

Jeb Bush
Governor

Department of Environmental Protection

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

Colleen M. Castille
Secretary

June 30, 2005

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Ms. Karen Sheffield, General Manager
Big Bend Station
Tampa Electric Company
Post Office Box 111
Tampa, Florida 33601-0111

Re: Big Bend Unit 3
DEP File No. 0570039-022-AC
Selective Catalytic Reduction (SCR) System

Dear Ms. Sheffield:

We have begun the review of your air construction permit application received on June 6, 2005. However, we must deem your application *incomplete*, because we need further information relative to the following items:

- You are requesting a permit condition authorizing the cessation of the ammonia injection during periods of low load and exhaust temperature. Please provide documentation from the SCR catalyst manufacturer recommending this operating practice.
- Please provide a status report concerning EPA's responses to the items in Mr. Gregory Nelson's letter of June 24, 2005, on the SCR project, specifically:
 - Approval of the emissions limit of 0.15 lb/mmBtu for NO_x for the Unit.
 - Assessment of the request for cessation of the ammonia injection during periods of low load and exhaust temperature (SCR bypass).
- We note that one difference between the Big Bend 3 and Big Bend 4 projects is the addition of a "partial SCR maintenance bypass" duct as indicated in the Flow Diagram. Although logical for maintenance needs, perhaps a condition identifying the need to ensure closure of this duct when not in a maintenance period should be added. Please comment on this item.

When we receive this information, we will continue processing your application. If you have any questions, please contact Tom Cascio at 850-921-9526.

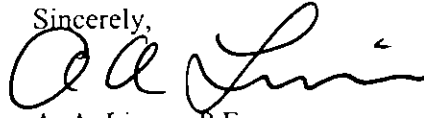
Rule 62-4.050(3), F.A.C., requires that all applications for a Department permit must be certified by a professional engineer registered in the State of Florida. This requirement also applies to responses to Department requests for additional information of an engineering nature. Permit applicants are advised that Rule 62-4.055(1), F.A.C., requires applicants to respond to requests for information within 90 days, unless the applicant has requested in writing, and has been granted, additional time within 90 days.

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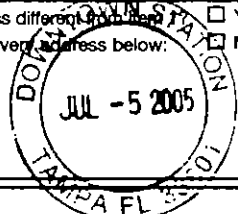
Ms. Karen Sheffield, General Manager
Big Bend Station
Page 2 of 2

Sincerely,

A handwritten signature in black ink, appearing to read "A. A. Linero". The signature is fluid and cursive, with the first name "A. A." being more prominent and the last name "Linero" following in a similar style.

A. A. Linero, P.E.
Program Administrator
Permitting South Section

Cc: Thomas Davis, P.E.
Shelly Castro, TEC
Alice Harman, EPCHC
Jason Waters, FDEP-SWD
David Lloyd, EPA Region 4

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<ul style="list-style-type: none"> ■ Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. ■ Print your name and address on the reverse so that we can return the card to you. ■ Attach this card to the back of the mailpiece, or on the front if space permits. 	A. Signature <input checked="" type="checkbox"/> Agent <input checked="" type="checkbox"/> Addressee
1. Article Addressed to: Ms. Karen Sheffield, General Manager Big Bend Station Tampa Electric Company Post Office box 111 Tampa, Florida 33601-0111	B. Received by (Printed Name) <i>Karen Sheffield</i> C. Date of Delivery
2. Article Number <i>(Transfer from service label)</i> 7000 2870 0000 7028 2430	D. Is delivery address different from here? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No if YES, enter delivery address below:  3. Service Type <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D. 4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes

PS Form 3811, February 2004

Domestic Return Receipt

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Ms. Karen Sheffield, General Manager	
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PS Form 3800, May 2000	See Reverse for Instructions

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JUN 06 2005

June 3, 2005

BUREAU OF AIR REGULATION

Mr. Tom Cascio,
Florida Department of
Environmental Protection
111 South Magnolia Drive, Suite 4
Tallahassee, FL 32301

Via FedEx
Airbill No. 7922 9890 5641

**Re: Tampa Electric Company
Big Bend Station
Consent Decree
Civil Action No. 99-2524 CIV-T-23F
Air Construction Permit Application for
Unit 3 Selective Catalytic Reduction (SCR) Project**

Dear Mr. Cascio,

Tampa Electric Company (TEC) requests an air construction permit to install a selective catalytic reduction (SCR) system for nitrogen oxides (NO_x) control on its Big Bend Station Unit 3 coal-fired boiler. TEC entered into the agreements with the Environmental Protection Agency (EPA) and the Florida Department of Environmental Protection (FDEP) concerning the installation of additional air pollution control systems at Big Bend Station. These agreements (EPA Consent Decree and FDEP Consent Final Judgment) included requirements to install additional air pollution control systems for NO_x control on Unit 3. In response to these requirements, TEC determined that the installation of low NO_x burners (LNB) and an SCR system are the technologies to be utilized to reduce the NO_x emissions on Big Bend Unit 3 to satisfy the requirements of the agreements.

Additionally, TEC reviewed the impacts with the operation of the SCR, associated combustion controls and associated systems (sulfur trioxide control) to determine the affects on the coal combustion byproducts and found that the fly ash would have limited marketability due to high ammonia content and carbon content. Therefore, a large portion of the fly ash could potentially need to be disposed of in a landfill. TEC researched this issue and found that several other companies mitigate the SCR impacts on fly ash by using carbon burnout (CBO) technology to reduce the carbon content. TEC has evaluated this technology and determined it to be feasible at Big Bend Station. A separate air construction permit for the CBO technology will be submitted.

As stated in a letter sent to the FDEP dated April 4, 2003 and as mentioned in the meeting between TEC and FDEP on May 31, 2005, TEC reviewed the effects of installing the future NO_x

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Mr. Tom Cascio

June 3, 2005

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control and SO₃ control systems and determined that there is a potential for increase in particulate matter (PM) and opacity. Therefore, a request for higher permit limits may be submitted in the future.

Please find the enclosed air construction permit application for Big Bend Station's Unit 3 SCR.

TEC appreciates the cooperation of the Department in this matter. If you have any questions or comments, please contact Shelly Castro or me at (813) 228-4408.

Sincerely,

A handwritten signature in black ink, appearing to read "Byron T. Burrows". The signature is fluid and cursive, with the first name "Byron" being the most prominent.

Byron T. Burrows
Manager - Air Programs
Environmental, Health & Safety

EHS/rhk/SSC222

Enclosure

c/enc: Ms. Alice Harman, EPCHC
Mr. Jerry Kissel, FDEP SW
Mr. David Lloyd, EPA
Mr. Scott Sheplak, FDEP
Ms. Trina Vielhauer, FDEP
Mr. Sterlin Woodard, EPCHC