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February 1, 2012

Dear Mr. Koerner:

## RECEIVED

FEB 02 2012

DIVISION OF AIR RESOURCE MANAGEMENT

028-AV module ABO61 029-AC module - ABO6

Mr. Jeffrey F. Koerner, Program Administrator Florida Department of Environmental Protection Office of Air Permitting and Compliance 2600 Blair Stone Road, M.S. 5505

Tallahassee, Florida 32399-2400

Re: Tampa Electric Company - Polk Power Station

> Title V Permit Number 1050233-026-AV Temporary Relief from VE & Fuel Testing

EU-001, -003, -004, -009, -010

Facility ID No. 1050233

Project No: 1050233-028-AV

Via FedEx

Airbill No. 7980-1127-0556

The current Title V permit 1050233-026-AV has requirements for daily visible emission and fuel sampling requirements. These requirements overcomply and do not provide any real benefit to the environment. TEC requests the Department provide a letter of authorization this federal fiscal year (FFY) 2012 to reduce the onerous visible emission and fuel sampling requirements while still demonstrating the basic requirements of the permit.

## Existing Sulfuric Acid Visible Emission Procedure

Condition C.10, Monitoring - Visible Emission Observation (EU-004) requires the owner or operator to observe and record a quantified visible emission observation, six (6) minutes in duration, for the sulfuric acid plant on a daily basis for the purpose of periodic monitoring.

The historical visible emissions summary was collected from the sulfuric acid plant (SAP) stack during the period from 2009 to 2011 pursuant to Condition C.10 (see attached). The data shows that all daily visible emissions were 0% and in compliance with the 10% visible emission requirement in Condition C.5, Visible Emissions (VE).

## **Existing Fuel Sampling Procedure**

The permit has specified daily fuel sampling requirements and bulk shipment fuel requirements. Condition B.19, Sulfur Content of Fuel (EU-003) requires the owner or operator to demonstrate compliance by testing for sulfur content of the No. 2 fuel oil in the storage tanks once per day when firing oil. Conditions F.21, Fuel Oil Monitoring Schedule (EU-009, -010) requires, the owner or operator to demonstrate compliance with the sulfur content of the fuel from an analysis provided by the vendor.

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

(B13) 228-4111