



Jeb Bush
Governor

Department of Environmental Protection

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.

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*Reading file
Barbara*

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7. Description of method(s) to be used to assure compliance with SO₂ 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 Cindv.Phillips@dep.state.fl.us.

Sincerely,



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

c: Rob Kalch, EPCHC