



Florida Department of Environmental Protection

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

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

October 30, 2007

Electronic Mail – Received Receipt Requested.

kasheffield@tecoenergy.com

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

Re: Big Bend Units 3 and 4
DEP File No. 0570039-030-AC
DEP File No. 0570039-031-AC
Modifications to Selective Catalytic Reduction System Permits
Duct Work Separation for Scrubber Tower

Dear Ms. Sheffield:

Enclosed are documents indicating the Department's intent to issue air construction permits to modify certain specific conditions of the previously issued air construction permits (0570039-020-AC and 0570039-022-AC) for the installation of selective catalytic reduction systems on Units 3 and 4 at the Big Bend Station in Tampa. The documents include: the "Intent to Issue Air Construction Permit Modifications"; the "Public Notice of Intent to Issue Air Construction Permit Modifications"; the "Draft Permit Modifications"; and the "Technical Evaluation and Preliminary Determination."

The Public Notice must be published one time only as soon as possible in a newspaper of general circulation in the area affected, pursuant to Chapter 50, Florida Statutes. Proof of publication, i.e., newspaper affidavit, must be provided to the Department's Bureau of Air Regulation office within seven (7) days of publication. Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permit.

Please submit any other written comments you wish to have considered concerning the Department's proposed action to Mr. A. A. Linero, Program Administrator, South Permitting Section at the above letterhead address. If you have any questions, please call Tom Cascio at 850/921-9526.

Sincerely,

Trina L. Vielhauer, Chief
Bureau of Air Regulation

TLV/aal/tbc

Enclosures

Executed in Tallahassee, Florida.



Trina L. Vielhauer, Chief
Bureau of Air Regulation

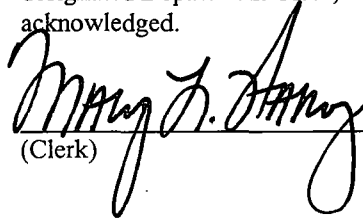
CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that these Draft Air Construction Permit Modifications, this Technical Evaluation and Preliminary Determination, this Intent to Issue an Air Construction Permit Modifications, and this Public Notice of Intent to Issue Air Construction Permit Modifications, and all copies were sent electronically (with Received Receipt) before the close of business on 10/31/07 to the person(s) listed below.

Karen Sheffield, General Manager, TEC kasheffield@tecoenergy.com
Bryon Burrows, TEC btburrows@tecoenergy.com
Tom Davis, ETC tdavis@ectinc.com
Mara Nasca, FDEP-SWD mara.nasca@dep.state.fl.us
Jerry Campbell, HCEPC Campbell@epchc.org
James Little, EPA Region 4 little.james@epa.gov

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to §120.52, Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.



(Clerk)

10/31/07
(Date)

In the Matter of an
Application for Permit Modifications by:

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

DEP File No. 0570039-030-AC
DEP File No. 0570039-031-AC
Air Construction Permit Modifications
NO_x Reduction System (SCR)
Duct Work Separation for Scrubber Tower
Steam Generator Units 3 and 4
Hillsborough County

INTENT TO ISSUE AIR CONSTRUCTION PERMIT MODIFICATIONS

The Department of Environmental Protection (Department) gives notice of its intent to issue air construction permit modifications (copy of draft permit modifications attached) for the projects, detailed in the application specified above, for the reasons stated below.

The applicant, Tampa Electric Company (TEC), operates the Big Bend Station located at Big Bend Road, North Ruskin, Hillsborough County. TEC currently holds air construction permits to install selective catalytic reduction (SCR) systems for nitrogen oxides (NO_x) control on the facility's Units No. 3 and No. 4 coal-fired boilers. These air construction permit modifications (0570039-030-AC and 0570039-031-AC) revise the language of the specific conditions of the previously issued permits. Specifically, these permit modifications: (1) extend the air construction permit expiration date from December 31, 2007 to March 31, 2008 for Unit No. 4, and (2) authorize the construction work for duct work separation as part of a scrubber tower separation initiative.

The Department has permitting jurisdiction under the provisions of Chapter 403.087, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210 and 62-213. This action is not exempt from permitting procedures. The Department has determined that air construction permit modifications are required.

The Department intends to issue these air construction permit modifications based on the belief that reasonable assurances have been provided to indicate that operation of these emission units will not adversely impact air quality, and the emission units will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297, F.A.C.

Pursuant to Section 403.815, F.S., and Rule 62-110.106(7)(a)1., F.A.C., you (the applicant) are required to publish at your own expense the enclosed Public Notice of Intent to Issue Air Construction Permit Modifications. The notice shall be published one time only in the legal advertisement section of a newspaper of general circulation in the area affected. Rule 62-110.106(7)(b), F.A.C., requires that the applicant cause the notice to be published as soon as possible after notification by the Department of its intended action. For the purpose of these rules, "publication in a newspaper of general circulation in the area affected" means publication in a newspaper meeting the requirements of Sections 50.011 and 50.031, F.S., in the county where the activity is to take place. If you are uncertain that a newspaper meets these requirements, please contact the Department at the address or telephone number listed below. The applicant shall provide proof of publication to the Department's Bureau of Air Regulation, at 2600 Blair Stone Road, Mail Station #5505, Tallahassee, Florida 32399-2400 (Telephone: 850/488-0114; Fax 850/ 921-9533). You must provide proof of publication within seven days of publication, pursuant to Rule 62-110.106(5), F.A.C. No permitting action for which published notice is required shall be granted until proof of publication of notice is made by furnishing a uniform affidavit in substantially the form prescribed in section 50.051, F.S. to the office of the Department issuing the permit. Failure to publish the notice and provide proof of publication may result in the denial of the permit pursuant to Rules 62-110.106(9) & (11), F.A.C.

The Department will issue the final construction permit modifications unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The Department will accept written comments concerning the proposed permit issuance action for a period of fourteen (14) days from the date of publication of Public Notice. Written comments should be provided to the Department's Bureau of Air Regulation at 2600 Blair Stone Road, Mail Station #5505, Tallahassee, FL 32399-2400. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in the proposed agency action, the Department shall revise the proposed permit and require, if applicable, another Public Notice.

P.E. CERTIFICATION STATEMENT

PERMITTEE

Tampa Electric Company (TECO)
Post Office Box 111
Tampa, Florida 33601-0111

TECO Big Bend Units 3 and 4
Separation of Scrubber Modules
File Nos. 0570039-030-AC
& 0570039-031-AC

PROJECT DESCRIPTION

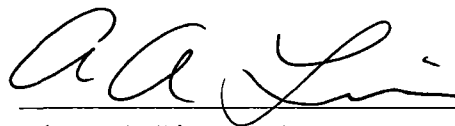
TECO proposes to reconfigure the duct work, split the common scrubber (allotting two of the four modules to each unit), and dedicate a separate existing stack to each unit. Under the proposed configuration, the gases will no longer be intermingled before or after treatment.

Previous projects resulted in significant actual reductions since 1995 of 50,000 to 55,000 TPY of SO₂ between Units 3 and 4. Also the sum of the emissions from the two units has since 2001 been about the same as the emissions from Unit 4 alone prior to interconnection. Most of the reductions since 1995 occurred due to actions taken by TECO pursuant to its Acid Rain strategy and before the subsequent requirements of the Consent Final Judgment with the Department and the Consent Decree with EPA.

While it is possible that emissions from Unit 4 could increase after the split (when no longer restricted by Unit 3 efficiency and emission limit requirements in the CD) this is not actually expected by TECO to occur. The Department can in the future review data in accordance with its rules to determine whether emissions increases have occurred and whether they are due to the scrubber split.

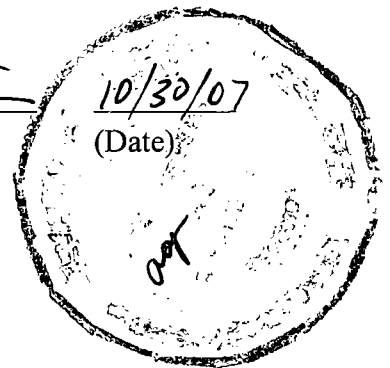
TECO disagrees that a permit is required for the project. In consultation with experts in the Department, I have determined that, in accordance with our rules, an air construction permit is necessary to conduct the work. The company has cooperated by submitting an application and providing the information necessary to issue the permit.

I HEREBY CERTIFY that the air pollution control engineering features described in the above referenced application and subject to the proposed permit conditions provide reasonable assurance of compliance with applicable provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 62-4 and 62-204 through 62-297. However, I have not evaluated and I do not certify aspects of the proposal outside of my area of expertise (including but not limited to the electrical, mechanical, structural, hydrological, and geological features).



Alvaro A. Linero, P.E.

Registration Number: 26032



The Department will issue the construction permit modifications with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to sections 120.569 and 120.57 F.S., before the deadline for filing a petition. The procedures for petitioning for a hearing are set forth below.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under sections 120.569 and 120.57 of the Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida, 32399-3000. Petitions filed by the permit applicant or any of the parties listed below must be filed within fourteen days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under section 120.60(3) of the Florida Statutes must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of this notice of intent, whichever occurs first. Under section 120.60(3), however, any person who asked the Department for notice of agency action may file a petition within fourteen days of receipt of that notice, regardless of the date of publication. 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 will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205 of the Florida Administrative Code.

A petition that disputes the material facts on which the Department'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 how and when petitioner received notice of the agency action or proposed action; (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate; (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 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 Department'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.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Department's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any such final decision of the Department on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation is not available in this proceeding.

Persons subject to regulation pursuant to any federally delegated or approved air program should be aware that Florida is specifically not authorized to issue variances or waivers from any requirements of any such federally delegated or approved program. The requirements of the program remain fully enforceable by the Administrator of the EPA and by any person under the Clean Air Act unless and until the Administrator separately approves any variance or waiver in accordance with the procedures of the federal program.

PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT MODIFICATIONS

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

DEP File No. 0570039-030-AC

DEP File No. 0570039-031-AC

Tampa Electric Company
Big Bend Station, Hillsborough County

The Department of Environmental Protection (Department) gives notice of its intent to issue air construction permit modifications to Tampa Electric Company (TEC) for the Big Bend Station located at Big Bend Road, North Ruskin, Hillsborough County. The applicant's mailing address is: Tampa Electric Company, P.O. Box 111, Tampa, Florida 33601-0111.

TEC currently holds air construction permits to install selective catalytic reduction (SCR) systems for nitrogen oxides (NO_x) control on the facility's Units No. 3 and No. 4 coal-fired boilers. These draft air construction permit modifications (0570039-030-AC and 0570039-031-AC) revise the language of the specific conditions of the previously issued permits. Specifically, these permit modifications: (1) extend the air construction permit expiration date from December 31, 2007 to March 31, 2008 for Unit No. 4, and (2) authorize the construction work for duct work separation as part of a scrubber tower separation initiative. A Best Available Control Technology (BACT) determination was not required pursuant to Rules 62-212.400, Florida Administrative Code (F.A.C.), and 40 Code of Federal Regulations (CFR) 52.21, Prevention of Significant Deterioration (PSD).

The Department will issue the final air construction permit modifications unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The Department will accept written comments concerning the proposed construction permit issuance action for a period of fourteen (14) days from the date of publication of this Public Notice of Intent to Issue Air Construction Permit Modifications. Written comments should be provided to the Department's Bureau of Air Regulation at 2600 Blair Stone Road, Mail Station #5505, Tallahassee, FL 32399-2400. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in the proposed agency action, the Department shall revise the proposed permit and require, if applicable, another Public Notice.

The Department will issue the permits with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to sections 120.569 and 120.57 Florida Statutes (F.S.), before the deadline for filing a petition. The procedures for petitioning for a hearing are set forth below. Mediation is not available in this proceeding.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under sections 120.569 and 120.57 F.S. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida, 32399-3000. Petitions filed by the permit applicant or any of the parties listed below must be filed within fourteen days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under section 120.60(3) F.S. must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of this notice of intent, whichever occurs first. Under section 120.60(3), however, any person who asked the Department for notice of agency action may file a petition within fourteen days of receipt of that notice, regardless of the date of publication. 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 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 Department'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 how and when petitioner received notice of the agency action or proposed action; (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate; (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 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 Department'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 Department's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any such final decision of the Department on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

A complete project file is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

Dept. of Environmental Protection Bureau of Air Regulation Suite 4, 111 S. Magnolia Drive Tallahassee, Florida, 32301 Telephone: 850/488-0114 Fax: 850/921-9533	Dept. of Environmental Protection Southwest District 13051 N Telecom Parkway Temple Terrace, FL 33637-0926 Telephone: 813/ 632-7600 Fax: 813/ 632-7665	Hillsborough County Environmental Protection Commission Air Management Division 3629 Queen Palm Drive Tampa, Florida 33619 Telephone: 813/627-2600
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The complete project file includes the permit application, draft air construction permit modifications, and the information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Department's reviewing engineer for this project, Tom Cascio at MS 5505, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, or Tom.Cascio@dep.state.fl.us, or call 850/921-9526 for additional information. Key documents may also be viewed at: www.dep.state.fl.us/Air/permitting/construction.htm and clicking on TECO Big Bend Unit 4 – Scrubber Split Project in the power plant category.



Florida Department of Environmental Protection

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

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

Month day, year

Electronically Sent – Received Receipt Requested.

kasheffield@tecoenergy.com

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

Re: DEP File No. 0570039-030-AC
Air Construction Permit Modification -- Unit 3 SCR System
Duct Work Separation for Scrubber Tower

Dear Ms. Sheffield:

The Florida Department of Environmental Protection (“the Department”) has reviewed your application to make some minor modifications to Air Construction Permit No. 0570039-022-AC that authorized the installation of a selective catalytic reduction (SCR) system for nitrogen oxides (NO_x) control on the facility’s Unit No. 3 coal-fired boiler. This Air Construction Permit Modification (0570039-030-AC) adds two specific conditions to the previously issued permit. Specifically, this permit modification authorizes the construction work for duct work separation as part of a scrubber tower separation initiative. The current air construction permit for Unit No. 3 has not yet expired. Therefore, the change requested will be addressed as an Air Construction Permit Modification.

MODIFICATIONS OF AIR CONSTRUCTION PERMIT NO. 0570039-022-AC

Double-underline denotes additions.

New Specific Conditions **A.14.1.** and **A.14.2.** are added as follows:

A.14.1. Currently, Units 3 and 4 of the facility share a common flue gas desulfurization scrubber and common stacks. During normal operation, flue gasses from both units are routed to this common scrubber. With this air construction permit, the permittee is authorized to perform the construction work for duct work separation as part of a scrubber tower separation initiative. This initiative (to split the common scrubber) is necessary in order for the plant management to perform maintenance on one of the units while the other unit is operating. As a consequence, the towers will also be split and the duct work configured, dedicating a stack to each unit.

[Rule 62-4.070(3), F.A.C.]

A.14.2. Future Actual Emissions Reporting. The permittee shall maintain and submit to the Department on an annual basis for a period of 5 years from the date the duct work separation initiative is placed in operation, information demonstrating in accordance with Rule 62-212.300(1)(e), F.A.C., using the emissions computation and reporting procedures in Rule 62-210.370, F.A.C., that the implementation of the initiative did not result in an emissions increase of SO₂ that would equal or exceed the respective significant emission rate as defined in Rule 62-210.200, F.A.C. [Rule 62-212.300(1)(e), F.A.C.]

A copy of this letter shall be filed with the referenced permit and shall become part of the permit. Any party to this permitting decision (order) has the right to seek judicial review of it under Section 120.68 of the Florida Statutes, 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, Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000, 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 thirty days after this order is filed with the clerk of the Department.

Executed in Tallahassee, Florida.

Joseph Kahn, Director
Division of Air Resource Management

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this PERMIT MODIFICATION was sent electronically (with Received Receipt) before the close of business on _____ to the person(s) listed below:

- Karen Sheffield, General Manager, TEC kasheffield@tecoenergy.com
- Bryon Burrows, TEC btburrows@tecoenergy.com
- Tom Davis, ETC tdavis@ectinc.com
- Mara Nasca, FDEP-SWD mara.nasca@dep.state.fl.us
- Jerry Campbell, HCEPC Campbell@epchc.org
- James Little, EPA Region 4 little.james@epa.gov

Clerk Stamp
FILING AND ACKNOWLEDGMENT FILED,
on this date, pursuant to §120.52, Florida Statutes,
with the designated Department Clerk, receipt of
which is hereby acknowledged.

(Clerk)

(Date)



Florida Department of Environmental Protection

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

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

Month day, year

Electronically Sent – Received Receipt Requested.

kasheffield@tecoenergy.com

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

Re: DEP File No. 0570039-031-AC
Air Construction Permit Modification -- Unit 4 SCR System
Permit Expiration Extension and Duct Work Separation for Scrubber Tower

Dear Ms. Sheffield:

The Florida Department of Environmental Protection (“the Department”) has reviewed your application to make some minor modifications to Air Construction Permit No. 0570039-020-AC that authorized the installation of a selective catalytic reduction (SCR) system for nitrogen oxides (NO_x) control on the facility’s Unit No. 4 coal-fired boiler. This Air Construction Permit Modification (0570039-031-AC): (1) extends the air construction permit expiration date from December 31, 2007 to March 31, 2008, and (2) authorizes the construction work for duct work separation as part of a scrubber tower separation initiative. The current air construction permit for Unit No. 4 has not yet expired. Therefore, the changes requested will be addressed as an Air Construction Permit Modification.

MODIFICATIONS OF AIR CONSTRUCTION PERMIT NO. 0570039-020-AC

Double-underline denotes additions.

New Specific Conditions **A.14.1.** and **A.14.2.** are added as follows:

A.14.1. Currently, Units 3 and 4 of the facility share a common flue gas desulfurization scrubber and common stacks. During normal operation, flue gasses from both units are routed to this common scrubber. With this air construction permit, the permittee is authorized to perform the construction work for duct work separation as part of a scrubber tower separation initiative. This initiative (to split the common scrubber) is necessary in order for the plant management to perform maintenance on one of the units while the other unit is operating. As a consequence, the towers will also be split and the duct work configured, dedicating a stack to each unit.
[Rule 62-4.070(3), F.A.C.]

A.14.2. Future Actual Emissions Reporting. The permittee shall maintain and submit to the Department on an annual basis for a period of 5 years from the date the duct work separation initiative is placed in operation, information demonstrating in accordance with Rule 62-212.300(1)(e), F.A.C., using the emissions computation and reporting procedures in Rule 62-210.370, F.A.C., that the implementation of the initiative did not result in an emissions increase of SO₂ that would equal or exceed the respective significant emission rate as defined in Rule 62-210.200, F.A.C. [Rule 62-212.300(1)(e), F.A.C.]

A copy of this letter shall be filed with the referenced permit and shall become part of the permit. Any party to this permitting decision (order) has the right to seek judicial review of it under Section 120.68 of the Florida Statutes, 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, Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000, 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 thirty days after this order is filed with the clerk of the Department.

Executed in Tallahassee, Florida.

Joseph Kahn, Director
Division of Air Resource Management

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this PERMIT MODIFICATION was sent electronically (with Received Receipt) before the close of business on _____ to the person(s) listed below:

Karen Sheffield, General Manager, TEC kasheffield@tecoenergy.com
Bryon Burrows, TEC btburrows@tecoenergy.com
Tom Davis, ETC tdavis@ectinc.com
Mara Nasca, FDEP-SWD mara.nasca@dep.state.fl.us
Jerry Campbell, HCEPC Campbell@epchc.org
James Little, EPA Region 4 little.james@epa.gov

Clerk Stamp
FILING AND ACKNOWLEDGMENT FILED,
on this date, pursuant to §120.52, Florida Statutes,
with the designated Department Clerk, receipt of
which is hereby acknowledged.

(Clerk)

(Date)

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

1.0 APPLICATION INFORMATION

1.1 Applicant Name and Address

Tampa Electric Company (TECO)
Post Office Box 111
Tampa, Florida 33601-0111

Representative: Karen Sheffield, General Manager, Big Bend Station

1.2 Reviewing and Process Schedule

09-12-07: Received Notification of Change without Permit Revision
09-15-07: Advised TECO of possibility that permit is required
09-19-07: Requested additional information (RAI) regarding project
10-11-07: Received responses to RAI
10-12-07: Advised TECO and consultant (ECT) that permit is required
10-22-07: Received application for Units 3 and 4 stack and scrubber project
10-29-07: Distributed Intent to Issue Air Construction Permit

2.0 FACILITY INFORMATION

2.1 Facility Location: Big Bend Station located at Wyandotte Road between Apollo Beach and North Ruskin, Hillsborough County.



Figure 1. N. Ruskin, Apollo Beach and Big Bend

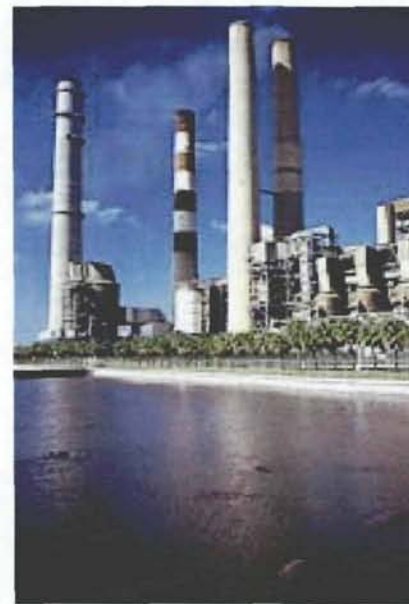


Figure 2. Big Bend Station

2.2 Standard Industrial Classification Code (SIC)

Major Group No.	49	Electric, Gas, and Sanitary Services
Group No.	491	Electric Services
Industry No.	4911	Electric Services

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

2.3 Existing Facility/Emission Unit Description

This facility is an electric utility.

This air construction permit will affect Steam Generators Nos. 3 and 4.

2.4 Regulatory Classification

The key regulatory provisions applicable to Stanton Units 1 and 2 are:

Title I, Part C, Clean Air Act (CAA): The facility is located in an area that is designated as "attainment", "maintenance", or "unclassifiable" for each pollutant subject to a National Ambient Air Quality Standard. It is classified as a "fossil fuel-fired steam electric plant of more than 250 million BTU per hour of heat input", which is one of the 28 Prevention of Significant Deterioration (PSD) Major Facility Categories with the lower PSD applicability threshold of 100 tons per year. Potential emissions of at least one regulated pollutant exceed 100 tons per year, therefore the facility is classified as a "major stationary source" of air pollution with respect to Rule 62-212.400, Florida Administrative Code (F.A.C.), Prevention of Significant Deterioration of Air Quality.

Title I, Section 111, CAA: Unit 4 is subject to Subpart Da (Standards of Performance for Electric Utility Steam Generating Units for Which Construction is Commenced After September 18, 1978) of the New Source Performance Standards in 40 Code of Federal Regulation (CFR) Part 60.

Title I, Section 112, CAA: The facility is a "Major Source" of hazardous air pollutants (HAP).

Title IV, CAA: The facility operates units subject to the Acid Rain provisions of the CAA.

Title V, CAA: The facility is a Title V or "Major Source of Air Pollution" in accordance with Chapter 62-213, F.A.C. because the potential emissions of at least one regulated pollutant exceed 100 tons per year (TPY). Regulated pollutants include pollutants such as carbon monoxide (CO), nitrogen oxides (NO_x), particulate matter (PM/PM₁₀), sulfur dioxide (SO₂), and volatile organic compounds (VOC).

CAIR: The facility is subject to the Clean Air Interstate Rule (CAIR) set forth in Rule 62-296.470, Florida Administrative Code (FAC).

CAMR: The facility is subject to the Clean Air Mercury Rule (CAMR) set forth in Rule 62-296.480, F.A.C.

Siting: Unit 4 was originally certified pursuant to the power plant siting provisions of Chapter 62-17, F.A.C.

3.0 PERMITTING STATUS

Operation of the Big Bend Station is authorized by the Title V Operation Permit Revision 0570039-017-AV that has an effective date of January 1, 2005 and expires on December 31, 2009. The current permit includes the applicable requirements from federal and state regulations and construction permits. It also includes a Consent Final Judgment (CFJ, DEP vs. TECO) dated December 6, 1999 and a Consent Decree (CD, EPA vs. TECO) dated February 29, 2000 and amended October 4, 2000. The CFJ and CD require

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

substantial progressive emission reductions from the four coal fired steam generation units by specific dates.

The current Title V Operation Permit (Title V Permit) includes a number of projects or improvements pursuant to the CFJ and CD including: improved scrubbing efficiency on Units 1 and 2; Low NO_x Burners (LNBs) on Units 1, 2, and 3; installation of new coal nozzles suitable for low NO_x operation; modification redesign of windbox components to allow for proper distribution and staging of air; and installation of a separate overfire air (SOFA) system on Unit 4.

The Title V Permit incorporates the terms of the original PSD permit for Unit 4 that required installation of a wet flue gas desulfurization (FGD) system or scrubber. The same permit incorporates subsequent permits that allowed the routing of exhaust gases from Unit 3 to the Unit 4 scrubber and specifically requires such treatment when petroleum coke is co-fired in Unit 3.

There are several active construction permits implementing requirements pursuant to the CFJ and CD to further reduce NO_x by installation of selective catalytic reduction (SCR) systems. Finally there are provisions in the CFJ and particularly the CD requiring progressive reductions in SO₂, especially for Unit 3. The details are discussed below.

4.0 ORIGINAL UNIT 4 LIMITS AND SUBSEQUENT SCRUBBER IMPROVEMENT

The U.S. Environmental Protection Agency (EPA) issued a PSD (PSD-FL-040) permit to TECO on October 15, 1981 to construct Unit 4. The best available control technology (BACT) determination was 0.82 pounds per million Btu heat input (lb/mmBtu) and was less than the NSPS Subpart Da limit of 1.2 lb/mmBtu. Subpart Da also has a scrubbing efficiency requirement of 90% whenever emissions are between 0.6 and 1.2 lb/mmBtu and 70% whenever they are less than 0.6 lb/mmBtu.

Unit 4 began commercial operation in 1985. Figure 3 is a diagram of the air pollution control equipment on Unit 4.

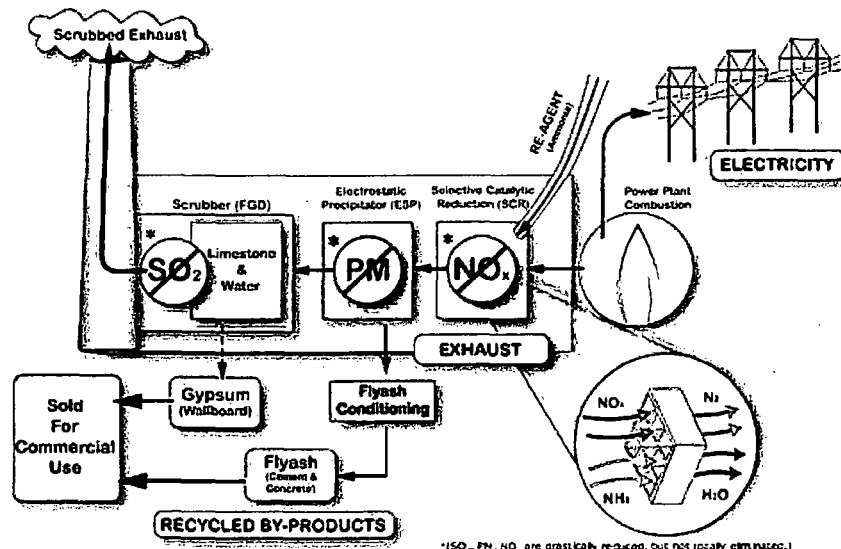


Figure 3. Diagram of Pollution Control Equipment on TECO Big Bend Unit 4

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

Besides the limit given above, there was a separate requirement pursuant to Subpart Da to achieve scrubbing efficiency on a sliding scale between 70 and 90% depending on the sulfur in the coal.

The wet limestone FGD scrubber was originally designed with four modules (three plus a spare). Based on the results of Department of Energy (DOE) sponsored testing of dibasic acid (DBA) additive on Unit 4 in 1992 TECO conducted modifications to treat flue gas from Unit 3 as well as that from Unit 4 in the original Unit 4 scrubber. This was accomplished by implementing the DBA program and operating all four modules (instead of three) at a maximum flue gas velocity of about 10 to 11 feet per second (ft/s). This velocity is about 50% greater than the original design velocity (DOE, 1997).

The primary benefit of the scrubber improvement is that it provided additional scrubber capacity for TECO Acid Rain SO₂ strategy providing the company with more options regarding sales or purchases of allowances.

5.0 UNITS 3 AND 4 INTERCONNECTION AND PETROLEUM COKE PERMITS

Prior to 1995, the key SO₂ limit applicable to Unit 3 was 6.5 pounds per million Btu lb/mmBtu on a two-hour basis and 8.5 tons per hour (TPH) on a 24-hour basis which equates to more than 74,000 tons per year (TPY). In May 1995 the Department of Environmental Protection (Department) through its Southwest District office issued an amendment of Unit 3 air operating permit (pre Title V). The key change added the following language:

"Tampa Electric Company is allowed to divert and integrate all of the Big Bend Unit 3 flue gas for the purposes of treating that flue gas in the existing Big Bend Unit No 4 flue gas desulfurization (FGD) system. While in the integrated mode Units 3 and 4 shall meet the sulfur dioxide emission limitations that are applicable to Unit 4 (40 CFR 60.40a) and Permit No. PSD-FL-040."

The 1995 action greatly reduced the limits applicable to Unit 3 but only when operating in the interconnected mode. Overall the requirements of Unit 4 remained more stringent than Unit 3 when not operating in interconnected mode. As discussed further below, the requirements for Unit 3 have since become much more stringent and will eventually be more stringent than Unit 4 if not already more stringent than Unit 4.

In September 1995 the Department's Bureau of Air Regulation issued a modification of the Unit 4 PSD permit providing for burning of a blend of coal and petroleum coke (petcoke). The permit did not change the previously cited limits but required adherence to the 90%. Conditions were placed in the permit to insure there would not be an increase in actual emissions resulting from petcoke use. Establishment of a 90% scrubbing provision in lieu of the previous range (70 to 90%) had the effect of increasing the stringency of the Unit 4 limits and also Unit 3 (when interconnected).

In September 1996 the Department's Bureau of Air Regulation issued a further amendment of the Unit 3 permit to provide for combustion of petcoke in Unit 3. The key provision is as follows:

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

“At all times while firing any blend of coal and petroleum coke, Unit No. 3 shall operate only in the integrated mode as described in Specific Condition No. 4 except during startups, shutdowns and/or malfunctions during all of which best operational practices shall be employed including the cessation of petroleum coke bunkering.”

While petcoke tended to increase SO₂ emissions, the scrubbing requirement caused overall emission reductions because petcoke use increased the amount of time during which the stringency of the Unit 3 requirements equaled those of Unit 4.

The changes to the Unit 4 requirements were included in a federally enforceable modification of the PSD permit. The requirements applicable to Unit 3 were not included in an enforceable and public noticed air construction permit. However they have been included in all subsequent Title V permits and the limitations have been made more stringent by the CFJ and especially the CD.

6.0 ADDITIONAL REQUIREMENTS OF THE CD

The CD requirements for SO₂ are more stringent than those of the CFJ. The CD did not change the limits applicable to Unit 4. However it did change the limits applicable to Unit 3 to the point where they are ultimately, if not already, more stringent than those applicable to Unit 4. Under several scenarios, the operation of the scrubber to meet the Unit 3 requirements has affected or can affect the stringency of the Unit 4 limits.

The following table shows the effects of the CD on the emission limits applicable to Unit 3 and Unit 4. The case of operation after the proposed now proposed project to split the scrubber is included though not foreseen in the CD.

Year	Unit 3 SO ₂ Limits		Unit 4 SO ₂ Limits	
	(lb/mmBtu)	Removal	(lb/mmBtu)	Removal
Before 2000 when not connected	6.5	-	0.82	90%
Before 2000 when interconnected	0.82	90%	0.82	90%
2000-2010 when interconnected	0.82	93%	0.82	93%
2000-2002 only Unit 3 operating	0.35	93%		
2002-2010 only Unit 3 operating	0.30	95%		
2010 if Unit 3 remains coal-fired	0.25	95%		
2000-2010 only Unit 4 operating			0.82	90%
2010 and thereafter interconnected*	0.25	95%	Presumed same as Unit 3	
2010 and thereafter if split*	0.25	95%	0.82	90%

* Inferred from reading of permits and CD that did not actually contemplate scrubber split.

The key point in the table above is that the CD requires that in the long run and by 2010, whatever scrubber serves Unit 3 (presently the Unit 4 scrubber) must achieve a 95% SO₂ removal requirement or achieve 0.25 lb/mmBtu. Also as long as Unit 3 and 4 are served by the same scrubber, Unit 4 will be scrubbed to a greater degree than otherwise required.

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

7.0 SO₂ EMISSIONS SINCE INTERCONNECTED OPERATION AND CD

The following charts show how SO₂ emissions have changed since the scrubber improvement and integration projects. According to the chart on the left side of Figure 4, Unit 3 SO₂ emissions declined considerably while there was a small increase in annual emissions from Unit 4. The two units together experienced a drop in SO₂ emissions from the range of 60,000 to 65,000 tons per year (TPY) during 1992 and 1994 to less than 20,000 tons in 1995.

Beginning in 2001 and thereafter, total emissions from the two units have been less than 10,000 TPY despite using blends of coal and petroleum coke. In recent years emissions from Unit 4 have been less than they were before sharing the scrubber with Unit 3.

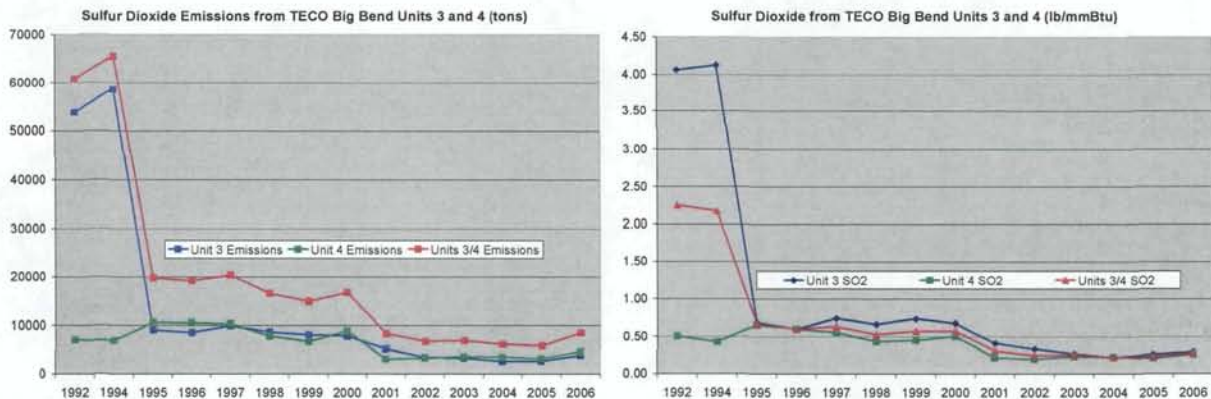


Figure 4. Sulfur Dioxide Emissions from Big Bend Units 3 and 4 in (tons, lb/mmBtu)

The SO₂ emission rates for Unit 3 dropped from values greater than 4.0 lb/mmBtu before commencing integrated operation in 1995 to less than 0.70 lb/mmBtu and eventually to less than 0.30 lb/mmBtu. The Unit 4 emission rate initially increased from approximately 0.5 to nearly 0.7 lb/mmBtu, but progressively fell thereafter to less than 0.30 lb/mmBtu.

The recent data suggest that the 2010 objectives of the CD have been nearly achieved by Unit 3. Furthermore significant reductions in Unit 4 emissions (not specifically required by the CD) from the limit of 0.82 lb/mmBtu have also been realized in part due to the compliance requirements for Unit 3 and by TECO's Acid Rain strategy.

8.0 TECO SCRUBBER SEPARATION PROJECT

Until 2010 Unit 3 may (with certain restrictions) operate up to 30 days per year during scrubber outages. Afterwards Unit 3 exhaust gases must be scrubbed at all times or the unit must be shut down. According to TECO in order to perform maintenance on one unit while the other unit is operating, the common scrubber must be split.

TECO proposes to reconfigure the duct work, split the common scrubber (two of the four modules per unit) and dedicate a separate existing stack to each unit. Unit 3 will be shut down for 6 months beginning in November 2007 to conduct the previously approved SCR installation project. Unit 4 will be shut down for one week in December to complete the scrubber separation. Under the proposed configuration, the gases will no longer be intermingled before or after treatment.

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

In general there would be concern if a scrubber originally dedicated to one unit (pursuant to a PSD permit and BACT determination) was split in two. According to the company, the overall scrubbing efficiency will be similar to the present operation in that the four modules will still accommodate the two units.

The previous projects resulted in significant actual reductions since 1995 of 50,000 to 55,000 TPY of SO₂ between Units 3 and 4. Also the sum of the emissions from the two units has since 2001 been about the same as the emissions from Unit 4 alone prior to interconnection. Most of the reductions since 1995 occurred due to actions taken by TECO pursuant to its Acid Rain strategy and before the subsequent requirements of the CD.

While it is possible that emissions from Unit 4 could increase after the split (when no longer restricted by Unit 3 efficiency and emission limit requirements in the CD) this is not actually expected by TECO to occur. While the Department does not necessarily agree that splitting the scrubber is the best way to conduct future operations, the Department defers to TECO on this matter. The Department can in the future review data in accordance with its rules to determine whether emissions increases have occurred and whether they are due to the scrubber split.

9.0 MODIFICATION AND PERMITTING APPLICABILITY

TECO claims that the project will not increase either actual or potential emissions and is not a *modification* as defined by Rule 62-210.200(24), F.A.C. Actually the section cited is the definition of *allowable emissions* rather than modification which is defined Rule 62-210.200(205), F.A.C. The relevant part of the definition follows:

“Modification” – Any physical change in, change in the method of operation of, or addition to a facility which would result in an increase in the actual emissions of any air pollutant subject to regulation under the Act, including any not previously emitted, from any emissions unit or facility. A physical change or change in the method of operation shall not include routine maintenance, repair, or replacement of component parts of an emissions unit.

There are clearly physical and operational changes associated with splitting the scrubbing and no longer practicing interconnected operation. The described actions are clearly not routine maintenance, repair or replacement. Actually they are quite novel and not at all routine. Actual emissions are defined at Rule 62-210.200(11), F.A.C. as follows:

“Actual Emissions” – The actual rate of emission of a pollutant from an emissions unit as determined in accordance with the following provisions:

- (a) In general, actual emissions as of a particular date shall equal the average rate, in tons per year, at which the emissions unit actually emitted the pollutant during a consecutive 24-month period which precedes the particular date and which is representative of the normal operation of the emissions unit. The Department shall allow the use of a different time period upon a determination that it is more representative of the normal operation of the emissions unit. Actual emissions shall be calculated using the emissions unit’s actual operating hours, production rates and types of materials processed, stored, or combusted during the selected time period.*

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

(b) *The Department may presume that unit-specific allowable emissions for an emissions unit are equivalent to the actual emissions of the emissions unit provided that such unit-specific allowable emissions limits are federally enforceable.*

(c) *For any emissions unit that has not begun normal operations on a particular date, actual emissions shall equal the potential emissions of the emissions unit on that date.*

As seen in Table 1, actual emissions in recent years have been very low in terms of TPY and lb/mmBtu. Unit 3 will soon be subject to limits of 0.25 lb SO₂/mmBtu or 95% scrubbing efficiency.

On the other hand, emissions from Unit 4 (after the scrubber split) can theoretically increase from their present low levels of 0.30 lb/mmBtu to the 0.82 or 90%. Realistically emissions of 0.82 lb/mmBtu are highly unlikely but there is not an applicable sulfur limit in the coal.

Also, normal operations have not yet commenced under the split mode with actual separation of the modules compared with the original configuration of Unit 4. Any comparison of recent actual emissions per (a) above with allowable or potential emissions per (b) or (c) above will easily result in an increase of SO₂ emissions.

Department concludes that the proposed project constitutes a modification and an air construction permit is required.

10.0 MAJOR MODIFICATION AND PSD PERMITTING APPLICABILITY

It is also necessary to determine whether the modification is subject to the Department's PSD rules at 62-212.400, F.A.C. The requirements of Sections 62-212.400(4) through (12), F.A.C., apply to major modifications of existing major stationary source. The key criterion is a comparison of *baseline actual* to *projected actual* emissions. Baseline actual emissions are defined for electric utility steam units at Section 62-210.200(36), F.A.C. as follows:

For any existing electric utility steam generating unit, baseline actual emissions means the average rate, in tons per year, at which the unit actually emitted the pollutant during any consecutive 24-month period selected by the owner or operator within the 5-year period immediately preceding the date a complete permit application is received by the Department. The Department shall allow the use of a different time period upon a determination that it is more representative of normal source operation.

Projected future actual emissions are defined at Section 62-210.200(248) as follows:

"Projected Actual Emissions" – The maximum annual rate, in tons per year, at which an existing emissions unit is projected to emit a PSD pollutant in any one of the 5 years following the date the unit resumes regular operation after the project, or in any one of the 10 years following that date, if the project involves increasing the emissions unit's design capacity or its potential to emit that PSD pollutant and full utilization of the unit would result in a significant emissions

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

increase or a significant net emissions increase at the major stationary source. One year is one 12-month period. In determining the projected actual emissions, the Department:

- (a) Shall consider all relevant information, including historical operational data, the company's own representations, the company's expected business activity and the company's highest projections of business activity, the company's filings with the State or Federal regulatory authorities, and compliance plans or orders, including consent orders; and*
- (b) Shall include fugitive emissions to the extent quantifiable and emissions associated with startups and shutdowns; and*
- (c) Shall exclude that portion of the unit's emissions following the project that an existing unit could have accommodated during the consecutive 24-month period used to establish the baseline actual emissions and that are also unrelated to the particular project including any increased utilization due to product demand growth; or*
- (d) In lieu of using the method set out in paragraphs (a) through (c) above, may be directed by the owner or operator to use the emissions unit's potential to emit, in tons per year.*

A major modification requires a PSD permit and is defined at Section 62-210.200(191), F.A.C. as follows:

*"Major Modification" – (a) Any physical change in or change in the method of operation of a major stationary source that would result in a **significant emissions increase** of a PSD pollutant and a **significant net emissions increase** of that pollutant from the major stationary source.*

Significant emissions rate, for the purpose of determining whether a significant net emissions increase (SNEI) has occurred, is defined at 62-210.200(278), F.A.C. The part of the definition that includes SO₂ is as follows:

"Significant Emissions Rate" – (a) With respect to any emissions increase or any net emissions increase, or the potential of a facility to emit any of the following pollutants, significant emissions rate means a rate of pollutant emissions that would equal or exceed:

- 1. A rate listed at 40 CFR 52.21(b)(23)(i), adopted by reference at Rule 62-204.800, F.A.C.; specifically, any of the following rates:*
 - a. Carbon monoxide: 100 tons per year (tpy);*
 - b. Nitrogen oxides: 40 tpy;*
 - c. Sulfur dioxide: 40 tpy; etc.*

The significant emissions rate (SER) for SO₂ of 40 TPY is very low especially compared with the emissions from Unit 3 and 4 over the years. Furthermore it is much less than the difference between actual emissions and allowable or potential emissions discussed in the previous section. Therefore the possibility of a SNEI for SO₂ is a consideration.

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

11.0 CONCLUSION

The Department's preliminary determination is based on the facts and representations provided by TECO, information on file regarding the previous projects, and the historical data available through the EPA Air Markets Program. The Department also considered the overall effects of the CFD, the CD, the EPA Acid Rain Program and the Clean Air Interstate Rule (CAIR).

Based on the foregoing technical evaluation of the application and other available information, the Department has made a determination that the proposed project will comply with applicable state and federal air pollution regulations. The Department will issue a Draft air construction permit to the applicant that provides for the requested split of the scrubber between Units 3 and 4. Recordkeeping will be required for determining in future years whether a SNEI of SO₂ occurs and is caused by the project.

The Department's determination is strictly limited to this specific case and should not be used as a precedent for other cases, or lead to unintended consequences construed from the language contained in this determination. Ultimately, it is the Department that interprets its own regulations and opinions.

Harvey, Mary

From: Harvey, Mary
Sent: Wednesday, October 31, 2007 2:32 PM
To: 'kasheffield@tecoenergy.com'; 'btburrows@tecoenergy.com'; 'Mr. Thomas W. Davis, ECT'; Nasca, Mara; 'campbell@epchc.org'; 'Mr. Jim Little, EPA Region 4'
Cc: Cascio, Tom; Linero, Alvaro; Adams, Patty; Gibson, Victoria
Subject: TECO - DEP File #'s 0570039-030-AC & 0570039-031-AC - DRAFT
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To: kasheffield@tecoenergy.com; btburrows@tecoenergy.com; Mr. Thomas W. Davis, ECT; Nasca, Mara; campbell@epchc.org; Mr. Jim Little, EPA Region 4
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Sent: Wednesday, October 31, 2007 2:44 PM
To: Harvey, Mary
Subject: Re: FW: TECO - DEP File #'s 0570039-030-AC & 0570039-031-AC - DRAFT

thanks

Katy R. Forney
Air Permits Section
EPA - Region 4
61 Forsyth St., SW
Atlanta, GA 30024

Phone: 404-562-9130
Fax: 404-562-9019

"Harvey, Mary"
<Mary.Harvey@dep
.state.fl.us>

10/31/2007 02:33
PM

To
James Little/R4/USEPA/US@EPA
cc
Kathleen Forney/R4/USEPA/US@EPA
Subject
FW: TECO - DEP File #'s
0570039-030-AC & 0570039-031-AC -
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Cc: Cascio, Tom; Linero, Alvaro; Adams, Patty; Gibson, Victoria
Subject: TECO - DEP File #'s 0570039-030-AC & 0570039-031-AC - DRAFT

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To: Harvey, Mary
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To: 'kashfield@tecoenergy.com'; 'btburrows@tecoenergy.com'; 'Mr. Thomas W. Davis, ECT'; Nasca, Mara; 'campbell@epchc.org'; 'Mr. Jim Little, EPA Region 4'
Cc: Cascio, Tom; Linero, Alvaro; Adams, Patty; Gibson, Victoria
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To: Harvey, Mary
Sent: Wednesday, October 31, 2007 2:42 PM
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To: Harvey, Mary
Sent: Wednesday, October 31, 2007 2:38 PM
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From: Karen Sheffield [kashffield@tecoenergy.com]
Sent: Thursday, November 01, 2007 6:42 AM
To: Harvey, Mary
Cc: Byron Burrows
Subject: Re: TECO - DEP File #'s 0570039-030-AC & 0570039-031-AC -DRAFT

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Thank you,

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Harvey, Mary

From: Byron Burrows [btburrows@tecoenergy.com]
Sent: Wednesday, October 31, 2007 4:43 PM
To: Harvey, Mary
Subject: Re: TECO - DEP File #'s 0570039-030-AC & 0570039-031-AC -DRAFT

File Received.

Thanks,

Byron

Byron T. Burrows, P.E. BCEE
Manager, Air Programs
Tampa Electric Company
P.O. Box 111
Tampa, FL 33601-0111
Ph - 813.228.1282
Mob - 813.230.3445
Fax - 813.228.1308
btburrows@tecoenergy.com

>>> "Harvey, Mary" <Mary.Harvey@dep.state.fl.us> 10/31/07 2:31:54 PM >>>

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11/1/2007

Harvey, Mary

From: Nasca, Mara
To: Harvey, Mary
Sent: Wednesday, October 31, 2007 3:36 PM
Subject: Read: TECO - DEP File #'s 0570039-030-AC & 0570039-031-AC - DRAFT

Your message

To: 'kasheffield@tecoenergy.com'; 'btburrows@tecoenergy.com'; 'Mr. Thomas W. Davis, ECT'; Nasca, Mara; 'campbell@epchc.org'; 'Mr. Jim Little, EPA Region 4'
Cc: Cascio, Tom; Linero, Alvaro; Adams, Patty; Gibson, Victoria
Subject: TECO - DEP File #'s 0570039-030-AC & 0570039-031-AC - DRAFT
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Harvey, Mary

From: Campbell, Jerry [Campbell@epchc.org]
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Subject: Read: TECO - DEP File #'s 0570039-030-AC & 0570039-031-AC - DRAFT

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