



January 20, 1987

Mr. Bill Thomas
Florida Department of
Environmental Regulation
District Office
7601 Highway 301 North
Tampa, Florida 33610-9544

Re: Tampa Electric Company
Administrative Changes to
Air Permits

Dear Mr. Thomas:

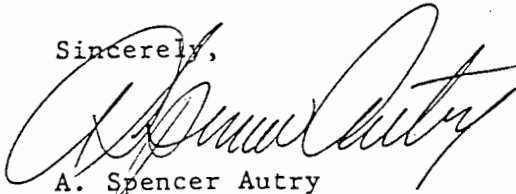
During a recent review of Tampa Electric Company's air permits, administrative inconsistencies were identified that have lead to hardships on us that we feel are not intended by the Department. As shown on the attachment, the inconsistencies involve reporting and application for renewal requirements contained in older air permits. The requested modifications reflect the requirements of the specific conditions listed in our most recent air permits.

In order to communicate our concerns, we discussed the issue with Mr. Tom John, DER, and Mr. Victor San Agustin of the Hillsborough County Environmental Protection Commission on January 14, 1987. Based on this discussion, it is our understanding that neither Mr. John nor Mr. San Agustin are opposed to modifying the applicable air permits to provide consistency as outlined to them.

Tampa Electric Company respectfully requests that the air permits listed on the attachment be modified to reflect consistent administrative conditions as stated. The requested modifications will not change our environmental limits, they only clarify the distribution of compliance related reports and the quantity of renewal applications required.

We would greatly appreciate an expeditious review of our request for permit modifications. Thank you for your cooperation, and please call me if you have any questions.

Sincerely,



A. Spencer Autry
Manager
Environmental Planning

ASA/jst/001/EE

Attachment

cc: Tom John, FDER
Victor San Agustine, HCEPC

INCONSISTENCIES IN ADMINISTRATIVE PROCEDURES

DER AIR PERMITS

TAMPA ELECTRIC COMPANY (TEC)

The following modifications will provide consistent administrative requirements for the compliance reports and permit renewal applications required in TEC's air permits:

- Specify that one copy of each report (i.e. Annual Emissions Report, Annual Stack Test Report, etc.) listed in the below specific conditions be sent to both the Florida Department of Environmental Regulation and the Hillsborough County Environmental Protection Commission.

<u>Source</u>	<u>Permit Number</u>	<u>Specific Conditions</u>
<u>F.J. Gannon</u>		
XA ✓ Unit 2-1	A029-112412	4, 7 <i>done but permit</i>
XA ✓ Unit 3-2	A029-95792	4, 7 <i>changes in the permit</i>
XA ✓ Unit 4-3	A029-80043	4 <i>changes in the permit 3-4-87 date</i>
✓ Combustion Turbine 1	A029-85099	1, 5
✓ Fly Ash Silo 1	A029-80048	2, 7
X-Fly Ash Silo 2-4	A029-80046 <i>VH</i>	1, 6
X-Economizer Silo-5	A029-87409 <i>VH</i>	1, 5
-Coal Yard	A029-94044 <i>new number</i>	2, 10
<u>Big Bend</u>		
X Unit 1	A029-63296 <i>VH</i>	1, 4, 6 <i>new permit</i>
Unit 2 + 6	A029-66329	4, 5.c, 8
Unit 3 - 7	A029-93937	5, 6.c, 9
X Combustion Turbine 1-8	A029-85100 <i>VH complete</i>	1, 6
Combustion Turbine 2-9	A029-100797	1, 6
Combustion Turbine 3-10	A029-100795	1, 6
Fly Ash Silo 1-11	A029-90129 <i>date permit</i>	1, 9
Fly Ash Silo 2-12	A029-90128 <i>date permit</i>	1, 9

- Specify that an application to renew the operating permit, and 3 copies with original seals and signatures, shall be submitted to the Hillsborough County Environmental Protection Commission at least 60 days prior to the expiration date of the permit.

<u>Source</u>	<u>Permit Number</u>	<u>Specific Conditions</u>
<u>F.J. Gannon</u>		
✓ Unit 2	A029-112412	10
-Coal Yard	A029-94044	11
<u>Big Bend</u>		
Unit 2	A029-66329	9
Unit 3	A029-93937	10