



TAMPA ELECTRIC

February 28, 2013

Mr. Jeffery 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. 7948-5432-9300

Re: Tampa Electric Company (TEC) - Big Bend Station  
Temporary Relief from Permit Conditions R.5/R.6 (EU-047)  
Title V Permit Number 0570039-054-AV  
Facility ID No. 0570039

RECEIVED  
MAR 01 2013  
DIVISION OF AIR  
RESOURCE MANAGEMENT

Dear Mr. Koerner:

On February 8, 2013, plant maintenance indicated the fogging system had malfunctioned due to the pluggage in the main headers and nozzles. The preliminary review of the pluggage showed that rust or small metal fines had plugged the fogging system water lines. The other issue was that Big Bend was receiving coal shipments by train on Saturday morning (2/9/13), Sunday morning (2/10/13) and Monday morning (2/11/13) and there was no practical means to stage the railcars until the fogging system was placed back into service.

On February 8, 2013, TEC requested enforcement discretion to operate the railcar conveyance system without the fogging system. On February 8, 2013, the EPCHC provided verbal and written enforcement discretion to operate the railcar conveyors without the fogging system. Under this agreement, the EPCHC required TEC to conduct VE Tests (Method 9) upon startup or at the maximum operating throughput during these unloading activities and report these activities as a permit deviation. EPCHC also suggested conducting frequent checks for any dusting (Method 22) as necessary during the conveying operation. TEC has continued to utilize the existing surfactant dust suppression during the conveying process.

As requested, TEC conducted the Method 9 testing to quantify any dusting with the malfunction of the fogging system. These tests were conducted on Saturday (2/9/13), Sunday (2/10/13) and Monday (2/11/13) while the railcar conveyance system was operating without the fogging system. All VE tests were reported to be 0% opacity during operation (see attached). On February 11, 2013, TEC requested only rudimentary visual observations (no VE testing) be conducted until the fogging system is repaired this week. The EPCHC agreed that only visual observations for dusting are sufficient until the system was repaired.

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The VE testing data shows there are no fugitive dust emissions in the absence of the fogging system. The results also demonstrate the operation of both systems over complies and provides no real benefit to the environment. Furthermore, 40CRF60 Subpart Y and the fugitive dust control plan require the operation of one or more dust suppression systems. The rule does not require the operation of both as required by permit conditions R.5 and R.6.

TEC is requesting the Department waive the operating permit conditions R.5 and R.6 to allow the operation of the chemical surfactant system or the water/fogging system in this federal fiscal year 2012. TEC intends to submit a Title V permit application to revise the existing permit conditions to reflect these changes.

Please contact me at (813) 228-4232, if you have any question regarding this request.

Sincerely,



Robert A. Velasco, P.E., BCEE, QEP

Air Programs

Environmental, Health & Safety

Tampa Electric Company

cc: Kelly Boatwright, SW DEP  
Diana Lee, EPCHC

EHS/iy/RAV191