



Jeb Bush
Governor

Department of Environmental Protection

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

Colleen M. Castille
Secretary

January 20, 2005

CERTIFIED MAIL – RETURN RECEIPT REQUESTED

Ms. Karen Sheffield
General Manager
Tampa Electric Company
Post Office Box 111
Tampa, Florida 33601-0111

Re: Title V Air Operation Permit Revision Project No.: 0570039-019-AV
Air Construction Permit Modification Project No.: 0570039-018-AC
Big Bend Station – Fuel Transloading and Unit 4 CO Emission Limit

Dear Ms. Sheffield:

The Department received your request, to remove the current Unit 4 CO emission limit from the PSD-FL-040/Title V Permit 0570039-017-AV and to allow off-site transloading operations of coal, petcoke or slag at the Big Bend Station fuel yard for subsequent use by non-TEC facilities. The Department has determined that the application is incomplete and requires the submittal of additional information and/or clarification as described below.

Transloading of Solid Fuel: Please review Subsection H of FINAL Title V permit 0570039-017-AV and refer to Description and Specific Condition H.2 (d) and (e) and (f). Please clarify the exact changes requested in this condition to conform to the future transloading practices requested.

Some of the changes requested in the Title V permit were already made in the above referenced permit. Some of the changes requested were based on a draft version of the same permit. Please reconcile your most recent requested changes with the DRAFT and FINAL version of the Operation Permit 0570039-017-AV. Resubmit your request marked to the Final Permit. Include the rationale for each change.

Unit 4 - Removal of CO emission Limit: Annual testing of CO testing for Unit 4 appears to be required based on the Common Conditions included as Subsection N of the Title V Permit. Condition N.8.(a)4. states, "During each federal fiscal year (October 1 -- September 30), unless otherwise specified by rule, order, or permit, the owner or operator of each emissions unit shall have a formal compliance test conducted for:

"More Protection, Less Process"

Printed on recycled paper.

- b. Each of the following pollutants, if there is an applicable standard, and if the emissions unit emits or has the potential to emit: 5 tons per year or more of lead or lead compounds measured as elemental lead; 30 tons per year or more of acrylonitrile; or 100 tons per year or more of any other regulated air pollutant.

The potential to emit CO from Unit 4 is over 400 tons per year based on the PSD and Certification Limits of 124 pounds per hr and 0.029 lb/mmBtu incorporated into the Title V Permit as Specific Condition B.10. Therefore the rationale to remove the CO limit simply because of the perception that no testing is required does not appear to be valid. It is clear that the original project triggered PSD for CO and that a BACT limit is applicable.

Please provide an explanation for the claim in the application that the existing BACT CO value is inconsistent with the installation of the Low NO_x burners (LNBS), Supplementary Overfire Air (SOFA), and Selective Catalytic Reduction (SCR). It would appear that the SOFA system can promote the necessary burnout following the LNB. Please provide some of the historical CO measurements including any taken recently for the design of the mentioned projects.

Rule 62-4.050(3), F.A.C. requires that all applications for a Department permit must be certified by a professional engineer registered in the State of Florida. This requirement also applies to responses to Department requests for additional information of an engineering nature. Please note that per Rule 62-4.055(1): "The applicant shall have ninety days after the Department mails a timely request for additional information to submit that information to the Department Failure of an applicant to provide the timely requested information by the applicable date shall result in denial of the application."

If you have any questions regarding this matter, please call Teresa Heron at 850/921-9529.

Sincerely,



A. A. Linero, Program Administrator
South Permitting Section

Cc: Tom Davis, P.E.
Alice Harmon, EPCHC
Jim Little, EPA