



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

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DIVISION OF AIR
RESOURCE MANAGEMENT

November 5, 2012

Kyle Baker
Protected Resources Division
NOAA National Marine Fisheries Service
Southeast Regional Office
263 13th Avenue South
St. Petersburg, Florida 33701-5505

Subject: Designation of Non-Federal Representative and Request for Informal Consultation under Section 7 of the Federal Endangered Species Act for the Proposed Tampa Electric Company – Polk Power Station 2-5 Combined Cycle Conversion Project

Dear Mr. Baker:

By this letter, the United States Environmental Protection Agency Region 4 (EPA Region 4) requests informal consultation and concurrence under Section 7 of the federal Endangered Species Act (ESA) for the proposed Tampa Electric Company (TECO) – Polk Power Station 2-5 Combined Cycle Conversion Project. TECO is proposing to convert four existing simple cycle combustion turbines (designated as Units 2 through 5) to combined cycle operation, increasing the nominal output from 165 megawatts (MW) to 290 MW each.

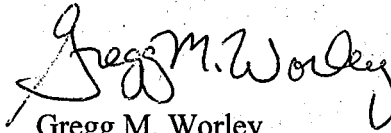
The proposed project also includes the addition of four heat recovery steam generators with duct burners, a steam turbine generator, a six-cell mechanical draft cooling tower, and a 0.5 MW emergency generator. Natural gas will be the primary fuel for the combustion turbines and the duct burners whereas fuel oil will serve as the primary fuel for the emergency generator and backup for the combustion turbines. The proposed project will result in net emission increases greater than Prevention of Significant Deterioration (PSD) threshold limits for particulate matter as total suspended particulates, particulate matter of less than or equal to ten microns in diameter, particulate matter of less than or equal to 2.5 microns in diameter, oxides of nitrogen, carbon monoxide, sulfuric acid mist, and greenhouse gases (GHGs); therefore, the project is subject to PSD review. Region 4 will be responsible for issuing a PSD permit regulating GHG emissions and the Florida Department of Environmental Protection (FDEP) is responsible for issuing a PSD permit for the remaining pollutants. The proposed project is located within the existing Polk Power Station site, approximately 13 miles southwest of Bartow, in Polk County, Florida.

In processing TECO's PSD permit application, the EPA must assure that listed species or their critical habitat will not be jeopardized by the changes at the TECO facility. Although endangered species are discussed in Section 5.1 of the application, the information contained therein does not appear to be sufficient enough to adequately support TECO's determination that there will be "no additional impacts on biological resources." Consequently, we are unable to determine our obligations, if any, under Section 7 of the ESA.

Region 4 would like to begin an informal consultation with the NOAA National Marine Fisheries Service (NMFS) regarding the proposed project. TECO has been designated by Region 4 as the non-federal representative and will be responsible for preparing and submitting a complete Biological Assessment to Region 4 and the NMFS.

If you have any questions concerning the review of this application, please contact Art Hofmeister of the Air Permits Section at (404) 562-9115.

Sincerely,



Gregg M. Worley
Chief
Air Permits Section

cc: Jeff Koerner, FDEP
Paul Carpinone, TECO
Thomas Davis, P.E., ECT

Enclosure (CD of Application)