



RECEIVED

OCT 16 2012

DIVISION OF AIR  
RESOURCE MANAGEMENT

October 15, 2012

Jeff Koerner  
Florida Department of Environmental Protection  
Division of Air Resource Management  
3900 Commonwealth Blvd.  
M.S. 49  
Tallahassee, FL 32399

**Via FedEx**  
**Airbill No. 7991-9112-0030**

Ms. Danielle Henry  
Florida Department of Environmental Protection  
13051 N. Telecom Parkway  
Tampa, FL 33637

**Via Email Notification**  
**Danielle.d.Henry@dep.state.fl.us**

**Re: Tampa Electric Company**  
**Polk Power Station**  
**Permit No. 1050233 – 026 – AV**  
**Visible Emission Testing**

Dear Mr. Koerner & Ms. Henry,

Tampa Electric Company (TEC) Polk Power Station has asserted that baghouses are not required to meet the emission standards applicable to EU – 005. These baghouses are permitted to be utilized on an as-needed basis and have not ever been needed to control fugitive emissions from EU – 005. At the request of FDEP, TEC conducted visible emissions testing on the baghouses/transfer points on September 28, 2012 (notified on September 13, 2012 to FDEP Southwest District) to document that compliance can be achieved without the baghouses. A total of 8 visible emissions tests were performed, one on each baghouse exhaust (baghouse on) and one on each transfer point (baghouse off; surfactant dust suppression only). As evidenced by the enclosed test results, each of the 8 tests resulted in zero visible emissions from the respective test points. As described in 40 CFR 60 Subpart Y, Condition: 6.252(c); “On and after the date on which the performance test required to be conducted by 60.8 is completed, an owner or operator subject to the provisions of this subpart shall not cause to be discharged into the atmosphere from any coal processing and conveying equipment, coal storage system, or coal transfer and loading system processing coal, gases which exhibit 20 percent opacity or greater.” TEC hereby notifies FDEP that TEC is removing the baghouses and utilizing a non – baghouse dust suppression system, as needed. FDEP has already updated the current proposed permit to accurately reflect the future mode of operation. However, the applicable visible emission standard should be changed from 5% opacity to 20% opacity.

Mr. Jeff Koerner  
Ms. Danielle Henry  
October 15, 2012  
Page 2 of 2



Sincerely,

Lyndsey Baldyga  
Engineer – Air Programs  
Environmental Health & Safety

EHS/iym/LMB 106 Visible Emission Testing (Baghouse On/Off)

SOURCE NAME		SOURCE LOCATION		OBSERVATION DATE				START TIME		STOP TIME			
Polk Power Station		Coal transfer point		9-28-12				10:07		11:35 DST			
TYPE OF FACILITY				SEC.		SEC.							
Power Generation				MIN	0	15	30	45	MIN	0	15	30	45
DISTANCE FROM OBSERVER				1	0	0	0	0	31				
~ 10'				2	0	0	0	0	32				
SKY CONDITIONS/PLUME BACKGROUND				3	0	0	0	0	33				
Cloudy				4	0	0	0	0	34				
<p>SOURCE LAYOUT SKETCH      DRAW NORTH ARROW</p> <p>SUN →      WIND →</p>				5	0	0	0	0	35				
				6	0	0	0	0	36				
				7	0	0	0	0	37				
				8	0	0	0	0	38				
				9	0	0	0	0	39				
				10	0	0	0	0	40				
				11	0	0	0	0	41				
				12	0	0	0	0	42				
				13	0	0	0	0	43				
				AVERAGE OPACITY				14	0	0	0	0	44
0				15	0	0	0	0	45				
WIND SPEED (EST.)				16	0	0	0	0	46				
~ 1 mph				17	0	0	0	0	47				
WIND DIRECTION (EST.)				18	0	0	0	0	48				
NE				19	0	0	0	0	49				
OBSERVER'S NAME (PRINT)				20	0	0	0	0	50				
Ryan Newell				21	0	0	0	0	51				
OBSERVER'S SIGNATURE				22	0	0	0	0	52				
<i>[Signature]</i>				23	0	0	0	0	53				
DATE				24	0	0	0	0	54				
9-28-12				25	0	0	0	0	55				
COMMENT				26	0	0	0	0	56				
10:07 - 10:13, 10:41 - 10:54				27	0	0	0	0	57				
11:05 - 11:12, 11:30 - 11:35				28	0	0	0	0	58				
				29	0	0	0	0	59				
				30	0	0	0	0	60				
COPY OF VISIBLE EMISSIONS CERTIFICATION CARD													

**VISIBLE EMISSIONS EVALUATOR**

Ryan Newell

This is To Certify That The Above Named Observer Has Met The Specifications Of Federal Reference Method 9 And Qualifies As A Visible Emissions Evaluator. Certification Test Conducted By Eastern Technical Associates Of Raleigh, N.C.

NEW806214	405354
Student ID Number	Certificate Number
8/8/2012	2/7/2013
Certification Date	Certification Expiration Date
ORLANDO, FL	TMPS11
Location	Last Lecture

SOURCE NAME <b>Dolk Power Station</b>		SOURCE LOCATION <b>Coal sile transfer</b>		OBSERVATION DATE <b>9-28-12</b>		START TIME <sup>05+</sup> <b>0848</b>		STOP TIME <sup>05+</sup> <b>0958</b>	
TYPE OF FACILITY <b>Power Generation</b>		DISTANCE FROM OBSERVER <b>~ 70'</b>		SKY CONDITIONS/PLUME BACKGROUND <b>Cloudy Blue/Gray</b>		SUN POSITION SKETCH		DRAW NORTH ARROW	
SUN - O		WIND -		AVERAGE OPACITY - <b>0</b>		WIND SPEED (EST.) <b>~ 1mph</b>		WIND DIRECTION (EST.) <b>NE</b>	
OBSERVER'S NAME (PRINT) <b>Ryan Newell</b>		OBSERVER'S SIGNATURE <i>Ryan Newell</i>		DATE <b>9-28-12</b>		COMMENTS <b>848-858, 9:15-9:21, 9:44-958</b>		COPY OF VISIBLE EMISSIONS CERTIFICATION CARD	
SEC. MIN	0	15	30	45	SEC. MIN	0	15	30	45
1	0	0	0	0	31				
2	0	0	0	0	32				
3	0	0	0	0	33				
4	0	0	0	0	34				
5	0	0	0	0	35				
6	0	0	0	0	36				
7	0	0	0	0	37				
8	0	0	0	0	38				
9	0	0	0	0	39				
10	0	0	0	0	40				
11	0	0	0	0	41				
12	0	0	0	0	42				
13	0	0	0	0	43				
14	0	0	0	0	44				
15	0	0	0	0	45				
16	0	0	0	0	46				
17	0	0	0	0	47				
18	0	0	0	0	48				
19	0	0	0	0	49				
20	0	0	0	0	50				
21	0	0	0	0	51				
22	0	0	0	0	52				
23	0	0	0	0	53				
24	0	0	0	0	54				
25	0	0	0	0	55				
26	0	0	0	0	56				
27	0	0	0	0	57				
28	0	0	0	0	58				
29	0	0	0	0	59				
30	0	0	0	0	60				

**VISIBLE EMISSIONS EVALUATOR**

**Ryan Newell**

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NEW806214  
Student ID Number

405354  
Certificate Number

8/11/2012  
Certification Date

2/7/2013  
Certification Expiration Date

ORLANDO, FL  
Location

TMPS11  
Last Lecture



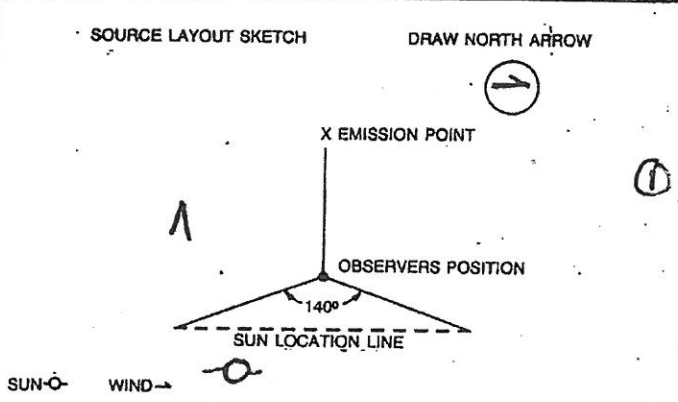
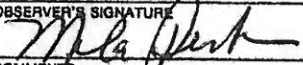
# VISIBLE EMISSION OBSERVATION

E-486 R 10/85

SOURCE NAME E.U. ID NO 005		SOURCE LOCATION FUEL SURGE BIN		OBSERVATION DATE 9/28/2012		START TIME 0851		STOP TIME 0959							
TYPE OF FACILITY IGCC-Polk		BAGHOUSE		SEC.	MIN	0	15	30	45	SEC	MIN	0	15	30	45
DISTANCE FROM OBSERVER 25'				1	0	0	0	0	0	31	0	0	0	0	0
SKY CONDITIONS/PLUME BACKGROUND WHITE WALL				2	0	0	0	0	0	32					
SOURCE LAYOUT SKETCH DRAW NORTH ARROW WHITE WALL (1) X EMISSION POINT OBSERVERS POSITION 140° SUN LOCATION LINE SUN-O WIND- (1)				3	0	0	0	0	0	33					
AVERAGE OPACITY 0				4	0	0	0	0	0	34					
WIND SPEED (EST.) 5-8 MPH		WIND DIRECTION (EST.) NE		5	0	0	0	0	0	35					
OBSERVER'S NAME (PRINT) MIKE PERKINS				6	0	0	0	0	0	36					
OBSERVER'S SIGNATURE Mike Perkins		DATE 9/28/2012		7	0	0	0	0	0	37					
COMMENTS BAGHOUSE ON COAL ON BELT (2)				8	0	0	0	0	0	38					
(1) 0851-0901				9	0	0	0	0	0	39					
(2) 0916-0923				10	0	0	0	0	0	40					
(3) 0945-0959				11	0	0	0	0	0	41					
COPY OF VISIBLE EMISSIONS CERTIFICATION CARD				12	0	0	0	0	0	42					
VISIBLE EMISSIONS EVALUATOR Mike Perkins				13	0	0	0	0	0	43					
This is To Certify That The Above Named Observer Has Met The Specifications Of Federal Reference Method 9 And Qualifies As A Visible Emissions Evaluator. Certification Test Conducted By Eastern Technical Associates Of Raleigh, N.C.				14	0	0	0	0	0	44					
PER866220 Student ID Number		405591 Certificate Number (3)		15	0	0	0	0	0	45					
8/15/2012 Certification Date		2/14/2013 Certification Expiration Date		16	0	0	0	0	0	46					
TAMPA, FL Location		TMPF08 Last Lecture		17	0	0	0	0	0	47					
				18	0	0	0	0	0	48					
				19	0	0	0	0	0	49					
				20	0	0	0	0	0	50					
				21	0	0	0	0	0	51					
				22	0	0	0	0	0	52					
				23	0	0	0	0	0	53					
				24	0	0	0	0	0	54					
				25	0	0	0	0	0	55					
				26	0	0	0	0	0	56					
				27	0	0	0	0	0	57					
				28	0	0	0	0	0	58					
				29	0	0	0	0	0	59					
				30	0	0	0	0	0	60					

**VISIBLE EMISSION OBSERVATION**

E-496 R 10/85

SOURCE NAME <b>G.U. ID NO 005</b>		SOURCE LOCATION <b>FUEL SURGE BIN</b>		OBSERVATION DATE <b>9/28/2012</b>		START TIME <b>1009</b>		STOP TIME <b>1138</b>											
TYPE OF FACILITY <b>IGCC POLK</b>		BAG HOUSE		SEC.	MIN	0	15	30	45	SEC.	MIN	0	15	30	45				
DISTANCE FROM OBSERVER <b>15'</b>										1	0	0	0	0	31	0	0	0	0
SKY CONDITIONS/PLUME BACKGROUND <b>CLOUDY SKIES</b>										2	0	0	0	0	32	0	0	0	0
SOURCE LAYOUT SKETCH DRAW NORTH ARROW 										3	0	0	0	0	33				
										4	0	0	0	0	34				
										5	0	0	0	0	35				
										6	0	0	0	0	36				
										7	0	0	0	0	37				
										8	0	0	0	0	38				
										9	0	0	0	0	39				
										10	0	0	0	0	40				
AVERAGE OPACITY <b>0</b>										11	0	0	0	0	41				
WIND SPEED (EST.) <b>10-15 MPH</b>										12	0	0	0	0	42				
WIND DIRECTION (EST.) <b>NE</b>										13	0	0	0	0	43				
OBSERVER'S NAME (PRINT) <b>MIKE PERKINS</b>										14	0	0	0	0	44				
OBSERVER'S SIGNATURE 										15	0	0	0	0	45				
DATE <b>9/28/2012</b>										16	0	0	0	0	46				
COMMENTS <b>BAG HOUSE OFF</b>										17	0	0	0	0	47				
<b>RECLAIMER BELT DROP POINT</b>										18	0	0	0	0	48				
① 1009 - 1015										19	0	0	0	0	49				
② 1041 - 1055										20	0	0	0	0	50				
③ 1126 - 1138										21	0	0	0	0	51				
COPY OF VISIBLE EMISSIONS CERTIFICATION CARD										22	0	0	0	0	52				
										23	0	0	0	0	53				
										24	0	0	0	0	54				
										25	0	0	0	0	55				
										26	0	0	0	0	56				
										27	0	0	0	0	57				
										28	0	0	0	0	58				
										29	0	0	0	0	59				
										30	0	0	0	0	60				

**VISIBLE EMISSIONS EVALUATOR**

Mike Perkins

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PER866220  
Student ID Number

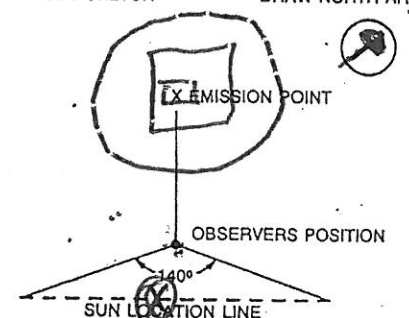

405591  
Certificate Number

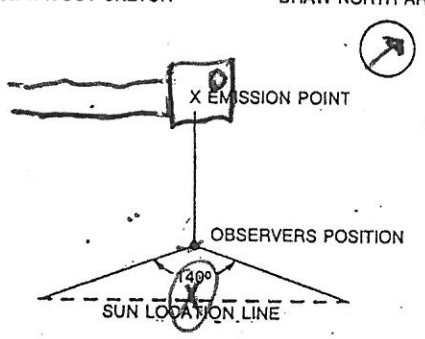
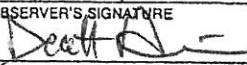
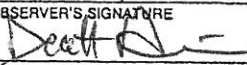
8/15/2012  
Certification Date

2/14/2013  
Certification Expiration Date

TAMPA, FL  
Location

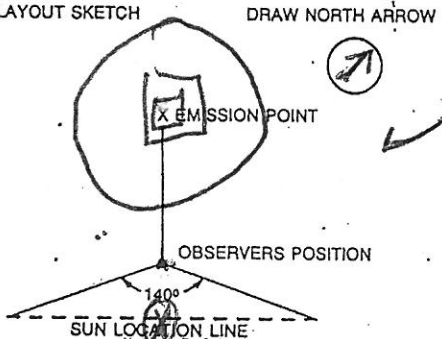

TMPF08  
Last Lecture

SOURCE NAME <i>Bag house</i>		SOURCE LOCATION <i>Dolk Power Station</i>		OBSERVATION DATE <i>09-28-2012</i>		START TIME <i>09 14</i>		STOP TIME <i>0943</i>	
TYPE OF FACILITY <i>Power plant</i>		DISTANCE FROM OBSERVER <i>~ 70'</i>		SKY CONDITIONS/PLUME BACKGROUND <i>Scattered / white - blue</i>		SOURCE LAYOUT SKETCH 		DRAW NORTH ARROW 	
AVERAGE OPACITY - <i>0%</i>		WIND SPEED (EST.) <i>3-7</i>		WIND DIRECTION (EST.) <i>NE</i>		OBSERVER'S NAME (PRINT) <i>Scott Given</i>		OBSERVER'S SIGNATURE <i>Scott Given</i>	
OBSERVER'S SIGNATURE <i>Scott Given</i>		DATE <i>09-28-2012</i>		OBSERVER'S SIGNATURE <i>Scott Given</i>		DATE <i>09-28-2012</i>		OBSERVER'S SIGNATURE <i>Scott Given</i>	
COMMENTS <i>Bag house on</i>		COMMENTS <i>① 914 - Truck unloading / 0919 Stop</i>		COMMENTS <i>② 0933 - Truck start / 0935 Stop</i>		COMMENTS <i>③ 0938 - Truck start / 0943 Stop</i>		COMMENTS <i>AD 0946 - Truck start /</i>	
COPY OF VISIBLE EMISSIONS CERTIFICATION CARD		COPY OF VISIBLE EMISSIONS CERTIFICATION CARD		COPY OF VISIBLE EMISSIONS CERTIFICATION CARD		COPY OF VISIBLE EMISSIONS CERTIFICATION CARD		COPY OF VISIBLE EMISSIONS CERTIFICATION CARD	
VISIBLE EMISSIONS EVALUATOR:  <b>Scott Given</b>		VISIBLE EMISSIONS EVALUATOR:  <b>Scott Given</b>		VISIBLE EMISSIONS EVALUATOR:  <b>Scott Given</b>		VISIBLE EMISSIONS EVALUATOR:  <b>Scott Given</b>		VISIBLE EMISSIONS EVALUATOR:  <b>Scott Given</b>	
This is To Certify That The Above Named Observer Has Met The Specifications Of Federal Reference Method 9 And Qualifies As A Visible Emissions Evaluator. Certification Test Conducted By Eastern Technical Associates Of Raleigh, N.C.		This is To Certify That The Above Named Observer Has Met The Specifications Of Federal Reference Method 9 And Qualifies As A Visible Emissions Evaluator. Certification Test Conducted By Eastern Technical Associates Of Raleigh, N.C.		This is To Certify That The Above Named Observer Has Met The Specifications Of Federal Reference Method 9 And Qualifies As A Visible Emissions Evaluator. Certification Test Conducted By Eastern Technical Associates Of Raleigh, N.C.		This is To Certify That The Above Named Observer Has Met The Specifications Of Federal Reference Method 9 And Qualifies As A Visible Emissions Evaluator. Certification Test Conducted By Eastern Technical Associates Of Raleigh, N.C.		This is To Certify That The Above Named Observer Has Met The Specifications Of Federal Reference Method 9 And Qualifies As A Visible Emissions Evaluator. Certification Test Conducted By Eastern Technical Associates Of Raleigh, N.C.	
GIV984072	405334	GIV984072	405334	GIV984072	405334	GIV984072	405334	GIV984072	405334
Student ID Number	Certificate Number	Student ID Number	Certificate Number	Student ID Number	Certificate Number	Student ID Number	Certificate Number	Student ID Number	Certificate Number
8/8/2012	2/7/2013	8/8/2012	2/7/2013	8/8/2012	2/7/2013	8/8/2012	2/7/2013	8/8/2012	2/7/2013
Certification Date	Certification Expiration Date	Certification Date	Certification Expiration Date	Certification Date	Certification Expiration Date	Certification Date	Certification Expiration Date	Certification Date	Certification Expiration Date
ORLANDO, FL	TMPF10	ORLANDO, FL	TMPF10	ORLANDO, FL	TMPF10	ORLANDO, FL	TMPF10	ORLANDO, FL	TMPF10
Location	Last Lecture	Location	Last Lecture	Location	Last Lecture	Location	Last Lecture	Location	Last Lecture

SOURCE NAME <b>Asilo - dump point</b>		SOURCE LOCATION <b>Polk Power Station</b>		OBSERVATION DATE <b>09-28-12</b>		START TIME <b>0948</b>		STOP TIME <b>1008</b>	
TYPE OF FACILITY <b>Power Plant</b>		DISTANCE FROM OBSERVER <b>~ 60'</b>		SKY CONDITIONS/PLUME BACKGROUND <b>Scattered / blue - white</b>		SOURCE LAYOUT SKETCH 		AVERAGE OPACITY - <b>0%</b>	
WIND SPEED (EST.) <b>3-7</b>		WIND DIRECTION (EST.) <b>NE</b>		OBSERVER'S NAME (PRINT) <b>Scott Given</b>		OBSERVER'S SIGNATURE 		DATE <b>09-28-12</b>	
OBSERVER'S NAME (PRINT) <b>Scott Given</b>		OBSERVER'S SIGNATURE 		DATE <b>09-28-12</b>		COMMENTS ① <b>0948 - truck start / 0956 - stop</b> ② <b>0956 - truck start / 1001 - stop</b> ③ <b>1009 - truck start / 1008 stop</b>		COPY OF VISIBLE EMISSIONS CERTIFICATION CARD	
VISIBLE EMISSIONS EVALUATOR <b>Scott Given</b>		GIV984072 Student ID Number		405334 Certificate Number		8/8/2012 Certification Date		2/7/2013 Certification Expiration Date	
ORLANDO, FL Location		TMPF10 Last Lecture		This is To Certify That The Above Named Observer Has Met The Specifications Of Federal Reference Method 9 And Qualifies As A Visible Emissions Evaluator. Certification Test Conducted By Eastern Technical Associates Of Raleigh, N.C.					

SEC.	MIN	0	15	30	45	SEC	MIN	0	15	30	45
1	0	Ø	Ø	Ø	Ø	31					
2	0	Ø	Ø	Ø	Ø	32					
3	0	Ø	Ø	Ø	Ø	33					
4	0	Ø	Ø	Ø	Ø	34					
5	0	Ø	Ø	Ø	Ø	35					
6	0	Ø	Ø	Ø	Ø	36					
7	0	Ø	Ø	Ø	Ø	37					
8	0	Ø	Ø	Ø	Ø	38					
9	0	Ø	Ø	Ø	Ø	39					
10	0	Ø	Ø	Ø	Ø	40					
11	0	Ø	Ø	Ø	Ø	41					
12	0	Ø	Ø	Ø	Ø	42					
13	0	Ø	Ø	Ø	Ø	43					
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15	0	Ø	Ø	Ø	Ø	45					
16	0	Ø	Ø	Ø	Ø	46					
17	0	Ø	Ø	Ø	Ø	47					
18	0	Ø	Ø	Ø	Ø	48					
19						49					
20						50					
21						51					
22						52					
23						53					
24						54					
25						55					
26						56					
27						57					
28						58					
29						59					
30						60					



SOURCE NAME <b>Silo B - Baghouse</b>		SOURCE LOCATION <b>Polk Power Station</b>		OBSERVATION DATE <b>09-29-12</b>		START TIME <b>10:37</b>		STOP TIME <b>11:22</b>	
TYPE OF FACILITY <b>Power plant</b>		SEC.		MIN		SEC			
DISTANCE FROM OBSERVER <b>~ 20'</b>		MIN		0		15		30	
SKY CONDITIONS/PLUME BACKGROUND <b>Scattered / blue - white</b>		MIN		45		MIN		0	
SOURCE LAYOUT SKETCH DRAW NORTH ARROW 		MIN		0		15		30	
		MIN		45		MIN		0	
SUN-O- WIND->		1		0		15		30	
AVERAGE OPACITY - <b>0%</b>		2		0		15		30	
WIND SPEED (EST.) <b>3-7</b>		3		0		15		30	
WIND DIRECTION (EST.) <b>NE</b>		4		0		15		30	
OBSERVER'S NAME (PRINT) <b>Scott Given</b>		5		0		15		30	
OBSERVER'S SIGNATURE 		6		0		15		30	
DATE <b>09-29-12</b>		7		0		15		30	
COMMENTS <b>Baghouse on</b>		8		0		15		30	
① 1037 - Truck start / stop - 1042 ② 1101 - Truck start / stop - 1104 ③ 1118 - Truck start / stop - 1122		9		0		15		30	
		10		0		15		30	
		11		0		15		30	
COPY OF VISIBLE EMISSIONS CERTIFICATION CARD		12		0		15		30	
<b>VISIBLE EMISSIONS EVALUATOR</b>		13		0		15		30	
<b>Scott Given</b>		14		0		15		30	
This is To Certify That The Above Named Observer Has Met The Specifications Of Federal Reference Method 9 And Qualifies As A Visible Emissions Evaluator. Certification Test Conducted By Eastern Technical Associates Of Raleigh, N.C.		15		0		15		30	
GIV984072	405334	16		0		15		30	
Student ID Number	Certificate Number	17		0		15		30	
8/8/2012	2/7/2013	18		0		15		30	
Certification Date	Certification Expiration Date	19		0		15		30	
ORLANDO, FL	TMPF10	20		0		15		30	
Location	Last Lecture	21		0		15		30	
		22		0		15		30	
		23		0		15		30	
		24		0		15		30	
		25		0		15		30	
		26		0		15		30	
		27		0		15		30	
		28		0		15		30	
		29		0		15		30	
		30		0		15		30	

SOURCE NAME <i>SIOB - dump point</i>		SOURCE LOCATION <i>Polk Power Station</i>		OBSERVATION DATE <i>09-28-12</i>		START TIME <i>1134</i>		STOP TIME <i>1159</i>							
TYPE OF FACILITY <i>Power plant</i>		DISTANCE FROM OBSERVER <i>~ 20'</i>		SEC.	MIN	0	15	30	45	SEC.	MIN	0	15	30	45
SKY CONDITIONS/PLUME BACKGROUND <i>Scattered / blue-white</i>		SOURCE LAYOUT SKETCH		DRAW NORTH ARROW		SUN LOCATION LINE		SUN - WIND		AVERAGE OPACITY		WIND SPEED (EST.)		WIND DIRECTION (EST.)	
								<i>0%</i>		<i>3-7</i>		<i>E</i>		OBSERVER'S NAME (PRINT)	
														OBSERVER'S SIGNATURE	
OBSERVER'S NAME (PRINT) <i>Scott Given</i>		OBSERVER'S SIGNATURE <i>Scott Given</i>		DATE <i>09-28-12</i>		COMMENTS		<i>11:36 Truck start / stop - 11:36</i> <i>1147 Truck start / stop - 1152</i> <i>1154 - Truck start / stop - 1159</i>		1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30		31 32 33 34 35 36 37 38 39 40 41 42 43 44 45 46 47 48 49 50 51 52 53 54 55 56 57 58 59 60			
COPY OF VISIBLE EMISSIONS CERTIFICATION CARD <b>VISIBLE EMISSIONS EVALUATOR:</b> <b>Scott Given</b> This Is To Certify That The Above Named Observer Has Met The Specifications Of Federal Reference Method 9 And Qualifies As A Visible Emissions Evaluator. Certification Test Conducted By Eastern Technical Associates Of Raleigh, N.C. GIV984072 Student ID Number 8/8/2012 Certification Date ORLANDO, FL Location 405334 Certificate Number 2/7/2013 Certification Expiration Date TMPF10 Last Lecture															