



United States Department of the Interior

FISH AND WILDLIFE SERVICE
WASHINGTON, D.C. 20240ADDRESS ONLY THE DIRECTOR,
FISH AND WILDLIFE SERVICE

January 27, 1994

Memorandum

To: Regional Director, Region 4

From: Chief, Air Quality Branch

Subject: Proposed 260 MW Integrated Coal Gasification Combined
Cycle Unit - Tampa Electric Co., Polk Power Station,
Polk County, Florida

We have reviewed the Florida Department of Environmental Protection (FDEP) Technical Evaluation and Preliminary Determination and the draft Prevention of Significant Deterioration permit for Tampa Electric Co.'s (TECO) proposed 260 MW Integrated Coal Gasification Combined Cycle Unit (IGCC) at its Polk Station. This IGCC unit consists of a 190 MW combustion turbine (CT) and a 70 MW heat recovery steam generator (HRSG), with coal gasification facilities. The coal gasification facilities will be used to produce synthesis gas (syngas), which will be used to fuel the IGCC unit, with low sulfur No. 2 fuel oil as the backup.

The IGCC unit will be supported in part through funding from the U.S. Department of Energy (DOE) under the Clean Coal Technology Demonstration Program. Under the program, the IGCC unit will be used to demonstrate the integration of coal gasification and CC technologies and to demonstrate a more efficient method for removal of sulfur from syngas, called hot gas clean up (HGCU). Under the agreement with DOE, TECO will demonstrate the HGCU system for a 2-year period. During this two-year demonstration period, allowable emissions of some pollutants are higher (see attached table), so that TECO has the flexibility to evaluate the efficiency of HGCU using a variety of coal types.

In the future, TECO plans to add two 220 MW combined cycle generating units and six 75 MW CTs, for a total generating capacity of 1,150 MW. The Polk Station would be located in Polk County, Florida, approximately 120 km southeast of Chassahowitzka Wilderness Area (WA). Estimated significant emissions from the proposed project are listed in the attached table.

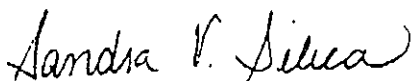
We agree that the proposed emission control systems represent best available control technology to minimize emissions from the TECO facility.

TECO's modeling analysis that was presented in the Site Certification Application predicted that the 24-hour SO₂ increment would be consumed, but not violated at Chassahowitzka WA as a result of this and existing projects. TECO subsequently performed another modeling analysis that predicted smaller SO₂ impacts. We point out that the assumptions used in this second analysis were incorrect, and the conclusions are invalid. We accept the results of the first modeling analysis, but emphasize that the increment consumed by this analysis cannot be "banked" by TECO. Future applicants performing Class I increment analyses for Chassahowitzka WA should model the emissions from the TECO Phase I project, not the emissions from the entire 1150 MW project.

Regarding potential visibility impacts, TECO passed the Level I VISCREEN analysis, and therefore, is not expected to cause visible plume impacts at the wilderness area.

TECO failed to adequately assess cumulative effects of pollutant loadings at Chassahowitzka WA. Although deposition of sulfate, nitrate, mercury, and beryllium from the TECO project alone is small, we are concerned with total deposition at the wilderness area. We ask FDEP to require TECO to perform a cumulative analysis when they apply for permits to expand Polk Station.

Please sign the attached letter and forward it to FDEP immediately. Please fax a copy of the signed letter to FDEP at (904) 922-6979 by February 2. If you have any questions regarding this matter, please call me or Ellen Porter at (303) 969-2071.



Sandra V. Silva

Attachments

EMISSIONS TABLE

Pollutant	Emissions (tons per year)	
	Demonstration Period	Post-demonstration Period
Sulfur dioxide (SO ₂)	2269	1564
Nitrogen oxides (NO _x)	2908	1044
Volatile Organic Compounds (VOC)	39	39
Carbon monoxide (CO)	430	430
Particulate Matter (PM/PM ₁₀)	75	75
Lead (Pb)	0.13	0.067
Sulfuric Acid Mist (H ₂ SO ₄)	241	241
Inorganic Arsenic (As)	0.35	0.019
Beryllium (Be)	0.0029	0.0029
Mercury (Hg)	0.11	0.017

Mr. Clair Fancy
Chief, Bureau of Air Regulation
Florida Department of Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Dear Mr. Fancy:

We have reviewed the Prevention of Significant Deterioration (PSD) permit application and the Technical Evaluation and Preliminary Determination for Tampa Electric Company's (TECO) proposed 260 MW Integrated Coal Gasification Combined Cycle Unit. This is the first phase of a project at TECO's Polk Station that would eventually have a generating capacity of 1150 MW. The facility would be located Polk County, Florida, approximately 120 km southeast of Chassahowitzka Wilderness Area (WA), a Class I air quality area administered by the U.S. Fish and Wildlife Service (FWS). The proposed project would be a significant emitter of nitrogen oxides (NO_x), sulfur dioxide (SO₂), particulate matter (PM/PM₁₀), carbon monoxide (CO), volatile organic compounds (VOC), and sulfuric acid mist (H₂SO₄). The facility is also subject to PSD regulations for lead, beryllium, and mercury.

Best Available Control Technology Analysis

The proposed acid gas removal and sulfur recovery processes are estimated to achieve an overall sulfur removal efficiency of 95.6 percent. Nitrogen oxide (NO_x) emissions from the future combined cycle and simple cycle combustion turbines will be controlled by dry low-NO_x combustion technology, resulting in NO_x concentrations of 9 and 42 parts per million (ppm) for gas and oil firing, respectively. We agree that the proposed sulfur removal systems and dry-low NO_x technology represent best available control technology to minimize sulfur dioxide and NO_x emissions from the TECO facility.

Air Quality Modeling Analysis

Although this PSD permit is for the first phase of the project, a 260 MW facility, the modeling was performed for the entire project, which will eventually have a generating capacity of 1150 MW.

The Class I increment modeling was first performed with the EPA ISCST2 and ISCLT2 dispersion models. The modeling was performed for five years, using surface meteorological data from Tampa, Florida, and upper air data from Ruskin, Florida. The ISC modeling was performed for both the proposed Polk Station, and for all increment consuming or expanding sources. The cumulative ISCST2 analysis did indicate that the 3-hour and 24-hour Class I increments for SO₂ would be exceeded.

Therefore, the EPA MESOPUFF II model was run to determine whether the proposed Polk Station would significantly contribute to the 3-hour and 24-hour Class I SO₂ increment exceedances. In the earlier analysis for the Environmental Impact Statement (EIS), the MESOPUFF II modeling indicated that the entire 1150 MW proposed Polk Project would not significantly contribute to a 3-hour or 24-hour increment violation. The cumulative high second-high 24-hour SO₂ concentration in that report was stated to be 5.0 µg/m³. In the PSD modeling analysis for the Phase I application, the applicant has erroneously used the option in the MESOPUFF II model to uniformly distribute SO₂ concentrations within the puffs, instead of using the option of a gaussian distribution within the puffs. This error incorrectly produced a high second high 24-hour SO₂ concentration of 3.8 µg/m³. This requirement for gaussian distribution within the puffs is found in the EPA document "Interagency Workgroup on Air Quality Modeling (IWAQM) Phase 1 Report" and contains the methodology that must be used in a Class I analysis.

We accept the results from the modeling analysis contained in the EIS that indicate the 24-hour SO₂ increment may be exceeded but not violated. However, the modeling represents the impact from the full Polk Station project of 1150 MW. While one could argue that this represents a conservative assumption, it could be construed as "increment banking", which would put future applicants in the area at risk of not having sufficient increment available for their proposed sources. It is our understanding that the State of Florida also does not accept this "increment banking" effort and we support the State's position. For future applicants performing Class I increment analyses for Chassahowitzka WA, the emissions from the proposed TECO Polk Phase I 260 MW facility should be modeled and not the emissions from the future 1150 MW project.

The visibility analysis performed with the EPA VISCREEN model indicates that there should be no impact of a coherent visible plume at Chassahowitzka WA.

Air Quality Related Values Analysis

In our letter to EPA of July 1993 regarding the Site Certification Application for this project, we asked that TECO perform a cumulative analysis, using the revised MESOPUFF II model, to predict deposition and concentration of sulfate, nitrate, mercury, and beryllium at the Chassahowitzka WA. We asked that TECO perform an Air Quality Related Values Analysis based on the results of the deposition modeling.

EPA replied to our request in a December 1993 letter that MESOPUFF was not conducted for the requested parameters. Instead, the ISC dispersion model was used to predict deposition at Chassahowitzka WA. While we agree that TECO's contribution of sulfate and nitrate at the wilderness area is small (5.7×10^{-5} and 6.7×10^{-4} g/sq m/year, respectively), the modeling did not predict cumulative deposition. As we have stated in numerous letters to your department, we are concerned not only with an individual source's impact to AQRVs, but with the cumulative impact of all sources in an area. EPA states that TECO's small sulfate contribution will be assimilated by

the ecosystem. We are concerned that the organic soils of Chassahowitzka WA may have reached their capacity to assimilate sulfate, and that additional sulfate may oxidize the soils, resulting in their erosion.

The analysis of nitrogen deposition similarly concluded that TECO's contribution was small, and thus impacts to Chassahowitzka WA would be small. Again, we are concerned with cumulative impacts. While TECO's contribution to nitrogen deposition may only change the level of nitrogen in near shore waters by one percent, twenty such sources will have a much more significant impact. The analyses for mercury and beryllium deposition were not cumulative, either. We need to know: 1) the cumulative deposition of pollutants, and 2) the ecological consequences of this deposition. We ask that TECO be required to perform these analyses when they apply for permits for future phases of their Polk Power Station.

Thank you for providing us the opportunity to comment on the proposed project. If you have questions, call Ellen Porter of our Air Quality Branch in Denver at (303) 969-2071.

Sincerely,

James W. Pulliam, Jr.
Regional Director

cc: Jewell Harper, Chief
Air Enforcement Branch
Air, Pesticides and Toxic Management Division
U.S. EPA, Region 4
345 Courtland Street, NE
Atlanta, Georgia 30365

bcc:
FWS-REG. 4: AQC
CHAS: Refuge Manager
AQD-DEN: Ellen Porter
National Park Service - AIR
P.O. Box 25287
Denver, CO 80225



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET, N.E.
ATLANTA, GEORGIA 30365

JAN 26 1994

RECEIVED

DEPARTMENT OF
ENVIRONMENTAL PROTECTION

JAN 31 1994

OFFICE OF THE SECRETARY

FEB 01 1994

Bureau of
Air Regulation

4APT-AEB

Clair H. Fancy, P.E., Chief
Bureau of Air Regulation
Florida Department of Environmental
Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

SUBJ: Tampa Electric Company, Polk County, Florida (PSD-FL-194)

Dear Mr. Fancy:

This is to acknowledge receipt of your technical evaluation, preliminary determination, and draft Prevention of Significant Deterioration (PSD) permit for the above referenced facility by your letter dated December 20, 1993. Tampa Electric Company (TECO) proposes to construct and operate a 1,150 MW power plant consisting of an integrated coal gasification combined-cycle (IGCC) facility, two additional combined-cycle (CC) units, and six simple-cycle combustion turbines (CTs) fueled primarily by natural gas. As discussed between Mr. Syed Arif of your staff and Mr. Stan Kukier of my staff on January 24, 1994, we have reviewed the package as submitted and have no adverse comments.

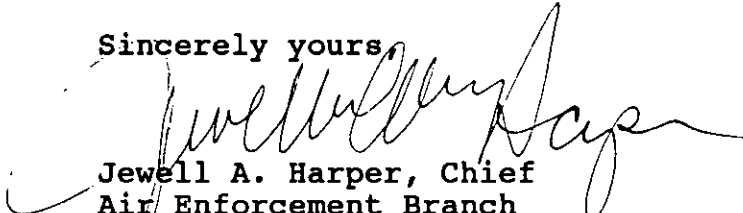
We agree that the use of low sulfur coal and the integral sulfur removal and recovery processes can be considered BACT for control of IGCC facility sulfur dioxide and acid gas emissions. Good combustion practices are considered BACT for control of CO and VOC emissions from the IGCC facility, CC units, and CTs. Use of clean, low ash fuels, and good combustion techniques are also considered BACT for particulate emissions from all combustion units. We also agree that dry low-NO_x burners and water injection are representative of BACT for NO_x emissions from the CC units and CTs. The Florida Department of Environmental Protection will make a BACT determination for IGCC facility combustion turbine NO_x emissions based on the results of NO_x emission testing. NO_x emission testing will be performed on the IGCC facility combustion turbine every two months over a twelve to eighteen month period.

We also agree that wet suppression methods, enclosing coal unloading, conveyor, and transfer points, and applying both crusting agents and surfactants, are representative of BACT for control of fugitive particulate emissions from coal storage and reclaiming operations.

Mr. Arif has indicated that the air quality analysis concerns have been addressed satisfactory.

Thank you for the opportunity to comment on this package. If you have any questions, please contact Mr. Stan Kukier of my staff at (404) 347-5014.

Sincerely yours,



Jewell A. Harper, Chief
Air Enforcement Branch
Air, Pesticides, and Toxics
Management Division

cc: J. Arif
D. Outlaw
J. Rogers
G. Bunyak, NPS
C. Holladay
B. Thomas, SW Dist
B. Owen
R. Donelan
G. Nelson, TE CD
CHF/IB/PL

LAW OFFICES

HOLLAND & KNIGHT

OFFICES:

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P.O. DRAWER 810 (ZIP 32302-0810)
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(904) 224-7000
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300 EAST 42ND STREET
NEW YORK, NY 10017
(212) 338-0970

January 13, 1994

RECEIVED

JAN 13 1994

Bureau of
Air Regulation

VIA HAND DELIVERY

Mr. Clair Fancy
State of Florida Department
of Environmental Protection
111 South Magnolia Courtyard
Suite 4
Tallahassee, Florida 32399-2400

Re: Polk Power Station; Affidavits of Publication of
Notice of Intent to Issue PSD Permit (PSD-FL-194)

Dear Mr. Fancy

Attached are copies of the Affidavits of Publication from the
Lakeland Ledger, the Tampa Tribune, and the Mulberry Press relating
to the Department's Notice of Intent to Issue the above referenced
PSD permit to Tampa Electric Company.

Please give me a call if you have any questions.

Sincerely,

HOLLAND & KNIGHT


Samuel J. Morley

Attachments
SJM/mrh
TAL-38029

cc w/att:

Sayed Arif (via hand delivery)
Lawrence N. Curtin
Richard Donelan
Buck Oven
Tom Davis
Jewell Harper
B. Thomas, SW Dist
G. Blumh, NPS

AFFIDAVIT OF PUBLICATION

THE LEDGER
Lakeland, Polk County, Florida

Case No.

STATE OF FLORIDA)
 COUNTY OF POLK)

Before the undersigned authority personally appeared Tharon Honeycutt, who on oath says that he is Controller of The Ledger, a daily newspaper published at Lakeland in Polk County, Florida; that the attached copy of advertisement, being a

Notice of intent to issue permit

in the matter of

PSD-FL-194

in the

Court, was published in said newspaper in the issues of

January 3;

1994

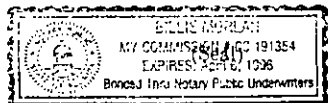
Affiant further says that said The Ledger is a newspaper published at Lakeland, in said Polk County, Florida, and that the said newspaper has heretofore been continuously published in said Polk County, Florida, daily, and has been entered as second class matter at the post office in Lakeland, in said Polk County, Florida, for a period of one year next preceding the first publication of the attached copy of advertisement; and affiant further says that he has neither paid nor promised any person, firm or corporation any discount, rebate, commission or refund for the purpose of securing this advertisement for publication in the said newspaper.

Signed Tharon Honeycutt
 Controller

by Tharon Honeycutt who is personally known to me.

Sworn to and subscribed before me this 3rd

day of January A D. 19 1994



Billie Morlan
 Notary Public

My Commission Expires
 Holland & Knight
 Acct #12610

BILLIE MORLAN

STATE OF FLORIDA
 DEPARTMENT OF ENVIRONMENTAL PROTECTION
 NOTICE OF INTENT TO ISSUE PERMIT
 The Department of Environmental Protection gives notice of its intent to issue a PSD permit (PSD-FL-194) to Tampa Electric Company, located 13 miles south of Bartow, Polk County, Florida, to construct a 260 MW integrated coal gasification combined cycle facility. A determination of Best Available Control Technology (BACT) was required. The total PSD increments consumed by all sources, including the facility, in the Class I and II areas are

Class I Area					
Parameter	Averaging Period	Total PSD Impact From All Sources (ug/m3)	Class I PSD Increment (ug/m3)	Increment Consumed (%)	
SO2	3-hour	12.9	15	52	
	24-hour	3.8	5	76	
	Annual	0.4	2	32	
NO2	Annual	0.8	2.5	32	
	PM	24-hour	5.7	10	57
		Annual	1.1	5	22

Class II Area					
Parameter	Averaging Period	Total PSD Impact From All Sources (ug/m3)	Class I PSD Increment (ug/m3)	Increment Consumed (%)	
SO2	3-hour	104	512	20	
	24-hour	27	21	30	
	Annual	0	20	0	
NO2	Annual	3.3	25	13	
	PM	24-hour	31.8	37	86
		Annual	5.4	19	28

The Department is issuing this intent to issue for the reasons stated in the Technical Evaluation and Preliminary Determination.
 A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, within 14 days of publication of this notice. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, Florida Statutes.
 The Petition shall contain the following information: (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department Permit Fee Number and the county in which the project is proposed; (b) A statement of how and when each petitioner received notice of the Department's action or proposed action; (c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action; (d) A statement of the material facts disputed by petitioner, if any; (e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action; (f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and (g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.
 If a petition is filed, the administrative hearing process is designed to formulate agency action if a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this Notice.
 Persons whose substantial interests will be affected by any decision of the Department with regard to the application have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of publication of this notice in the Office of General Counsel of the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28.5-207, F.A.C.
 The application is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:
 Department of Environmental Protection
 Bureau of Air Regulation
 111 S. Magnolia Park Courtyard
 Tallahassee, Florida 32301
 Department of Environmental Protection
 Southwest District
 3804 Coconut Palm Drive
 Tampa, Florida 33619-8218
 Any person may send written comments on the proposed action to Mr. Preston Lewis at the Department's Tallahassee address. All comments received within 30 days of the publication of this notice will be considered in the Department's final determination.
 Further, a public hearing can be requested by any person(s). Such requests must be submitted within 30 days of this notice.
 D-93 - 1-3, 1994

R

THE TAMPA TRIBUNE

Published Daily

Tampa, Hillsborough County, Florida

State of Florida
County of Hillsborough } ss.

Before the undersigned authority personally appeared R. Putney, who on oath says that he is Accounting Manager of The Tampa Tribune, a daily newspaper published at Tampa in Hillsborough County, Florida; that the attached copy of advertisement being a

LEGAL NOTICE POLK

in the matter of

STATE OF FLORIDA

was published in said newspaper in the issues of

DECEMBER 27, 1993

Affiant further says that the said The Tampa Tribune is a newspaper published at Tampa in said Hillsborough County, Florida, and that the said newspaper has heretofore been continuously published in said Hillsborough County, Florida, each day and has been entered as second class mail matter at the post office in Tampa, in said Hillsborough County, Florida, for a period of one year next preceding the first publication of the attached copy of advertisement; and affiant further says that he has neither paid nor promised any person, firm, or corporation any discount, rebate, commission or refund for the purpose of securing this advertisement for publication in the said newspaper.

R. Putney

Sworn to and subscribed before me, this 27 day of DECEMBER AD 19 93

Personally Known or Produced Identification

Type of Identification Produced

(SEAL)

T. J. Kennedy

**STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
NOTICE OF INTENT TO ISSUE PERMIT**

The Department of Environmental Protection gives notice of its intent to issue a PSD permit (PSD-FL-194) to Tampa Electric Company, located 13 miles south of Seaford, Polk County, Florida, to construct a 200 MW integrated coal gasification combined cycle facility. A determination of Best Available Control Technology (BACT) has been made. The total PSD increments consumed by all sources, including this facility, in the Class I and II areas are:

Class I Area	Averaging Period	Total PSD Impact from All Sources (ug/m ³)	Class I PSD Increment (ug/m ³)	Increment Consumed (%)
BC	3-hour	12.9	25	52
	24-hour	3.8	5	76
	Annual	0.4	2	20
NO	Annual	0.8	2.5	32
	PM	24-hour	5.7	10
PM	Annual	1.1	5	22

Class II Area	Averaging Period	Total PSD Impact from All Sources (ug/m ³)	Class I PSD Increment (ug/m ³)	Increment Consumed (%)
BC	3-hour	101	612	17
	24-hour	37	91	39
	Annual	6.0	20	30
NO	Annual	3.3	25	13
	PM	24-hour	21.9	37
PM	Annual	8.1	19	28

The Department is issuing this intent to issue for the reasons stated in the Technical Evaluation and Preliminary Determination.

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2800 Blair Stone Road, Tallahassee, Florida 32309-2400, within 14 days of publication of this notice. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right said person may have to request an administrative determination (hearing) under Section 120.57, Florida Statutes.

The Petition shall contain the following information: (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed; (b) A statement of how and when each petitioner received notice of the Department's action or proposed action; (c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action; (d) A statement of the material facts disputed by Petitioner, if any; (e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action; (f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and (g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this Notice. Persons whose substantial interests will be affected by any decision of the Department with regard to the application have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of publication of this notice in the Office of General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of the right to petition for an administrative proceeding under Section 120.57, F.S., and to participate as a party to the proceeding. Any subsequent intervention will occur at the approval of the presiding officer upon notice filed pursuant to Rule 2.000, Florida Rules of Civil Procedure.

The application is available for public inspection during business normal hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

Department of Environmental Protection
Bureau of Air Regulation
111 S. Magnolia Park Courtyard,
Tallahassee, Florida 32301

Department of Environmental Protection
Southwest District
5804 Coconut Palm Drive
Tampa, Florida 33619-6218

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AFFIDAVIT OF PUBLICATION

**Second Class U.S.
Postage Paid
at Mulberry, Florida**

MULBERRY PRESS

Area's legal newspaper since 1909
Phone 813-425-3411

Press Building
1020 N. Church Ave.
(Hwy. 37-N)
Mulberry, Florida
33860-2040

Mulberry, Polk County, Florida
Published Every Thursday

Published Weekly

Mulberry, Polk County, Florida

Case No. Docket Page No.

STATE OF FLORIDA }
COUNTY OF POLK } as.

Before the undersigned authority personally appeared
William M. Histed, who on oath says that he is
Publisher of the Mulberry Press, a newspaper published at
Mulberry, in Polk County, Florida; that the attached copy of advertisement,
being a *Public Legal Notice*
in the matter of *State of Florida Department of
Environmental Protection Gives notice of intent*
in the Court, was published in said newspaper in the
issues of *December 30, 1993*

Affiant further says that the MULBERRY PRESS is a newspaper published at Mulberry,
in said Polk County, Florida, and that said newspaper has heretofore been continuously
published in said Polk County, Florida, each Thursday, and has been entered as second class
matter at the post office in Mulberry, in said Polk County, Florida, for a period of one year
next preceding the first publication of the attached copy of advertisement, and affiant further
says that he as neither paid nor promised any person, firm, or corporation any discount,
rebate, commission, or refund for the purpose of securing this advertisement for publication
in said newspaper.

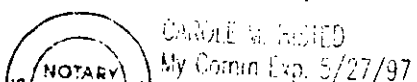
Signed *William M. Histed*
William M. Histed

Sworn to and subscribed before me this *4th* day of *Jan.*, 19*94* by

WILLIAM M. HISTED who is personally known to
me or who has produced as

identification. *Carole M. Histed*
Carole M. Histed Notary Public

My commission Expires:



LEGAL NOTICE

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL PROTECTION NOTICE OF INTENT TO ISSUE PERMIT

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Class I Area

Parameter	Averaging Period	Total PSD Impact From All Sources ($\mu\text{g}/\text{m}^3$)	Class I PSD Increment ($\mu\text{g}/\text{m}^3$)	Increment Consumed (%)
SO ₂	3-hour	12.9	25	52
	24-hour	3.8	5	76
	Annual	0.4	2	20
NO ₂	Annual	0.8	2.5	32
PM	24-hour	5.7	10	57
	Annual	1.1	5	22

Class II Area

Parameter	Averaging Period	Total PSD Impact From All Sources ($\mu\text{g}/\text{m}^3$)	Class I PSD Increment ($\mu\text{g}/\text{m}^3$)	Increment Consumed (%)
SO ₂	3-hour	104	512	20
	24-hour	27	91	30
	Annual	0	20	0
NO ₂	Annual	3.3	25	13
PM	24-Hour	31.8	37	86
	Annual	5.4	19	28

The Department is issuing this Intent to Issue for the reasons stated in the Technical Evaluation and Preliminary Determination.

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, within 14 days of publication of this notice. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, Florida Statutes.

The Petition shall contain the following information: (a) The name, address, and telephone number of each petitioner; the applicant's name and address; the Department permit File Number and the county in which the project is proposed; (b) A statement of how and when each petitioner received notice of the Department's action or proposed action; (c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action; (d) A statement of the material facts disputed by Petitioner, if any; (e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action; (f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and (g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.

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The application is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

Department of Environmental Protection
Bureau of Air Regulation

111 S. Magnolia Park Courtyard

Tallahassee, Florida 32301

Department of Environmental Protection
Southwest District

3804 Coconut Palm Drive

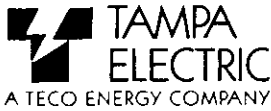
Tampa, Florida 33619-8218

Any person may send written comments on the proposed action to Mr. Preston Lewis at the Department's Tallahassee address. All comments received within 30 days of the publication of this notice will be considered in the Department's final determination.

Further, a public hearing can be requested by any person(s). Such requests must be submitted within 30 days of this notice.

TAL-36986

Published Mulberry Press, Mulberry, Florida December 30, 1993



January 12, 1994

Mr. G. Preston Lewis, P.E.
Professional Engineer III
Permitting and Standards Section
Bureau of Air Regulation
Florida Department of Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Re: Tampa Electric Company
Polk Power Station IGCC Unit
Federal Number: PSD-FL-194
Site Certification Number: PA-92-32

Dear Mr. Lewis:

Thank you for the opportunity to review the Technical Evaluation and Preliminary Determination for the above referenced project. In the course of our review we have developed the enclosed comments. These comments are marked on the appropriate pages of the Technical Evaluation and Preliminary Determination.

Should you have any further questions, please do not hesitate to contact me.

Sincerely,

Gregory M. Nelson, P.E.
Senior Engineer
Environmental Planning

gt\LL687
Enclosure

cc: Mr. C.H. Fancy, P.E., FDEP
Mr. H.S. Oven, Jr., P.E., FDEP (w/enc.)

Syed

RECEIVED

JAN 14 1994

Bureau of
Air Regulation

Certified Mail P 231 802 147
Return Receipt Requested

III. AMBIENT AIR QUALITY ANALYSIS FOR TECO POLK POWER STATION

A. Introduction

The proposed Tampa Electric Company Polk Power Station site is located approximately 17 miles south of the City of Lakeland, approximately 11 miles south of the City of Mulberry, and approximately 13 miles southwest of the City of Bartow in southwest Polk County, Florida.

The applicant's proposed maximum annual emissions, along with the prevention of significant deterioration (PSD) significant emission rates, are presented in Table 1. As presented in Table 1, PSD review was required for the pollutants carbon monoxide (CO), nitrogen oxides (NO_x), sulfur dioxide (SO₂), particulate matter (PM₁₀), total suspended particulates (TSP), volatile organic compounds (VOC), beryllium (Be), sulfuric acid mist (H₂SO₄), lead (Pb) and mercury (Hg). In addition to the PSD pollutants, the project will also emit several air contaminants considered to be air toxics by the Department, which are also presented in Table 1.

As part of the PSD review process, the Department reviewed analyses on existing air quality, PSD increment consumption (Class I and II areas), ambient air quality standards (AAQS), soils, vegetation and wildlife impacts, visibility, growth-related air quality impacts, and proposed stack heights. In addition, an air toxics analysis was conducted in accordance with the Department's draft "Air Toxics Guidelines".

B. Modeling Methodology

In support of the PSD permit application, the applicant was required to demonstrate to the Department that the proposed project would not cause or contribute to an exceedance of any federal or state AAQS, PSD increment, visibility limit, ~~or~~ Florida Ambient Reference Concentration (Department's draft "Air Toxics Guidelines"). These demonstrations were conducted by dispersion modeling techniques approved by the Department. AD

For emissions from combustion turbines (CT's) and combined cycle units, operating load and ambient temperature can affect plume dispersion, and therefore, ground-level impacts. For each fuel (oil, syngas with 100% cold gas cleanup, and syngas with 50% hot gas cleanup and 50% cold gas cleanup), two or three operating load cases (100%, 75%, and 50%) at three ambient temperatures (20 F, 59 F, and 90 F) were analyzed at the screening level. The model used was SCREEN, an EPA-approved model. The load/temperature case shown in the screening analysis to cause the highest impacts for each source were used in the refined modeling analysis (See application Volume 4, Tables 7-1 through 7-7).

For estimating ambient impacts on air quality from the proposed project, the applicant used the refined Industrial Source Complex (ISC2) dispersion models and the MESOPUFF-II long-range transport model. ISCLT2 was used for annual and quarterly computations, while ISCST2 was used for short-term concentrations. The applicant's choice of models for compliance demonstration purposes was acceptable to the Department. In conducting the ISC modeling, the applicant applied the model's building downwash option, the rural dispersion option, and chose the regulatory default option, which are all acceptable to the Department.

The applicant modeled the proposed project's ambient impacts at the nearest PSD Class I area (Chassahowitzka National Wilderness Area), located approximately 120 km to the Northwest as well as the area surrounding the Polk County Site. The MESOPUFF-II model was used in conjunction with the ISCST2 model, to address impacts in the PSD Class I area. The methodology used to run the MESOPUFF-II model is discussed in detail in Section 9.0 of the original application.

Initial modeling used the SCREEN model. For this model the receptor grid started at 1000 meters, since this distance approximates the distance between the proposed sources and the nearest property line. For the refined modeling, discrete receptors were placed at the property boundary. Receptor rings were placed at distances beginning at 2000 meters; note that for the 2000 meter ring receptors at 40, 100, 110, 120, 140, 190, 200, 210, 220, 230, 240, and 250 degree radials fell within the property boundary. Receptor rings were placed at distances of 2000, 2500, 3000, 3500, 4000, 5000, 6000, 7000, 8000, 9000, 10,000, 12,500, 15,000, 17,500, 20,000, 22,500, 25,000, 27,500, 30,000, 32,500, 35,000, 40,000, 45,000, and 50,000 from the grid center.

For the ISCST2 model, meteorological data used by the applicant was supplied by the Department in the form of hourly preprocessed National Weather Service (NWS) data from Tampa, Florida and twice-daily upper air soundings from Ruskin, Florida, for the five years 1982 through 1986. For the ISCLT2 model, the applicant used Tampa STAR (STability ARray) data for the same period.

The applicant's proposed maximum annual emissions are summarized in Table 1. All sources of SO₂, NO_x and TSP associated with the Polk County Site are considered "increment consuming" in relation to the PSD Class I and II areas.

C. Analysis of Existing Air Quality

The proposed project will be located in a PSD Class II area currently classified as attainment for all criteria pollutants, except PM₁₀, by both the U.S. Environmental Protection Agency (EPA) and the Department. The entire state is unclassified for PM₁₀.

TABLE 1
TECO POLK POWER STATION
MAXIMUM POTENTIAL ANNUAL EMISSIONS
AND PSD SIGNIFICANCE VALUES

Pollutant	Proposed Maximum Emissions (TPY) ⁽¹⁾	PSD Significant Emission Rate (TPY)	PSD Review Required (Yes/No)	
Carbon Monoxide	2523 2526	100	Yes	X
Nitrogen Oxides	5245 5250	40	Yes	X
Sulfur Dioxide	3843 3917	40	Yes	X
Particulate Matter (PM ₁₀)	905 917	15	Yes	X
Total Suspended Particulates (TSP)	905 917	25	Yes	X
Volatile Organic Compounds	393 394	40	Yes	X
Lead	0.6	0.6	Yes	
Asbestos	0.0	10	No	
Beryllium	.03	0.0004	Yes	
Mercury	0.5	0.1	Yes	
Vinyl Chloride	0.0	1	No	
Total Fluorides	1.2	3	No	
Sulfuric Acid Mist	393	7	Yes	
Hydrogen Sulfide	6.2 7.1	10	No	X
Total Reduced Sulfur	6.2 7.1	10	No	X
Arsenic	.52	NA	NA	
Cadmium	.18	NA	NA	
Chromium	1.5	NA	NA	

(1) Emissions include the highest annual emission estimates from the 7F CT, plus other related combustion emissions (e.g., thermal oxidizer), plus other associated process and fugitive emissions, plus four stand-alone CT's in CC mode, plus six stand-alone CT's in simple-cycle mode.

TPY = Tons per year.
 NA = Not Applicable.

*Revised impacts represent Revision 2 changes
 (site layout changes and removal of thermal oxidizer)*

TABLE 2

TECO POLK POWER STATION
 MAXIMUM AIR QUALITY IMPACTS FOR COMPARISON TO THE
 SIGNIFICANT IMPACT AND DE MINIMUS AMBIENT LEVELS

Pollutant	Averaging Time	Highest Predicted Impact ($\mu\text{g}/\text{m}^3$)	Highest, Second-Highest Predicted Impact ($\mu\text{g}/\text{m}^3$)	Sign. Impact Level ($\mu\text{g}/\text{m}^3$)	De Minimus Level ($\mu\text{g}/\text{m}^3$)
Carbon Monoxide	1-hour	169.2 137.4	168.1 136.1	2000	NA
	8-hour	67.1 52.9	63.3 50.4	500	575
Nitrogen Dioxide	Annual	1.8 1.1	NA	1.0	14
Sulfur Dioxide	3-hour	68.6 47.3	51.7 35.4	25	NA
	24-hour	19.0 14.6	18.1 11.1	5	13
	Annual	1.6 1.2	NA	1	NA
PM ₁₀ or TSP	24-hour	29.4 33.6	24.6 23.6	5	10
	Annual	1.5 1.1	NA	1	NA
Lead	Quarterly	1 .0012	NA	NA	.1
VOC's	Annual	394 TPY	NA	NA	100 TPY
Beryllium	24-hour	.00075	.00069	NA	.001
Mercury	24-hour	.005	.004	NA	.25

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Revised impacts represent Revision 2 changes
 (site layout changes and removal of thermal oxidizer)

PERMITTEE:
Tampa Electric Company

Permit Number: PA-92-32
PSD-FL-194
Expiration Date: June 1, 1996

SPECIFIC CONDITIONS:

<u>FUEL BOUND NITROGEN</u> <u>(% by weight)</u>	<u>NO_x EMISSION LEVELS</u> <u>(ppmvd @ 15% O₂)</u>
0.015 or less	42
0.020	44
0.025	46
0.030	48

using the formula $STD = 0.0042 + F$ where:

STD = allowable NO_x emissions (% by volume at 15% O₂ and on a dry basis).

F = NO_x emission allowance for FBN defined by the following table:

<u>FUEL BOUND NITROGEN</u> <u>(% by weight)</u>	<u>F (NO_x % BY VOLUME)</u>
0 < N < 0.015	0
0.015 < N < 0.03	0.04 (N-0.015)

N = nitrogen content of the fuel (% by weight).

NO_x emissions are preliminary for the fuel oil specified in Specific Condition ~~xxxx~~ of Conditions of Certification. The permittee shall submit fuel bound nitrogen content data for the low sulfur fuel oil prior to commercial operation to the Bureau of Air Regulation in Tallahassee, and on each occasion that fuel oil is transferred to the storage tanks from any other source to the Southwest District office in Tampa. The % FBN (Z) following each delivery of fuel shall be determined by the following equation:

$$x(Y) + m(n) = (x+m) (Z)$$

where x = amount fuel in storage tank
y = % FBN in storage tank
m = amount fuel added
n = % FBN of fuel added
Z = % FBN of composite

- (a) Syngas lb/MMBtu values based on heat input (HHV) to coal gasifier and includes emissions from H₂SO₄ plant thermal oxidizer. Pollutant concentrations in ppmvd are corrected to 15% oxygen.
- (b) Annual emission limits (TPY) based on 10 percent annual capacity factor firing fuel oil.

$$\frac{\text{Load (\%)} \times \text{hours of operation}}{100} \leq 876 \text{ for fuel oil.}$$

PERMITTEE:
Tampa Electric Company

Permit Number: PA-92-32
PSD-FL-194
Expiration Date: June 1, 1996

SPECIFIC CONDITIONS:

- (c) Exclusive of background concentrations.
- (d) Excluding sulfuric acid mist.

2. The maximum allowable emissions from the IGCC combustion turbine, when firing syngas and No. 2 fuel oil during the two year demonstration period, shall not exceed the following:

POLLUTANT	FUEL	EMISSIONS LIMITATIONS	
		7FCT LB/HR*	TPY ^a
NO _x	Oil**	311	N/A
	Syngas	664.2	2,908.3
VOC ^b	Oil	32	N/A
	Syngas	3	38.5
CO	Oil	99	N/A
	Syngas	99	430.1
PM/PM ₁₀ ^c	Oil	17	N/A
	Syngas	17	74.5
Pb	Oil	0.101	N/A
	Syngas	0.023	0.13
SO ₂	Oil	92.2	N/A
	Syngas	518	2,269
Visible Emissions		Syngas 10 percent opacity	
		Oil 20 percent opacity	

(*) Emission limitations in lbs/hr are 30-day rolling averages.

(a) Annual emission limits (TPY) based on 10-percent annual capacity factor firing No. 2 fuel oil.

$$\frac{\text{Load (\%)}}{100} \times \text{hours of operation} \leq 876 \text{ for oil.}$$

- (b) Exclusive of background concentrations.
- (c) Excluding sulfuric acid mist.

(**) Footnote ** as shown in Specific Condition H.1. for fuel bound nitrogen adjustment also applies to oil firing during the Demonstration Period.

PERMITTEE:
Tampa Electric Company

Permit Number: PA-92-32
PSD-FL-194
Expiration Date: June 1, 1996

SPECIFIC CONDITIONS:

(I,A). c. Reference Methods 7, 7A, 7C, 7D, or 7E for NO_x

Other DEP approved methods may be used for compliance testing after prior departmental approval.

K. Sulfur Content of Fuel

The maximum sulfur content of the low sulfur fuel oil shall not exceed 0.05 percent by weight. Compliance shall be demonstrated in accordance with the requirements of 40 CFR 60.334 by testing for sulfur content of the fuel oil in the storage tanks once per day when firing oil. Testing for fuel oil heating value, shall also be conducted on the same schedule.

L. Monitoring Requirements

A continuous emission monitoring system (CEMS) shall be installed, operated, and maintained in accordance with 40 CFR 60, Appendix F, for the combined cycle unit to monitor nitrogen oxides and a diluent gas (CO₂ or O₂). The applicant shall request that this condition of certification be amended to reflect the Federal Acid Rain Program requirements of 40 CFR 75 when those requirements become effective within the state.

1. Each CEMS shall meet performance specifications of 40 CFR 60, Appendix B.

2. CEMS data shall be recorded and reported in accordance with Chapter 17-297.500, F.A.C., 40 CFR 60 and 40 CFR 75. The record shall include periods of startup, shutdown, and malfunction.

3. A malfunction means any sudden and unavoidable failure of air pollution control equipment or process equipment to operate in a normal or usual manner. Failures that are caused entirely or in part by poor maintenance, careless operation or any other preventable upset condition or preventable equipment breakdown shall not be considered malfunctions.

4. The procedures under 40 CFR 60.13 shall be followed for installation, evaluation, and operation of all CEMS.

5. For purposes of the reports required under this permit, excess emissions are defined as any calculated average emission concentration, as determined pursuant to Specific Condition No. H.4. herein, which exceeds the applicable emission limits in Condition No. ~~H.1.~~ H.1. ✗

Annual pollutant emissions are shown in Table ² ~~1~~ for all *
sources. Pollutant emission rates are listed in the section
entitled "BACT Determination by DEP".

Flare Stacks

This source did not propose a BACT since its operation is
expected to be infrequent (startup and shutdown, and emergencies).

BACT Determination Procedure

In accordance with Florida Administrative Code Chapter 17-296,
Stationary Sources - Emission Standards, this BACT determination is
based on the maximum degree of reduction of each pollutant emitted
which the Department, on a case-by-case basis, taking into account
energy, environmental and economic impacts, and other costs,
determines is achievable through application of production
processes and available methods, systems, and techniques. In
addition, the regulations state that in making the BACT
determination the Department shall give consideration to:

- (a) Any Environmental Protection Agency determination of Best Available Control Technology pursuant to Section 169, and any emission limitation contained in 40 CFR Part 60 (Standards of Performance for New Stationary Sources) or 40 CFR Part 61 (National Emission Standards for Hazardous Air Pollutants).
- (b) All scientific, engineering, and technical material and other information available to the Department.
- (c) The emission limiting standards or BACT determinations of any other state.
- (d) The social and economic impact of the application of such technology.

The EPA currently stresses that BACT should be determined using the "top-down" approach. The first step in this approach is to determine for the emission source in question the most stringent control available for a similar or identical source or source category. If it is shown that this level of control is technically or economically infeasible for the source in question, then the next most stringent level of control is determined and similarly evaluated. This process continues until the BACT level under consideration cannot be eliminated by any substantial or unique technical, environmental, or economic objections.

LAW OFFICES

HOLLAND & KNIGHT

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(212) 338-0970

December 23, 1993

Mr. Clair Fancy, P.E.
Chief, Bureau of Air Regulation
State of Florida Department
of Environmental Protection
111 South Magnolia
Suite 4
Tallahassee, Florida 32399

RECEIVED

JAN 10 1994

Re: Polk Power Station; PSD Public Notice

Bureau of
Air Regulation

Dear Mr. Fancy:

Attached is a copy of the revised public Notice of Intent to Issue Permit which reflects minor revisions to the notice attached to your December 17, 1993 letter to Mr. Greg Nelson. These revisions were approved by Mr. Syed Arif with the Department. Specifically, these revisions include the following revised last sentence of the first paragraph. The additional language is underlined.

"The total PSD increments consumed by all sources, including this facility, in the Class I and II areas are:"

Also, the schedules set out in the notice have been clarified to include captions for each of the schedule columns.

If there are any questions or comments regarding the above, please call me or Mr. Tom Davis with Environmental Consulting & Technology, Inc. ((904) 332-0444).

Sincerely,

HOLLAND & KNIGHT


Samuel J. Morley

Mr. Clair Fancy, P.E.
December 23, 1993
Page 2

cc: Lawrence N. Curtin
Richard Donelan
Buck Oven
Tom Davis
Jewell Harper

SJM/mrh
TAL-37022

S. Crisp

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
NOTICE OF INTENT TO ISSUE PERMIT

The Department of Environmental Protection gives notice of its intent to issue a PSD permit (PSD-FL-194) to Tampa Electric Company, located 13 miles south of Bartow, Polk County, Florida, to construct a 260 MW integrated coal gasification combined cycle facility. A determination of Best Available Control Technology (BACT) was required. The total PSD increments consumed by all sources, including this facility, in the Class I and II areas are:

Class I Area

Parameter	Averaging Period	Total PSD Impact From All Sources ($\mu\text{g}/\text{m}^3$)	Class I PSD Increment ($\mu\text{g}/\text{m}^3$)	Increment Consumed (%)
SO ₂	3-hour	12.9	25	52
	24-hour	3.8	5	76
	Annual	0.4	2	20
NO ₂	Annual	0.8	2.5	32
PM	24-hour	5.7	10	57
	Annual	1.1	5	22

Class II Area

Parameter	Averaging Period	Total PSD Impact From All Sources ($\mu\text{g}/\text{m}^3$)	Class I PSD Increment ($\mu\text{g}/\text{m}^3$)	Increment Consumed (%)
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The Department is issuing this Intent to Issue for the reasons stated in the Technical Evaluation and Preliminary Determination.

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, within 14 days of publication of this notice. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period

comments received within 30 days of the publication of this notice will be considered in the Department's final determination.

Further, a public hearing can be requested by any person(s). Such requests must be submitted within 30 days of this notice.

TAL-36986

shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, Florida Statutes.

The Petition shall contain the following information; (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed; (b) A statement of how and when each petitioner received notice of the Department's action or proposed action; (c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action; (d) A statement of the material facts disputed by Petitioner, if any; (e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action; (f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and (g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.

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The application is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

Department of Environmental Protection
Bureau of Air Regulation
111 S. Magnolia Park Courtyard
Tallahassee, Florida 32301

Department of Environmental Protection
Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619-8218

Any person may send written comments on the proposed action to Mr. Preston Lewis at the Department's Tallahassee address. All