



TAMPA ELECTRIC

September 16, 1998

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AIR REGULATION

Mr. Mike Harley
Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

**Re: Tampa Electric Company
Big Bend Station Units 1 & 2
New FDG and CEM System
September 10, 1998 Meeting Summary**

Dear Mr. Harley:

This letter is a summary of the issues and action items discussed at the meeting held September 10, 1998 at FDEP in Tallahassee concerning the new CEM system being considered for the new FGD being added to Big Bend Units 1 & 2. The following is the list of attendees at this meeting.

Ted Wenning - Tampa Electric	Mike Harley - FDEP
Patrick Shell - Tampa Electric	Amy Hulbert - FDEP
Martin Costello - FDEP	Joe Kahn - FDEP
Cleve Holladay - FDEP	Sterlin Woodard - HCEPC

On conference call:

Kim Nguyen - EPA ARD
Bill Proses - FDEP

Lynn Haynes - EPA Region 4

The main purpose of the meeting was to present the new Big Bend Units 1 & 2 FGD system and the proposed CEMS strategies that Tampa Electric Company (TEC) is planning to implement.

Summary of Issues Discussed and Action Items:

- I. A two phase implementation approach will be implemented. First, the new CEMS will take over the "dry" common stack by the 4th quarter of 1999, submitting common stack EDR reports from the new system. Second, starting in early 2000, depending on the final construction schedule, TEC will implement the "wet" stack configurations adding that stack scenario to the quarterly EDR for the 3rd quarter of 2000.

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- II. The system being developed will have the full networking capabilities to put the data together in any averaging scenario (e.g., 3, 8 or 24 hour averages) that will be proposed for the station permits in the future.
- III. Discussion on the location of all the monitors mainly centering around the "dry" stack after the FGD system was in full operation. Concerns if there would be enough FLOW from the "dry" stack to allow the SO₂, NO_x, CO₂ monitors to develop good values were discussed. Specifically, concern was raised about the accuracy of the flow monitors at low flows (3-5% of total flow). Further discussion generated the idea that if there seemed to be limited FLOW, the "dry" stack could be considered a "bypass" stack, thus reducing all the compliance and RATA testing required in future years. TEC, EPA, FDEP and EPCHC all agreed that this could be a very good option and a "Demonstration Period" of at least a year subsequent to the FGD being placed in full operations (starting approximately May or June 2000) would help give the historical data needed to help make this decision final. During that period, the stacks would be considered "common stacks" and all the normal compliance testing would be applied.

Prior to the new FGD startup, TEC will request a demonstration period to evaluate "dry" stack monitoring concerns. In addition, during the demonstration period, the following items will be evaluated:

- A. Amount of time there is air flow out of the "dry" stack
 - B. Evaluation of the accuracy of the flow meters for negative and/or low flow rates
 - C. Based on the results of these evaluations, a proposal for the stack to be considered a "bypass" stack will be made by TEC.
- IV. Kim Nguyen of the EPA ARD agreed that the EDR would be just like Big Bend 3 & 4 "common" stack report either way if a "bypass" stack is agreed to later or not. The reports would still look substantially the same.
 - V. Concern was raised about the possible over estimation of emissions due to the additional diluent from the "dry" stack while in scrubbed mode. In addition, over estimation of measurements may be further affected by the absorption of CO₂ in the scrubber. Possible solutions that were discussed included:
 - A. Use the CO₂ monitor readings prior to the scrubber as the diluent input for the "wet" stack emission measurements.
 - B. Install an O₂ meter on either both the "dry" stack and at the scrubber inlet instead of a CO₂ meter and correct for O₂ instead of CO₂.
 - C. TEC will evaluate the feasibility and cost effectiveness of these suggestions. While the currently proposed measurement methodology is satisfactory to meet

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regulatory- requirements, these suggestions were provided to potentially increase the accuracy of the measurements by reducing possible over estimation of emissions.

TEC appreciated the opportunity to discuss this matter with you and with all the various representatives. We will keep all parties updated as this project progresses. We look forward to working with you to help make this project a success. If you have any questions or other issues please feel free to contact me at (813) 641- 5178.

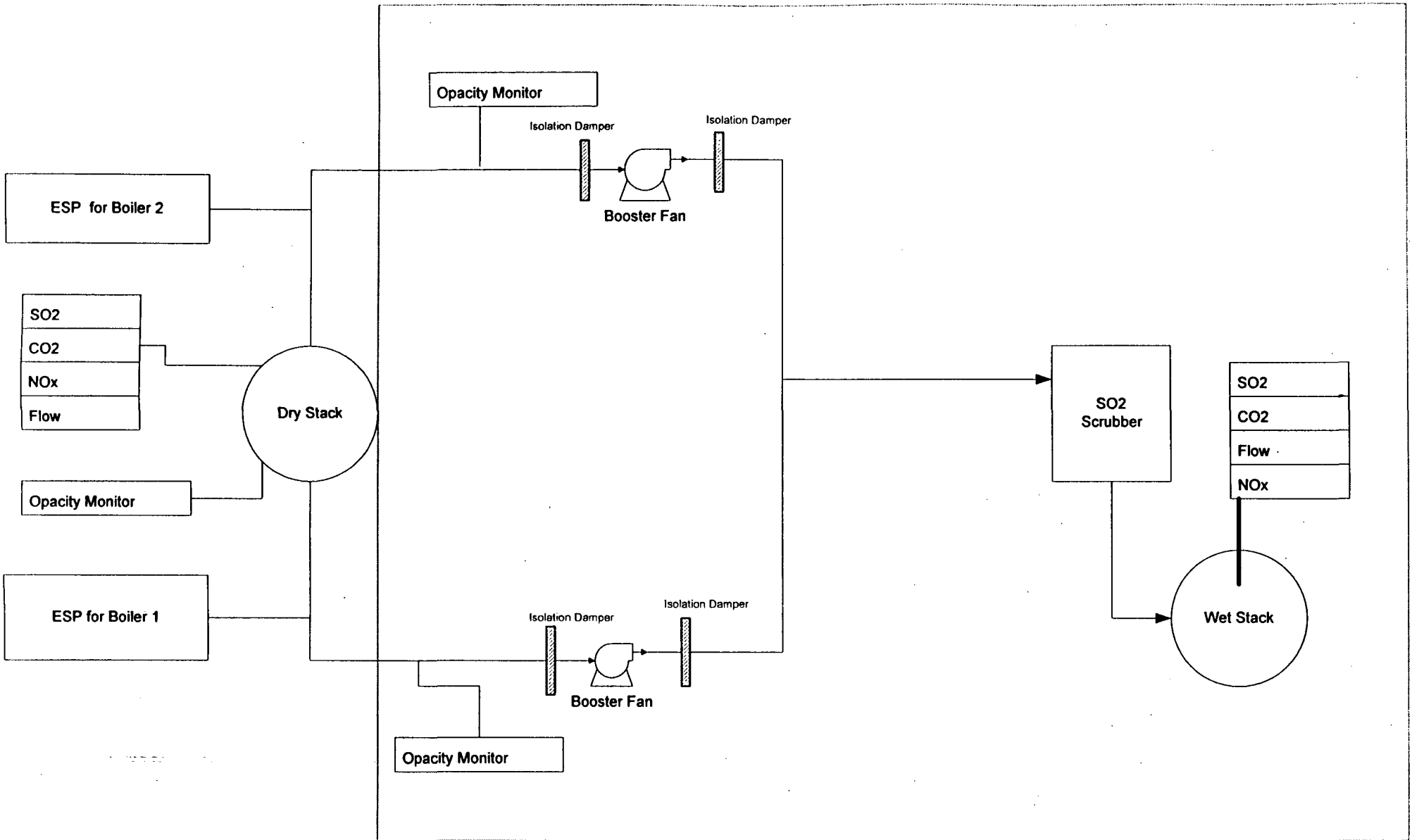
Sincerely



Ted Wenning
Sr. System Analyst
Environmental Planning

EP\gm\TBW105

c: Kim Nguyen, EPA Headquarters
Lynn Haines, Region IV
Joe Kahn, FDEP
Bill Proses, FDEP
Sterlin Woodard, EPCHC



Tampa Electric's New Scrubber for Big Bend Station's Units 1 & 2

MR. W. BARNES 9/10/98