



TAMPA ELECTRIC

December 27, 1999

Mr. Clair Fancy
Florida Department of Environmental Protection
111 South Magnolia Drive, Suite 4
Tallahassee, Florida 32399-2400

Via FedEx
Airbill No. 7910 2686 5209

Re: Tampa Electric Company
Big Bend Unit #4's TSP and SO₂ Ambient Monitoring Program
Permit Fee

RECEIVED
DEC 28 1999
BUREAU OF AIR REGULATION

Dear Mr. Fancy:

0570039-007-FL
PSD-FL-040

Enclosed is the check for the \$250.00 permit fee as described in the December 22, 1999 letter from Gregory M. Nelson. This permit fee is provided for the minor technical change to PSD-FL-040 to reflect the completion of the requirements of Condition #6.

Thank you for your assistance in this matter. If you should have any questions, please feel free to call Jamie Hunter or me at (813) 641-5033.

Sincerely,

Patrick L. Shell
Engineer
Environmental Planning

EP\gm\PLS137

c: Mr. Buck Oven, FDEP - Tallahassee
Mr. Jeff Koerner, FDEP - Tallahassee

TECO PRODUCTION SERVICES

PETTY CASH
6944 U.S. HWY. 41 N.
APOLLO BEACH, FL 33572
PH. 813-671-3361

472

Dec. 27, 19 99

63-469/631
31

PAY TO THE
ORDER OF FDEP

\$ 250.00

Two hundred fifty and no/100

DOLLARS



Barnett

040-031
203 Apollo Beach Boulevard
Apollo Beach, Florida 33572

FOR BB Permit Mod - Pat Shell

Nancy E. Foley MP

⑆063104697⑆0472 1406103012⑈



TAMPA ELECTRIC

December 22, 1999

Mr. Clair Fancy
Florida Department of Environmental Protection
111 South Magnolia Drive, Suite 4
Tallahassee, Florida 32399-2400

Via Facsimile and FedEx
Airbill No. 7918 1370 4136

**Re: Tampa Electric Company
Big Bend Unit #4's TSP and SO₂ Ambient Monitoring Program
Request for Minor Permit Modification**

Dear Mr. Fancy:

This letter is provided as follow up to our request to the Environmental Protection Commission of Hillsborough County to discontinue TSP and SO₂ monitoring as provided by Part I, Condition #6 of PSD-FL-040. Tampa Electric is requesting a minor technical change to PSD-FL-040 to reflect the completion of the requirements of Condition #6. Tampa Electric will follow this letter with a check for \$250.00 under separate cover as required by Chapter 62-4.050 FAC by December 28, 1999.

Thank you for your assistance in this matter. If you should have any questions, please feel free to call Jamie Hunter or me at (813) 641-5033.

Sincerely,

Gregory M. Nelson, P.E.
Manager
Environmental Planning

EPgmPLS136

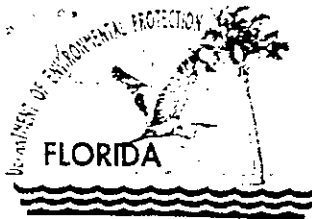
c: Mr. Buck Oven, FDEP - Tallahassee
Mr. Jeff Koerner, FDEP - Tallahassee

TAMPA ELECTRIC COMPANY
P. O. BOX 111 TAMPA, FL 33601-0111

AN EQUAL OPPORTUNITY COMPANY
[HTTP://WWW.TAMPAELECTRIC.COM](http://www.tampaelectric.com)

(813) 228-4111

CUSTOMER SERVICE:
HILLSBOROUGH COUNTY (813) 223-0800
OUTSIDE HILLSBOROUGH COUNTY 1 (888) 223-0800



Jeb Bush
Governor

Department of Environmental Protection

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

David B. Struhs
Secretary

December 13, 1999

Mr. Sterlin Woodard, P.E.
Air Management Division
Environmental Protection Commission
of Hillsborough County
1410 North 21 Street
Tampa, Florida 33605

Re: TECO Big Bend Unit #4's TSP and SO₂ Ambient Monitoring Program
(PA79-12 and PSD-FL-040)

Dear Mr. Woodard:

Thank you for reviewing Tampa Electric Company's (TECO's) request to discontinue the TSP and SO₂ Ambient Monitoring Program for the Big Bend Unit #4. Your comments, dated November 15, 1999, are appreciated.

Ms. Dotty Diltz, Chief of the Bureau of Ambient Monitoring and Mobile Sources, has notified Mr. Buck Oven, P.E. Administrator of the Office of Siting Coordination, that she has agreed to the discontinuance of this monitoring. Mr. Oven is in the process of removing this requirement from the Conditions of Certification for Big Bend Unit #4 and hopes to have this accomplished during the first quarter of 2000. However, Mr. Oven is of the opinion that the Conditions of Certification currently allow the Department to discontinue the monitoring whenever we are satisfied it is no longer necessary. As Ms. Diltz has made this decision, TECO may discontinue the monitoring immediately.

We will not be requiring re-modeling using the new Units #1&2 common stack.

Sincerely,

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

CHF/clp

c: Dotty Diltz
Buck Oven

"More Protection, Less Process"

Printed on recycled paper.

COMMISSION

PAT FRANK
CHRIS HART
JIM NORMAN
JAN PLATT
THOMAS SCOTT
RONDA STORMS
BEN WACKSMAN

EXECUTIVE DIRECTOR

ROGER P. STEWART



ADMINISTRATIVE OFFICES, LEGAL &
WATER MANAGEMENT DIVISION
1900 - 9TH AVENUE
TAMPA, FLORIDA 33605
TELEPHONE (813) 272-5960
FAX (813) 272-5157

AIR MANAGEMENT DIVISION
TELEPHONE (813) 272-5530

WASTE MANAGEMENT DIVISION
TELEPHONE (813) 272-5788

WETLANDS MANAGEMENT DIVISION
TELEPHONE (813) 272-7104

MEMORANDUM

RECEIVED

NOV 17 1999

DATE: November 15, 1999

TO: Clair Fancy, P.E.

FROM: Sterlin Woodard, P.E.

SUBJECT: TECO Big Bend Unit #4's TSP and SO₂ Ambient Monitoring Program
(PA79-12 and PSD-FI-040)

BUREAU OF AIR REGULATION

We have reviewed TECO's request, which we received on August 27, 1999, and have no objections to the TSP and SO₂ Ambient Monitoring program being discontinued. Both the Conditions of Certification (Specific Condition No. I.B.2.), and PSD-FI-040 (Part I, Specific Condition No. 6) requires that the facility operate and maintain SO₂ monitors. However, the Conditions of Certification specifies that TECO operate two TSP monitors and two SO₂ monitors. They have maintained and operated these monitors since 1984. However, Specific Condition No. 6 of the PSD Permit only requires that the SO₂ monitors be operated for at least a year, and until the Administrator determines that the effects of the modification on air quality have been quantified. It appears that the whole intent of the ambient monitoring program was to quantify the effects of the modification, even though the pre-construction modeling showed there would be little impact.

We have reviewed TECO's proposal, and the ambient data that is referenced agrees with the information in our files. Except for the one exceedance of the 3-hour NAAQS for SO₂ in 1985, there have been no recorded exceedances at these monitoring sites. On the other hand, in 1995 and 1996, our own monitors recorded elevated SO₂ levels in the area that were near the 24-hour standard on two separate days. However, since that time, the trend has been downward, and the levels are well within the Standards. We agree that the Acid Rain regulations have resulted in significant reductions in SO₂ from the entire Big Bend facility (down by over 50,000 TPY from 1990 levels), and that the pending completion of construction of the Big Bend #1, 2 scrubber will result in even further reductions. Even though we were not able to verify the results of TECO's statistical analysis, the wealth of historical information supports their assertion that the SO₂ levels will more than likely continue to remain well below the NAAQS. It is, therefore, our opinion that the SO₂ ambient monitors may no longer be necessary, and have no objections to TECO discontinuing their use.

Clair Fancy
Memorandum
November 15, 1999
Page 2

Because of the fact that the TSP NAAQS has been repealed, and replaced with newer Particulate Matter, PM10 and PM2.5 standards, we have no objections to TECO also discontinuing the use of the TSP Monitors. Their continued use is no longer warranted because the TSP Monitors, which over estimate the concentrations of these finer particulates, have shown continuous compliance with the new standards, and have served their initial purpose of quantifying the effects of the modification. With all the expected reductions at the plant, and the more than 14 years of ambient data that show no real overall change, we believe the effects of the modification have been quantified, and the air quality has not been significantly impacted.

Even though we support the discontinued use of the SO₂ and TSP Monitors, we recommend that the plant be re-modeled using the new Unit #1, 2 Common Stack to ensure that any possible reduced stack gas buoyancy (lower stack temperature and higher moisture content) does not increase the maximum SO₂ ground level impacts.

If you have any questions, please let me know.

cag