d on the reverse side?	SENDER: Complete items 1 and/or 2 for additional services. Complete items 3, 4a, and 4b. Print your name and address on the reverse of this form so that we can return this card to you. Attach this form to the front of the mailpiece, or on the back if space does not permit. Write "Return Receipt Requested" on the mailpiece below the article number. The Return Receipt will show to whom the article was delivered and the date delivered. 3. Article Addressed to:		I also wish to receive the following services (for an extra fee): 1. Addressee's Address 2. Restricted Delivery Consult postmaster for fee.	
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Department of Environmental Protection

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

David B. Struhs Secretary

January 26, 1999

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. R. Douglas Neeley, Chief Air and Radiation Technology Branch U. S. Environmental Protection Agency - Region 4 61 Forsyth Street Atlanta, Georgia 30303-8960

Re: Tampa Electric Company
Big Bend Station, FGD System for Units 1 and 2
VE Limit in Lieu of Stack Test for Sources Subject to 40 CFR 60 Subpart OOO

Dear Mr. Neeley:

Enclosed is a copy of the draft air construction permit to install a flue gas desulfurization (FGD) system at Tampa Electric Company's Big Bend Station in Hillsborough County. This FGD system will control sulfur dioxide emissions from units 1 and 2 at Big Bend. The FGD system includes new equipment for limestone handling to accommodate the project. This equipment is subject to the requirements of 40 CFR 60 Subpart OOO.

Tampa Electric Company has requested that for the baghouse controlling PM emissions from the new conveyor drop points, it be given a limit on visible emissions that is more stringent than the limit of Subpart OOO, in lieu of requiring a Method 5 stack test. Specifically, the applicant has requested a limit of no visible emissions (5% opacity) instead of 7% opacity (required by 40 CFR 60.672(a)(2)), and that the requirement to demonstrate compliance with the limit of 40 CFR 60.672(a)(1) be waived, provided the emissions comply with the more stringent limit. These conveyors are enclosed with emissions ducted to a baghouse which controls particulate emissions from the drop points. See specific conditions 16, 17, 18, 20 and 21 of the draft permit for the conditions which are related to this request.

This request is similar to an alternate approval provided by Rule 62-297.620(4), F.A.C., which allows sources subject to a state rule limitation for particulate matter which are controlled by a baghouse and have potential emissions of less than 100 tons per year, to comply with an opacity limit of 5% opacity in lieu of performing annual PM tests. However, the emissions unit in TEC's permit are subject to the federal NSPS regulation, so we are requesting your approval. Note that equivalent annual PM emissions from this emissions unit are about 4.8 tons per year. The Department recommends approval of Tampa Electric Company's request because performing Method 5 testing of these emissions units is burdensome with little environmental benefit.

Mr. R. Douglas Neeley US EPA - Region 4 January 26, 1999

Please send your written comments on or approval of the applicant's request as soon as possible. This project is subject to a 14 day public notice period, and we are required to issue a final permit soon after the notice period has transpired. (Note that the complete intent package was sent to Gregg Worley for review under separate cover because the project qualified for exemption from PSD as a pollution control project.) If your staff has any questions regarding this matter, please call Al Linero at 850/921-9523 or Joseph Kahn at 850/921-9519.

Sincerely,

C. H. Fancy, P.E., Chief Bureau of Air Regulation

CHF/jk

Enclosure

cc: Gregory M. Nelson, P.E., TEC