

Department of Environmental Protection

Jeb Bush
Governor

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

David B. Struhs
Secretary

May 15, 2002

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

Re: Recognition of Latex Binders as Dust Suppressants

Dear Ms. Castro:


We have received your request to begin using two different latex binders on your coal as a means of suppressing fugitive dust (COVOL 298 and COVOL 298-1, made by DOW Chemical Company). 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 these particular materials 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 sheets (MSDS), a copy of your contract with the coal supplier(s) specifying the material that will be applied to your coal, and a certification from the supplier(s) 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.

Under the provisions of Rule 62-297.310(7)(b), F.A.C., if, at any time, the Department has good 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. Fancy, 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"