

Memorandum

Jonathan  
Florida Department of  
Environmental Protection

**TO:** Clair Fancy, P.E.  
**THROUGH:** Scott Sheplak, P.E. *gms*  
**FROM:** Jonathan Holtom, P.E. *JH*  
**DATE:** February 14, 2001  
**SUBJECT:** TECO Big Bend Station Binder Request, Facility ID #: 0570039

This is a second request from TECO for approval of the use of a binder material on their coal to suppress fugitive dust. We approved the use of a latex binder material on October 20, 2000. They are now claiming that they have not used the latex binder and will not use it in the future. The "binder-of-the-day" is a combination of a styrene/butadiene polymer, water, and molasses. Although the styrene/butadiene polymer is about 65%, by weight, it will not be applied to the coal on-site. Therefore, I do not see a problem with an increase in VOC/HAP emissions from this facility. All VOC curing should be essentially complete by the time it reaches Florida. Any remaining VOC that happens to be bound in the product should be completely destroyed in the combustion process, as certified by their P.E. (Tom Davis).

Since their permit allows for the use of a non-specific chemical dust suppressant (Appendix TV-3, Condition 57), I see no problem agreeing to the use of this material in place of the previously approved latex binder.

I recommend the attached letter for your approval and signature.

*Jonathan Holtom*



# Department of Environmental Protection

Jeb Bush  
Governor

Marjory Stoneman Douglas Building  
3900 Commonwealth Boulevard  
Tallahassee, Florida 32399-3000

David B. Struhs  
Secretary

February 15, 2001

Mr. Jamie Hunter  
Consulting Engineer, Environmental Affairs  
Tampa Electric Company  
P.O. Box 111  
Tampa, Florida 33601-0111

Re: Recognition of Chemical Change Reagent MTT-180 as a Coal Dust Suppressant  
Big Bend Station, Facility ID #: 0570039

Dear Mr. Hunter:

We have received your request to begin using Midwest Terminals MTT-180 Chemical Change Reagent on your coal as a means of suppressing fugitive dust. It is our understanding that this material will be used instead of the latex binder (Latex DL 298NA, made by DOW Chemical Company) that was previously approved on October 20, 2000, and that you have not used, and will not be using, the Latex DL 298NA. We have also received a certification from your Professional Engineer detailing the lack of detrimental environmental effects resulting from the use of this product.

It is our opinion that this particular material falls within the classification of "chemical dust suppressant" that is authorized by your Title V permit (see Appendix TV-3, condition 57.). For inspection purposes, please retain on-site a copy of the material safety data sheet (MSDS), a copy of your contract with the coal supplier specifying the material that will be applied to your coal, and a certification from the supplier accompanying each delivery that attests that this is the only material that has been applied to your coal. If TECO or the supplier desires to use a different material, you must inform the Department and receive concurrence prior to combusting the new product. It should be noted that this approval is only valid if the MTT-180 is not applied to the coal on-site. Should you wish to apply this product to your coal on-site, a construction permit application detailing the increase in VOC/HAP emissions must first be submitted for processing.

Under the provisions of Rule 62-297.310(7)(b), F.A.C., if, at any time, the Department has reason to believe that any of your emission limits are not being met (i.e. increased particulate matter, etc.), it shall require the owner or operator of the emissions unit to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to the Department.

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

Sincerely,

*C.H. Fandy*  
C.H. Fandy, P.E.  
Chief  
Bureau of Air Regulation

CHF/jh

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

"More Protection, Less Process"