



May 20, 2011

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

Via FedEx  
Air Bill No. 7947 8171 5707

**Re: Tampa Electric Company - Big Bend Station  
Title V Permit Number 0570039-045-AV  
Temporary Relief to Permit Condition A.53  
Facility ID No. 0570039**

RECEIVED  
MAY 23 2011  
BUREAU OF  
AIR REGULATION

Dear Ms. Vielhauer:

Condition A.53 requires Unit No. 1 to be shut down during compliance testing of Unit No. 2. Conversely, the condition requires Unit No. 2 to be shut down during the compliance testing of Unit No. 1. Unplanned unit shutdowns, equipment malfunctions and electrical grid requirements make it difficult to meet stack testing requirements in Condition A.53. Furthermore, this results in numerous correspondences to the Florida Department of Environmental Protection (FDEP) and Environmental Protection Commission of Hillsborough County (EPC) and confusion with the notification process.

The previous SCR outages and shorter scheduled outages provided opportunities to meet Condition A.53. Since the implementation of these enhancements, Unit 1 and 2 availabilities have improved making it more difficult to meet Condition A.53. In 2010, seventeen (17) renotification correspondences were submitted to both the FDEP and EPC to reschedule stack tests on Units 1 and 2. Similarly year to date in 2011, approximately twelve (12) stack test renotification correspondences were submitted to the both agencies. A summary of the 2010 and 2011 notification requests are shown in the table below.

TEC is currently preparing a permit application to modify Condition A.53 to allow compliance testing of both Units 1 and 2 while online. This will substantially reduce the renotification correspondences and improve communication with the FDEP and EPC.

Condition A.43 also requires all units to be tested during the federal fiscal year (October 1<sup>st</sup> through September 30<sup>th</sup>) to demonstrate compliance with PM, NO<sub>x</sub> and SO<sub>2</sub>. This fiscal year deadline is fast approaching. Currently, there are no certain dates scheduled to test Unit 1 or Unit

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2. Therefore, TEC is requesting enforcement discretion to provide temporary relief of Condition A.53 to allow stack testing of Units 1 and 2 online. This request will serve as temporary condition to ensure compliance with Condition A.43.

Description	Rescheduling/Agency Renotification Requests
<b>2010</b>	
Unit 1	April 14, April 20, April 21, and December 14, 2010
Unit 2	January 7, February 17, February 18, February 24, March 8, March 16, March 24, March 30, April 20, April 14, April 15, April 21, May 11, May 18, May 19, and December 14, 2010
<b>2011</b>	
Unit 1	May 16 and June 16, 2011
Unit 2	January 11, January 26, March 9, March 22, April 12, April 21, April 28, April 29, May 9, May 13, May 16, and May 19, 2011

Please contact me at (813) 228-4232 or Byron Burrows at (813) 228-1282, if you have any questions or comments regarding this temporary request.

Sincerely,



Robert A. Velasco, P.E., BCEE  
Air Programs  
Environmental, Health & Safety  
Tampa Electric Company

EHS/ich/RAV102

Enclosure

cc: Cindy Zhang-Torres P.E., SW District  
Diana Lee P.E., EPCHC  
Jason Waters P.E., EPCHC