

Project No. 0570039-048-AE



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AIR REGULATION

July 1, 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. 7949 3337 3600

**Re: Tampa Electric Company - Big Bend Station
Title V Permit Number 0570039-045-AV
Temporary Relief to Permit Condition P.5
EUs-029 and -030
Facility ID No. 0570039**

Dear Ms. Vielhauer:

Previous Title V permits required Fuel Blending Bin Cyclone Collectors (EU-029) and Fuel Mill Cyclone Collectors (EU-030) to meet the 5% visual emission criteria using EPA Test Method 9. The existing permit 0570039-045-AV currently requires EU-029 and EU-030 to meet the visual and PM emission requirements. Specifically, Condition P.5 specifies each unit meet the 0.03 grains per dry standard cubic feet (gr/dscf) criteria pursuant to Rule 62-296.711(2)(b). The current locations and duct configurations make it prohibitive to meet the PM testing requirements in Condition P.8.

Table 1 shows the historical rotoclone visual emissions summary during the period from 1996 to 2011. The data shows that all emission units, particularly EUs-029 and -030, have successfully demonstrated compliance with the 5% visual emission requirements with Rule 62-297.620(4) F.A.C.

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Table 1. Historical RotoClone Visual Emissions Summary

Location	E.U. ID	Report/Test Date	Result
BB ROTOCLONE 1 VE	015	5/29/1996	0.0%
BB ROTOCLONE 1 VE	015	5/14/1999	0.0%
BB ROTOCLONE 1 VE	015	7/24/2001	0.0%
BB ROTOCLONE 1 VE	015	3/26/2002	0.0%
BB ROTOCLONE 1 VE	015	3/25/2003	0.0%
BB ROTOCLONE 1 VE	015	5/3/2004	0.0%
BB ROTOCLONE 1 VE	015	3/30/2005	0.0%
BB ROTOCLONE 1 VE	015	7/11/2006	0.0%
BB ROTOCLONE 1 VE	015	8/29/2007	0.0%
BB ROTOCLONE 1 VE	015	1/24/2008	0.0%
BB ROTOCLONE 1 VE	015	9/4/2009	0.0%
BB ROTOCLONE 1 VE	015	9/30/2010	0.0%
BB ROTOCLONE 1 VE	015	5/13/ 2011	0.0%
BB ROTOCLONE 2 VE	016	7/1/1994	0.0%
BB ROTOCLONE 2 VE	016	5/20/1997	0.0%
BB ROTOCLONE 2 VE	016	4/20/2000	0.0%
BB ROTOCLONE 2 VE	016	7/27/2001	0.0%
BB ROTOCLONE 2 VE	016	3/26/2002	0.0%
BB ROTOCLONE 2 VE	016	3/25/2003	0.0%
BB ROTOCLONE 2 VE	016	4/29/2004	0.0%
BB ROTOCLONE 2 VE	016	4/4/2005	0.0%
BB ROTOCLONE 2 VE	016	5/17/2006	0.0%
BB ROTOCLONE 2 VE	016	8/20/2007	0.0%
BB ROTOCLONE 2 VE	016	1/23/2008	0.0%
BB ROTOCLONE 2 VE	016	9/30/2010	0.0%
BB ROTOCLONE 3 VE	017	6/8/1995	0.0%
BB ROTOCLONE 3 VE	017	6/2/1998	0.0%
BB ROTOCLONE 3 VE	017	7/27/2001	0.0%
BB ROTOCLONE 3 VE	017	5/22/2002	0.0%
BB ROTOCLONE 3 VE	017	4/24/2003	0.0%
BB ROTOCLONE 3 VE	017	4/29/2004	0.0%
BB ROTOCLONE 3 VE	017	6/8/2005	0.0%
BB ROTOCLONE 3 VE	017	5/17/2006	0.0%
BB ROTOCLONE 3 VE	017	8/20/2007	0.0%
BB ROTOCLONE 3 VE	017	9/19/2008	0.0%
BB ROTOCLONE 3 VE	017	9/4/2009	0.0%
BB ROTOCLONE 3 VE	017	9/30/2010	0.0%
BB ROTOCLONE 4 VE	039	9/5/2001	0.0%
BB ROTOCLONE 4 VE	039	3/26/2002	0.0%
BB ROTOCLONE 4 VE	039	4/24/2003	0.0%

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Location	E.U. ID	Report/Test Date	Result
BB ROTOCLONE 4 VE	039	4/29/2004	0.0%
BB ROTOCLONE 4 VE	039	6/8/2005	0.0%
BB ROTOCLONE 4 VE	039	8/1/2006	0.0%
BB ROTOCLONE 4 VE	039	8/31/2007	0.0%
BB ROTOCLONE 4 VE	039	9/18/2008	0.0%
BB ROTOCLONE 4 VE	039	9/4/2009	0.0%
BB ROTOCLONE 4 VE	039	9/30/2010	0.0%
BB BLENDING BINS VE	029	04/30/2002, 05/01/2002, 05/03/2002	0.0%
BB BLENDING BINS VE	029	04/17/2003, 04/23/2003,	0.0%
BB BLENDING BINS VE	029	5/27/2004	0.0%
BB BLENDING BINS VE	029	3/30/2005	0.0%
BB BLENDING BIN A VE	029	7/25/2006	0.0%
BB BLENDING BIN B VE	029	8/17/2006	0.0%
BB BLENDING BIN C VE	029	7/25/2006	0.0%
BB BLENDING BIN D VE	029	8/17/2006	0.0%
BB BLENDING BIN A VE	029	4/19/2007	0.0%
BB BLENDING BIN B VE	029	4/19/2007	0.0%
BB BLENDING BIN C VE	029	4/19/2007	0.0%
BB BLENDING BIN D VE	029	4/19/2007	0.0%
BB BLENDING BIN A VE	029	2/29/2008	0.0%
BB BLENDING BIN B VE	029	1/25/2008	0.0%
BB BLENDING BIN C VE	029	1/23/2008	0.0%
BB BLENDING BIN D VE	029	1/23/2008	0.0%
BB BLENDING BIN A VE	029	9/4/2009	0.0%
BB BLENDING BIN B VE	029	9/4/2009	0.0%
BB BLENDING BIN C VE	029	9/4/2009	0.0%
BB BLENDING BIN D VE	029	9/4/2009	0.0%
BB BLENDING BIN A VE	029	6/21/2011	0.0%
BB BLENDING BIN D VE	029	6/21/2011	0.0%
BB FUEL CRUSHER VE	030	7/18/2002	0.0%
BB FUEL CRUSHER VE	030	5/2/2003	0.0%
BB FUEL CRUSHER VE	030	9/2/2004	0.0%
BB FUEL CRUSHER VE	030	8/17/2005	0.80%
BB FUEL CRUSHER VE	030	4/27/2006	0.80%
BB FUEL CRUSHER VE	030	9/28/2007	0.0%
BB FUEL CRUSHER VE	030	9/18/2008	0.0%
BB FUEL CRUSHER T1 VE	030	9/4/2009	0.0%
BB FUEL CRUSHER T2 VE	030	9/4/2009	0.0%

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The current PM testing requirements for EUs -029 and -030 are not considered practical. The exhaust duct configurations on each rotoclone unit were not designed for PM testing and currently do not meet the EPA Test Method 1. The duct work would need extensive engineering and modifications to meet the EPA Method 1 requirements. In addition, access to these emission units, particularly EU-029, is very difficult and too confined to properly test. Consequently, the PM testing requirements for EU-029 and -030 are considered prohibitive.

The review of the regulatory requirements suggests the EUs -029 and -030 should be exempt from PM testing requirements. Since the EUs comply with the visual emissions requirements, Rule 62-296.711(2)(b) F.A.C. is not necessarily a requirement for compliance. The Department can waive the testing requirement and use the visual emission standard to demonstrate compliance under Rules 62-297(7)(c)F.A.C.

Tampa Electric Company (TEC) requests the Department waive the PM testing requirements in Conditions P.5 and P.8 for this federal fiscal year 2011 and established compliance based solely on the visual emission standard in accordance with Rule 62-297(7)(c). In addition, TEC plans to file an air permit application to permanently delete the PM testing requirements in Conditions P.5 and P.8.

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

Sincerely,



Robert A. Velasco, P.E., BCEE, QEP
Senior Engineer, Air Programs
Environmental, Health & Safety

EHS/rk/RAV105

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