



Jeb Bush
Governor

Department of Environmental Protection

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

David B. Struhs
Secretary

October 30, 2002

Ms. Laura R. Crouch
Manager-Air Programs, Environmental Affairs
Tampa Electric Company
P. O. Box 111
Tampa, Florida 33601-0111

Re: Polk Power Station Sale of Assets

Dear Ms. Crouch:

We received a request on October 29, 2002 from your office for an Administrative Permit Correction to the current Polk Power Station Title V Operating Permit 1050233-009-AV. The request involves the transfer of ownership of several regulated and unregulated emissions units. The removal of emissions units from a Title V permit cannot be accomplished through the Administrative Permit Correction process.

In order to remove regulated or unregulated emissions units from a Title V permit, an application for a Title V Permit Revision must be processed. Once the Title V Permit Revision becomes final, Tampa Electric Company will no longer be responsible for these emissions units. Of course, the company acquiring the emissions units will need to apply for and receive a transfer of ownership and a FINAL Initial Title V Permit before they can begin operation of the emissions units.

If you have any other questions, please write me at the above letterhead address or contact Edward J. Svec at 850/921-8985.

Sincerely,

Scott M. Sheplak, P.E.
Title V Section

SMS/es

cc:
Gerald Kissel, PE, FDEP SWD
Buck Oven, PE, FDEP
Pat Comer, FDEP OGC

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October 25, 2002

Mr. Scott M. Sheplak, P.E.
Florida Department of Environmental Protection
Division of Air Resource Management
111 South Magnolia Drive, Suite 4
Tallahassee, Florida 32301

**Re: Tampa Electric Company
Polk Power Station
Operating Permit - Administrative Amendment
Permit No. 1050233-009-AV
AIRS #1050233, EU# 003 - 008**

RECEIVED

OCT 29 2002

BUREAU OF AIR REGULATION

**Via FedEx
Airbill No. 7912 1820 2536**

Dear Mr. Sheplak:

Tampa Electric Company (TEC) is currently in the process of finalizing documentation related to the sale of certain assets utilized in the operation of Polk Unit 1. These assets include, but are not limited to, the gasifier, sulfuric acid plant, air separation unit, solid fuel handling system, auxiliary boiler, and brine concentration facility. The Power Block and certain administrative facilities will remain with TEC. In addition, TEC will continue to function as the operator of all of the above mentioned assets pursuant to a contract with the new asset owner. In support of this upcoming asset sale, TEC respectfully requests an administrative amendment to the Title V operating permit (Final Permit Revision Number 1050233-009-AV, PSD-FL-194) for Polk Power Station (PPS) incorporating these changes. The new owner of the above mentioned assets will be Polk Gasification, LLC.

Currently, TEC is the owner and operator of Emission Unit (E.U.) ID's 003 - 006 of the Title V Operation Permit No. 1050233-009-AV. Upon sale closing, Polk Gasification, LLC will be the new owner of the following emission units:

- E.U. ID 003 (120 Million Btu per Hour Auxiliary Boiler),
- E.U. ID 004 (Sulfuric Acid Plant),
- E.U. ID 005 (Solid Fuel Handling System), and
- E.U. ID 006 (Solid Fuel Gasification System).

TEC and Polk Gasification, LLC intends to close sale during first quarter of 2003.

In addition, TEC is currently the owner and operator E.U. ID's 007 (One or more Emergency Generators) and 008 (One or more Heating Units and Internal Combustion Engines), which are groupings of unregulated emission units. Since these groupings of unregulated emission units relate to both the operation of the emission units for which Polk Gasification, LLC will be assuming ownership and the emission units that TEC will be retaining ownership of, TEC is requesting to divide the emission units and create two new E.U. ID's for permit clarity. This split of these groupings will not result in additional

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Mr. Scott Sheplak
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emissions from the facility. As of January 1, 2003, Polk Gasification, LLC will be the owner of the following two new emission units:

- E.U. ID 011 (Polk Gasification (PG) Emergency Generators) and
- E.U. ID 012 (PG Heating Units and Internal Combustion Engines).

While there will be a change in ownership, the operational control of E.U. ID's 003 - 006, 011, and 012 will still be handled by TEC as noted above. TEC understands that it may continue the operation of Polk Unit 1 as the Florida Department of Environmental Protection (FDEP) is processing this administrative amendment request. TEC appreciates the cooperation and consideration in this matter. If you have any questions or comments pertaining to this request or it is FDEP's opinion that permitting is required, please call Raiza Calderon or me at (813) 641-5261.

Sincerely,



Laura R. Crouch
Manager- Air Programs
Environmental Affairs

EA/bmr/RC141

c: Mr. Jerry Kissel - FDEP SW
Mr. Buck Oven - FDEP