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BUREAU OF AIR REGULATION

March 14, 2003

Mr. Edward Svec
Florida Department of Environmental Protection
Division of Air Resource Management
111 South Magnolia Drive, Suite 4
Tallahassee, Florida 32301

Via FedEx
Airbill No. 8132 1667 4440

**Re: Tampa Electric Company
Polk Power Station
Simple Cycle Combustion Turbines Title V Modification Application
Comments to DRAFT Title V Permit
DEP File No. 1050233-012-AV**

Dear Mr. Svec:

As a follow up to the March 12, 2003 conversation addressing the DRAFT Title V Permit No. 1050233-012-AV for Polk Power Station, Tampa Electric Company (TEC) would like to submit to the Florida Department of Environmental Protection (FDEP) the following comments. This correspondence is intended to provide comments to add to the DRAFT Title V Permit as permitting notes.

TEC Comment 1

Specific Condition F.12 should reflect Condition 41 of Permit No. PSD-FL-263 and Condition F.31 of the above referenced permit. TEC has used CEMs as the primary method of compliance for nitrogen oxides (NO_x) since the initial startup of Polk Unit 2 and 3, instead of monitoring fuel consumption and the ratio of water to fuel being fired in the turbine. To maintain consistency with Specific Condition F.31, these conditions should be linked and a note should be added to state TEC intends to demonstrate compliance with all applicable NO_x limits through the use of CEMs data.

TEC Comment 2

Specific Condition F.13 should reflect Condition 41 of Permit No. PSD-FL-263 and Condition F.31 of the above referenced permit. As stated above, to maintain consistency with Specific Condition F.31 these conditions should be linked and a note should be added to state TEC intends to demonstrate compliance with all applicable NO_x limits primarily through the use of CEMs data.

TEC Comment 3

Specific Condition F.16 should be eliminated to reflect TEC intends to demonstrate compliance with all applicable NO_x limits through the use of CEMs data, or the calibration of the water/fuel monitoring device required in 40 CFR 60.335(c)(2) (1998 version) should be replaced by the 40 CFR 75 certification tests of the NO_x CEMS as stated on condition F.31.

TEC Comment 4

The last sentence of Specific Condition F.18 should reflect the new conditions of the DRAFT Title V Permit not the conditions of Construction Permit No. PSD-FL-263 as follows:

These excess emissions periods shall be reported as required in Conditions ~~25 F.10~~ and ~~26 F.38~~.

TEC Comment 5

The beginning of Specific Condition F.30 should be linked to condition F.36 and F.37 for consistency and the last sentence should reflect the new conditions of the DRAFT Title V Permit not the conditions of Construction Permit No. PSD-FL-263 and as follows:

Excess Emissions and Monitoring System Performance Reports shall be submitted as specified in 40 CFR 60.7(c). CEM monitor downtime shall be calculated and reported according to the requirements of 40 CFR 60.7(c)(3) and 40CFR 60.7(d)(2). See specific condition F.36 and F.37. Periods when NOX emissions (ppmvd @ 15% oxygen) are above the BACT standards, listed in Specific Conditions No ~~18~~ and ~~19 F.4~~, shall be reported to the DEP Southwest District within one working day (verbally) followed up by a written explanation not later than three (3) working days (alternatively by facsimile within one working day).

TEC Comment 6

Specific Condition F.31 should be linked to condition F.12, F.13, F.16, and F.34 to maintain consistency as follows:

CEMS in lieu of Water to Fuel Ratio: The NOX CEMS shall be used in lieu of the water/fuel monitoring system for reporting excess emissions in accordance with 40 CFR 60.334(c)(1), Subpart GG (1998 version). The calibration of the water/fuel monitoring device required in 40 CFR 60.335 (c)(2) (1998 version) will be replaced by the 40 CFR 75 certification tests of the NOX CEMS. See specific condition F.12, F.13, F.16, and F.34.

TEC Comment 7

Specific Condition F.34 should reflect Condition 41 of Permit No. PSD-FL-263 and Condition F.31 of the above referenced permit. As stated above, to maintain consistency with Specific Condition F.31 these conditions should be linked and a note should be added to state TEC intends to demonstrate compliance will all applicable NO_x limits primarily through the use of CEMs data.

TEC Comment 8

Specific Condition F.35 should be eliminated to reflect TEC intends to demonstrate compliance with all applicable NO_x limits through the use of CEMs data or a note should reflect that Specific Condition F.36 will be required in lieu to Specific Condition F.35.

TEC Comment 9

Specific Condition F. 36 and F. 37 should be linked to Condition F. 30 as follows:

See specific condition F.30.

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TEC Comment 10

The last sentence of Specific Condition F.38 should be linked to Condition F.4 as follows:

Following the NSPS format, 40 CFR 60.7 Subpart A, periods of startup, shutdown, malfunction, shall be monitored, recorded, and reported as excess emissions when emission levels exceed the permitted standards **listed in condition F.4.**

TEC Comment 11

Specific Condition C.14 should reflect the minimum sample volume to be 30 dry standard cubic feet not 40 dry standard cubic feet, since the Sulfuric Acid Plant is not applicable to Subpart H regulations and Martin Costello from the FDEP approved sampling at a lower volume.

TEC appreciates the opportunity to provide the additional information contained in this correspondence. If you have any questions, please call Raiza Calderon or me at (813) 641-5261.

Sincerely,



Laura R. Crouch
Manager - Air Programs
Environmental Affairs

EA/bmr/RC153

c: Mr. Jerry Kissel, FDEP SW
Mr. Scott Sheplak, FDEP