



Jeb Bush  
Governor

# Department of Environmental Protection

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

Colleen M. Castille  
Secretary

October 28, 2004

Ms. Shelly Castro  
Engineer  
Environmental, Health & Safety  
Tampa Electric Company  
PO Box 111  
Tampa, FL 33601-0111

Re: Big Bend Station - Nalcoal Coal Binders

Dear Ms. Castro:

The Department has received your "Notification of Use of Coal Treated with Nalcoal 7899 and Nalcoal 9839/9838-1 Binders" dated September 28, 2004. In it you asked for the Department to acknowledge that Tampa Electric Company (TEC) is authorized to handle, store and combust coal treated with the Nalcoal 7899 and Nalcoal 9839/9838-1 binders at Big Bend Station. In addition, you stated that TEC disagrees with the Department's letter dated January 24, 2003 which notified you that an air construction permit would be needed in order for TEC to utilize these binders.

This letter is to notify you that the Department does not acknowledge that Tampa Electric Company (TEC) is authorized to handle, store and combust coal treated with the Nalcoal 7899 and Nalcoal 9839/9838-1 binders at Big Bend Station. The Department maintains its previous position as stated in our January 24, 2003 letter. Because this change would have the potential to increase actual emissions of regulated air pollutants, it constitutes a modification. In order to implement a modification, a federally enforceable air construction permit must be issued.

Specifically, in order to utilize these binders, TEC will need to submit a construction permit application and subsequent Title V permit revision application. The processing of this request would include a review of the past/current dust suppressants that have been used at your facility in order to do a thorough PSD/NSR applicability determination.

Should you have any questions regarding this response, please contact Cindy Phillips, P.E. at 850/921-9534 or [Cindy.Phillips@dep.state.fl.us](mailto:Cindy.Phillips@dep.state.fl.us), or write to me at the above letterhead address.

Sincerely,

Trina L. Vielhauer, Chief  
Bureau of Air Regulation

TLV/CLP

c: Ms. Karen Sheffield, R.O.  
Mr. Thomas W. Davis, P.E., ECT  
Ms. Alice Harman, P.E., EPCHC

"More Protection, Less Process"

Printed on recycled paper.