

Florida Department of Environmental Protection

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

Charlie Crist
Governor

Jill Kaulkamp
Governor

Thomas W. Le
Governor

December 14, 2007

Mr. Mark J. Hornick (mjhornick@tecoenergy.com)
General Manager
Tampa Electric Company
P.O. Box 111
Tampa, Florida 33601-0111

Re: Request for Additional Information Regarding Change in Fuel Blend at Polk Power Station
File No.: 1050233-021-AC

Dear Mr. Hornick:

The Department has received your air construction permit application for the Polk Power Station for the purpose of increasing the allowable petcoke/coal fuel blend from 60/40% and 3.5% sulfur to 85/15% and 4.4% sulfur. However, in order to continue processing this application, the Department is requesting the additional information outlined below. Should your response to any of the listed items require new calculations or result in changes to the submitted information, please submit the new calculations, assumptions, reference material and appropriate revised pages of the application form, certified by your Professional Engineer.

The submitted information regarding the test burn results for sulfuric acid mist (SAM) emissions from the combustion turbine at the varying percentages of petcoke/coal do not follow a logical progression. One reason may be that the projected emissions were based on pounds per hour rather than on pounds per million British thermal units (lbs/MMBtu). The emissions of sulfur dioxide (SO₂) also appear to decrease as the sulfur content of the fuel blend increases. Furthermore, the application makes reference to possible modifications that may be made at the plant equipment to ensure that adequate sulfur removal from the syngas is achieved to avoid any significant increases in SO₂ and SAM emissions. We also understand that TECO is contemplating immediately following this application with a prevention of significant deterioration (PSD) application to further increase the sulfur percentage of the fuel blend to 6%. In order to approve either of these requests, a better understanding of future SO₂ and SAM emissions will be needed. If PSD is going to be avoided, sufficient monitoring will be needed to ensure that the future actual emissions do not increase above the significant emissions rates of 7 tons per year for SAM and 40 tons per year for SO₂.

1. Please provide an explanation for the unexpected trend in SAM emissions at the different fuel blends that were tested.
2. Please provide a comparison of past actual annual SO₂ and SAM emissions from the combustion turbine to future projected annual emissions on a lb/MMBtu basis. For reasonable assurance purposes, in addition to the SO₂ continuous emissions monitor, please propose a method for regularly monitoring emissions of SAM from the combustion turbine to ensure that there are no PSD significant emissions increases from the project.
3. Please propose and provide details for the control devices or methods that will be installed to avoid any significant increases in SO₂ and SAM emissions from the sulfuric acid plant. Also, for reasonable assurance purposes, please propose a method for regularly monitoring emissions of SO₂ and SAM from the sulfuric acid plant to ensure that there are no PSD significant emissions increases from the project.

"More Protection, Less Process"

www.dep.state.fl.us

December 14, 2007

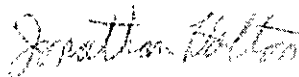
Page 2 of 2

4. If it is determined that it will be more expedient to process this request and the pending future request to burn 6% sulfur fuel at the same time, please provide a complete application for a PSD permit, including details and descriptions for any needed control devices that satisfy best available control technology (BACT) requirements.

The above comments require a written response to the Department within ninety days of receipt of this notice unless additional time is requested pursuant to Rule 62-4.055(1), F.A.C.

If you should have any questions, please contact me at (850) 921-9531.

Sincerely,



Jonathan Holtom, P.E.
North Permitting Section

/jh

CC: Mr. Joshua Ellwein, P.E., Tampa Electric Company (jdellwein@teccoenergy.com)
Ms. Mara Nasca, DEP, Southwest District Office (mara.nasca@dep.state.fl.us)
Mr. Greg Worley, U.S. EPA Region 4 (worley.gregg@epamail.epa.gov)

Harvey, Mary

From: Mark Hornick [mjhornick@tecoenergy.com]
Sent: Monday, January 14, 2008 11:39 AM
To: Harvey, Mary
Cc: Joshua Ellwein
Subject: Re: FW: TECO - Polk Power Station - File #1050233-021-AC

Mary
I have received the subject document.
Thank you,
Mark

Mark Hornick
General Manager
Polk Power Station
Tampa Electric Company
863 428-5988 (office)
813 376 6643 (cell)
mjhornick@tecoenergy.com

>>> "Harvey, Mary" <Mary.Harvey@dep.state.fl.us> 01/14/2008 10:30 AM
>>>

On December 14th this email was sent to you. I have checked my email and I don't see a read receipt response. If you have received this email please email me back so that I can complete this file on File #1050233-021-AC
- TECO
- Polk Power Station.

Thanks,

Mary

From: Harvey, Mary
Sent: Friday, December 14, 2007 4:10 PM
To: 'JDELLWEIN@TECOENERGY.COM'; Nasca, Mara; 'worley.gregg@epa.gov'; 'Ms. Kathleen Forney'; 'MJHORNICK@TECOENERGY.COM'
Cc: Holtom, Jonathan; Adams, Patty; Gibson, Victoria
Subject: TECO - Polk Power Station - File #1050233-021-AC

Dear Sir/Madam:

Please send a "reply" message verifying receipt of the attached document(s); this may be done by selecting "Reply" on the menu bar of your e-mail software and then selecting "Send". We must receive verification of receipt and your reply will preclude subsequent e-mail transmissions to verify receipt of the document(s).

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:
<http://www.adobe.com/products/acrobat/readstep.html>.

Harvey, Mary

From: Harvey, Mary
Sent: Friday, December 14, 2007 4:10 PM
To: 'JDELLWEIN@TECOENERGY.COM'; Nasca, Mara; 'worley.gregg@epa.gov'; 'Ms. Kathleen Forney'; 'MJHORNICK@TECOENERGY.COM'
Cc: Holtom, Jonathan; Adams, Patty; Gibson, Victoria
Subject: TECO - Polk Power Station - File #1050233-021-AC
Attachments: Additional Info Request - FILE#1050233-021-AC - LETTER.pdf

Tracking:	Recipient	Delivery	Read
	'JDELLWEIN@TECOENERGY.COM'		
	<input checked="" type="checkbox"/> Nasca, Mara		
	<input checked="" type="checkbox"/> worley.gregg@epa.gov'		
	<input checked="" type="checkbox"/> Ms. Kathleen Forney'		
	<input checked="" type="checkbox"/> 'MJHORNICK@TECOENERGY.COM'		
	<input checked="" type="checkbox"/> Holtom, Jonathan	Delivered: 12/14/2007 4:10 PM	Read: 12/17/2007 8:07 AM
	<input checked="" type="checkbox"/> Adams, Patty		Read: 12/14/2007 4:49 PM
	<input checked="" type="checkbox"/> Gibson, Victoria		Read: 12/17/2007 9:14 AM

Dear Sir/Madam:

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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

Immediate action within a specified time frame. Please open

Harvey, Mary

From: Holtom, Jonathan
Sent: Friday, December 14, 2007 3:58 PM
To: Harvey, Mary
Cc: Adams, Patty; Koerner, Jeff
Subject: Emailing: Additional Info Request

Attachments: Additional Info Request.pdf



Additional Info
Request.pdf (2...

i Mary,

Attached is an additional information request for the TECO - Polk Power Station's fuel blend increase project. The project number is 1050233-021-AC. Please distribute this by email to the people listed on the letter (also shown below).

Thank you, Jonathan.

Mr. Mark J. Hornick (mjhornick@tecoenergy.com) Mr. Joshua Ellwein, P.E., Tampa Electric Company (jdellwein@tecoenergy.com) Ms. Mara Nasca, DEP, Southwest District Office (mara.nasca@dep.state.fl.us) Mr. Greg Worley, U.S. EPA Region 4 (worley.gregg@epamail.epa.gov)

Harvey, Mary

From: Forney.Kathleen@epamail.epa.gov
Sent: Tuesday, December 18, 2007 8:09 AM
To: Harvey, Mary
Subject: Re: TECO - Polk Power Station - File #1050233-021-AC

thanks

Katy R. Forney
Air Permits Section
EPA - Region 4
61 Forsyth St., SW
Atlanta, GA 30024

Phone: 404-562-9130
Fax: 404-562-9019

"Harvey, Mary"
<Mary.Harvey@dep
.state.fl.us>

12/14/2007 04:09
PM

To
<JDELLWEIN@TECOENERGY.COM>,
"Nasca, Mara"
<Mara.Nasca@dep.state.fl.us>,
Gregg Worley/R4/USEPA/US@EPA,
Kathleen Forney/R4/USEPA/US@EPA,
<MJHORNICK@TECOENERGY.COM>

cc
"Holtom, Jonathan"
<Jonathan.Holtom@dep.state.fl.us>
, "Adams, Patty"
<Patty.Adams@dep.state.fl.us>,
"Gibson, Victoria"
<Victoria.Gibson@dep.state.fl.us>

Subject
TECO - Polk Power Station - File
#1050233-021-AC

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Harvey, Mary

From: Worley.Gregg@epamail.epa.gov
Sent: Tuesday, December 18, 2007 12:12 PM
To: Harvey, Mary
Subject: Re: TECO - Polk Power Station - File #1050233-021-AC

Gregg M. Worley
Chief, Air Permits Section
U.S. EPA Region 4
(404) 562-9141
fax (404) 562-9019

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Harvey, Mary

From: Holtom, Jonathan
To: Harvey, Mary
Sent: Monday, December 17, 2007 8:07 AM
Subject: Read: TECO - Polk Power Station - File #1050233-021-AC

Your message

To: 'JDELLWEIN@TECOENERGY.COM'; Nasca, Mara; 'worley.gregg@epa.gov'; 'Ms. Kathleen Forney'; 'MJHORNICK@TECOENERGY.COM'
Cc: Holtom, Jonathan; Adams, Patty; Gibson, Victoria
Subject: TECO - Polk Power Station - File #1050233-021-AC
Sent: 12/14/2007 4:10 PM

was read on 12/17/2007 8:07 AM.

Harvey, Mary

From: Nasca, Mara
Sent: Friday, December 14, 2007 4:13 PM
To: Harvey, Mary
Subject: RE: TECO - Polk Power Station - File #1050233-021-AC

Thanks Mary....have a wonderful weekend

Mara Grace Nasca
District Air Program Administrator
Department of Environmental Protection
Division of Air Resource Management
Southwest District
(813) 632-7600, Ext. 124
Suncom 514-9155, Ext. 124
Fax (813) 632-7668

From: Harvey, Mary
Sent: Friday, December 14, 2007 4:10 PM
To: 'JDELLWEIN@TECOENERGY.COM'; Nasca, Mara; 'worley.gregg@epa.gov'; 'Ms. Kathleen Forney'; 'MJHORNICK@TECOENERGY.COM'
Cc: Holtom, Jonathan; Adams, Patty; Gibson, Victoria
Subject: TECO - Polk Power Station - File #1050233-021-AC

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Thank you,

DEP, Bureau of Air Regulation

12/14/2007

Harvey, Mary

From: Gibson, Victoria
To: Harvey, Mary
Sent: Monday, December 17, 2007 9:14 AM
Subject: Read: TECO - Polk Power Station - File #1050233-021-AC

Your message

To: 'JDELLWEIN@TECOENERGY.COM'; Nasca, Mara; 'worley.gregg@epa.gov'; 'Ms. Kathleen Forney'; 'MJHORNICK@TECOENERGY.COM'
Cc: Holtom, Jonathan; Adams, Patty; Gibson, Victoria
Subject: TECO - Polk Power Station - File #1050233-021-AC
Sent: 12/14/2007 4:10 PM

was read on 12/17/2007 9:14 AM.

Harvey, Mary

From: Adams, Patty
To: Harvey, Mary
Sent: Friday, December 14, 2007 4:49 PM
Subject: Read: TECO - Polk Power Station - File:#1050233-021-AC

Your message

To: 'JDELLWEIN@TECOENERGY.COM'; Nasca, Mara; 'worley.gregg@epa.gov'; 'Ms. Kathleen Forney'; 'MJHORNICK@TECOENERGY.COM'
Cc: Holtom, Jonathan; Adams, Patty; Gibson, Victoria
Subject: TECO - Polk Power Station - File #1050233-021-AC
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