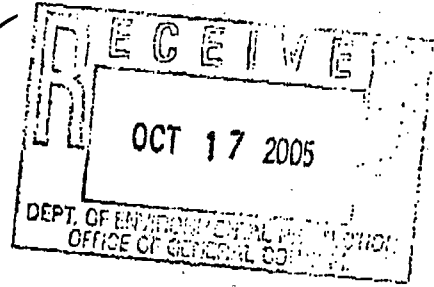


BEST AVAILABLE COPY

10m
Ad
Irina
Fatty ✓



TAMPA ELECTRIC



October 14, 2005

Ms. Lea Crandall
Agency Clerk - Office of the General Counsel
Florida Department of Environmental Protection
3900 Commonwealth Boulevard, MS #35
Tallahassee, FL 32399-3000

Via FedEx
Airbill No. 7912 3867 6677

Re: Tampa Electric Company Big Bend Unit 3
DEP File No. 0570039-022AC - Selective Catalytic Reduction System
Intent to Issue Air Construction Permit

Dear Ms. Crandall:

By letter dated October 3, 2005, and received by Tampa Electric Company on October 11, 2005, the Florida Department of Environmental Protection (FDEP) announced its intent to issue an air construction permit for the installation of a selective catalytic reduction system at the Big Bend Station located in Hillsborough County, Florida. Tampa Electric Company has had an opportunity to review the intent to issue the construction permit along with the proposed conditions and have some issues that we believe need to be resolved prior to finalization of the permit document.

To accommodate discussions with staff of the FDEP on these issues, we request that the time for Tampa Electric Company to petition for a formal administrative hearing be extended by an additional 45 days from the deadline set forth in the Intent to Issue Air Construction Permit pursuant to Rule 62-110.106(4), Florida Administrative Code. Tampa Electric Company believes that this time will be sufficient to amicably resolve the issues without the necessity of pursuing a formal administrative hearing.

Thank you for your consideration of this request. If you have any questions or comments, please contact Shelly Castro or me at (813) 228-4408.

Sincerely,

Byron T. Burrows, P.E.
Manager - Air Programs
Environmental, Health & Safety

EHS/nk/SSC231

c: Mr. Tom Cascio, FDEP
Mr. Al Linero, FDEP
Mr. Doug Beason, Esquire

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For the File

Florida Department of Environmental Protection
Office of General Counsel

Memo

To: Al Linero, Trina Vielhauer, and OGC File
From: Ronni Moore, Assistant General Counsel *rl*
Date: April 18, 2008
Re: Tampa Electric Company, vs. DEP; DEP Permit No. 0570039-027-AC; OGC No. 07-1465

On April 3, 2007, the Department issued a notice of intent to issue air construction permit no. 0570039-027-AC to Tampa Electric Company (TEC). TEC requested an extension of time to file a petition for hearing on the intent. The Department granted TEC an extension of time to file a petition through October 1, 2007.

On November 16, 2007, the Department withdrew the April 3, 2007, intent and issued a new intent. There being no further matters to consider, the Department's file in this matter is closed.

Gibson, Victoria

From: Moore, Ronni
Sent: Friday, April 18, 2008 11:53 AM
To: Linero, Alvaro; Vielhauer, Trina
Cc: Gibson, Victoria
Subject: RE: ol' Tampa Electric - case no 07-1465
Attachments: Tampa Electric - 07-1465 - closure memo.pdf

Attached is the closure memo for case no 07-1465 regarding the first intent we issued to Tampa Electric for construction permit no. 0570039-027-AC.

Ronda L. Moore
Assistant General Counsel



Please consider the environment before printing this email.

From: Moore, Ronni
Sent: Friday, April 18, 2008 10:52 AM
To: Linero, Alvaro; Vielhauer, Trina
Cc: Gibson, Victoria
Subject: RE: ol' Tampa Electric - case no 07-1465

Looks like this solves the mystery! Thanks. So, we issued an intent Aug. 3rd, then withdrew that intent and issued another on Nov. 16th – got it. I'll write up the closure memo.

Ronda L. Moore
Assistant General Counsel



Please consider the environment before printing this email.

From: Linero, Alvaro
Sent: Friday, April 18, 2008 10:33 AM
To: Moore, Ronni; Vielhauer, Trina
Subject: RE: ol' Tampa Electric - case no 07-1465

O.K. I think the action during Rebecca's tenure was replaced by the action described in the attached letter.

So maybe you can close that file.

From: Moore, Ronni
Sent: Friday, April 18, 2008 10:21 AM
To: Linero, Alvaro; Vielhauer, Trina
Subject: RE: ol' Tampa Electric - case no 07-1465

Thanks Al, but these are apparently different cases. I'm not familiar with the 07-1465. This came around before I came into this position, so I'm at a total loss.

4/18/2008

Ronda L. Moore
Assistant General Counsel



Please consider the environment before printing this email.

From: Linero, Alvaro
Sent: Friday, April 18, 2008 9:23 AM
To: Moore, Ronni; Vielhauer, Trina
Subject: RE: ol' Tampa Electric - case no 07-1465

O.k. Ronni:

Looks to me like you already closed it out.

Maybe Rebecca received one of the early requests for enlargement of time and you received a subsequent one for the same project.

Thanks.

Al.

From: Moore, Ronni
Sent: Friday, April 18, 2008 8:54 AM
To: Vielhauer, Trina; Linero, Alvaro
Subject: ol' Tampa Electric - case no 07-1465

Hi there,

I've stumbled on a case here and the only document I have in the file is the attached order granting an extension of time through October 1, 2007. Nothing else!! ☺ I'm asking you guys about it seeing that you were the ones copied on the order. Could you please give me an update so we can know what to do next? I imagine it can be closed, perhaps the permit was issued or the intent was withdrawn, etc.?

Thanks!
Ronni

Ronda L. Moore
Assistant General Counsel
Florida Department of Environmental Protection
3900 Commonwealth Blvd., MS 35
Tallahassee, FL 32399-3000
Phone: 850.245.2193
Fax: 850.245.2302
ronni.moore@dep.state.fl.us



Please consider the environment before printing this email.

4/18/2008



Department of Environmental Protection

Jeb Bush
Governor

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

Colleen M. Castille
Secretary

July 1, 2005

CERTIFIED MAIL – RETURN RECEIPT REQUESTED

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

Re: DEP Files 0570039-018-AC and 019-AV
Big Bend Station Fuel Transloading and Unit 4 CO Emission Limit
Application Status

Dear Ms. Sheffield:

The Department received TECO's response to our incompleteness letter on May 31, 2005. By electronic mail dated June 28 we advised Ms. Shelley Castro of the further additional information required to process the application. This letter is to provide you with some details on the status of the present carbon monoxide (CO) emission limit on Unit 4.


The application requests removal of the CO emission limitation (0.029 lb/mmBtu) that is in the present Title V Operation Permit issued by the Department and the PSD Permit Modification issued by EPA Region 4 in 1985 (that increased the limit from 0.014 lb/mmBtu).

We cannot remove the BACT CO limit without information supporting TECO's claim that the current limit is no longer appropriate because the CO monitoring and testing requirements were already removed from Permit PSD-FL-040 in the 1980's. We have found no record that the monitoring and testing requirements were actually removed. We cannot remove a BACT limit unless previously approved and we cannot modify the CO BACT limit without a specific application or a modification of the present application requesting a different CO BACT limit.

We agree, based on information provided by TECO, that the CO BACT limit is relatively low for a coal-fired unit. A proper BACT analysis will (among other things) require submittal of CO emission data. According to conversations with some of your staff, there is no CO data available for Unit 4. However, some data should be available from the various NO_x control studies. It is also likely that data is also available from the petroleum coke trial tests conducted in the mid-1990's and presumably thereafter documenting that there were no significant emission increases caused by permitted petroleum coke use.

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.
Byron Burrows, TECO
Alice Harmon, EPCHC
Jim Little, EPA

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