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DIVISION OF AIR
RESOURCE MANAGEMENT

January 19, 2012

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

Fedex No. 7931-3061-1484

**Re: Tampa Electric Company - Big Bend Station
Title V Permit Number 0570039-045-AV
Heat Input Revision & Compliance Determination
Air Permit Application 3030-1, RAI Response
Facility ID No. 0570039**

Dear Mr. Koerner:

Tampa Electric Company (TEC) submitted an electronic air construction permit application (No. 3030-1) on November 10, 2011. This application requests a modified heat input note, correction to the allowable heat input rates on Units No. 1 to 4, and a proposed fuel sampling methodology to demonstrate compliance with the heat input rates. On January 9, 2012, TEC received a correspondence from Mr. Martin Costello requesting additional information (RAI). TEC's responses to the RAI letter are discussed below.

Comment 1

Please provide the current design heat input rates for Big Bend Units 1-4 as of the date of your requested revisions.

Response 1

The information requested was previously provided in the application No. 3030-1, dated November 10, 2011. Section 3.2 in the permit application shows a summary of the design heat input data provided by the boiler manufacturer specifications. The specifications show the heat input rates for Units No. 1 and No. 2 at the continuous and peak rated conditions. The peak conditions are approximately 5 to 7% higher than the continuous rated conditions. The boiler specifications show Units No. 3 and No. 4 are based on the continuous rate conditions, not the peak rated conditions. A summary of the heat input rates as provided in the application is listed below.

TAMPA ELECTRIC COMPANY
P. O. BOX 111 TAMPA, FL 33601-0111

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System	Continuous Rated Heat Input (mmBtu/hr)	Peak Heat Input (mmBtu/hr)	Permitted Heat Input (mmBtu/hr)
Unit 1	3,770	4,037	4,037
Unit 2	3,780	3,996	3,996
Unit 3	4,115	N/A	4,115
Unit 4	4,330	N/A	4,330

Comment 2

Please include the method that was used for determining the values in item 1 above (either fuel sampling and analysis data or acid rain continuous emissions monitoring data) and the averaging time that these values represent.

Response 2

The information requested was previously provided in the application No. 3030-1, dated November 10, 2011. This information was previously identified in Sections 3.1, 3.2 and 3.3 of the application. Specifically, Section 5 outlines coal bunkering and composite fuel sampling shall be used to demonstrate compliance with the heat input rates. This methodology has been used since the inception of the Title V permitting program to track and monitor the performance parameters (including heat input) of each unit for TEC and the Public Service Commission (PSC).

Comment 3

Please indicate the desired method that will be used in the future to establish the permitted maximum capacity for pollutants for which emission rates are determined by stack testing.

Response 3

As indicated in the subject permit application (No. 3030-1), coal bunkering and monthly composite sampling is the desired method for establishing the maximum operating range during stack testing. This is the same method that has historically been utilized for this purpose and accepted by the department for each and every stack test conducted at Big Bend Station. TEC continues to assert that the monthly composite sampling is sufficient to meet potential-to-emit, stack test operating rate, and all other related regulatory requirements for Unit Nos. 1 to 4.

The above responses serve to clarify or reiterate the information previously provided in the application. This letter does not constitute an addendum, revision and modification to the permit application. Therefore, certification of this letter by a Responsible Official and Professional Engineer is not required.

TEC believes the proposed compliance methodology provides reasonable assurance of meeting requirements of Rule 62-4.070 F.A.C. It is requested the Department continue to process the air construction permit application to correct the allowable heat input limits and establish a reasonable approach for compliance with the heat input rates.

Mr. Jeffrey F. Koerner
January 19, 2012
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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.

Sincerely,

A handwritten signature in blue ink, appearing to read "Robert A. Velasco".

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

EHS/iyw/RAV128

cc Cindy Zhang-Torres DEP
Diana Lee, EPCHC