



TAMPA ELECTRIC

RECEIVED

SEP 10 2003

BUREAU OF AIR REGULATION

September 3, 2003

Mr. Michael G. Cooke
Division of Air Resource Management
Florida Department of Environmental Protection
111 South Magnolia, Suite 4
Tallahassee, FL 32301

Via FedEx
Airbill No. 7903 9767 2140

**Re: Tampa Electric Company (TEC)
Big Bend Station
Air Construction Permit for Settlement Projects
Permit No. 0570039-010-AV**

Dear Mr. Cooke:

Tampa Electric Company (TEC) is submitting this letter in response to the Florida Department of Environmental Protection's (Department) letter dated July 30, 2003 concerning the NO_x emission reduction projects that are planned for Big Bend Station as mandated in the Consent Decree.

TEC agrees with the Department on waiving air construction permit requirements for sulfur dioxide (SO₂) controls, particulate matter (PM) controls, and nitrogen oxides (NO_x) controls such as refinements to the coal and air flow monitoring system and regulation of sootblowing through the use of neural network controls.

As stated in our conversations with the Department's engineer, Greg DeAngelo, TEC is in the process of analyzing whether or not to continue firing coal, repower or shutdown. Should Big Bend Station remain a coal burning facility, TEC has agreed to submit a non-PSD air construction permit application for the addition of an SCR to allow the Department to review the project details. In addition, the Department had indicated that the non-PSD air construction permitting process will not lead to new emission limitations, permit conditions or delay any deadlines stipulated in the Consent Decree. The same holds true for submittals of non-PSD air construction permit applications for the low NO_x burners (LNB) and the separated over fired air (SOFA) NO_x control projects.

In addition, TEC appreciates your suggestion to pursue permitting of the PM continuous emission monitoring systems (PM CEMS) to help document location and the fact that the results will not be used for compliance determinations. Typically, TEC does not separately permit these types of systems. In this case, TEC believes the purpose for the installation is adequately documented and clear in the Consent Decree. Paragraph 32.E of the Consent Decree states that "data from, the PM CEM shall be used by Tampa Electric, at a minimum, to monitor progress in reducing PM emissions." In addition, Paragraph 32.F of the Consent Decree states that TEC is to

TAMPA ELECTRIC COMPANY
P. O. BOX 111 TAMPA, FL 33601-0111

(813) 228-4111

AN EQUAL OPPORTUNITY COMPANY
HTTP://WWW.TAMPAELECTRIC.COM

CUSTOMER SERVICE:
HILLSBOROUGH COUNTY (813) 223-0800
OUTSIDE HILLSBOROUGH COUNTY 1 (888) 223-0800

Mr. Michael G. Cooke
September 3, 2003
Page 2 of 2

demonstrate the PM CEMS for at least two years and determine if the equipment is infeasible. If both EPA and TEC agree that the equipment is infeasible, then an alternate PM monitoring plan will be submitted. Furthermore, Conditions A.14 and B.27 of the Title V Air Operating Permit identify EPA Methods 17, 5, 5B, or 5F as the methods of compliance for PM. Therefore, TEC does not believe there is a need for additional permitting at this time.

TEC appreciates the cooperation of the Department in this matter. If you have any questions or comments, please contact Shelly Castro or me at (813) 641-5033.

Sincerely,



Laura R. Crouch
Manager- Air Programs
Environmental Affairs

EA/bmr/SSC168

c: Ms. Trina Vielhauer - FDEP
Mr. Al Linero - FDEP
Mr. Greg DeAngelo - FDEP
Ms. Patricia Comer - FDEP Attorney
Mr. Scott Sheplak - FDEP
Mr. David Lloyd - EPA Region 4
Mr. Jerry Kissel - FDEP SWD
Mr. Jerry Campbell - EPCHC