



TAMPA ELECTRIC

August 11, 2000

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BUREAU OF AIR REGULATION

Mr. Scott M. Sheplak, P.E.  
Administrator, Title V Section  
Florida Department of Environmental Protection  
111 South Magnolia Drive, Suite 4  
Tallahassee, Florida 32301

Via FedEx  
Airbill No. 7908 7244 6490

Re: Tampa Electric Company  
Permit Revisions for Big Bend Unit 3, AO29-179911 and  
Big Bend Unit 4, PSD-FL-040

Dear Mr. Sheplak:

Tampa Electric Company has received the permit amendment for the above referenced Big Bend Unit 3 permit and the Technical Evaluation and Preliminary Determination, the Intent to Issue PSD Air Permit Modification, and the Public Notice of Intent to Issue PSD Air Permit Modification for the above referenced Big Bend Unit 4 permit. Tampa Electric Company appreciates the prompt response of the Department in this issue but would like the Department to consider several comments regarding the proposed action.

Comment 1

The additions to Specific Condition 21 of the Big Bend Unit 3 Permit and to Specific Condition 1.E. of the Big Bend Unit 4 Permit require Tampa Electric to perform quarterly sulfuric acid mist emissions testing to assure the Department that that the redefinition of the petcoke ash vanadium content limit will not result in a net significant increase in sulfuric acid mist emissions. Tampa Electric Company, however, feels that the redefinition of the petcoke ash vanadium content limit will not affect sulfuric acid mist emissions. In fact, sulfuric acid mist emissions may be reduced as a result of this redefinition. This allows Tampa Electric Company to purchase and fire low ash, low mass based ash vanadium content petcoke. Table 1 provides an example of the type of fuel that this limit redefinition will allow the Company to purchase and fire in the Big Bend Units.

ppm Vanadium	Percent Ash	Percent Vanadium
3500	1	35.0
	0.9	38.9
	0.8	43.8
	0.7	50.0
	0.6	58.3
	0.5	70.0
	0.4	87.5

Table 1

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Under existing limits, Tampa Electric Company is not permitted to fire petcoke containing less than 1% ash and 3,500-ppm vanadium. However, on a mass basis, less vanadium would be introduced to the boiler by firing a lower percent ash fuel containing 3,500-ppm vanadium. In fact, under existing limits, Tampa Electric Company is not permitted to fire petcoke containing 0.5% ash and 2,000 ppm vanadium in the ash because the resulting percent based ash vanadium content is 40%. Tampa Electric Company has requested the redefinition of this limit to a ppm basis to allow for the procurement and firing of petcoke with varying ash and vanadium contents. To provide the Department with additional assurance that sulfuric acid mist emissions will not increase as a result of this project, the Company proposes an additional limit on the ash content of the petcoke fired of 1% on a dry basis.

Comment 2

Finally, per the EPA Consent Decree, Tampa Electric Company is only permitted to operate Big Bend Unit 3 while unscrubbed for 30 days per year. The purpose of this provision is to allow for any forced outages of the scrubber system and to allow Tampa Electric Company to perform scrubber maintenance while still generating electricity with Unit 3. During the testing of Unit 4, emissions from Unit 3 cannot be directed through the scrubber system. Consequently, if the Company is required to test Unit 4 for sulfuric acid mist on a quarterly basis, Big Bend 3 must be deintegrated for an additional four days. This, in turn, will take away from the time for scrubber system maintenance, which helps ensure optimal operation for the rest of the year.

Tampa Electric Company feels that the incorporation of the additional vanadium ash content limit as well as compliance with the requirements of the EPA Consent Decree will provide the Department with reasonable assurance that the proposed change will not result in a net significant increase of any regulated air pollutant, and additional stack testing will not be necessary. Tampa Electric Company appreciates the opportunity to provide additional comments in this matter.

If you have any further questions, you may contact Shannon Todd or me at (813) 641-5125.

Sincerely,



Gregory M. Nelson, P.E.  
Director  
Environmental Affairs

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c: Mr. J. Campbell, EPCHC  
Mr. A. Linero, FDEP  
Mr. J. Kissel, FDEP SW  
Mr. H. Oven, FDEP  
Mr. S. Woodard, EPCHC

8/15/00 cc: Scott Sheplak  
Andy Phillips