

# Florida Department of Environmental Protection

Bob Martinez Center 2600 Blair Stone Road Tallahassee, Florida 32399-2400 Charlie Crist Governor

Jeff Kottkamp Lt. Governor

Michael W. Sole Secretary

April 18, 2008

Electronically Sent - Received Receipt Requested

Mr. David M. Lukcic Manager of Environmental Programs Tampa Electric Company P.O. Box 111 Tampa, Florida 33601-0111

RE: Application for Authorization to Construct Eight Simple Cycle Combustion Turbines and Two Emergency
Generator Diesel Engines
Project No. 0570040-024-AC/PSD-FL-399
H. L. Culbreath Bayside Power Station

#### Dear Mr. Lukcic:

On March 20, 2008, the Department of Environmental Protection (Department) received a request for authorization to construct eight simple cycle combustion turbines and two emergency generator diesel engines. Based on our review of the proposed project, we have determined that the following additional information is needed in order to continue processing this application package. Please provide all assumptions, calculations, and reference materials, that are used or reflected in any of your responses to the following issues:

- 1. What was the environmental bid specification for each pollutant that was provided to the simple cycle combustion turbine (CT) vendors to evaluate for bid submittals? Also, provide the vendor's quotes and guarantees.
- 2. What is the actual cost of each individual simple cycle CT system? What is the actual cost of each associated electrical generator?
- 3. What is the total cost for the overall proposed project?
- 4. Are you planning to convert these simple cycle CT systems into combined cycle CT systems? If so, when?
- 5. What are the maximum uncontrolled NOx emissions (ppm) from one of the proposed simple cycle CT systems? Based on the uncontrolled emissions for one simple cycle CT, provide a top-down detailed equipment requirement and cost effectiveness analysis to bring the NOx emissions down to 2.5 ppmvd @ 15% oxygen? Please address the question using only SCR, water injection plus SCR, and dry low-NOx combustors (DLNC) plus SCR.
- 6. What is the amount of additional power output [megawatts (MW)] expected to be achieved per hour by the use of water injection per simple cycle CT and per SwiftPac proposed operation? What is the amount of profit in dollars expected to be achieved per hour and annually from the use of water injection per simple cycle CT and per SwiftPac proposed operation?
- 7. What are the costs for dry low-NOx combustors (DLNC) for natural gas firing for a simple cycle CT system?
- 8. In conducting its BACT evaluation for the Seminole Electric Cooperative's Payne Creek combustion turbine project (PSD-FL-344), the Department staff identified several simple cycle CT systems (some aero-derivative

machines) that, seemingly, would meet NOx emissions much lower than the proposed 25 ppmvd @ 15% oxygen. Although not exhaustive, a list of these machines, the vendors of them, and internet links are included for your review, below. Please provide the following information: which, if any, of these manufacturers Tampa Electric Company (TECO) contacted regarding this project; which of these machines TECO evaluated for this project; if any of these machines were not evaluated for this project, the reasons for not considering them; why any of the machines that were evaluated were not chosen for this project; and why, if it is so, each of these machines fails to meet the Bayside Power Station's project specifications for the proposed pollutant emission limits. In reviewing TECO's response to these questions, it would be helpful, if possible, to have copies of the documents between TECO, its consultants and/or agents, and any equipment manufacturers related to or explaining the NOx emissions capabilities and operating specifications of the equipment chosen or considered.

- 9. On the application page F.1. for a simple cycle CT system, a total percent efficiency control value for the pollutant NOx is stated as 88%. What is the basis for the value and provide the calculations, assumptions and reference material to support this value?
- 10. In Table 5-4, the SCR catalyst life is stated as only 4 years. Since the turbines are only firing pipeline natural gas and no fuel oil, then it seems that the SCR catalyst's life would be more than the projected life stated in the cost evaluation. What type of SCR catalyst was selected for the cost evaluation in this project? How many catalysts are included in the pricing? Provide the vendor's specifications for the SCR catalyst system and include the vendor's guarantee for the SCR catalyst's life while firing only natural gas. Please note that there have been quotes that see the catalyst life expectancy of 15 years while firing natural gas only.
- 11. In Table 5-4, the electricity cost has a cost factor of 0.030 \$/kilowatt-hour and refers to a footnote that the factor is derived from a "recommended FDEP value". Provide the derivation of this factor.
- 12. In Table 5-5, under "Direct Capital Costs", provide a detailed breakdown of the individual equipment, a description of the equipment, and its cost that is included in the projected cost of \$16,104,000. If the initial catalyst cost is included in this total assessment, then its inclusion is not acceptable, based on the direction of EPA Region 4's letter to the Department of February 1, 2005, regarding the Seminole Electric Cooperative Payne Creek project. Please adjust appropriately and resubmit, if necessary.
- 13. In Table 5-5, under "Equipment Costs", there is a footnote that states "includes exhaust duct modifications". Please explain what the footnote means and the detailed breakdown of the associated costs.
- 14. In Table 5-5, under "Installation Costs", provide a detailed description and cost breakdown of the individual listings under this header.
- 15. In Table 5-5, under "Indirect Installation Cost", you have listed a Process Contingency of 5%. Also, under Project Contingency, you have listed a value of 15%. In EPA's letter to the Department of February 1, 2005, regarding the Seminole Electric Cooperative Payne Creek project, a comment was made that these values are not acceptable to use in the cost analysis, but suggested that only a value of 3% be used for the Process Contingency and 'zero' for the Project Contingency in the cost calculations. Please adjust your calculations appropriately and resubmit.
- 16. In Table 5-5, under "Preproduction Cost", provide a detailed description and breakdown of what is contained under this listing and the individual costs. If these costs are found in other evaluations, then it or they should be removed or adjusted appropriately and resubmitted, which is reflected in the U.S. EPA Region 4's letter to the Department of February 1, 2005, regarding the Seminole Electric Cooperative Payne Creek project.

- 17. In Table 5-5, under "Energy Penalty (EP)", provide a detailed description and breakdown of how this cost value was calculated. Although it is appropriate to calculate the cost of the CT backpressure due to SCR, it should be based on the cost of the additional fuel combusted to replace the lost power and not the current price of electricity. If these costs are found in other evaluations, then it or they should be removed or adjusted appropriately and resubmitted, which is reflected in the U.S. EPA Region 4's letter to the Department of February 1, 2005, regarding the Seminole Electric Cooperative Payne Creek project.
- 18. As stated in the U.S. EPA Region 4 letter to the Department of February 1, 2005, regarding the Seminole Electric Cooperative Payne Creek project, a NOx emissions rate of 25 ppmvd @ 15% oxygen using water injection does not represent BACT for a simple cycle CT system. This point is also reflected in a review of the U.S. EPA's RACT/BACT/LAER Clearinghouse (RBLC). Therefore, provide a top-down detailed equipment requirement and cost effectiveness analysis for a SCR system that would reduce the proposed BACT NOx standard of 25 ppmvd @ 15% oxygen to 2.5 ppmvd @ 15% oxygen.
- 19. For carbon monoxide (CO), provide a detailed plan for monitoring the CO catalyst reactivity and how CO emissions will be affected.
- 20. Besides performing annual compliance stack testing using EPA Method 10, 40 CFR 60, Appendix A, provide a detailed plan to periodically monitor CO emissions through some catalyst testing and/or parametric monitoring to demonstrate on-going compliance with the resultant CO standards. A CO continuous emissions monitoring system (CEMS) was not proposed.
- 21. Regarding the application pages, provide the calculations that were used to project the potential and allowable emissions for each pollutant. For any capacity and emissions dependent of the heating value of the fuel, be sure to use the same heating value (HHV or LHV) throughout for consistency purposes. The maximum heat input capacity value used in the application is 336 MMBtu/hr (HHV) from the use of natural gas.
- 22. For all of the tables in the write-up and in Appendix B, provide the calculations, assumptions, and any reference material that was used to establish these tables.
- 23. Will there be an operational scenario where both combustion turbines in a pod (CT/pod) will be operating simultaneously? If yes, please explain.
- 24. How many SCR systems are included in the submitted design and cost effectiveness spread sheet? Please provide a plot plan of the design that would include the SCR systems.
- 25. Was the design for the SCR system to service only one CT or CT/pod at a time?
- 26. For the cost effectiveness spreadsheet, explain in detail the catalyst maintenance schedule. Is the catalyst design such that individual modules can be replaced versus the entire catalyst as maintenance dictates?
- 27. Please estimate the CO<sub>2</sub> impacts from this project.
- 28. For Table 5-7, provide the calculations, assumptions and reference material, to support the values listed under "Emission Impacts".
- 29. Why wasn't DLNC technology (TALON II low-NOx combustors) proposed for this project? This technology has been used on Pratt-Whitney aero-derivative simple cycle CT units (FT8-2 type). What is the status of the Pratt-Whitney TALON II and TALON III low-NOx combustor technology? Has the TALON III low-NOx combustors been installed on any Pratt-Whitney aero-derivative simple cycle CT units? If so, where? Provide the identity of the application and the results of any testing to date.

- 30. Was the Pratt-Whitney FT8-2 turbine unit evaluated for this project since the unit can achieve up to 50 MW per TwinPac, which was one of the criteria used in the development of the project? If so, provide the analysis associated with evaluation. If not, explain why, since it appears to be the only FT8 unit equipped with DLNC, which is the dominant NOx control technology, besides SCR, associated with the latest BACT determinations.
- 31. Provide a pollutant netting table for the last five years from March 20, 2008, the date of the application.
- 32. For the proposed Black Start emergency generators (2), where are you going to store the fuel? Is there an existing storage tank on-site? If so, please describe.
- 33. On page 5-9, it is stated that "TEC has taken the opportunity to develop experience with a new generation technology, choosing P&W SwiftPac<sup>TM</sup> FT8-3 aero-derivative SCCTs in December 2007." Does this mean that TEC has already initiated and committed to a purchase contract for these simple cycle combustion turbines?
- 34. The following facilities were authorized to install new aero-derivative simple cycle combustion turbines through permitting. In these cases, SCR was imposed by BACT or proposed as the NOx control system that would allow the project to escape PSD new source review (NSR), which includes determinations of BACT or LAER.
- City of Tallahassee Arvah B. Hopkins Generating Station: On October 26, 2004, the Department issued an air construction permit, No. 0730003-005-AC/PSD-FL-343, for the construction of two General Electric LM6000 Turbine-Generator sets, which are aero-derivative simple cycle combustion turbine-generator sets. The NOx limit is 5 ppmvd @ 15% oxygen for either natural gas-firing or fuel oil-firing. NOx emissions are controlled using water injection and SCR. A permit restriction of the NOx limit was requested in order to escape PSD NSR. Therefore, the installation of SCR is considered to be cost effective because it was used to avoid PSD NSR. This is the latest NOx BACT determination issued by the Department for aero-derivative simple cycle combustion turbines; and, compliance has been demonstrated. The RBLC has an ID of PSD-FL-343.
- New York City Jamaica Bay Facility: A Pratt & Whitney FT8-3 TwinPac aero-derivative simple cycle CT set was permitted and the applicant requested a NOx limit of 2.5 ppmvd @ 15% oxygen for both natural gas and fuel oil; and, compliance has been demonstrated. NOx emissions are controlled using water injection and SCR. The proposed and permitted NOx limit were based on taking some fuel oil usage restriction in order to escape PSD NSR. Therefore, the installation of SCR is considered to be cost effective because it was used to avoid PSD NSR.
- CalPeak Power El Cajon LLC: On June 27, 2001, the San Diego County Air Pollution Control District issued an air construction permit, No. 976021, for the construction of a Pratt & Whitney FT8 DLNC TwinPac aero-derivative simple cycle CT set. The NOx BACT limit is 3.5 ppmvd @ 15% oxygen, 1-hour average, while firing only natural gas; and, compliance has been demonstrated. An SCR and oxidation catalyst were imposed by BACT for the additional control of NOx emissions. The RBLC has an ID of CA-1151.

Why did you not submit an application for emissions units that could meet, at a minimum, similar control criteria and standards?

- 35. Explain how you plan to demonstrate compliance with the NOx emissions standard using the emissions monitoring provisions of 40 CFR Part 75. Provide a detailed plan regarding this issue.
- 36. Comments were received from both the Hillsborough County Environmental Protection Commission and the U.S. EPA Region 4. These comments are attached and must be addressed as part of this incompleteness letter.

Example list of vendors and machines:

GE LM6000 and 15 ppm combustor:

http://www.gepower.com/about/press/en/2004 press/052504m.htm

GE 10-2 15 ppm:

http://www.gepower.com/about/press/en/2005 press/020105.htm

GE MS6001C 15 ppm:

http://www.gepower.com/prod\_serv/products/gas\_turbines\_cc/en/midrange/ms6001c.htm

GE MS6001B, MS7001EA, MS7001FA:

http://www.gepower.com/prod serv/products/tech docs/en/downloads/ger3568g.pdf

Siemens SGT 300:

http://www.powergeneration.siemens.com/en/oilgas/drives/gt/sgt300/technicaldata/index.cfm?session=518919x54914902

Siemens SGT 400:

http://www.powergeneration.siemens.com/en/oilgas/drives/gt/sgt400/technicaldata/index.cfm

Siemens SGT 700:

http://www.powergeneration.siemens.com/en/oilgas/drives/gt/sgt700/emissiontech/index.cfm

Siemens SGT-800:

http://www.powergeneration.siemens.com/en/oilgas/drives/gt/sgt800/emissiontech/index.cfm

The Department will resume processing this application after receipt of the requested information. If you have any questions regarding this matter, please call Bruce Mitchell at (850)413-9198 or Cleve Holladay at (850)921-8986.

Sincerely,

Jonathan Holtom, P.E. New Source Review Section Bureau of Air Regulation

JH/bm

#### Attachments

cc: Mr. David M. Lukcic, Tampa Electric Company (dmlukcic@tecoenergy.com)

Mr. Thomas W. Davis, P.E., Environmental Consulting & Technology, Inc. (tdavis@ectinc.com)

Mr. Jerry Campbell, Hillsborough County Environmental Protection Commission (campbell@epchc.org)

Ms. Kathleen Forney, U.S. EPA, Region 4 (forney.kathleen@epamail.epa.gov)

Mr. Jim Little, U.S. EPA, Region 4 (little.james@epamail.epa.gov)

Mr. Dee Morse, National Park Service (Dee Morse@nps.gov)

#### EPA Comments - TECO Bayside Power Station in Tampa, Florida.

- 1. The definition of BACT in the Clean Air Act, in federal PSD regulations, and in Florida's implementing regulations is primarily in terms of an emissions limitation. By far the majority of simple cycle combustion turbines (CT) approved in recent years have been approved with a NO<sub>x</sub> BACT emissions limitations between 9 ppmvd and 15 ppmvd (at 15 percent oxygen) when burning natural gas. The PSD permit application did not provide any documentation or analysis supporting the BACT emission limit of 25 ppmvd. A more detailed analysis should be provided before FDEP reaches a final decision on BACT for the simple cycle CTs.
- 2. According to the PSD application, the annual emissions for this project were calculated using the operating scenario of 59°F and 100% load. Although this seems to be the worst case scenario for NO<sub>x</sub> emissions, according to Table B-4 in the appendix, CO and VOC emissions are actually higher at 20 and 50% load at 9.1 lb/hr and 5.1 lb/hr, respectively. The calculation of annual emissions should be done using the worst case scenario for each regulated NSR pollutant and PSD applicability should be evaluated based on the revised annual emissions calculations.
- 3. Upon review of the BACT economic analysis for SCR control of NO<sub>x</sub> emissions from the simple cycle CTs, EPA had the following comments:
  - a. The applicant should provide a recent detailed vendor quote specific to the project for the selective catalytic reduction (SCR) system. Without a current vendor quote, it is unclear what is included in the Purchased Equipment Cost (PEC) of \$16,104,000 or why it is so high. In a similar project in Florida (Seminole Payne Creek in 2005) the applicant provided a cost analysis for SCR systems on 10 Pratt & Whitney FT8-3 simple cycle combustion turbines with a total PEC of \$11, 227,500. This is about an 80% increase in the cost of each SCR over a 3 year period. Additionally, it is unclear whether the applicant considered installing 4 SCR units (one for each SwiftPac set of turbines) or 8 SCR units (one for each combustion turbine). The BACT cost analysis should reflect the operating scenario that is being considered, especially if it would result in a more cost effective use of the SCR systems.
  - b. Given the routine nature of SCR installations on CTs, it is unnecessary to include both a 5% Process Contingency cost and a 15% Project Contingency cost. It is more appropriate in this case to include the standard 3% process contingency figure often used in BACT cost calculations.
  - c. It is not clear what is included in the Preproduction Cost value of \$577,800. If there are costs included in this figure that, if utilizing a standard cost evaluation method would normally have fallen into another category, then they may be included; otherwise it is not appropriate to include in the cost evaluation.

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d. The annual operating cost calculation includes a \$208,800/year value as the Energy Penalty due to turbine backpressure. It is our understanding that this cost was estimated using the lost power generation and cost of electricity at \$0.030/kWh. Although it is appropriate to calculate the cost of the CT backpressure due to SCR, it should be based on the cost of the additional fuel combusted to replace the lost power and not the current price of electricity. Finally, although they cited FDEP as the source, it is still unclear how the \$.030/kWh was derived.

## **MEMORANDUM**

DATE:

April 17, 2008

TO:

Bruce Mitchell, FDEP

FROM:

Pwu-Sheng Liu, Ph.D., P.E

Diana M. Lee, P.E. Sterlin Woodard, P.E.

SUBJECT: Tampa Electric Company (TECO) Application No. 0570039-027-AC

Below are our comments regarding TECO's PSD permit application relating to the Simple-Cycle Combustion Turbines Unit 3 through 6 for Bayside Power Station as part of our completeness review of this project.

Please be advised that the Environmental Protection Commission of Hillsborough County (EPC), as delegated by the Florida Department of Environmental Protection (DEP), has completed their initial review of TECO's permit application received on March 20, 2008, for the construction and operation of eight simple-cycle combustion turbines (SCCTs) at its existing H. L. Culbreath Bayside Power Station (BPS). In order to complete the review process the following additional information is being requested pursuant to Chapter 62-4.055, F.A.C.:

- 1. In accordance with Chapter 1-6.02.A.1.(a)(i), Rules of the Environmental Protection Commission of Hillsborough County, an application fee applies to permits that are to be reviewed pursuant to the authority of Chapter 84-446, Laws of Florida, and not pursuant to full permit delegation from the Florida Department of Environmental Protection (FDEP). The fee for a prevention of significant deterioration construction project for a non-delegated facility is \$480. Please submit the specified fee to the EPC.
- 2. In the Air Construction Permit Application, under Section 3.3, TECO stated that the SCCT project qualifies as a major modification to an existing major facility and is subject to the PSD NSR requirements of Rule 62-212.400, F.A.C., for those pollutants that are

emitted at or above the specified PSD significant emission rate levels. However, the application did not include the seven combined cycle natural gas fired turbines located at the Bayside Station. Pursuant to Rule 62-210.200(204) "Modification", F.A.C., a modification is defined as a physical change in, change in the method of operation of, or addition to a facility, which would result in an increase in actual emissions of any air pollutant regulated under the Act. On Page 5-7, Section 5.2 of the Application, it is stated that the SCCTs would reduce deliverable cost to double-peak loads where the SCCTs can dispatch to meet short duration heating demand more cost effectively than TECO's large operational constraint CCCTs (Combined Cycle Combustion Turbines). It appears from this statement that TECO is planning a change in the method of operation of the facility, which means that TECO needs to determine if there will be a net increase in actual emissions from the facility due to increase dependence on the SCCTs, as opposed to the existing CCCTs. Therefore, in accordance with Rule 62-212.400(2)(a)3., F.A.C., the Hybrid Test for Multiple Types of Emissions Units applies to this project, since it involves a combination of new and existing emissions units. EPC staff performed a PSD applicability analysis, and determined that the existing CCCTs and the proposed SCCTs emissions increase will exceed the significant emissions rates for VOC, NOx, CO, PM, PM10, and SO2. Therefore, pursuant to Rule 62-212.400(10)(c), F.A.C., a BACT analysis is necessary for each PSD pollutant at each emissions unit, which would result in an significant net emissions increase as a result of the modification at the facility.

- 3. In the Air Construction Permit Application Section 5.2. Evaluation of Alternative Electrical Generation Technologies, TECO only listed SCCT as the only alternative for fuel combustion at the Bayside facility. As defined by Rule 62-210.200(40), F.A.C., BACT is defined as an emission limitation, including a visible emission standard, based on the maximum degree of reduction of each pollutant emitted which the Department, on a case by case basis, taking into account: (1) energy, environment, and economic impacts, and other costs, (2) all scientific, engineering, and technical material and other information available to the Department, and (3) the emission limiting standards or BACT determinations of Florida and any other state, determines is achievable through application of production processes and available methods, systems and techniques (including fuel cleaning or treatment or innovative fuel combustion techniques) for control of each such pollutant. Please explain why TECO did not consider installing CCCTs in lieu of the proposed SCCTs, since CCCTs is a production process and available method, system and technique, or innovative fuel combustion technology, which operates more efficiently and yields lower emission rates than SCCTs. understand that, historically, EPA has not considered the BACT requirements as a means to redefine the design of the source when considering available control alternatives. However, as EPA stated in the NSR Workshop Manual, Page B.13, Draft 1990 Edition, 'this is an aspect of the PSD permitting process in which states have discretion to engage in a broader analysis if they so desire".
- 4. In the Air Construction Permit Application Section 5.3.2 Technical Feasibility and Ranking, TECO stated that the Dry low-NOx (DLN) combustor technology represents an inferior NOx control technology compared to wet injection, and is not considered further

in the BACT analysis. However, according to a study conducted by EPC staff by search the EPA RACT/BACT/LAER Clearinghouse (RBLC) information system database from 1998-2008, the DLN technology can achieve a better NOx limit to 9 ppmvd at 15% O2 which is better than the performance of water injection technology to 25 NOx ppmvd at 15% O2. Furthermore, in Section 5.3.4, Page 5-20, TECO stated that water injection technology was used as a baseline to compare SCR technology. Based upon this comparison, it was determined that SCR was not cost effective due to \$14,564/ton of NOx reductions (Table 5-7). However, EPA's New Source Review procedures require that any major source or major modification subject to PSD must conduct an analysis to ensure the application of BACT. The analysis includes a "top-down" method for determining BACT. The top-down process provides that all available control technologies be ranked in descending order of control effectiveness. The BACT analysis consists of five steps that include; identifying all control technologies, eliminating technically infeasible options, ranking remaining control technologies by control effectiveness, evaluating the most effect controls and documenting results, and choosing a BACT. Determination of the technical infeasibility should be clearly documented and should show, based on physical, chemical, and engineering practices, that technical difficulties would preclude the successful use of the control options. determining the most effective controls, energy, environmental and economic impacts must also be evaluated and quantified for each option. The BACT analysis submitted by TECO did not provide an analysis for SCR alone, but instead evaluated the incremental cost effectiveness between SCR and water injection. According to AP-42 Section 3.1.4.3, SCR in conjunction with water injection is typically used to reduced NOx emission rates at combustion turbines to levels less than 10 ppmvd at 15% oxygen. We are therefore, requesting that, pursuant to Rules 62-212.400(4)(c) and 62-4.070(3), F.A.C., TECO should submit a BACT analysis, which properly evaluates SCR as the "top control technology" without a comparison to any other "baseline" technology. We also believe that TEC should also consider SCR in conjunction with water injection or DLN in the top down process. On Page B.14 of EPA's NSR Workshop Manual, Draft 1990 Edition, they state that combinations of inherently lower-polluting processes/practices and add-on controls are likely to yield more effective means of emissions control than either approach alone, and that these combinations should be identified in Step 1 of the top-down process for evaluation. This analysis will more than likely result in the selection of SCR, SCR and water injection, or DLN technology as BACT, which is consistent with the NOx limitation of 9 ppmvd at 15% oxygen cited in the EPA RACT/BACT/LAER Clearinghouse.

From:

Harvey, Mary

Sent:

Tuesday, June 10, 2008 11:16 AM

To:

'Mr. David M. Lukcic, Tampa Electric Company'; 'Thomas W. Davis, P.E., ECT, Inc.:'; 'Jerry

Campbell, HCEPC:'; 'Ms. Kathleen Forney, EPA Region 4'; 'Dee\_ Morse@nps.gov'

Cc:

Holtom, Jonathan; Walker, Elizabeth (AIR); Gibson, Victoria

Subject:

FW: Please send RAI

Attachments: RAIreminderPSD399pdf.pdf; OriginalRAI\_4\_18\_08\_PSD399.pdf

Tracking:

cipient Delivery

'Mr. David M. Lukcic, Tampa Electric Company'

'Thomas W. Davis, P.E., ECT, Inc.:'

Cerry Campbell, HCEPC:

'Ms. Kathleen Forney, EPA Region 4'

Dee\_Morse@nps.gov'
Holtom, Jonathan
Walker, Elizabeth (AIR)

Read: 6/10/2008 12:20 PM

Read: 6/10/2008 11:20 AM

Gibson, Victoria

Delivered: 6/10/2008 11:16 AM Read: 6/10/2008 11:30 AM

Read

#### Dear Sir/Madam:

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The document(s) may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible.

The document is in Adobe Portable Document Format (pdf). Adobe Acrobat Reader can be downloaded for free at the following internet site: <a href="http://www.adobe.com/products/acrobat/readstep.html">http://www.adobe.com/products/acrobat/readstep.html</a>.

The Bureau of Air Regulation is issuing electronic documents for permits, notices and other correspondence in lieu of hard copies through the United States Postal System, to provide greater service to the applicant and the engineering community. Please advise this office of any changes to your e-mail address or that of the Engineer-of-Record.

Thank you,

DEP, Bureau of Air Regulation

From: Walker, Elizabeth (AIR)

**Sent:** Tuesday, June 10, 2008 11:11 AM

From:

Walker, Elizabeth (AIR)

To:

Harvey, Mary

Sent:

Tuesday, June 10, 2008 11:20 AM

Subject:

Read: FW: Please send RAI

#### Your message

To:

'Mr. David M. Lukcic, Tampa Electric Company'; 'Thomas W. Davis, P.E., ECT, Inc.:'; 'Jerry Campbell, HCEPC:'; 'Ms. Kathleen Forney, EPA Region 4'; 'Dee\_Morse@nps.gov' Holton, Jonathan; Walker, Elizabeth (AIR); Gibson, Victoria

Cc: Subject:

Sent:

FW: Please send RAI 6/10/2008 11:16 AM

was read on 6/10/2008 11:20 AM.

From:

Campbell, Jerry [Campbell@epchc.org]

To:

Sent:

Harvey, Mary Tuesday, June 10, 2008 1:53 PM Read: Please send RAI

Subject:

Your message

To:

Campbell@epchc.org

Subject:

was read on 6/10/2008 1:53 PM.

From:

Sent:

Dee\_Morse@nps.gov Tuesday, June 10, 2008 12:50 PM Harvey, Mary FW: Please send RAI

To:

Subject:

Return Receipt

Your

FW: Please send RAI

document:

was

Dee Morse/DENVER/NPS

received

by:

at:

06/10/2008 10:50:19 AM MDT

From: To:

Holtom, Jonathan

Harvey, Mary

Sent:

Tuesday, June 10, 2008 12:20 PM

Subject:

Read: FW: Please send RAI

#### Your message

To:

'Mr. David M. Lukcic, Tampa Electric Company'; 'Thomas W. Davis, P.E., ECT, Inc.:'; 'Jerry Campbell, HCEPC:'; 'Ms. Kathleen

Cc: Subject: Forney, EPA Region 4'; 'Dee\_Morse@nps.gov' Holtom, Jonathan; Walker, Elizabeth (AIR); Gibson, Victoria

Sent:

FW: Please send RAI 6/10/2008 11:16 AM

was read on 6/10/2008 12:20 PM.