



Jeb Bush  
Governor

# Department of Environmental Protection

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

David B. Struhs  
Secretary

July 25, 2000

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Mark J. Hornick  
General Manager -- Polk Power Station  
Tampa Electric Company  
Post Office Box 111  
Tampa, Florida 33601-0111

Re: DEP File No. 1050233-004-AC; 1050233-003-AV; PSD-FL-194E; PA92-32  
Polk Power Station Unit 1

Dear Mr. Hornick:

The Department has received the application on July 5, 2000 to allow for the permanent firing of syngas produced from the gasification of fuel blends of up to 60 percent petcoke and 40 percent coal. Based on our initial review of the proposed project, we have determined that additional information is needed in order to continue processing this application package.

Specific Condition 8 of the Performance Test permit states that "the pollutant emission results from the petroleum coke/coal blend syngas performance tests shall be used to estimate representative actual annual emissions following an operational change per 62-210.200(12)(d), F.A.C., for comparison with actual emissions per Rule 62-210.200(12)(a), F.A.C. The comparison will form the basis of a PSD applicability determination pursuant to 40 CFR 52.21. *The results of baseline performance tests when firing coal syngas will be used only to the extent that such information does not already exist or is insufficient to determine actual emissions.*"

The specific condition is clear in requiring the baseline performance test results to be utilized only for those pollutants for which prior information does not exist, such as sulfuric acid mist emissions. The pollutants, such as SO<sub>2</sub> and NO<sub>x</sub>, for which prior actual emissions data exists should have been used for PSD applicability determination. Actual emissions is defined in 62-210.200(12)(a) as the average rate, in tons per year, at which the emissions unit actually emitted the pollutant during a two year period which precedes the particular date and which is representative of the normal operation of the emissions unit.

In order to comply with this requirement, please submit additional data for SO<sub>2</sub> and NO<sub>x</sub>. The data should be compared with the fuel blend test results to provide reasonable assurance to the Department that PSD review is not triggered for these pollutants.

"More Protection, Less Process"

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The Department will resume processing this application after receipt of the requested information. Rule 62-4.050(3), F.A.C. requires that all applications for a Department permit must be certified by a professional engineer registered in the State of Florida. This requirement also applies to responses to Department requests for additional information of an engineering nature. A new certification statement by the authorized representative or responsible official must accompany any material changes to the application. Rule 62-4.055(1), F.A.C. now requires applicants to respond to requests for information within 90 days.

If there are any questions regarding this matter, please call Syed Arif, P.E. at (850) 921-9528.

Sincerely,

Handwritten signature of A.A. Linero in cursive script, followed by the date 7/25.

A.A. Linero, P.E. Administrator  
New Source Review Section

AAL/sa

cc: Buck Oven, DEP  
Ed Svec, DEP  
Brian Beals, EPA  
John Bunyak, NPS  
Bill Thomas, SWD

Z 031 392 036

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PS Form 3800, April 1995

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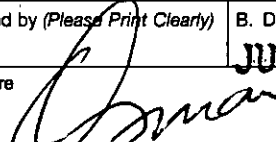
1. Article Addressed to:

Mr. Mark J. Hornick  
 General Mgr. - Polk Power Station  
 Tampa Electric Company  
 PO Box 111  
 Tampa, FL 33601-0111

2. Article Number (Copy from service label)

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