



G. Daniels

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
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ATLANTA, GEORGIA 30303-8960

OCT 8 1998

4APT-ARB

Howard L. Rhodes, Director
Air Resources Management Division
Florida Department of Environmental Protection
Mail Station 5500
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

SUBJ: EPA's Review of Proposed Title V Permit
Tampa Electric Company
Polk Power Station
Permit No. 1050233-001-AV

Dear Mr. Rhodes:

The purpose of this letter is to provide comments to the Florida Department of Environmental Protection (DEP) on the proposed title V operating permit for Tampa Electric Company, Polk Power Station, which was posted on DEP's web site on August 25, 1998. Based on the Environmental Protection Agency's (EPA's) review of the proposed permit and the supporting information for this facility, EPA formally objects, under the authority of Section 505(b) of the Clean Air Act (the Act) and 40 C.F.R. § 70.8(c) (see also Florida Regulation 62-213.450), to the issuance of the title V permit for this facility. The basis of EPA's objection is that the permit does not fully meet the periodic monitoring requirements of 40 C.F.R. § 70.6(a)(3)(i), the permit does not identify 40 C.F.R. Part 60, Subpart Y as an applicable requirement, and the permit contains inadequate averaging times and start-up/shutdown reporting requirements.

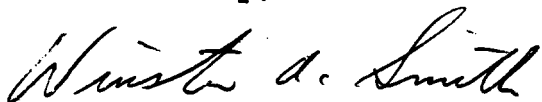
As you know, 40 C.F.R. § 70.8(c) requires EPA to object to the issuance of a proposed permit in writing within 45 days of receipt of the proposed permit (and all necessary supporting information) if EPA determines that the permit is not in compliance with the applicable requirements under the Act or 40 C.F.R. Part 70. Section 70.8(c)(4) and Section 505(c) of the Act further provide that if the State fails to revise and resubmit a proposed permit within 90 days to satisfy the objection, the authority to issue or deny the permit passes to EPA and EPA will act accordingly. Because the objection issues must be fully addressed within the 90 days, we suggest that the revised permit be submitted in advance in order that any outstanding issues may be addressed prior to the expiration of the 90-day period.

Pursuant to 40 C.F.R. § 70.8(c), this letter and its enclosure provide a statement of EPA's reasons for its objection. The enclosure contains a detailed explanation of the objection issues and the changes necessary to make the permit consistent

with the requirements of 40 C.F.R. Part 70. The enclosure also contains general comments applicable to the permit.

If you have any questions or wish to discuss this further, please contact Ms. Carla E. Pierce, Chief, Operating Source Section at (404) 562-9099. Should your staff need additional information they may contact Ms. Gracy R. Danois, Florida Title V Contact, at (404) 562-9119, or Ms. Lynda Crum, Associate Regional Counsel, at (404) 562-9524.

Sincerely,



Winston A. Smith
Director
Air, Pesticides & Toxics
Management Division

Enclosure

cc: Mr. Charles A. Shelnut
General Manager
Tampa Electric Company

Enclosure

U.S. EPA Region 4 Objection
Proposed Part 70 Operating Permit
Tampa Electric Company
Polk Power Station
Permit no. 1050233-001-AV

I. EPA Objection Issues

1. Periodic Monitoring: Conditions A.1. and B.1., establish the permitted capacity for the combined cycle combustion turbine and the auxiliary boiler, respectively. The origin of these conditions is the PSD permit for this facility. The permit needs to include appropriate periodic monitoring or recordkeeping requirements to reasonably assure compliance with these conditions. In order to satisfy this requirement, the permit must require that the facility maintain fuel usage records to demonstrate compliance with the applicable heat input rate. Since the limits are expressed as hourly limits, the condition should establish an hourly fuel usage recordkeeping.
2. Periodic Monitoring: The permit does not require sufficient periodic monitoring to ensure compliance with the applicable SO₂, PM/PM₁₀, CO, VOC, visible emissions (VE), lead, inorganic arsenic, beryllium, and mercury limits in Section III, subsection A. The TEC-Polk County permit only requires testing once every five years for SO₂, PM/PM₁₀, CO, VE, and VOC, and no testing for the remaining pollutants. This monitoring scheme does not constitute adequate periodic monitoring to ensure compliance with the limits contained in the permit. As for the lead, inorganic arsenic, beryllium and mercury limitations, EPA is concerned that the concentration of these pollutants could vary significantly with every fuel batch. In order for infrequent testing to be approved as the periodic monitoring method for this facility, the State must provide a technical demonstration that no additional monitoring is warranted to ensure compliance with the limits listed above. The demonstration should identify the rationale for basing the compliance certification on data from a short-term test once every five years. If it is determined that additional monitoring is necessary to ensure compliance with the permit conditions, more frequent testing requirements must be included in the permit.

Regarding the VE limit, the State must use the existing COMs to ensure compliance with the opacity standard. Requiring that the opacity monitor be used for

conducting periodic monitoring imposes little or no additional burden on the source.

Additionally, this unit has a continuous emission monitor for SO₂. While fuel analysis may be adequate for determining SO₂ emissions from fuel oil combustion, it may not be true for syngas because of the variability of the fuel. Use of the data gathered by the SO₂ monitors would provide a more reasonable assurance of compliance than fuel sampling analysis.

3. Periodic Monitoring: Section III, Subsection B, condition B.4 limits the hours of operation for the auxiliary boiler. This Subpart needs to include recordkeeping requirements for this condition.
4. Periodic Monitoring: Section III, Subsection C does not contain adequate periodic monitoring requirements to provide reasonable assurance of compliance with the limitations for VE, SO₂ and Acid Mist. Since the permit only requires testing once every five years, the testing frequency does not provide a reasonable assurance of compliance with the pollutant limitations contained in this subsection. In order to approve the infrequent testing for the pollutants included in this subsection as the periodic monitoring method, the State must provide a technical demonstration that no additional monitoring is warranted to ensure compliance with the limits. The demonstration should identify the rationale for basing the compliance certification on data from a short-term test once every five years. If it is determined that additional monitoring is necessary to ensure compliance with the permit conditions, more frequent testing requirements must be included in the permit.

Also, daily recordkeeping of the plant production must be kept to ensure that the facility does not exceed the limit contained in condition C.1. This requirement is very important because it is limiting the source's production below 300 tons per day. If the facility exceeded the 300 tons per day production capacity, F.A.C. rule 62-296.402 requires that the facility install and operate continuous emissions monitors for VE, SO₂, and Acid Mist.

5. Periodic Monitoring: Section III, subsection D, condition D.4 specifies that the facility conduct a Method 22 test once per year. The infrequent testing does not provide a reasonable assurance of compliance with the VE limitation contained in this subsection. In order to approve the infrequent testing for visible emissions, the State must provide a technical demonstration that no additional monitoring is

warranted to ensure compliance with the VE limit or require the source to conduct daily VE readings.

6. Reporting and Recordkeeping: Section III, subsection C, condition C.8 addresses the excess emissions from start-up, shutdown, and malfunctions. Condition C.20 requires the reporting of excess emissions due to malfunctions only. This condition needs to also require reporting of excess emissions from start-up and shutdown.
7. Missing Applicable Requirement: Subsection D of the permit must include a statement establishing that the source is subject to the requirements of 40 C.F.R. Part 60, Subpart Y, Standards of Performance for Coal Preparation Plants.
8. Control Equipment Requirements: The description provided in Subsection E of this permit describes various pieces of control equipment. The permit does not contain any references to the control equipment nor does it contain adequate periodic monitoring requirements for the equipment. The State must explain and provide information in the statement of basis supporting the decision not to require parametric monitoring of the control equipment in the permit.
9. Averaging Times: In order for the emissions standards in conditions A.5 and A.6 to be practicably enforceable, appropriate averaging times must be specified in the permit. If the pounds per hours standards are the ones for which the facility would have to demonstrate compliance, the 30-day rolling average is not the appropriate averaging time. Also, for condition A.5, it is unclear whether the facility would have to demonstrate compliance with the limitations listed under "Basis" or the "LB/HR" numbers or both.

II. EPA General Comments

1. Section II, condition 11: Replace "Operating Source Section" with "Air & EPCRA Enforcement Branch, Air Compliance Section."
2. Section III, subsection A, condition A.3.b: The equation should read:
$$[\text{Load}(\%)] / 100\% * \text{hrs. of operation} \leq 876 \text{ hrs}$$
3. Section III, subsection A, condition A.48: EPA recommends that this condition be moved to the "Emissions Limitations and Standards" section since it

is related to the NO_x limit that the facility would have to comply with after the demonstration period.

4. Section III, subsection A, conditions A.7 and A.51: EPA recommends that the State combine conditions A.7 and A.51, since they refer to the same parameter and are based on the same PSD permit requirement. We also recommend that the resulting condition be placed in the "Emissions Limitations and Standards" portion of subsection A.
5. Section III, subsection A, condition A.49: This condition states that results from NO_x testing conducted on the combustion turbine every two months for 12 to 18 months after the demonstration will not be used for compliance purposes. The State needs to provide the basis for this decision in the statement of basis.
6. Section III, subsection B, conditions B.7 and B.52: EPA recommends that the State combine conditions B.7 and B.52, since they refer to the same parameter and are based on the same PSD permit requirement. We also recommend that the resulting condition be placed in the "Emissions Limitations and Standards" portion of subsection B.
7. Section III, subsection B, conditions B.19 and B.32: EPA recommends that the State combine conditions B.19 and B.32, since they refer to the same parameter and are based on the same NSPS Subpart. We also recommend that the resulting condition be placed in the "Emissions Limitations and Standards" portion of subsection B.
8. Section III, subsection C, C.3: The intent of this condition is unclear. It appears that this condition is intended to limit the fuel used by this plant to propane. If this is the case, the State should rephrase the condition to clearly state that intent.