Sheplak

March 28, 2002

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**“The solid fuel handling system consists of an an ~~bottom~~ unloading station where water/surfactant spray is applied to the incoming fuel as needed for dust control.”**

**“Solid fuel is received by truck and is ~~bottom~~ unloaded to the fuel unloading bin.”**

Amending the permit to include the proposed language will allow PPS the operational flexibility to use both bottom-discharge and open-end type trucks.

### **CLOSING**

TEC appreciates the cooperation and consideration of the Department in this matter. If you have any questions or comments pertaining to this request, please direct them to Raiza Calderon at (813) 641-5261.

Sincerely,



Laura R. Crouch  
Manager- Air Programs  
Environmental Affairs

EA/gm/RC115