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BUREAU OF AIR REGULATION

February 6, 2001

Ms. Cindy L. Phillips, P.E.  
Bureau of Air Regulation  
Florida Department of Environmental Protection  
111 South Magnolia Avenue, Suite 4  
Tallahassee, FL 32301

Via FedEx  
Airbill No. 7919 6525 2833

Re: Tampa Electric Company  
Permit Revisions for Big Bend Unit 3, AO29-179911 and Unit 4, PSD-FL-040

Dear Ms. Phillips:

During the process of requesting two permit revisions for the above referenced permits TEC requested that the Department change Specific Condition 21 of permit number AO29-179911 from:

21. *Fuels fired in Unit No.3 shall consist of coal or a coal/petroleum coke blend containing a maximum of 20.0% petroleum coke by weight. The sulfur content of the petroleum coke shall not exceed 6.0% by weight. (dry basis). Vanadium content of the mineral ash from the petroleum coke fired shall not exceed 35% by weight (ignited basis). [Rule 62-4.070(3), F.A.C.]*

To (in part):

21. a. *Fuel fired shall consist of coal or a coal/petroleum coke blend containing a maximum of 20.0% petroleum coke by weight. The vanadium content in the petroleum coke fired shall not exceed 2,660 ppm vanadium in the ash. The ash content of the petroleum coke fired shall not exceed 0.76% by weight on a dry basis. (Bold added)*

Similarly, TEC requested that the Department change Specific Condition 1.A. of PSD-FL-040 from:

1. A. *Fuel fired shall consist of coal or a coal/petroleum coke blend containing a maximum of 20% petroleum coke by weight. The sulfur content of the petroleum coke shall not exceed 6.0% by weight (dry basis). Vanadium content of the mineral ash from the petroleum coke fired shall not exceed 35% by weight (ignited basis)*

To (in part):

1. A. *Fuel fired shall consist of coal or a coal/petroleum coke blend containing a maximum of 20.0% petroleum coke by weight. The vanadium content in the petroleum coke fired shall not exceed 2,660 ppm vanadium in the ash. The ash content of the petroleum coke fired shall not exceed 0.76% by weight on a dry basis. (Bold added)*

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The intent of these changes was to allow TEC to fire the same petcoke in Big Bend Units 1 through 4. In concept, the revised limits on the petcoke fired in Units 3 and 4 are more restrictive than the original limits. Under the old permit limits, a petcoke with 1% ash and 35% vanadium in the ash contained 3,500 ppm vanadium. By limiting the ash content of the petcoke under the new limits to 0.76% and assuming a 35% vanadium content, a new petcoke vanadium content limit was calculated to be 2,660 ppm, much lower than the previous limit allowed. As noted above, the original requests stated "*The vanadium content in the petroleum coke fired shall not exceed 2,660 ppm vanadium in the ash.*" This language contains a typographical error as submitted by TEC. To alleviate this inconsistency, TEC requests that Specific Condition 21 of FDEP permit AO29-179911 and Specific Condition A.1. of FDEP permit PSD-FL-040 be changed as outlined below:

*Fuel fired shall consist of coal or a coal/petroleum coke blend containing a maximum of 20.0% petroleum coke by weight. The vanadium content in the petroleum coke fired shall not exceed 2,660 ppm vanadium. ~~in the ash.~~ The ash content of the petroleum coke fired shall not exceed 0.76% by weight on a dry basis.*

This is consistent with the intent of the original requests and will not result in a significant increase of any regulated air pollutants.

TEC appreciates the cooperation of the Department in this matter. If you have any further questions, you may contact Shannon Todd or me at (813) 641-5125.

Sincerely,



Gregory M. Nelson  
Director  
Environmental Affairs

EP\gm\SKT232

c: Mr. J. Campbell, EPCHC  
Mr. A. Linero, FDEP  
Mr. J. Kissel, FDEP SW  
Mr. H. Oven, FDEP  
Mr. S. Woodard, EPCHC

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