



TAMPA ELECTRIC

June 11, 2004

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

**Re: Tampa Electric Company (TEC)
Big Bend Station
Title V Permit No. 0570039-010-AV
Request for Generic Exemption
Coal, Petcoke or Slag Transloading**

Dear Ms. Vielhauer,

This purpose of this correspondence is to notify the Florida Department of Environmental Protection (Department) that Tampa Electric Company (TEC) intends to utilize the fuel yard at Big Bend Station to temporarily store coal, petcoke or slag for another facility. TEC presently handles a variety of solid fuels at its Big Bend Station located in North Ruskin, Hillsborough County. These solid fuels include coal, coal residual, and petroleum coke (petcoke). TEC plans to receive, store, and transfer coal, petcoke or slag to trucks for subsequent use by another facility.

TEC is submitting this request for a generic exemption to ensure that this is included in Big Bend Station's Title V Permit. TEC believes that the transloading operation qualifies as a generic exemptions unit per Florida Administrative Code (F.A.C.) 62-210.300(3)(b). TEC believes that this request does not need to be formally submitted until permit renewal per F.A.C. 62-213.430(6). However, in the interest of completeness and open disclosure, TEC is informing the Department with this letter.

The coal, petcoke or slag will be brought in by barge at infrequent intervals and transloaded onto existing solid fuel handling equipment. The only new additional emission points associated with the handling of coal, petcoke or slag are: (a) the transfer of coal, petcoke or slag from a storage pile by front-end loaders to trucks, and (b) coal, petcoke or slag truck travel on Big Bend Station paved roads. All other coal, petcoke or slag handling activities will utilize existing equipment; i.e., conveyor belts, storage pile stackout, dozer operations on storage piles, etc. The coal or petcoke will be treated with a chemical surfactant prior to arriving at the Big Bend Station. Based on its glassine properties, the slag has minimal dust potential and therefore does not need to be treated with a chemical surfactant. TEC plans to handle a maximum of 150,000 tons of coal, petcoke, and slag annually. There will be no increases in maximum hourly or annual Big Bend Station fuel yard solid fuel handling rates. TEC will continue to comply with all solid fuel yard requirements specified in its current Big Bend Station Title V operating permit.

A block diagram with the illustrated transfer points is included in Attachment D. The coal, petcoke or slag is loaded into the hopper on the dock with the clamshell and transfers onto the D conveyor. From the D conveyor it moves through the T1 (transfer structure 1). It is then transferred through the T1 to the E conveyor. From the E conveyor it moves through the T2 (transfer structure 2). It is then transferred through the T2 to the Y conveyor. Finally, the coal, petcoke or slag moves from the Y conveyor to the Z

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conveyor. The Z conveyor stacks the coal, petcoke or slag material in the North Yard. Each will have individual piles. All transfer structures are enclosed. The hopper on the dock is enclosed on 3 sides and the top.

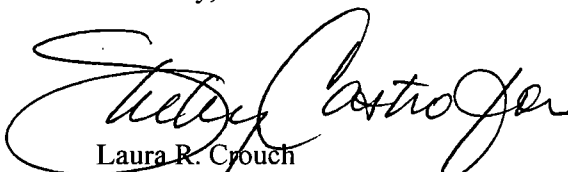
Potential PM/PM₁₀ emissions were estimated using applicable procedures from EPA's AP-42 document, *Compilation of Air Pollutant Emission Factors, Fifth Edition*. Specifically, potential PM/PM₁₀ emissions from coal, petcoke or slag truck loading were estimated using procedures obtained from AP-42, Section 13.2.4, Aggregate Handling and Storage Piles. Potential PM/PM₁₀ emissions due to coal, petcoke or slag truck traffic on paved plant roadways were estimated using procedures obtained from AP-42, Section 13.2.1, Paved Roads. As requested by the Department, the emission estimates also include transloading operations that utilize existing solid fuel handling equipment. However, the hourly emissions from existing fuel handling equipment during transloading will be lower than currently authorized for this equipment because the maximum transloading throughput rate of 144.2 tons per hour is much lower than the maximum rate of 4,000 tons per hour for existing solid fuel handling. Details of these potential PM/PM₁₀ emission rate estimates are provided in Attachment A. The coal, petcoke, or slag handling potential emission rates, using these AP-42 procedures, are estimated to total between 3.07 - 3.28 and 0.65 - 0.75 tons per year for PM and PM₁₀, respectively. These estimated emission rates are well below the 5.0 tons per year generic and insignificant emissions unit thresholds. The coal, petcoke or slag will not emit lead or any other hazardous air pollutants. There is no unit-specific requirement for coal, petcoke or slag handling, and the additional emissions from the activity will not cause the facility to exceed any preconstruction review emission thresholds. Therefore, the coal, petcoke or slag handling activity qualifies for a generic exemption and constitutes an "insignificant activity."

A Professional Engineer certification is provided in Attachment B along with a Responsible Official certification in Attachment C.

Based on this information, TEC believes that this operation is exempt from permitting per F.A.C. 62-210.300(3)(b) and requests written concurrence from the Department. TEC appreciates the Department's immediate consideration in this matter.

If you have any questions, please feel free to telephone Shelly Castro or me at (813) 228-4408.

Sincerely,



Laura R. Crouch
Manager / Air Programs
Environmental, Health & Safety

EHS/bmr/SSC195

Attachments

c/attach.: Mr. Jerry Kissel, FDEP SW
Mr. Scott Sheplak, FDEP
Mr. Sterlin Woodard, EPCHC
Ms. Alice Harman, EPCHC