



Jeb Bush
Governor

Department of Environmental Protection

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

Colleen M. Castille
Secretary

June 11, 2004

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Ms. Shelly A. Castro
Engineer, Air Programs
Environmental, Health & Safety
Tampa Electric Company
P.O. Box 111
Tampa, FL 33601-0111

Re: PM CEM Testing at TEC Big Bend Facility
AIRS ID 0570039

Dear Ms. Castro:

Tampa Electric Company (TEC) recently completed the fourth and final series of stack tests necessary to correlate the readings from the particulate matter (PM) continuous emission monitoring (CEM) system with U.S. Environmental Protection Agency (EPA) approved test methods. The Florida Department of Environmental Protection (FDEP, or "the Department") received the written report from the last stack test event on May 18, 2004. Upon reviewing the collection of written reports, I have some additional questions and concerns about the testing.

Please address the following, either in a separate correspondence or as part of the "Feasibility Report and Alternate Monitoring Plan" to be submitted within 180 days from March 19, 2004 (i.e., 180 days after the conclusion of the PM CEM stack testing).

- According to the ENSR reports, stack gas bypassed the electrostatic precipitator (ESP) and flue gas desulfurization (FGD) scrubber during the first test run (June 2002).
 - Did TEC receive advance authorization for bypassing the control devices?
 - Did TEC notify either FDEP or the Environmental Protection Commission of Hillsborough County (EPCHC)?
 - Did TEC pre-bunker and use low sulfur coal during the first test run?
 - Did TEC count these days as "unscrubbed" days for purposes of the Federal Consent Decree?
 - Did TEC experience any PM limit exceedances during the test?

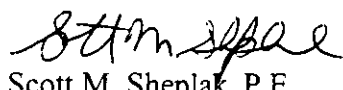
"More Protection, Less Process"

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- Were the ESP or the FGD bypassed during the second and third tests (January and June, 2003)?
- To explain the poor correlation between Trains A and B during the first three test runs, ENSR noted that they believed the stack to be stratified for PM emissions. Given the quite good correlation between Trains A and B during the fourth test, does ENSR or TEC still believe the stack is stratified for PM?
- The written reports from ENSR do not contain the PM CEM system's readings that correspond to each of the run numbers. Please summarize for each run the corresponding PM CEM system reading along with the stack conditions necessary to convert the stack test results (mg/dscm) into the units of the PM standard (lb/MMBtu).
- The written report for the fourth series of stack tests indicates that draft PS-11 was followed. Your quarterly activities report for the first quarter of 2004 says that the promulgated (i.e., final) version of PS-11 was used. Please identify which methodology was actually followed for the fourth testing series as well as any significant differences between the draft and final versions of PS-11.
- At the higher PM loading of the fourth test series, the duplicate Method 5B sampling trains all agreed within 10 percent relative standard deviation. But at the low PM levels in the second and third test series, duplicate trains showed significant relative standard deviation. Does it follow that a PS-11 certified PM CEM system provides a more accurate result at lower PM levels when compared to a Method 5B stack test?
- Please provide records documenting that low sulfur coal (< 2.2 lb/MMBtu) was used in Unit 3 during the testing period (March 15 through March 19, 2004).

If you have any additional questions or concerns, please feel free to contact Greg DeAngelo at (850)921-9506.

Sincerely,



Scott M. Sheplak, P.E.

Administrator

Compliance and Enforcement Section

cc: Jerry Kissel – FDEP SWD
David Lloyd – EPA Region 4
Sterlin Woodard – EPCHC

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