



Jeb Bush  
Governor

# Department of Environmental Protection

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

David B. Struhs  
Secretary

January 24, 2002

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

Re: Listing Of An Asphalt-Based Coal Dust Binder As An Insignificant Activity  
Big Bend Station, Facility ID #: 0570039

Dear Ms. Castro:

This letter is being sent at your request as a follow-up to the telephone conversation that you had on Friday, January 17 with Scott Sheplak and Jonathan Holtom. Based on the available information and a thorough review of Department Rules, we have concluded that the addition of a chemical substance to the coal that TECO is permitted to burn would constitute a change to the permitted method of operation. Because this change would have the potential to increase actual emissions of regulated air pollutants, it constitutes a modification. In order to implement a modification, a federally enforceable air construction permit must be issued. Therefore, we can not allow the burning of these "synthetic fuels" as an activity covered by the "chemical dust suppressant" provision authorized by condition 57 of Appendix TV-3.

For the purposes of burning the 2,100 tons of coal treated with an asphalt-based dust binder, we require that a construction permit application be submitted for this activity. If it is possible to completely burn this amount of coal at the requested 5% blend ratio within 180 days of receiving the final construction permit, it should not be necessary to submit a Title V permit revision application. However, if TECO plans to utilize any additional types of synthetic fuels in the future, it will need to submit a construction permit application and subsequent Title V permit revision application. The processing of this future request would include a review of the past/current dust suppressants that have been used at your facility in order to do a thorough PSD/NSR applicability determination.

Should you have any questions regarding this response, please contact Scott Sheplak, P.E., at (850) 921-9532, or write to me at the above letterhead address.

Sincerely,

Trina Vielhauer, Chief  
Bureau of Air Regulation

TLV/SMS/h

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

"More Protection, Less Process"

Printed on recycled paper.