

Law Offices

HOLLAND & KNIGHT LLP

315 South Calhoun Street
Suite 600
P.O. Drawer 810 (ZIP 32302-0810)
Tallahassee, Florida 32301

850-224-7000
FAX 850-224-8832
<http://www.hklaw.com>

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August 19, 1998

RECEIVED

AUG 19 1998

**BUREAU OF
AIR REGULATION**

Mr. C. H. Fancy
Chief, Bureau of Air Quality Management
Florida Department of Environmental
Protection
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Re: Tampa Electric Company -- Big Bend Units 1 and 2
Flue Gas Desulfurization Project

Dear Clair:

As you know, Tampa Electric Company has submitted a permit application for authorization to construct facilities associated with the installation of a flue gas desulfurization (FGD) system that will operate to reduce emissions from Big Bend Generating Station Units 1 and 2. Prior to submitting the permit application, we discussed with you and with other representatives at the Department the need to begin certain preliminary activities at the site to ensure that the pollution control system would become operational at the earliest possible date.

We have continued to review the regulations and Department guidance materials concerning the permitting requirements for pollution control systems. In particular, the guidance document dated June 8, 1995 from Howard Rhodes, entitled "Guidance on the Replacement or Addition of Air Pollution Control Equipment on Existing Sources" seems applicable to our circumstances. A copy of this document is attached. As we understand it, the guidance document provides that the permitting action required for a custom designed pollution control system for an existing source is an amendment to the existing permit. The guidance further indicates that no public notice is required for such an action.

Based upon our review, the FGD system proposed for Big Bend Units 1 and 2 comes within the purview of this guidance. We therefore request that the operating permits for Big Bend Units 1 and 2 be modified to provide the necessary authorization for installation and operation of the FGD system. In accordance with the guidance, the permit application that has been submitted has been sealed in its entirety by a professional engineer. This should satisfy the terms of the guidance.

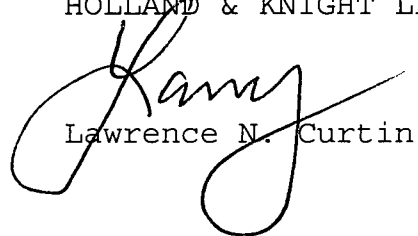
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Department of Environmental Protection
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We would appreciate an early response to this request. This will ensure that the air quality benefits anticipated to occur from this project will not be delayed. We will be pleased to provide you with any additional information that you may require to assist in your review.

Please let me know if you have any questions.

Sincerely,

HOLLAND & KNIGHT LLP



Lawrence N. Curtin

LNC/jfg
Attachment

cc: Mr. Kirby Green, w/attach.
Mr. Gregory M. Nelson, w/attach.

TAL-136711

Memorandum

Florida Department of
Environmental Protection

DARM-PER/GEN-25

TO: District Air Program Administrators
County Air Program Administrators
Bureau of Air Regulation Engineers

FROM: Howard L. Rhodes, Director *HLR*
Division of Air Resources Management

DATE: June 8, 1995

SUBJECT: Guidance on the Replacement or Addition of Air Pollution
Control Equipment on Existing Sources

This memo is to provide guidance to district, local program, and headquarters staff on the permitting action required when a source owner replaces or adds an air pollution control device to an existing source.

If the pollution control equipment is for a unit with uncontrolled emissions of less than 100 tons per year, and the equipment is "off the shelf", then no permitting action is required.

If the pollution control equipment is custom designed for any source, or is "off the shelf" to control a unit with uncontrolled emissions greater than or equal to 100 tons per year, the source owner will need to apply for an amendment to the permit. The request would need to be signed and sealed by a P.E. The Department or local program, if it finds the replacement air pollution equipment to be satisfactory, shall issue a letter amendment to the operation permit. No public notice shall be required for such an action.

HLR/chf/cd