

TAMPA ELECTRIC

December 16, 2003

Mr. David Lloyd,
Environmental Scientist
Air Enforcement Section
U.S. Environmental Protection Agency, Region IV
61 Forsyth Street, S.E.
Atlanta, Georgia 30303

**Re: Tampa Electric Company
Big Bend Station
Consent Decree - Civil Action No. 99-2524 CIV-T-23F
Request for Additional Information (RAI)
Particulate Matter Continuous Emissions Monitor (PM CEM)**

Dear Mr. Lloyd:

Tampa Electric Company (TEC) has received your request for additional information concerning the Particulate Matter Continuous Emissions Monitor (PM CEM). This letter is intended to provide 1) background of the PM CEM and actions required of TEC by the Consent Decree, and 2) a resource list to respond to each specific data need requested by the Environmental Protection Agency (EPA).

Background

Paragraph 32.E of the Consent Decree requires TEC to install, calibrate, and commence continuous operation of one PM CEM at Big Bend Unit 4 on or before March 1, 2002. The PM CEM was installed on the common stack for Big Bend Units 3 and 4 on February 27, 2002 and was calibrated to historic stack test data on February 28, 2002. Since February 28, 2002, the PM CEM has been in continuous operation except for periods of malfunction of the PM CEM or routine maintenance performed on the PM CEM.

Paragraph 32.F states that if after TEC operates the PM CEMS for at least two years, and if the parties then agree that it is infeasible to sustain continuous operation of the PM CEM, TEC shall submit an Alternative Monitoring Plan for review and approval by the EPA. The plan shall include an explanation of the basis for stopping operation of the PM CEM and an alternative monitoring protocol. Per correspondence dated July 28, 2003, TEC and EPA agreed that will submit, if necessary, the Alternative Monitoring Plan 180 days after the two-year demonstration period or the final round of PM CEM stack testing, whichever occurs last

Paragraph 32.H of the Consent Decree requires TEC, prior to installation of the PM CEM and annually thereafter, to conduct stack tests and report results to EPA as part of the quarterly report. TEC has met the provisions of this section by conducting annual stack tests, as required by the facility's Title V Air Operating Permit, and providing these to the EPA.

TAMPA ELECTRIC COMPANY
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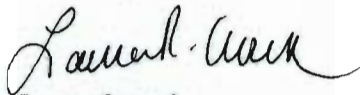
Beyond the requirements of the Consent Decree, TEC has developed a test program based on the EPA's proposed Performance Specification 11 (PS-11): Specifications and Test Procedures for Particulate Matter Continuous Emission Monitoring Systems at Stationary Sources and Procedure 2: Quality Assurance Requirements for Particulate Matter Continuous Monitoring Systems at Stationary Sources (Procedure 2) to understand the accuracy of the instrument and determine the feasibility of sustaining the continuous operation of the PM CEM. TEC's test program consists of a series of four comprehensive stack-testing events conducted over the course of two years. Three of the stack-testing events have been completed, with the fourth scheduled for February of 2004. Although not required by the Consent Decree, TEC has submitted the stack test reports from the first three stack testing events with quarterly reports. Once all testing is complete, TEC will correlate the data in general accordance with PS-11 and Procedure 2, as applicable, and summarize the information in a final report. The feasibility determination will be based on the results of the test program and PM CEM operations.

TEC Responses to EPA RAI

TEC's responses to the EPA's November 6, 2003 RAI are provided in Appendix to this correspondence.

If you should have any further questions, please feel free to contact Ms. Shelly Castro or myself at (813) 641-5033.

Sincerely,



Laura Crouch
Manager, Air Programs
Environmental, Health & Safety

Enclosures

EA/bmr/SSC172

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