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BUREAU OF AIR REGULATION

May 22, 2000

Mr. Scott M. Sheplak, P.E.
Florida Department of Environmental Protection
Division of Air Resource Management
111 South Magnolia Drive, Suite 4
Tallahassee, Florida 32301

Via FedEx
Airbill No. 7923 3467 3031

Re: Tampa Electric Company – Phase II NO_x Compliance Plan Revision for Big Bend and Gannon Stations

Dear Mr. Sheplak:

As you are aware, to ensure compliance with Phase II of the Acid Rain program, Tampa Electric Company has elected to employ a System Wide NO_X Averaging Plan. However, in the absence of a final Title V permit for Big Bend and Gannon Stations, there was some question as to whether or not the System Wide NO_X Averaging Plan was valid. Recently, Section 403.0872 of the Florida Statutes was amended by HB 1425 to address this issue. Specifically, Section 13 of HB 1425 reads:

"...This operation permit is the only department operation permit for a major source of air pollution required for such source; provided, at the applicant's request, the department shall issue a separate Acid Rain permit for a major source of air pollution that is an affected source within the meaning of 42 U.S.C s. 7651a(1)...."

Therefore, in accordance with section 403.0872 F.S., TEC formally requests a separate Acid Rain permit that includes the System Wide NO_X Averaging Plan as approved by the Department on January 19, 2000. If you have any questions, please telephone Shannon Todd or me at (813) 641-5125.

Sincerely,

Gregory M. Nelson, P.E.
Designated Representative
Acid Rain Program

EP\gm\SKT165

c: Robert Miller, USEPA
Brian Beals, USEPA
Scott Davis, USEPA Region IV
Jerry Campbell, EPCHC

xc: Clair Kanay
Pat Comer
Cindy Phillips

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BUREAU OF AIR REGULATION

April 13, 2000

Ms. Cindy L. Phillips, P.E.
Bureau of Air Regulation
Florida Department of Environmental Protection
111 South Magnolia Avenue, Suite 4
Tallahassee, FL 32301

Via FedEx
Airbill No. 7908 3088 7955

Re: Tampa Electric Company
Big Bend Station DRAFT Title V Permit Revisions

Dear Ms. Phillips:

With respect to the above referenced DRAFT Title V permit, Tampa Electric Company (TEC) offers the following suggested revisions and requested term definitions:

1. Insignificant Emission Units and/or Activities

TEC feels that the Insignificant Emissions Units and or Activities should include the following:

1. Internal combustion engines in boats, aircraft and vehicles used for transportation of passengers or freight.
2. Cold storage refrigeration equipment, except for any such equipment located at a Title V source using an ozone-depleting substance regulated under 40 CFR Part 82.
3. Vacuum pumps in laboratory operations.
4. Equipment used for steam cleaning.
5. Belt or drum sanders having a total sanding surface of five square feet or less and other equipment used exclusively on wood or plastics or their products having a density of 20 pounds per cubic foot or more.
6. Equipment used exclusively for space heating, other than boilers.
7. Laboratory equipment used exclusively for chemical or physical analyses.
8. Brazing, soldering or welding equipment.
9. One or more emergency generators located within a single facility provided:
    a. None of the emergency generators is subject to the Federal Acid Rain Program; and
    b. Total fuel consumption by all such emergency generators within the facility is limited to 32,000 gallons per year of diesel fuel, 4,000 gallons

per year of gasoline, 4.4 million standard cubic feet per year of natural gas or propane, or an equivalent prorated amount if multiple fuels are used.

10. One or more heating units and general purpose internal combustion engines located within a single facility provided:
    a. None of the heating units or general purpose internal combustion engines is subject to the Federal Acid Rain Program; and
    b. Total fuel consumption by all such heating units and general purpose internal combustion engines within the facility is limited to 32,000 gallons per year of diesel fuel, 4,000 gallons per year of gasoline, 4.4 million standard cubic feet per year of natural gas or propane, or an equivalent prorated amount if multiple fuels are used.
11. Fire and safety equipment.
12. Degreasing units using heavier-than-air vapors exclusively, except any such unit using or emitting any substance classified as a hazardous air pollutant.
13. Turbine vapor extractors.
14. Architectural coatings.
15. Surface coating operations utilizing only coatings containing 5.0 percent or less VOCs, by volume.
16. Evaporation of up to 150,000 gallons of non-hazardous boiler chemical cleaning waste which was generated on site.
17. No. 2 fuel Oil Storage Tanks > 550 gallons.
18. Vehicle Refueling Operations.
19. Molten Sulfur Storage Tanks with an annual throughput ≤ 200,000 lb/yr.

2. Unregulated Emissions Units and/or Activities

TEC feels that the Unregulated Emissions Units and/or Activities should include the following:

E.U. ID No.	Brief Description of Emissions Units and/or Activities
-xxx	Slag and bottom ash sources BH-001 through BH-004
	Gypsum handling and storage sources GH-001 through GH-017
	General Purpose Internal Combustion Engines
	Fugitive PM sources-on site vehicles
	Material Handling of slag and ash for cleanup purposes
	Fugitive PM sources-abrasive blasting operations with temporary enclosure

3. Flame Stabilization

Flame stabilization is defined as the use of No. 2 fuel oil to stabilize a flame during times of unexpected poor coal quality or equipment failure such as coal piping pluggage. Flame stabilization due to poor coal quality occurs when coal is wet or does not provide the necessary heat to maintain a stable flame. In this situation, No. 2 fuel oil is combusted to provide the additional required heat input to maintain a stable flame. Flame stabilization due to equipment failure occurs when coal piping is plugged or equipment is otherwise damaged that results in an inconsistent amount of coal reaching the burners. Under certain conditions, this may result in the burners intermittently seeing large amounts of fuel at one time, causing a potentially explosive flame 'puff'. In this situation, No. 2 fuel oil must be used for stabilization to prevent flame 'puffing' and ensure safe operation.

4. Injection of Nonhazardous Boiler Chemical Cleaning Waste

Boiler chemical cleaning takes place at Big Bend less than once per year. In fact, the last boiler chemical cleaning that took place was in 1993. Typically, TEC uses approximately 70,000 gallons of a mineral acid solution to clean the boiler.

5. Permitting note addition to Specific Condition B-1

Consistent with specific condition A-1, the following permitting note should be added to specific condition B-1:

{Permitting note: The heat input limitations have been placed on this permit to identify the capacity of each unit for the purposes of confirming that emissions testing is conducted within 90 to 100 percent of the unit's rated capacity (or to limit future operation to 110 percent of the test load), to establish appropriate emission limits and to aid in determining future rule applicability. Regular record keeping is not required for heat input. Instead the owner or operator is expected to determine heat input whenever emission testing is required, to demonstrate at what percentage of the rated capacity that the unit was tested. Rule 62-297.310(5), F.A.C., requires measurement of the process variables for emission tests. Such heat input determination may be based on measurements of fuel consumption by various methods including but not limited to fuel flow metering or tank drop measurements, using the heat value of the fuel determined by the fuel vendor or the owner or operator, to calculate average hourly heat input during the test.}

6. Permitting Conditions that require the inclusion of the quantity of liquid fuel combusted to determine applicable limits.

TEC requests that all such conditions be eliminated. This will remove the requirement for unnecessary paperwork. The amount of liquid fuel is insignificant when compared to the amount of solid fuel combusted. Therefore, the limits are essentially the same both before and after the consideration of the amount of liquid fuel combusted.

7. Revision of Specific Condition D.1

TEC requests that the limit on loading rate for Silo No. 2 be removed to be consistent with the operating permit amendment dated February 7, 1990. This amendment removed the maximum permitted loading rate limit of 11.9 tons per hour and TEC feels that the Title V permit should reflect this.

8. Abrasive Blasting

TEC requests that the maximum permitted usage of abrasive blast media in the abrasive blast booth be limited to 300 tons per year. Other abrasive blasting performed at Big Bend is done within a portable enclosure to minimize particulate emissions. TEC feels that this activity is covered in the Appendix U-1 Unregulated Emissions Units and Activities.

9. Transfer of Flyash from Tanker Trucks to Silo 3

Consistent with Subsection D, TEC requests that the following language be added to Subsection E:

Also, flyash may be pneumatically conveyed from tanker trucks to Silo No. 3.

This allows TEC to transfer flyash from Silos 1 and 2 to Silo 3 in case of an unforeseen malfunction.

10. Incorporation of Construction Permits into the Draft Title V Permit

The following two construction permits should be incorporated into the Draft Title V permit:

- Units 1 & 2 FGD Construction Permit
- CT 2 & 3 Inlet Air Fogging System Construction Permit

11. Periodic Monitoring

Consistent with periodic monitoring requirements for Crystal River Unit 2, TEC suggests the following language be incorporated into the Title V permit to address periodic monitoring for Big Bend Units 1-4:

Periodic monitoring for particulate matter shall be COMS. For any calendar quarter in which more than five percent of the COMS readings show 20% or greater opacity for Units 1, 2, 3 and 4 (excluding startup, shutdown, and malfunction periods), a steady-state particulate matter stack test shall be performed within the following calendar quarter. Due to the allowed opacity level of 60% for sootblowing and load changing periods for Units 1, 2, 3 and 4, periods of sootblowing and load changing shall also be excluded for those units. The stack test shall comply with all of the testing and reporting requirements contained in the preceding specific conditions and, where practicable, shall be performed while operating at conditions representative of those showing greater than 20% opacity. Units are not required to be brought on-line solely for the purpose of performing this special test. If the unit does not operate in the following quarter, the special test may be postponed until the unit is brought back on-line. In such cases, the special test shall be performed within 30 days of the unit being brought back on-line.
[Rule 62-213.440, F.A.C.]

TEC appreciates the opportunity to provide this input and if you have any further questions or need additional clarification, please do not hesitate to call Shannon Todd or me at (813) 641-5125.

Sincerely,

Stanley Martin

Stanley J. Martin
General Manager / Responsible Official
Big Bend Station

EP\gm\SKT156

c: Mr. Clair Fancy - FDEP
Mr. Scott Sheplak - FDEP
Mr. Jerry Kissel - FDEP SW
Mr. Steve Pak - EPCHC

Department of Environmental Protection

Jeb Bush
Governor

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

David B. Struhs
Secretary

NOTICE OF AIR OPERATION PERMIT AMENDMENT

In the Matter of a Request for an air operation permit amendment:

Tampa Electric Company
P.O. Box 111
Tampa, FL 33601-0111

Permit No.: AO29-179911
Big Bend Station
Unit No. 3

Enclosed is an AMENDMENT to the air operation permit, AO29-179911, for the operation of the Tampa Electric Company Big Bend Station Unit No. 3 located at Big Bend Road, North Ruskin, Hillsborough County. This amendment is issued pursuant to Rule 62-210.360(1)(c), Florida Administrative Code and Chapter 403, Florida Statutes (F.S.). This amendment does not alter the effective dates of the existing permit.

Any party to this order (permit) has the right to seek judicial review of the permit pursuant to Section 120.68, F.S., by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the Department in the Legal Office; and, by filing a copy of the Notice of Appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The Notice of Appeal must be filed within 30 (thirty) days from the date this Notice is filed with the Clerk of the Department.

Executed in Tallahassee, Florida.

Howard L. Rhodes, P.E.
Director
Division of Air Resources Management

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this NOTICE OF AIR OPERATION PERMIT AMENDMENT (including the corrected page) was sent by certified mail (*) and copies were mailed by U.S. Mail before the close of business on 2/24/00 to the persons listed or as otherwise noted:

James Hunter, Administrator – Air Programs Environmental Planning, TEC
Rick Kirby, EPCHC
Sterlin Woodard, EPCHC

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to §120.52(7), Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.

Barbara J. Boutwell 2/24/00
(Clerk) (Date)

AIR OPERATION PERMIT AMENDMENT
Permit No.: AO29-179911
Big Bend Station Unit No. 3

Specific Condition 9 on Page 3 is hereby changed:

~~9. This source shall be stack tested for sulfur dioxide at intervals of 12 months from the date of August 14, 1989, or within a 90-day period prior to that annual date. Testing procedures shall be consistent with the requirements of Rule 17-2.700, F.A.C. A copy of the test data shall be submitted to both the Environmental Protection Commission of Hillsborough County and the Florida Department of Environmental Regulation within 45 days of such testing.~~

9. Compliance with the SO_2 emission standards set forth by Specific Condition # 4 shall be demonstrated by Continuous Emission Monitoring (CEM) Systems The owner or operator shall calibrate, maintain, and operate a continuous emission monitoring system, in each of the stacks that are used by Unit No. 3, to measure and record the sulfur dioxide emissions from these emissions units, in a manner sufficient to demonstrate compliance with the emission limits of this permit. Compliance with the emission limits of this permit shall be based on 2-hour or 3-hour averages or 24-hour calendar day averages calculated by the CEM system expressed in units of pounds per million Btu heat input, pounds per hour or tons per hour, as applicable. [Rule 62-4.070(3), F.A.C., and applicant request.]

Specific Condition 12 on Pages 4 and 5 is hereby changed:

~~12. Compliance with the SO_2 emission standards set forth by Specific Condition # 4 shall be demonstrated by:~~

~~A) Conducting an annual stack test, using an approved DER Method, with a fuel analysis for the coal burned to show compliance with the two hour standard of 6.5 pounds of sulfur dioxide per million Btu heat input.~~

~~B) Not charging the fuel bunker of units 1 through 3 with any coal with a composite sulfur content that would produce emissions greater than 6.5 pounds of sulfur dioxide per million Btu heat input to show continuing compliance with the two hour standard. This can be accomplished in part by blending various grades of coal on site prior to charging into the fuel bunkers located in the tripper room.~~

~~C) Daily composite fuel sampling and analysis to show compliance with the emission cap for units 1 through 3 of 25 tons of sulfur dioxide per hour on a 24 hour average. The following equation shall be used:~~

~~(i) (ii) (iii) (iv) (v) (vi)~~

$$SO_2 = \frac{\#S}{MMBTU} \times \frac{2\#SO_2}{\#S} \times \frac{MMBTU}{MWH} \times .95 \times \frac{MWH}{day} \times \frac{tons\ SO_2}{2000\ lbs.\ SO_2}$$

~~Where: (i) comes from the daily fuel analysis~~
~~(ii) conversion factor~~
~~(iii) heat rate from the previous month's heat rate calculation~~
~~(iv) conversion factor describing percent S in the coal that is converted to gaseous SO_2 (reference 6/25/76 DER-TECO stipulation)~~
~~(iv) daily generation from station logs~~
~~(v) conversion factor~~

~~This equation shall be used and the calculations completed for each of the units 1 through 3. This information shall be submitted to the Environmental Protection Commission of Hillsborough County and the Florida Department of Environmental Regulation on a quarterly basis no later than 45 days following the calendar quarter. If an exceedance of this standard occurs, then the permittee shall report this event to the Department of Environmental Regulation and the Environmental Protection Commission of Hillsborough County within 24 hours of the determination.~~

~~D) Adhering to the study, previously submitted, that demonstrates by a statistical analysis, that the 31.5 tons of SO_2 per hour on a three hour average is being met. This study provides reasonable assurance that a daily sample can be used to demonstrate compliance with the 3 hour emission cap.~~

12.A. CEM System Requirements: The CEM systems shall be certified pursuant to 40 CFR Part 75 and shall be operated and maintained in accordance with the applicable requirements of 40 CFR Part 75, Subparts B and C. Missing data shall be substituted in a manner pursuant to 40 CFR Part 75, Subpart D. Record keeping and reporting shall be conducted pursuant to 40 CFR Part 75, Subpart F and G. Excess emissions shall be determined using the CEM systems. [Rule 62-4.070(3), F.A.C.]

12.B. Records of Operation: The owner or operator shall make and maintain a daily record of operation of the emissions unit showing the date, fuel(s) used, time the unit operated in the integrated mode, and the duration of all startups, shutdowns and malfunctions of the boiler. [Rule 62-4.070(3), F.A.C.]

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Mr. James Hunter, Administrator
Air Programs Environmental
Planning, TEC
Tampa Electric Company
P.O. Box 111
Tampa, Florida 33601-0111

4a. Article Number
Z 094 212 819

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Permit No.AO29-219924
Permit No.AO29-179912
Permit No.AO29-179911

PS Form **3800**, April 1995

Reading file

Department of Environmental Protection

Jeb Bush
Governor

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

David B. Struhs
Secretary

February 18, 2000

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. J. James Hunter
Administrator-Air Programs
Environmental Planning
Tampa Electric Company
P.O. Box 111
Tampa, FL 33601-0111

Re: Permit Revisions for Big Bend Unit 3, AO29-179911, and Unit 4, PSD-FL-040
Request for Additional Information

Dear Mr. Hunter:

Your request, dated January 21, 2000, to revise permits AO29-179911 and PSD-FL-040 is incomplete. In addition to the required $250 processing fee, please provide the following information for both Units 3 and 4:

1. The actual sulfur, nickel, and vanadium content of typical petcoke batches Tampa Electric Company (TEC) has purchased over the past four years. (Note: vanadium catalyzes SO_2 to SO_3, thus forming acid mist, so there is a link to a directly regulated pollutant.)

2. The method by which TEC will insure that acid mist emissions will be minimized. The scrubber may or may not be efficient at removing small acid mist particles regardless of its overall SO_2 removal efficiency.

3. The characteristics of any petcoke that TEC has historically been unable to purchase due to the present constraints on Big Bend Units 3 and 4.

4. An overall summary of the historical data that TEC has submitted (or should have submitted) annually to demonstrate that burning petcoke blends has not resulted in an emissions increase.

5. Reasonable assurance that removal of the petcoke sulfur content limitation, and the vanadium content of mineral ash limitation, will not result in a PSD-significant increase of any regulated pollutant.

6. Since sulfuric acid mist emissions are not continuously monitored, reasonable assurance will require that TEC conduct additional tests for sulfuric acid mist emissions using a grade of petcoke representative of the highest sulfur and vanadium content that will be used at the facility. Please state what those sulfur and vanadium contents will be and submit a test schedule and protocol for conducting the sulfuric acid mist emission tests.

7. Description of method(s) to be used to assure compliance with SO_2 limitation during periods of FGD downtime.

This information needs to be sealed by a Professional Engineer registered in the state of Florida. Please submit this information within 45 days.

If you have any questions concerning this request for information, please phone me at 850/921-9534, or send email to Cindy.Phillips@dep.state.fl.us.

Sincerely,

Cindy L. Phillips

Cindy L. Phillips, P.E.
Bureau of Air Regulation

c: Rob Kalch, EPCHC

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3. Article Addressed to:

Mr. J. James Hunter
Administrator-Air Programs
Enviromental Planning
Tampa Electric Company
P.O. Box 111
Tampa, Fl 33601-0111

4a. Article Number
Z 094 212 817

4b. Service Type
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☐ Return Receipt for Merchandise ☐ COD

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BUREAU OF AIR REGULATION

January 21, 2000

Mr. Clair Fancy
Florida Department of Environmental Protection
2600 Blair Stone Road
Twin Towers Office Building
Tallahassee, Florida 32399-2400

Via FedEx
Airbill No. 7910 3522 6048

Re: Revision of Big Bend Unit 3 AO29-179911 Specific Condition 21
Revision of Big Bend Unit 4 PSD-FL-040 Specific Condition 1.A.

Dear Mr. Fancy:

On January 1, 2000, the new scrubber serving Big Bend Units 1 and 2 became commercially operational and, as a result, TEC was given the option of blending petcoke with coal for use as a fuel. The construction permit associated with this project does not identify a percent sulfur limit in the petcoke because TEC will be using CEMs as the method of compliance with all applicable standards. This allows TEC to receive credit for scrubbing the boiler emissions and ensures that the SO_2 emissions reported are what the atmosphere actually 'sees' rather than calculating emissions based on the percent sulfur of the fuel fed to the boiler.

Unfortunately, when Big Bend Unit 3 was originally permitted, fuel sampling and analysis was the method of compliance with the sulfur dioxide standard. This method does not allow TEC to receive credit for scrubbing the boiler flue gases and the SO_2 emissions reported may not be what is actually emitted to the atmosphere. The only way to determine the quantity of emissions actually released to the atmosphere is to measure them as close to the emission point as possible. During the Title V permitting process, TEC proposed using CEMs as the method of compliance for all applicable standards; an idea that the Department is in favor of. This would allow for the accurate measurement of emissions released to the atmosphere independent of the fuel analysis. Therefore, to remain consistent with the Big Bend Units 1 and 2 FGD construction permit, TEC requests that the Department remove all existing restrictions on the sulfur content of petcoke fed to the Unit 3 boiler.

Finally, Big Bend Unit 4 SO_2 emissions are limited to 0.82 lb SO_2 /MMBtu heat input. This limit is measured by a CEM in the stack and must be complied with regardless of the fuel sulfur content. Again, this is what the atmosphere actually 'sees', not what is fed to the boiler. Consequently, TEC requests that the Department remove the limit on the sulfur content of petcoke fed to the Unit 4 boiler.

In addition to the sulfur content of petcoke, TEC requests that all limits on the vanadium content of mineral ash be removed from the Big Bend Unit 3 Operating Permit and the Big Bend Unit 4 PSD permit. Since there is currently no applicable standard by which to quantify vanadium impacts on the environment, TEC does not feel that it should be subject to a vanadium limit on mineral ash produced during combustion. All of the above referenced changes can be addressed through one straightforward modification to each permit.

TEC suggests that Specific Condition 21 of the Big Bend Unit 3 Operating Permit be simplified to:

> *21. Fuels fired shall consist of coal or a coal/petroleum coke blend containing a maximum of 20.0% petroleum coke by weight. ~~The sulfur content of the petroleum coke shall not exceed 6.0 percent by weight (dry basis). Vanadium content of the mineral ash from the petroleum coke fired shall not exceed 35.0 percent by weight (ignited basis).~~*

Similarly, TEC suggests that Specific Condition 1.A. of the Big Bend Unit 4 PSD permit be simplified to

> *1.A. Fuels fired shall consist of coal or a coal/petroleum coke blend containing a maximum of 20.0% petroleum coke by weight. ~~The sulfur content of the petroleum coke shall not exceed 6.0 percent by weight (dry basis). Vanadium content of the mineral ash from the petroleum coke fired shall not exceed 35.0 percent by weight (ignited basis).~~*

TEC appreciates the cooperation of the Department in this matter and should you have any questions, please feel free to contact Shannon Todd or me at (813) 641-5033.

Sincerely,

J. James Hunter
Administrator-Air Programs
Environmental Planning

EP\gm\SKT138

c: Mr. J. Campbell, EPCHC
Mr. A. Linero, FDEP
Mr. J. Kissel, FDEP SW
Mr. H. Oven, FDEP
Ms. C. Phillips, FDEP
Mr. S. Woodard, EPCHC

2/1/00 cc: Cindy Phillips

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JAN 03 2000
BUREAU OF AIR REGULATION

December 30, 1999

Mr. Clair Fancy
Florida Department of Environmental Protection
Bureau of Air Regulations
Mail Station #5505
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Via FedEx
Airbill No. 792531877212

Re: Tampa Electric Company
Big Bend Station Units 1, 2 and 3
Permits AO29-219924, AO29-179912 and AO29-179911
Request for Amendment

Dear Mr. Fancy:

As you are aware, Tampa Electric Company (TEC) has installed a new flue gas desulfurization (FGD) system capable of treating the flue gas from Units 1 and 2. The Department, in a letter amendment to permits AO29-219924 and AO29-179912 dated August 19, 1998, authorized the installation of this FGD. In addition, the Department on February 26, 1999 issued construction permit 0570039-003-AC and -004-AC for this project. This construction permit, in Section III - Conditions 6 and 7, requires the use of a continuous emission monitoring (CEM) system to demonstrate compliance with the emission limits of that permit. The existing operation permits for Units 1,2 and 3 require fuel sampling and analysis as the only applicable means to determine compliance with some of the same emission limits. The use of fuel sampling and analysis does not allow TEC to take appropriate credit for treating the SO_2 emissions from these units in either the new FGD system (Units 1&2) or the existing FGD system (Unit 3).

In light of the above concern, TEC requests that the above referenced operating permits be amended to allow the option to use either fuel sampling and analysis or a CEM system to demonstrate compliance with the SO_2 emission standards found in those permits. The following suggested language may be sufficient.

> *In lieu of other SO_2 compliance demonstration methodologies referenced in this permit, the owner or operator may install, calibrate, maintain, and operate a continuous emission monitoring (CEM) system in the stack(s) to measure and record the sulfur dioxide emissions from these units, in a manner sufficient to demonstrate compliance with the emission limits of this permit.*

TEC appreciates your timely review and processing of this permit amendment. If you should have any questions, please feel free to call me at (813) 641-5033.

Sincerely,

James Hunter
Administrator - Air Programs
Environmental Planning

EP\gm\JJH

c: Scott Sheplak, FDEP- Tallahassee
Cindy Phillips, FDEP-Tallahassee
Joe Kahn, FDEP - Tallahassee
Rick Kirby, EPCHC
Sterlin Woodard, EPCHC