Florida Department of Environmental Protection

Bob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Rick Scott
Governor

Carlos Lopez-Cantera
Lt. Governor

Noah Valenstein
Secretary

NOTICE OF ADMINISTRATIVELY CORRECTED TITLE V AIR OPERATION PERMIT

In the Matter of a Request for Administrative Correction:

Mr. Ron Bishop, Director – Big Bend Station
Tampa Electric Company
P.O. BOX 111
Tampa, FL 33601-0111

Project No. 0570039-114-AV
Administrative Correction to:
Permit No. 0570039-110-AV
Hillsborough County

Enclosed are the administratively corrected pages to Title V Air Operation Permit No. 0570039-110-AV for the operation of the Big Bend Station in Hillsborough County at 13031 Wyandotte Road in Gibsonton, Florida. 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 November 30, 2017, to clarify rule references and to incorporate two process heaters (EU 051) into the Title V air operation permit. The applicant requested a modification to this request on December 4, 2017, to revise language for consistency with the PM annual testing requirements for the boilers. This corrective action does not alter the effective dates of the existing permit. A copy of this corrective action shall be kept on file at the facility with the permit being corrected and shall be incorporated into Permit No. 0570039-116-AV.

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.

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, Agency_Clerk@dep.state.fl.us, before the deadline. Petitions must be filed within 14 days of receipt of this administratively corrected permit. 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 (in a proceeding initiated by another party) 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 when and how each petitioner received notice of the agency action or proposed decision; (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 including an explanation of how the alleged facts relate to the specific rules or statutes; 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. 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.

Judicial Review: Any party to this permitting decision (order) has the right to seek judicial review of it under Section 120.68, F.S., by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel, 3900 Commonwealth Boulevard, MS 35, Tallahassee, Florida 32399-3000, Agency_Clerk@dep.state.fl.us, 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 must be filed within 30 days after this order is filed with the clerk of the Department.

Executed in Tallahassee, Florida.

David Lyle Read, P.E.
2017.12.15 13:25:33 -05'00'

For:
Syed Arif, P.E., Program Administrator
Office of Permitting and Compliance
Division of Air Resource Management

SA/dlr/lcr

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Notice of Administratively Corrected Permit or a link to these documents made available electronically on a publicly accessible server, was sent by electronic mail with received receipt requested to the persons listed below:

Mr. Ron Bishop, Tampa Electric Company: rdbishop@tecoenergy.com
Mr. Robert A. Velasco P.E., Tampa Electric Company: ravalesco@tecoenergy.com
Ms. Diana Lee, Hillsborough County Environmental Protection Commission: lee@epchc.org
EPA Region 4: R4TitleVFL@epa.gov
Ms. Lynn Scearce, DEP OPC: lynn.scearce@dep.state.fl.us

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.

2017.12.18 07:19:26 -05'00'

The following permit condition is revised as indicated. ~~Strikethrough~~ is used to denote the deletion of test Double-underlines are used to denote the addition of text. All changes are emphasized with shading.

1. Section I, Facility Information.

Applicant's Request: The regulations table is not consistent with the rules referenced in Section III, Subsections A through R.

Department's Response: The Department agrees to revise this section and shall incorporate additional corrections than those requested to Subsections B. and C. as follows:

Subsection B. Summary of Emissions Units.

Compression Ignition (CI) Internal Combustion Engines (ICE)	
043	SCCT Black-Start Emergency Diesel Engine (1,495 HP)
044	Units 3 & 4 Emergency Diesel Generator (1,046 HP)
053	Units 1 & 2 Emergency Diesel Generator (197 HP)
Process Heaters	
051	Two 6 MMBtu/hour Natural Gas-fired Process Heaters

Subsection C. Applicable Regulations.

Regulation	**EU Nos.**
Federal Rule Citations	
40 CFR 60, Subpart A, NSPS General Provisions	004, 010, 020, 021, 029, 030, 041 – 044, 046 – 048, ~~052,~~ 053
40 CFR 60, Subpart Y, NSPS Standards of Performance for Coal Preparation and Processing Plants	010, 029, 030, 046 - 048
40 CFR 60, Subpart Da, NSPS Standards of Performance for Electric Utility Steam Generating Units	004
40 CFR 60, Subpart OOO, NSPS Standards of Performance for Nonmetallic Mineral Processing Plants	020, 021
40 CFR 60, Subpart KKKK, NSPS Standards of Performance for Stationary Combustion Turbines	041, 042
40 CFR 60, Subpart IIII, NSPS Standards of Performance for Stationary CI ICE	043, 044, 053
40 CFR 63, Subpart A, NESHAP General Provisions	001 – 004~~, 020, 021~~, 043, 044, 051, 053
~~40 CFR 63, Subpart OOO, NESHAP Nonmetallic Mineral Processing Plants~~	~~020, 021~~
40 CFR 63, Subpart ZZZZ, NESHAP Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines	043, 044, 053
40 CFR 63, Subpart DDDDD, NESHAP Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters	051
40 CFR 63, Subpart UUUUU, NESHAP Coal- and Oil-Fired Electric Utility Steam Generating Units with an effective date of April 16, 2015	001 - 004
40 CFR 75, Acid Rain Monitoring Provisions	001 – 004, 041, 042
State Rule Citations	
Rule 62-212.400, F.A.C., Prevention of Significant Deterioration	004, 008, 009, 010, 012-014, ~~020, 021~~, 023, 029, 030, 050
Rule 62-296.405, F.A.C., Fossil Fuel Steam Generators, More than 250 MMBtu/Hour Heat Input	001 - 004

Regulation	EU Nos.
Rule 62-296.500, F.A.C., RACT - VOC and NO_X Emitting Facilities	032
Rule 62-296.513, F.A.C., Surface Coating of Miscellaneous Metal Parts and Products	
Rule 62-296.700, F.A.C., RACT PM (O&M Plan)	001 – 004, 048
Rule 62-296.711, F.A.C., Materials Handling, Sizing, Screening, Crushing & Grinding Operations	008, 009, 012-014~~017~~, 020-021~~023~~, 029, 030, ~~039,~~ 048, 050

2. Section III, Subsection A. Emissions Unit 001 – 003

2.1. *Applicant's Request*: Units 1 to 3 received a BACT limitation of 0.03 lb/MMBtu pursuant to the former Consent Decree. As such, these units should no longer be subject to the PM RACT in accordance with Rule 62-296.700(1)(a) F.A.C. Therefore, the PM RACT O&M plan contained in the Title V appendices and references in Sections I and III should be deleted. The PM limitation of 0.1 lb/MMBtu was previously removed from Units 1 to 3 in Permit No. 0570039-083-AV. Please confirm the correct rule applicability and reference.

Department's Response: The applicant's request to alter the PM RACT applicability cannot be processed through an administrative correction. In addition, the Consent Decree formally defined BACT Analysis as follows:

"BACT Analysis shall mean the technical study, analysis, review, and selection of recommendations typically performed in connection with an application for a PSD permit. Except as otherwise provided in this Consent Decree, such study, analysis, review, and selection of recommendations shall be carried out in conformance with applicable federal and state regulations and guidance describing the process and analysis for determining Best Available Control Technology (BACT)."

The Consent Decree established BACT limits and requirements using the same process and analysis in determining the maximum degree of reduction of PM emissions. However, pursuant to Rule 62-296.700(1)(a), F.A.C., **a permit must be received in connection with Rule 62-212.400, F.A.C.**, to limit the emission of PM in order to escape applicability from the referenced RACT rules. Therefore, the applicable requirements of the RACT Rules 62-296.405(1)(b) and 62-296.702, F.A.C., apply to Units 1 – 4. Rule 62-296.405(1)(b), F.A.C. establishes a PM limit of 0.1 lb/MMBtu and will be incorporated back into the Title V air operation Permit No. 0570039-116-AV. Compliance with the 0.03 lb/MMBtu PM limit will demonstrate compliance with the 0.1 lb/MMBtu limit. Therefore, the Department will not remove the applicable requirements for the PM RACT O&M plan.

2.2. *Applicant's Request*: Specific Condition **A.2.** specifies the heat input method contained in Specific Condition **A.32.** (Operational Records). Should this condition reference Specific Condition **A.31.** (Determination of Heat Input)? Please confirm the correct reference.

Department's Response: The Department agrees with the reference to Specific Condition **A.31**. Therefore, Specific Condition **A.2.** is changed as follows:

A.2. Emissions Unit Operating Rate Limitation during Testing. Testing of emissions shall be conducted with the emissions unit operating at or above 90% of the design capacity specified in this permit. The values above represent design values which, in some cases, may be exceeded as the unit is operated at full load for stack testing. The heat input values are to be measured during stack testing to within +/- 10% of its true value using the methods/procedures contained in Specific Condition ~~**A.32**~~**A.31**. If it is impracticable to test at this rate, an emissions unit may be tested at less than 90% of the design capacity; in this case, subsequent emissions unit operation is limited to 110% 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 design capacity. See

the related testing provisions in Appendix TR, Facility-wide Testing Requirements. [Rules 62-297.310(3) and 62-213.440, F.A.C.]

2.3. *Applicant's Request*: Specific Condition **A.4.e.** (Control Device Operation) is in conflict with Specific Condition **A.4.f.** (FGD and ESP Operating Exemption). Please confirm the clarification.

Department's Response: For clarification purposes, the Department shall revise Specific Condition **A.4.e.** as follows:

e. *Control Device Operation*. All air pollution control devices shall be in operation according to manufacturer's recommendations whenever the boilers are in operation, except as specified in Condition **A.4.f.** Note: under current permitted ductwork configuration, the air pollution control devices cannot be physically bypassed. In the event of a control device malfunction resulting in excess emissions beyond the allowable periods established for these units, the associated boiler shall be removed from service until such time that the control device resumes normal operation.

2.4. *Applicant's Request*: The permit states the Specific Conditions **A.9** – **A.14** are based on the specified average time of the applicable test method. Should the permit reference **A.9** – **A.15** and include the mercury in Condition **A.15**? Please confirm the correct reference.

Department's Response: The Department agrees and revises the introductory paragraph to the emission limitations and standards to Subsection A as follows:

Unless otherwise specified, the averaging times for Specific Conditions **A.9 – ~~A.14~~A.15** are based on the specified averaging time of the applicable test method.

2.5. *Applicant's Request*: The MATS rule for HCl specifies 2.0E-3 lb/MMBtu or 2.0E-2 lb/MWh. Specific Conditions **A.10.a.** and **A.14.** state 0.002 lb/MMBtu or 0.02 lb/MWh. Should the limits be 0.0020 lb/MMBtu or 0.020 lb/MWh?

Department's Response: The Department agrees and revises Specific Conditions **A.10.a.** and **A.14.** as follows:

A.10. SO_2 Emissions.

a. As determined by CEMS, SO_2 emissions not exceed 0.20 lb/MMBtu or 1.5 pound per megawatt hour (lb/MWh) from each unit based on a 30-day rolling average; or, hydrogen chloride (HCl) emissions of 0.0020 lb/MMBtu or 0.020 lb/MWh from each unit based on a 30-day rolling average.

A.14. HCl or SO_2 Emissions. HCl emissions shall not exceed .0020 lb/MMBtu or 0.020 lb/MWh from each unit based on a 30-day rolling average; or, SO_2 emissions of 0.20 lb/MMBtu or 1.5 lb/MWh from each unit based on a 30-day rolling average. [NESHAP Subpart UUUUU of 40 CFR 63]

3. Section III, Subsection B. Emissions Unit 004

3.1. *Applicant's Request*: Specific Condition **B.2.** specifies the heat input method contained in Specific Condition **B.33** (Hg Compliance). Should this condition reference Specific Condition **B.32** (Determination of Heat Input)? Please confirm the correct reference.

Department's Response: The Department agrees and revises Specific Condition **B.2.** as follows:

B.2. Emissions Unit Operating Rate Limitation during Testing. Testing of emissions shall be conducted with the emissions unit operating at or above 90% of the design capacity specified in this permit. The values above represent design values which, in some cases, may be exceeded as the unit is operated at full load for stack testing. The heat input values are to be measured during stack testing to within +/- 10% of its true value using the methods/procedures contained in Specific Condition **~~B.33~~B.32**. If it is impracticable to test at this rate, an emissions unit may be tested at less than 90% of the design capacity; in this case, subsequent emissions unit operation is limited to 110% 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 design

capacity. See the related testing provisions in Appendix TR, Facility-wide Testing Requirements. [Rules 62-297.310(3) and 62-213.440, F.A.C.]

3.2. *Applicant's Request*: Specific Condition **B.4.e.** (Control Device Operation) is in conflict with Specific Condition **B.4.f.** (FGD and ESP Operating Exemption). Please confirm the clarification.

Department's Response: For clarification purposes, the Department shall revise Specific Condition **B.4.e.** as follows:

f. *Control Device Operation*. All air pollution control devices shall be in operation according to manufacturer's recommendations whenever the boilers are in operation, except as specified in Condition **B.4.f.** Note: under current permitted ductwork configuration, the air pollution control devices cannot be physically bypassed. In the event of a control device malfunction resulting in excess emissions beyond the allowable periods established for these units, the associated boiler shall be removed from service until such time that the control device resumes normal operation.

3.3. *Applicant's Request*: Specific Condition **B.14.a**. specifies the emissions rate of SO_2. The permitting note references 3,551 lb/hr and 15,553.4 tons/year of NO_X. Should the permitting note reference SO_2? Please confirm the correct reference.

Department's Response: As established in Permit No. PSD-FL-040, the correct equivalent is 3,576 lb/hour of SO_2. However, Permit No. 0570039-071-AC (PSD-FL-040B) removed this equivalence at the applicant's request. Therefore, Specific Condition **B.14.a**. is changed as follows:

B.14. SO_2 Emissions.

a. As determined by CEMS, SO_2 emissions shall not exceed 0.82 lb/MMBtu heat input and 10% of the potential combustion concentration (90% reduction) based on a 30-day rolling average. ~~*{Permitting Note: For informational purposes, the NO_x limit equates to 3,551 lb/hour and 15,553.4 tons/year.}*~~

3.4. *Applicant's Request:* Specific Condition **B.18.a.** specifies the "Hg emissions shall not exceed the potential Hg mass emission of 29.0 lb/year (58.0 lb/year)." Is the potential rate 29.0 or 58.0 lb/year? Please confirm the correct reference.

Department's Response: Pursuant to 40 CFR 63.10005(h)(1)(ii)(B), the Department revises Specific Condition **B.18.a.** as follows:

B.18. Mercury (Hg) Emissions.

a. *LEE Status EGUs*. Hg emissions shall not exceed potential Hg mass emissions of 29.0 lb/year ~~(58.0 lb/year)~~ or exceed 1.2 lb/TBtu or 0.013 lb/GWh during 30-boiler operating day performance test for each individual EGU; or

4. Section III, Subsection S. Emissions Unit 051

Applicant's Request: The air permit application 4910-1 requested a concurrent air construction permit/Title V permit revision application to incorporate the igniter replacement projects. This project included EU-051, two 6 MMBtu/hr Natural Gas-fired Process Heaters, in air construction permit no. 0570039-091-AC. The final Title V air permit no. 0570039-110-AV did not include a Subsection incorporating this emission unit.

Department's Response: The Department shall incorporate EU 051 into the Title V air operation permit. This change shall be reflected in Permit No. 0570039-116-AV.

5. Appendix CEM, Unit 4

Applicant's Request: The permit requires the calculation of the CO emission rate in lb/MMBtu. Specific Condition **7** in Appendix CEM specifies a moisture correction, if necessary to report the concentration on a dry basis. This requirement is not necessary, if a dilution extraction system is used to calculate the CO emission rate in lb/MMBtu. Specific Condition **7** (Moisture Correction) should be deleted.

Department's Response: The Department denies the request to remove Specific Condition **7**. Appendix CEM, Unit 4, was established through Permit No. 0570039-027-AC (PSD-FL-390). The requested change may only be considered through an air construction permit application.