

INTEROFFICE MEMORANDUM

Date: 24-Jul-2000 11:55am
From: sterlin woodard
 woodard@epcjanus.epchc.org
Dept:
Tel No:

To: Jamie Hunter (jjhunter@tecoenergy.com)
CC: Scott.Sheplak (Scott.Sheplak@dep.state.fl.us)

Subject: Re: Draft Gannon Title V - Condition III.B.3.

Alice and I have reviewed the information you provided, and have no objections to the removal of the sulfur limit.

> -----Original Message-----

> From: Jamie Hunter [mailto:jjhunter@tecoenergy.com]
 > Sent: Wednesday, July 12, 2000 4:50 PM
 > To: woodard@epcjanus.epchc.org
 > Cc: Scott.Sheplak@dep.state.fl.us
 > Subject: Draft Gannon Title V - Condition III.B.3.

> As we discussed, I believe that the provisions in the EPC Rule
 > 1-3.63(c) referenced in the above permit condition were intended
 > to apply to the firing of No. 6 oil as the primary fuel in an
 > existing fossil fuel steam generators. At the time of adoption of
 > the EPC Rule (1986), and ever since, the only units that this
 > rule applied to are boilers 1 - 6 at Tampa Electric's Hookers
 > Point Station. The boilers at Gannon Station had all been
 > reconverted back to coal firing as the primary fuel. The 1.1
 > lb/MMBtu sulfur limit noted in the EPC rule is consistent with
 > the historical (and current) limit found in the operating permits
 > for the Hookers Point boilers, as well as 62-296.405(c)1.d.,
 > F.A.C. which covers the Hookers Point units only. I believe that
 > the EPC rule was adopted to insure that the units at Hookers
 > Point Station would continue to be limited to their current limit
 > at the time of adoption and to insure that if existing steam
 > units at Gannon (or elsewhere) were converted to oil firing as
 > their primary fuel, that they would also be restricted to the No.
 > 6 oil limit at Hookers Point Station.

> Other liquid fuels burned in steam units general only consists of
 > small amount of new No.2 oil (0.5 % S) used for start-up and
 > flame stabilization purposes and even smaller amounts of on-spec
 > used oil. The primary sources of used oil burned at Gannon
 > Station (as address in the Title V permit) are primarily mineral
 > oil from transformers, along with spent lubricating oils and
 > other minor oily wastes. All of the on-spec used oil burned at
 > Gannon is regulated by the applicable Federal and State used oil
 > rules as noted in Specific Condition III.B.6. of the draft Title
 > V permit. Sulfur content of used oil is not regulated under these
 > rules, as sulfur content of typical on-spec used oil is
 > relatively insignificant (much less than 1.1 lb/MMBtu) due to the
 > types of oil that make up the bulk of the on-spec used oil that
 > is burned for energy recovery.

> I do not believe that EPC Rule 1-3.63(c) was intended to apply to
 > the small amounts of on-spec used oil currently burned at Gannon
 > Station. The additional burden placed on the facility to perform

INTEROFFICE MEMORANDUM

Sensitivity: COMPANY CONFIDENTIAL

Date: 05-Jul-2000 12:04pm
From: Scott Sheplak TAL
SHEPLAK_S
Dept: Air Resources Management
Tel No: 850/488-1344

To: harman@epcjanus.epchc.org
CC: campbell@epcjanus.epchc.org
CC: Cindy Phillips TAL (PHILLIPS_C)

Subject: FWD: Tampa Electric Company

Please see the attached plan to wrap up TECO's Title V permits. The comment period ends this Friday, July 7.

I have one question for you on Gannon. TECO would like the 1.1 lb/MMBTU SO2 limit as we have applied it to onspec used oil removed (See condition B.3.). The firing of onspec used oil is not a major method of operation; it's a disposal option. We met with TECO last week and they did not think that the EPCHC rule should apply to onspec used oil. I'd like to remove it.

Please comment/advise.

Scott M. Sheplak, P. E. Administrator
Title V Section
Department of Environmental Protection
850/921-9532
scott.sheplak@dep.state.fl.us

INTEROFFICE MEMORANDUM

Date: 05-Jul-2000 10:20am
From: Scott Sheplak TAL
SHEPLAK_S
Dept: Air Resources Management
Tel No: 850/488-1344

To: Cindy Phillips TAL (PHILLIPS_C)
To: Doug Beason TAL (BEASON_D)
CC: Clair Fancy TAL (FANCY_C)

Subject: Tampa Electric Company

On June 30, Tampa Electric Company (TECO) called me to ask for extensions of time in which to file petitions for administrative hearings on the latest DRAFT Title V permits for Big Bend and Gannon.

TECO at the advise of their counsel claimed that it was "too much" to file petitions for hearings. TECO wanted: 1) to ensure that all of the agreed upon changes are memorialized into the new permits; and 2) to expand their time to encompass the comment period. The comment period ends on July 7 (this Friday).

I agreed to an extension of time up to July 21. I told TECO that we would finish the PROPOSED permit for Big Bend by July 12 (next Wednesday) and the PROPOSED permit for Gannon by July 19 (following Wednesday). We could issue both on July 21 (Friday).

PROGRESS NOTE: On June 29, Russell and myself met with TECO on Gannon. We discussed their initial comments at great length. There were no significant issues. All of TECO's comments were very minor in nature. TECO will be providing their final comments on Gannon to me. TECO has already submitted a few comments to Cindy on Big Bend. TECO has taken our deadline with EPA seriously.

Later in the day I received TECO's extension requests. TECO, as agreed upon w/ me, requested the extension up to July 21.

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JUL 21 2000

BUREAU OF AIR REGULATION



TAMPA ELECTRIC

July 20, 2000

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

Via FedEx
Airbill No. 7923 5606 8410

**Re: Tampa Electric Company
F. J. Gannon Station
Professional Engineering Certification
FDEP Files No. 0570040-011-AC,
0570040-006-AC and 0570040-010-AC**

Dear Mr. Sheplak:

Based on your verbal request for additional information necessary to complete the incorporation of Tampa Electric Company's comments into the current draft version of the Title V permit for Gannon Station, please find enclosed a signed and sealed Professional Engineer Certification to incorporate the provisions from the following air construction permits into the Title V air operation permit.

- Gannon Station Unit No. 3 Wood Derived Fuel Modification (0570040-011-AC)
- Gannon Station Fuel Yard Throughput Modification (0570040-006-AC)
- Gannon Station Fuel Yard Crusher House Modification (0570040-010-AC)

All activities required by the above permits have been performed, including initial compliance certification testing.

Please feel free to telephone Jamie Hunter at (813) 641-5033, if you have any questions.

Sincerely,

A handwritten signature in black ink that reads "Gregory M. Nelson".

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

EP\dJJH927

Enclosure

c/enc: Mr. Clair Fancy, FDEP-Tallahassee
Mr. Jerry Kissel, FDEP-SW District
Mr. Jerry Campbell, EPCHC

7/25/00 cc = Scott Sheplak

TAMPA ELECTRIC COMPANY
P. O. BOX 111 TAMPA, FL 33601-0111

AN EQUAL OPPORTUNITY COMPANY
HTTP://WWW.TAMPAELECTRIC.COM

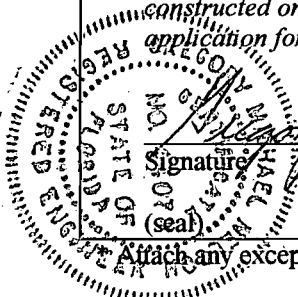
(813) 228-4111

CUSTOMER SERVICE:
HILLSBOROUGH COUNTY (813) 223-0800
OUTSIDE HILLSBOROUGH COUNTY 1 (888) 223-0800

**Re: Tampa Electric Company
Gannon Station Air Construction Permits 0570040-011-AC, 0570040-006-AC and
0570040-010-AC**

Professional Engineer Certification

1. Professional Engineer Name: Gregory M. Nelson Registration Number: 44078
2. Professional Engineer Mailing Address: Organization/Firm: Tampa Electric Company Street Address: 6944 U.S. Highway 41 North City: Apollo Beach State: Florida Zip Code: 33572-1500
3. Professional Engineer Telephone Numbers: Telephone: (813) 641-5061 Fax: (813) 641-5081
4. Professional Engineer Statement: <i>I, the undersigned, hereby certify, except as particularly noted herein*, that:</i> <i>(1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this Application for Air Permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; and</i> <i>(2) To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application.</i> <i>If the purpose of this application is to obtain a Title V source air operation permit (check here [] , if so), I further certify that each emissions unit described in this Application for Air Permit, when properly operated and maintained, will comply with the applicable requirements identified in this application to which the unit is subject, except those emissions units for which a compliance schedule is submitted with this application.</i> <i>If the purpose of this application is to obtain an air construction permit for one or more proposed new or modified emissions units (check here [] , if so), I further certify that the engineering features of each such emissions unit described in this application have been designed or examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application.</i> <i>If the purpose of this application is to obtain an initial air operation permit or operation permit revision for one or more newly constructed or modified emissions units (check here [X] , if so), I further certify that, with the exception of any changes detailed as part of this application, each such emissions unit has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with all provisions contained in such permit.</i>



Gregory M. Nelson
Signature

7/20/00
Date

Attach any exception to certification statement.



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JUN 05 2000

BUREAU OF AIR REGULATION

June 2, 2000

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

Via FedEx
Airbill No. 7908 4760 6686

Re: Tampa Electric Company
F. J. Gannon Station
Title V – Periodic Monitoring
FDEP File No. 0570040-002-AV

Dear Mr. Sheplak:

In a letter dated April 5, 2000 Tampa Electric Company proposed that the following language be included in the next draft of the Title V permit for this facility to satisfy concerns that the existing monitoring requirements may be determined to be insufficient based on guidance published by EPA.

Periodic monitoring for particulate matter shall be COMS. For any calendar quarter in which more than five percent of the COMS readings show 20% or greater opacity for any of the Units 1 - 6 (excluding startup, shutdown, and malfunction periods), a steady-state particulate matter stack test shall be performed within the following calendar quarter. Due to the allowed opacity level of 60% for sootblowing and load changing periods for Units 1 - 6, periods of sootblowing and load changing shall also be excluded. The stack test shall comply with all of the testing and reporting requirements contained in the preceding specific conditions. Units are not required to be brought on-line solely for the purpose of performing this special test. If the unit does not operate in the following quarter, the special test may be postponed until the unit is brought back on-line. In such cases, the special test shall be performed within 30 days of the unit being brought back on-line.

In the April 14, 2000 District of Columbia Circuit Court of Appeals decision (Appalachian Power Company, et al., vs. EPA) regarding EPA's periodic monitoring guidance document, the court stated:

"State permitting authorities may not, on the basis of EPA's guidance or 40 CFR s 70.6(a)(3)(i)(B), require in permits that the regulated source conduct more frequent monitoring of its emissions than that provided in the applicable State or

Mr. Scott M. Sheplak, P.E.

June 2, 2000

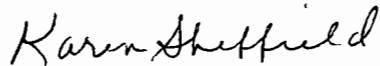
Page 2 of 2

federal standard, unless that standard requires no periodic testing, specifies no frequency, or requires only a one-time test."

Based on this court decision, TEC requests the above proposed periodic monitoring not be included in the Tile V permit for this facility.

Please feel free to telephone Jamie Hunter at (813) 641-5033, if you have any questions.

Sincerely,



Karen A. Sheffield, P.E.

General Manager

F.J. Gannon Station

EP\gm\JJH922

c: Mr. Clair Fancy, FDEP-Tallahassee
Mr. Jerry Kissel, FDEP-SW District
Mr. Jerry Campbell, EPCHC



TAMPA ELECTRIC

June 14, 2000

Mr. David Zell
Air Permitting Engineer
Florida Department of Environmental Protection
Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

Mr. Sterlin Woodard
Air Management Division
Environmental Protection Commission
of Hillsborough County
1410 N. 21st Street
Tampa, Florida 33605

Re: Tampa Electric Company (TEC) – F.J. Gannon Station Unit 3
Wood Derived Fuel (WDF) Test Burn
FDEP Permit No. 0570040-008-AC

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JUN 19 2000

BUREAU OF AIR REGULATION

Via FedEx
Airbill No. 7910 9873 7525

Via FedEx
Airbill No. 7908 5177 7423

Dear Mr. Zell and Mr. Woodard:

Please find enclosed the final report addressing the Wood Derived Fuel test burn that took place at the F.J. Gannon Station. Based on the results, the combustion of a blend of up to 4% by weight of yard waste does not increase emissions of any criteria pollutant above the thresholds outlined in Table 212.400-2 F.A.C.

If you have any questions, please feel free to call Shannon Todd or me at (813) 641-5125.

Sincerely,

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

EPgm\SKT177

Enclosure

c/enc: S.Sheplak – FDEP