

11/27/96
cc: TECO Gannon, Big Bend,
Hooker's Point ALE

09/10/96 14:47

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ADMINISTRATIVE OFFICES, LEGAL &
WATER MANAGEMENT DIVISION
1900 - 9TH AVENUE
TAMPA, FLORIDA 33605
TELEPHONE (813) 272-5980
FAX (813) 272-5157

AIR MANAGEMENT DIVISION
TELEPHONE (813) 272-5630

WASTE MANAGEMENT DIVISION
TELEPHONE (813) 272-5788

ECOSYSTEMS MANAGEMENT DIVISION
TELEPHONE (813) 272-7104

ENVIRONMENTAL PROTECTION COMMISSION
OF HILLSBOROUGH COUNTY

FAX TRANSMITTAL SHEET

DATE: 9/10/96

TO: John Brown

FAX PHONE: (904) 922-6979 VOICE PHONE: _____

TOTAL NUMBER OF PAGES INCLUDING THIS COVER PAGE: 3

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FROM: Rick Kirby
(CIRCLE APPLICABLE SECTION BELOW)

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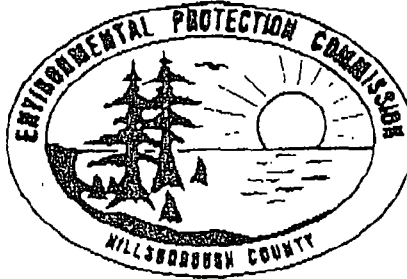
SPECIAL INSTRUCTIONS: _____

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EXECUTIVE DIRECTOR

ROGER P. STEWART



ADMINISTRATIVE OFFICES, LEGAL &
 WATER MANAGEMENT DIVISION
 1800 - 9TH AVENUE
 TAMPA, FLORIDA 33605
 TELEPHONE (813) 272-5960
 FAX (813) 272-5157

AIR MANAGEMENT DIVISION
 TELEPHONE (813) 272-5530

WASTE MANAGEMENT DIVISION
 TELEPHONE (813) 272-5788

WETLANDS MANAGEMENT DIVISION
 TELEPHONE (813) 272-7104

M E M O R A N D U M

DATE: September 10, 1996

TO: John Brown

FROM: Rick Kirby

THRU: Jerry Campbell
 Iwan Choronenko

SUBJECT: Title V Review of TECO Facilities in Hillsborough County

The EPC has received copies of Tampa Electric Company Title V applications. The packages were received August 14 and 21, 1996 with a request that comments be provided by September 9, 1996. The actual application and some supporting documentation were provided on computer disk.

I have begun my initial review of the Big Bend facility and have already turned up several issues which should be addressed. Some of these are as follows:

1. The State sulfur dioxide standards for the Big Bend and Gannon stations do not appear to meet any of the criteria for practical enforceability. Rules 62-296.405(1)(c)2.a. and b., F.A.C. are truly not comprehensible to anyone other than a doctorate of mathematics or statistics. While we are not suggesting the standard be tightened through the Title V process, we are stating that it should be simplified so it is meaningful. TECO now has CEMs in the stacks and we should look to establishing them as the reference method with a practically enforceable standard that will pass the EPA muster. We do not see how they can provide reasonable assurance that these standards are being met or that these limits protect the ambient air quality standards. You recall we have experienced a number of sulfur dioxide violations downwind of the Gannon Station and these have not been resolved. The EPC feels very strongly about this particular issue.
2. It appears that many sources have been grouped into one emissions unit, when they may not meet the state definition of similar sources. These include fuel and other material handling.

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3. Many of these units have been presented as being fugitive emissions sources when they do not meet that definition.
4. There are fuels and chemicals listed for use in boilers which have no previous permitting approval. These include used oil and non-hazardous cleaning chemicals.
5. Some emission units are not listed. EPC had previously agreed to defer permitting of a marine vessel repair and painting operation to be included in the Title V process. It was not found in this package.

Based on the above issues, I feel it is necessary to have EPC permitting engineers perform an inspection of each facility, to include a thorough air pollution source audit, as well as an in depth application and file review. Additionally, EPC has been unable to generate or access the applications for the Hookers Point and F.J. Gannon facilities. As you may be aware, PDEP data personnel came to EPC recently. On the same day, a lightning strike took out a large part of our computer system. It is still not completely functional. Cindy Phillips has graciously agreed to generate hard copies of the two remaining facilities.

I would like to close by saying that these are very complex projects. In addition to the size of each facility, there are complicating factors such as the outstanding Chapter 120 F.S. hearing request by the citizens of Apollo Beach for the latest Big Bend modification and the application for modification at the F.J. Gannon facility which may well trigger PSD. This is the largest polluter in Hillsborough County and a thorough, complete review is called for. We respectfully request that the review time given us be extended for 30 days to insure that we can properly represent the interest of the citizens.

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