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JUL 21 1992

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SOUTHWEST DISTRICT
TAMPA

MEMORANDUM

DATE: July 21, 1992
TO: J. Harry Kerns, P.E.
FROM: Sterlin Woodard *SKW* **THRU:** Jerry Campbell, P.E. *Jc*
SUBJECT: Permit Amendment - Tampa Electric Company

Attached is amended Permit No. A029-160258 for the operation of F.J. Gannon Station Units 5 and 6 fly ash silo with baghouse and pugmill.

The pugmill was constructed in accordance with the FDER's September 12, 1991 authorization letter and compliance tested on April 28, 1992 in accordance with the FDER's April 3, 1992 authorization letter.

On March 31, 1992, the EPC/HC received TECO's initial request to amend the permit (A029-160258) but the request along with the C.O.C.O.C., compliance test results and fees were returned because the truck loadout from the pugmill failed the 5% V.E. standard. The highest 6 minute average for the test was 6.9%. TECO was granted additional time to retest and resubmit the appropriate information and fees pursuant to FDER's April 3, 1992 authorization letter.

The EPC/HC and FDER then received TECO's request on April 30, 1992 to amend their current operating permit (A029-160258) to include the pugmill as required in the April 3, 1992 authorization letter.

The fly ash silo and pugmill are subject to the 5% opacity standard of Rule 17-2.650(2)(c)11.b., F.A.C. and the fly ash silo is also subject to the 0.03 gr/dscf standard since it is vented to a baghouse.

Mr. J. Harry Kerns, P.E.
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The operation of the pugmill will not increase emissions since the fly ash will be "conditioned" (wetted using water) in the pugmill and neither the truck loading nor silo loading rate will increase. The April 28, 1992 compliance test on the truck loading (highest 6 minute average of 2.5%) was within the 5% opacity standard.

The EPC/HC recommends issuing the above amended operating permit. A draft and diskette along with a copy of the V.E. test are enclosed for your review.

SKW:A0160258