



TAMPA ELECTRIC

October 19, 2007

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BUREAU OF AIR REGULATION

Ms. Trina Vielhauer
Chief, Bureau of Air Regulation
Florida Department of Environmental Protection
Division of Air Resource Management
111 South Magnolia Drive, Suite 4
Tallahassee, FL 32301

Via Fed Ex
Airbill No. 7997 3715 0502

Re: Tampa Electric Company (TEC)
Big Bend Station; Title V Permit No. 0570039-017-AV
Request for Air Construction Permit - Units 3 and 4 Ductwork Revisions

Dear Ms. Vielhauer,

Operation of the Tampa Electric Company (TEC) Big Bend Station is currently authorized by Title V Air Operation Permit No. 0570039-017-AV effective January 1, 2005 with an expiration date of December 31, 2009.

In correspondence dated September 7, 2007, TEC advised the Department of its plans to separate the common FGD scrubber serving Big Bend Station Units 3 and 4 as required by the EPA Consent Decree. The common FGD scrubber consists of four scrubbing towers (A through D). Following revisions to the Units 3 and 4 flue gas ductwork, Unit 3 will be scrubbed by Towers A and B and will discharge through Stack BB03 (formerly named CS003), and Unit 4 will be scrubbed by Towers C and D and will discharge through Stack BB04 (formerly named CS002).

The Unit 3 and Unit 4 ductwork revisions will not increase either actual or potential emissions. Accordingly, the ductwork revision project is not a modification as defined by Rule 62-210.200(24), F.A.C., and therefore does not require an air construction permit in accordance with Rule 62-210.300(1)(a), F.A.C. The ductwork revisions also qualify as an operating change as defined by Rule 62-210.200(224), F.A.C., and therefore do not require a revision to the Title V air operation permit in accordance with Rule 62-213.410(2), F.A.C. In our numerous discussions with Bureau staff about this issue, we have not been provided with any information or rule citations supporting a contrary interpretation.

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Ms. Trina Vielhauer
October 19, 2007
Page 2 of 2

Although we remain convinced that the Big Bend Station Unit 3 and Unit 4 ductwork revisions do not require pre-construction permits, this application for a Title V air construction permit is submitted in response to a request by the Department. The administrative portion of the Department's Application for Air Permit - Long Form is enclosed for your review. Your expeditious processing of this air construction permit application will be appreciated.

If you have any questions regarding this request, please feel free to contact me at (813) 228-1282.

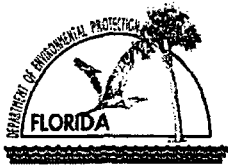
Sincerely,

A handwritten signature in black ink, appearing to read 'Byron Burrows', with a long horizontal flourish extending to the right.

Byron Burrows, P.E. BCEE
Manager - Air Programs
Environmental, Health & Safety

Enclosures

c/enc: Ms. Mara Grace Nasca, FDEP SW
Mr. Al Linero, FDEP
Mr. Lynn Robinson, EPCHC
Mr. David Llyod, EPA Region 4



Department of Environmental Protection

Division of Air Resource Management

APPLICATION FOR AIR PERMIT - LONG FORM

I. APPLICATION INFORMATION

Air Construction Permit – Use this form to apply for any air construction permit at a facility operating under a federally enforceable state air operation permit (FESOP) or Title V air permit. Also use this form to apply for an air construction permit:

- For a proposed project subject to prevention of significant deterioration (PSD) review, nonattainment area (NAA) new source review, or maximum achievable control technology (MACT) review; or
- Where the applicant proposes to assume a restriction on the potential emissions of one or more pollutants to escape a federal program requirement such as PSD review, NAA new source review, Title V, or MACT; or
- Where the applicant proposes to establish, revise, or renew a plantwide applicability limit (PAL).

Air Operation Permit – Use this form to apply for:

- An initial federally enforceable state air operation permit (FESOP); or
- An initial/revised/renewal Title V air operation permit.

Air Construction Permit & Title V Air Operation Permit (Concurrent Processing Option) – Use this form to apply for both an air construction permit and a revised or renewal Title V air operation permit incorporating the proposed project.

To ensure accuracy, please see form instructions.

Identification of Facility

| | |
|---|--|
| 1. Facility Owner/Company Name: Tampa Electric Company | |
| 2. Site Name: Big Bend Station | |
| 3. Facility Identification Number: 0570039 | |
| 4. Facility Location... Street Address or Other Locator: 13031 Wyandotte Road City: Apollo Beach County: Hillsborough Zip Code: 33572 | |
| 5. Relocatable Facility? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | 6. Existing Title V Permitted Facility? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |

Application Contact

| | |
|---|--|
| 1. Application Contact Name: Byron T. Burrows, P.E., Manager Air Programs | |
| 2. Application Contact Mailing Address... Organization/Firm: Tampa Electric Company Street Address: P.O. Box 111 City: Tampa State: FL Zip Code: 33601-0111 | |
| 3. Application Contact Telephone Numbers... Telephone: (813) 228-1282 ext. Fax: (813) 228-1308 | |
| 4. Application Contact Email Address: btburrows@tecoenergy.com | |

Application Processing Information (DEP Use)

| | |
|------------------------------------|-----------------------------------|
| 1. Date of Receipt of Application: | 3. PSD Number (if applicable): |
| 2. Project Number(s): | 4. Siting Number (if applicable): |

APPLICATION INFORMATION

Purpose of Application

This application for air permit is submitted to obtain: (Check one)

Air Construction Permit

- Air construction permit
- Air construction permit to establish, revise, or renew a plantwide applicability limit (PAL).
- Air construction permit to establish, revise, or renew a plantwide applicability limit (PAL), and separate air construction permit to authorize construction or modification of one or more emissions units covered by the PAL.

Air Operation Permit

- Initial Title V air operation permit.
- Title V air operation permit revision.
- Title V air operation permit renewal.
- Initial federally enforceable state air operation permit (FESOP) where professional engineer (PE) certification is required.
- Initial federally enforceable state air operation permit (FESOP) where professional engineer (PE) certification is not required.

**Air Construction Permit and Revised/Renewal Title V Air Operation Permit
(Concurrent Processing)**

- Air construction permit and Title V permit revision, incorporating the proposed project.
- Air construction permit and Title V permit renewal, incorporating the proposed project.

Note: By checking one of the above two boxes, you, the applicant, are requesting concurrent processing pursuant to Rule 62-213.405, F.A.C. In such case, you must also check the following box:

- I hereby request that the department waive the processing time requirements of the air construction permit to accommodate the processing time frames of the Title V air operation permit.

APPLICATION INFORMATION

Application Comment

Operation of the Tampa Electric Company (TEC) Big Bend Station is currently authorized by Title V Air Operation Permit No. 0570039-017-AV effective January 1, 2005 with an expiration date of December 31, 2009.

In correspondence dated September 7, 2007, TEC advised the Department of its plans to separate the common FGD scrubber serving Big Bend Station Units 3 and 4 as required by the EPA Consent Decree. The common FGD scrubber consists of four scrubbing towers (A through D). Following revisions to the Units 3 and 4 flue gas ductwork, Unit 3 will be scrubbed by Towers A and B and will discharge through Stack BB03 (formerly named CS003), and Unit 4 will be scrubbed by Towers C and D and will discharge through Stack BB04 (formerly named CS002).

The Unit 3 and Unit 4 ductwork revisions will not increase either actual or potential emissions. Accordingly, the ductwork revision project is not a *modification* as defined by Rule 62-210.200(24), F.A.C., and therefore does not require an air construction permit in accordance with Rule 62-210.300(1)(a), F.A.C. The ductwork revisions also qualify as an *operating change* as defined by Rule 62-210.200(224), F.A.C., and therefore do not require a revision to the Title V air operation permit in accordance with Rule 62-213.410(2), F.A.C.

Although the Big Bend Station Unit 3 and Unit 4 ductwork revisions do not require pre-construction permits, this application for an air construction permit is submitted in response to a request by the Department.

APPLICATION INFORMATION

Scope of Application

| Emissions Unit ID Number | Description of Emissions Unit | Air Permit Type | Air Permit Proc. Fee |
|---------------------------------|--------------------------------------|------------------------|-----------------------------|
| 003 | Unit No. 3 Steam Generator | N/A | N/A |
| 004 | Unit No. 4 Steam Generator | N/A | N/A |
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Application Processing Fee

Check one: Attached - Amount: \$ _____ Not Applicable

APPLICATION INFORMATION

Owner/Authorized Representative Statement

Complete if applying for an air construction permit or an initial FESOP.

| |
|---|
| 1. Owner/Authorized Representative Name : Karen Sheffield, General Manager, Big Bend Station |
| 2. Owner/Authorized Representative Mailing Address... Organization/Firm: Tampa Electric Company Street Address: P.O. Box 111 City: Tampa State: Florida Zip Code: 33601-0111 |
| 3. Owner/Authorized Representative Telephone Numbers... Telephone: (813) 228-4111 ext. Fax: (813) 228-1308 |
| 4. Owner/Authorized Representative Email Address: kasheffield@tecoenergy.com |
| 5. Owner/Authorized Representative Statement: <i>I, the undersigned, am the owner or authorized representative of the facility addressed in this air permit application. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof and all other requirements identified in this application to which the facility is subject. I understand that a permit, if granted by the department, cannot be transferred without authorization from the department, and I will promptly notify the department upon sale or legal transfer of the facility or any permitted emissions unit.</i> Signature: <u><i>Karen A. Sheffield</i></u> Date: <u><i>10/18/07</i></u> |

APPLICATION INFORMATION

Application Responsible Official Certification N/A

Complete if applying for an initial/revised/renewal Title V permit or concurrent processing of an air construction permit and a revised/renewal Title V permit. If there are multiple responsible officials, the “application responsible official” need not be the “primary responsible official.”

| |
|---|
| 1. Application Responsible Official Name: |
| 2. Application Responsible Official Qualification (Check one or more of the following options, as applicable): <input type="checkbox"/> For a corporation, the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit under Chapter 62-213, F.A.C. <input type="checkbox"/> For a partnership or sole proprietorship, a general partner or the proprietor, respectively. <input type="checkbox"/> For a municipality, county, state, federal, or other public agency, either a principal executive officer or ranking elected official. <input type="checkbox"/> The designated representative at an Acid Rain source. |
| 3. Application Responsible Official Mailing Address... Organization/Firm: Street Address: City: State: Zip Code: |
| 4. Application Responsible Official Telephone Numbers... Telephone: ext. Fax: |
| 5. Application Responsible Official Email Address: |
| 6. Application Responsible Official Certification: <i>I, the undersigned, am a responsible official of the Title V source addressed in this air permit application. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof and all other applicable requirements identified in this application to which the Title V source is subject. I understand that a permit, if granted by the department, cannot be transferred without authorization from the department, and I will promptly notify the department upon sale or legal transfer of the facility or any permitted emissions unit. Finally, I certify that the facility and each emissions unit are in compliance with all applicable requirements to which they are subject, except as identified in compliance plan(s) submitted with this application.</i> _____ Signature _____ Date |

APPLICATION INFORMATION
Professional Engineer Certification

1. Professional Engineer Name: **Thomas W. Davis**
Registration Number: **36777**

2. Professional Engineer Mailing Address...
Organization/Firm: **Environmental Consulting & Technology, Inc.**
Street Address: **3701 Northwest 98th Street**
City: **Gainesville** State: **Florida** Zip Code: **32606-5004**

3. Professional Engineer Telephone Numbers...
Telephone: **(352) 332-0444** ext. Fax: **(352) 332-6722**

4. Professional Engineer Email Address: **tdavis@ectinc.com**

5. Professional Engineer Statement:

I, the undersigned, hereby certify, except as particularly noted herein, that:*

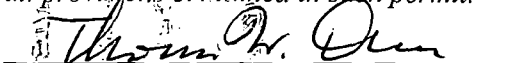
(1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this application for air permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; and

(2) To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application.

(3) If the purpose of this application is to obtain a Title V air operation permit (check here , if so), I further certify that each emissions unit described in this application for air permit, when properly operated and maintained, will comply with the applicable requirements identified in this application to which the unit is subject, except those emissions units for which a compliance plan and schedule is submitted with this application.

(4) If the purpose of this application is to obtain an air construction permit (check here , if so) or concurrently process and obtain an air construction permit and a Title V air operation permit revision or renewal for one or more proposed new or modified emissions units (check here , if so), I further certify that the engineering features of each such emissions unit described in this application have been designed or examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application.

(5) If the purpose of this application is to obtain an initial air operation permit or operation permit revision or renewal for one or more newly constructed or modified emissions units (check here , if so), I further certify that, with the exception of any changes detailed as part of this application, each such emissions unit has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with all provisions contained in such permit.


Signature

10/10/07
Date

(seal)

*Attach any exception to certification statement.

APPLICATION INFORMATION

II. FACILITY INFORMATION

A. GENERAL FACILITY INFORMATION

Facility Location and Type

| | | | |
|--|--------------------------------------|--|------------------------------------|
| 1. Facility UTM Coordinates... Zone 17 East (km) 361.9 North (km) 3,075.0 | | 2. Facility Latitude/Longitude... Latitude (DD/MM/SS) Longitude (DD/MM/SS) | |
| 3. Governmental Facility Code: 0 | 4. Facility Status Code: A | 5. Facility Major Group SIC Code: 49 | 6. Facility SIC(s): 4911 |
| 7. Facility Comment : | | | |

Facility Contact

| |
|---|
| 1. Facility Contact Name: Karen Zwolak, Senior Environmental Consultant |
| 2. Facility Contact Mailing Address... Organization/Firm: Tampa Electric Company Street Address: P.O. Box 111 City: Tampa State: Florida Zip Code: 33601-0111 |
| 3. Facility Contact Telephone Numbers: Telephone: (813) 228-4111 ext. Fax: (813) 228-1308 |
| 4. Facility Contact Email Address: kozwolak@tecoenergy.com |

Facility Primary Responsible Official N/A

Complete if an "application responsible official" is identified in Section I. that is not the facility "primary responsible official."

| |
|--|
| 1. Facility Primary Responsible Official Name: |
| 2. Facility Primary Responsible Official Mailing Address... Organization/Firm: Street Address: City: State: Zip Code: |
| 3. Facility Primary Responsible Official Telephone Numbers... Telephone: () - ext. Fax: () - |
| 4. Facility Primary Responsible Official Email Address: |

APPLICATION INFORMATION

Facility Regulatory Classifications

Check all that would apply *following* completion of all projects and implementation of all other changes proposed in this application for air permit. Refer to instructions to distinguish between a “major source” and a “synthetic minor source.”

| | |
|---|----------------------------------|
| 1. <input type="checkbox"/> Small Business Stationary Source | <input type="checkbox"/> Unknown |
| 2. <input type="checkbox"/> Synthetic Non-Title V Source | |
| 3. <input checked="" type="checkbox"/> Title V Source | |
| 4. <input checked="" type="checkbox"/> Major Source of Air Pollutants, Other than Hazardous Air Pollutants (HAPs) | |
| 5. <input type="checkbox"/> Synthetic Minor Source of Air Pollutants, Other than HAPs | |
| 6. <input checked="" type="checkbox"/> Major Source of Hazardous Air Pollutants (HAPs) | |
| 7. <input type="checkbox"/> Synthetic Minor Source of HAPs | |
| 8. <input checked="" type="checkbox"/> One or More Emissions Units Subject to NSPS (40 CFR Part 60) | |
| 9. <input type="checkbox"/> One or More Emissions Units Subject to Emission Guidelines (40 CFR Part 60) | |
| 10. <input type="checkbox"/> One or More Emissions Units Subject to NESHAP (40 CFR Part 61 or Part 63) | |
| 11. <input type="checkbox"/> Title V Source Solely by EPA Designation (40 CFR 70.3(a)(5)) | |
| 12. Facility Regulatory Classifications Comment: | |
| | |

APPLICATION INFORMATION

List of Pollutants Emitted by Facility

| 1. Pollutant Emitted | 2. Pollutant Classification | 3. Emissions Cap [Y or N]? |
|--------------------------|-----------------------------|-------------------------------|
| NOX | A | N |
| SO2 | A | Y |
| CO | A | N |
| PM10 | A | Y |
| PM | A | Y |
| VOC | A | N |
| H106 (Hydrogen Chloride) | A | N |
| H107 (Hydrogen Fluoride) | A | N |
| H133 (Nickel Compounds) | A | N |
| HAPS (Total) | A | N |
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APPLICATION INFORMATION

B. EMISSIONS CAPS

Facility-Wide or Multi-Unit Emissions Caps

| 1. Pollutant Subject to Emissions Cap | 2. Facility Wide Cap [Y or N]? (all units) | 3. Emissions Unit ID No.s Under Cap (if not all units) | 4. Hourly Cap (lb/hr) | 5. Annual Cap (ton/yr) | 6. Basis for Emissions Cap |
|---------------------------------------|--|--|-----------------------|------------------------|----------------------------|
| SO2 | N | 001 - 004 | | 71,810 | ESCPSD |
| PM/PM10 | N | 001 - 004 | | 2,767 | ESCPSD |
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7. Facility-Wide or Multi-Unit Emissions Cap Comment:

Additional SO₂ caps for Units 001 – 003 are 31.5 ton/hr (3-hour average) and 25 ton/hr (24-hour block average). In addition, Units 001 and 002 are limited to 16.5 ton/hr SO₂ (24-hour block average).

APPLICATION INFORMATION

C. FACILITY ADDITIONAL INFORMATION

Additional Requirements for All Applications, Except as Otherwise Stated

| |
|---|
| 1. Facility Plot Plan: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Previously Submitted, Date Oct 2004 |
| 2. Process Flow Diagram(s): (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Previously Submitted, Date: Jan 2005 |
| 3. Precautions to Prevent Emissions of Unconfined Particulate Matter: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Previously Submitted, Date: Oct 2004 |

Additional Requirements for Air Construction Permit Applications

| |
|--|
| 1. Area Map Showing Facility Location: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable (existing permitted facility) |
| 2. Description of Proposed Construction, Modification, or Plantwide Applicability Limit (PAL): <input type="checkbox"/> Attached, Document ID: _____ See Application Comment on Page 3 |
| 3. Rule Applicability Analysis: <input type="checkbox"/> Attached, Document ID: _____ Not Applicable |
| 4. List of Exempt Emissions Units (Rule 62-210.300(3), F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable |
| 5. Fugitive Emissions Identification: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable |
| 6. Air Quality Analysis (Rule 62-212.400(7), F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable |
| 7. Source Impact Analysis (Rule 62-212.400(5), F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable |
| 8. Air Quality Impact since 1977 (Rule 62-212.400(4)(e), F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable |
| 9. Additional Impact Analyses (Rules 62-212.400(8) and 62-212.500(4)(e), F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable |
| 10. Alternative Analysis Requirement (Rule 62-212.500(4)(g), F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable |

APPLICATION INFORMATION

Additional Requirements for FESOP Applications N/A

- | |
|--|
| 1. List of Exempt Emissions Units (Rule 62-210.300(3)(a) or (b)1., F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable (no exempt units at facility) |
|--|

Additional Requirements for Title V Air Operation Permit Applications N/A

| |
|--|
| 1. List of Insignificant Activities (Required for initial/renewal applications only): <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable (revision application) |
| 2. Identification of Applicable Requirements (Required for initial/renewal applications, and for revision applications if this information would be changed as a result of the revision being sought): <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable (revision application with no change in applicable requirements) |
| 3. Compliance Report and Plan (Required for all initial/revision/renewal applications): <input type="checkbox"/> Attached, Document ID: _____ Note: A compliance plan must be submitted for each emissions unit that is not in compliance with all applicable requirements at the time of application and/or at any time during application processing. The department must be notified of any changes in compliance status during application processing. |
| 4. List of Equipment/Activities Regulated under Title VI (If applicable, required for initial/renewal applications only): <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Equipment/Activities On site but Not Required to be Individually Listed <input type="checkbox"/> Not Applicable |
| 5. Verification of Risk Management Plan Submission to EPA (If applicable, required for initial/renewal applications only): <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable |
| 6. Requested Changes to Current Title V Air Operation Permit: <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable |

Additional Requirements Comment

| |
|--|
| |
|--|