



Jeb Bush  
Governor

# Department of Environmental Protection

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

David B. Struhs  
Secretary

November 20, 2002

Ms. Shelly Castro  
Associate Engineer, Environmental Affairs  
Tampa Electric Company  
P.O. Box 111  
Tampa, Florida 33601-0111

Re: Request For Use Of An Asphalt-Based Binder As A Coal Dust Suppressant  
Big Bend Station, Facility ID #: 0570039

Dear Ms. Castro:

We have reviewed your request (dated September 17, 2002) to burn a maximum of 2,100 tons of coal treated with an asphalt-based binder. Because this type of fuel is not a permitted alternative method of operation, we can not concur with your request. In a letter dated May 3, 2002, we explained that we do not believe that this particular material falls within the intent of a chemical dust suppressant that is allowed by a condition contained in your Title V permit (Appendix TV-3, condition 57). Based on the information that you have submitted, it is still our opinion that combustion of this product has the potential to increase air pollutant emissions by means of a change in a method of operation. By definition, this would constitute a modification that requires the issuance of a construction permit prior to making this type of operating change. In addition, Florida's Title V Rules do not provide any means of authorizing unpermitted temporary activities.

Based on the above reasons, we do not concur with your request to receive and burn the 2,100 tons of treated coal in question without first obtaining the necessary permits.

Should you have any questions regarding this response, please contact Jonathan Holtom, P.E., at (850) 921-9531, or write to me at the above letterhead address.

Sincerely,

Trina Vielhauer, Chief  
Bureau of Air Regulation

/jh

cc: Mr. Thomas W. Davis, P.E., ECT  
Mr. Buck Oven, P.E., DEP-SCO  
Mr. Jerry Kissel, P.E., DEP-SWD  
Mr. Jerry Campbell, P.E., EPCHC

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Division of Air Resources Mgt.  
Bureau of Air Regulation, NSR  
2600 Blair Stone Rd., MS 5505  
Tallahassee, FL 32399-2400

BUREAU OF AIR REGULATION

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## 1. Article Addressed to:

Ms. Shelly Castro  
 Associate Engineer, Environmental Affairs  
 Tampa Electric Company  
 P. O. Box 111  
 Tampa, FL 33601-0111

## 2. Article#

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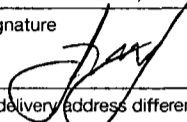
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