



Department of Environmental Protection

Jeb Bush
Governor

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

Colleen M. Castille
Secretary

July 1, 2005

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

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

Re: DEP Files 0570039-018-AC and 019-AV
Big Bend Station Fuel Transloading and Unit 4 CO Emission Limit
Application Status

Dear Ms. Sheffield:

The Department received TECO's response to our incompleteness letter on May 31, 2005. By electronic mail dated June 28 we advised Ms. Shelley Castro of the further additional information required to process the application. This letter is to provide you with some details on the status of the present carbon monoxide (CO) emission limit on Unit 4.

The application requests removal of the CO emission limitation (0.029 lb/mmBtu) that is in the present Title V Operation Permit issued by the Department and the PSD Permit Modification issued by EPA Region 4 in 1985 (that increased the limit from 0.014 lb/mmBtu).

We cannot remove the BACT CO limit without information supporting TECO's claim that the current limit is no longer appropriate because the CO monitoring and testing requirements were already removed from Permit PSD-FL-040 in the 1980's. We have found no record that the monitoring and testing requirements were actually removed. We cannot remove a BACT limit unless previously approved and we cannot modify the CO BACT limit without a specific application or a modification of the present application requesting a different CO BACT limit.

We agree, based on information provided by TECO, that the CO BACT limit is relatively low for a coal-fired unit. A proper BACT analysis will (among other things) require submittal of CO emission data. According to conversations with some of your staff, there is no CO data available for Unit 4. However, some data should be available from the various NO_x control studies. It is also likely that data is also available from the petroleum coke trial tests conducted in the mid-1990's and presumably thereafter documenting that there were no significant emission increases caused by permitted petroleum coke use.

If you have any questions regarding this matter, please call Teresa Heron at 850/921-9529.

Sincerely,

FLX
A. A. Linero, Program Administrator
South Permitting Section

cc: Tom Davis, P.E.
Byron Burrows, TECO
Alice Harmon, EPCHC
Jim Little, EPA

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