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Module AB25



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DIVISION OF AIR
RESOURCE MANAGEMENT

November 30, 2011

Jeffrey F. Koerner, Program Administrator
Florida Department of Environmental Protection
Division of Air Resource Management
Office of Air Permitting and Compliance
2600 Blair Stone Road, M.S. 5505
Tallahassee, Florida 32399-2400

Via FedEx
Airbill No. 7954 5689 3311

**Re: Tampa Electric Company - Big Bend Station
Title V Permit Number 0570039-045-AV
Temporary Relief to Permit Condition A.53 (FY 2012)
Facility ID No. 0570039**

project No: 0570039 - 056 - AC

Dear Mr. Koerner:

On May 20, 2011, Tampa Electric Company (TEC) requested temporary relief from Condition A.53 to allow stack testing of both Units No. 1 and 2 simultaneously in the common stack (CS0W1) to demonstrate compliance for each unit in federal fiscal year (FFY) 2011. The Florida Department of Environmental Protection granted our request in a letter of authorization (LOA) (0570039-046-AC), but included a requirement to submit an air construction application by January 30, 2012 to revise Condition A.53. On August 19, 2011, TEC subsequently submitted an air construction permit application (EPSAP Application No. 2982-1) to fulfill the requirements of the LOA. However, TEC submitted two subsequent amendments to this application that have substantially delayed the processing of the application.

TEC is planning to test Units No. 1 and 2 on December 14, 2011. The main reason for pursuing this selected test date is unit availability and general logistics. It is substantially difficult to achieve the requirements of Condition A.53 in a timely manner due to unit availability. In FY 2011, approximately thirty three (33) renotification correspondences were submitted to the FDEP and EPC to reschedule stack tests on Units 1 and 2.

With the historical challenges of performing compliance tests for Units No. 1 and 2 in a reasonable time frame, TEC believes it is prudent to be proactive and begin scheduling and conducting the necessary stack tests in order to meet the testing requirements. Therefore, for this FFY 2012, TEC seeks additional relief from Condition A.53 to allow stack testing of both Units No. 1 and 2 simultaneously in common stack CS0W1 to demonstrate compliance for each unit.

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Mr. Jeffrey F. Koerner
November 30, 2011
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Please contact me at (813) 228-4232 or Byron Burrows at (813) 228-1282, if you have any questions or comments regarding this request.

Sincerely,



Robert A. Velasco, P.E., BCEE, QEP
Air Programs
Environmental, Health & Safety
Tampa Electric Company

EHS/rfk/RAV127

cc: Cindy Zhang-Torres P.E., SW District
Diana Lee P.E., EPCHC
Jason Waters P.E., EPCHC