

*Enforcement*

DEC 30 1974

Ref: 4AEL:JBB

RECEIVED DPC

JAN 2 1975

EXECUTIVE DIRECTOR

Mr. Melvin Goldstein  
Director  
Office of Exceptions and Appeals  
Federal Energy Administration  
Washington, D. C. 20461

RE: Tampa Electric Company  
Cannon Station Units 1-4  
Application For Exception  
from Section 215.3 Pursuant  
to Section 215.6 FEA  
Regulations

Dear Mr. Goldstein:

The U. S. Environmental Protection Agency has initiated enforcement action, pursuant to Section 113 of the Clean Air Act, as amended, against Tampa Electric Company. It is imperative that this facility come into compliance as expeditiously as possible in order to cure the current violation of national primary ambient air quality standards for SO<sub>2</sub> in the Tampa-Hillsborough County area.

In an effort to determine the alternatives available to the Tampa Electric Company at this facility an outside consultant was brought in by EPA. Notwithstanding the fact that the majority of work in the conversion from coal to low sulfur oil has already been completed, it was determined by our consultants that due to the physical space limitations Tampa Electric Company was constrained to utilize fuel conservation to meet the Florida regulations for SO<sub>2</sub> and particulates.

RECEIVED  
DEPT. OF POLLUTION CONTROL

JAN 3 1974

BUREAU OF ENFORCEMENT

It is for the above mentioned reasons that an allocation of low sulfur oil is essential for Tampa Electric Company to be able to fulfill the obligations imposed on it by the Clean Air Act. We would appreciate all due consideration in this matter. If there is additional information that you need, please advise.

Sincerely yours,

Jack E. Ravan  
Regional Administrator

cc: ~~Bob Murray, Esquire~~  
Pete Baljet  
Roger Stewart  
J. D. Hicks



STATE OF FLORIDA  
DEPARTMENT OF POLLUTION CONTROL

2562 EXECUTIVE CENTER CIRCLE, EAST  
MONTGOMERY BUILDING  
TALLAHASSEE, FLORIDA 32301

PETER P. BALJET  
EXECUTIVE DIRECTOR

W.D. FREDERICK, JR.  
CHAIRMAN

D. P. C.

January 24, 1975

JAN 29 1975

WEST CENTRAL REGION  
WINTER HAVEN

D. P. C.

JAN 27 1975

WEST CENTRAL REGION  
ST. PETERSBURG

Mr. Thomas Wieker  
Assistant Director  
Office of Exceptions and  
Appeals  
Federal Energy Administration  
Washington, D. C. 20461

Re: Tampa Electric Company  
Case Numbers FEE 1324, FEE 1327

Dear Mr. Wieker:

This letter is intended to give your agency additional information supporting the Florida Department of Pollution Control's certification that the use of low sulfur petroleum products at Tampa Electric Company's F. J. Gannon Station, Units 1 - 4, and Hookers Point Plant, Units 1 - 6 is essential to meet the National Primary Ambient Air Quality Standards for sulfur dioxide and the State of Florida Air Implementation Plan, and that there is no practical alternative to the use of the low sulfur petroleum products.

The subject plants are all located within Hillsborough County, Florida, which is within the West Central Florida Intrastate Air Quality Control Region as defined by the United States Environmental Protection Agency in Title 40, Code of Federal Regulations, Subsection 81.96.

A copy of the Air Quality Report for Hillsborough County is enclosed. This report clearly demonstrates the seriousness of sulfur dioxide concentrations in Hillsborough County, and the need to maintain low emissions of sulfur dioxide from the subject plants in order to maintain the State and Federal ambient air quality standards.

John R. Middlemas  
BOARD MEMBER

Alice C. Wainwright  
BOARD MEMBER

Mark D. Hollis  
BOARD MEMBER

Y.E. Hall  
BOARD MEMBER

*Handwritten notes:*  
K. H. Lester  
Kama file  
W-1-23-75

Mr. Thomas Wieker  
January 24, 1975  
Page Two

As to the models mentioned in the earlier letters of certification, Tampa Electric has submitted several copies directly to your office. That modeling, however, does not show precisely the highest sulfur content fuel that can be burned at the subject plants. The Environmental Protection Agency is running such a model for each of Tampa Electric Company's plants as well as the combined effects of the Hookers Point and Gannon Plants. This information will be submitted directly to your office by the Environmental Protection Agency.

It is the position of the State of Florida Department of Pollution Control that the highest sulfur content fuel that can be used in the subject plants is the content necessary to comply with the Florida emission standards set forth in the Florida Air Implementation Plan. This Plan was promulgated pursuant to the Clean Air Act Amendments of 1970, Public Law 91-604; 42 U.S.C. 1857, et seq., and has been approved by the Administrator of E.P.A. and incorporated into Federal Law, 40 C.F.R. §52.520. A copy of the Plan is enclosed. The Federal Energy Administration has no statutory authority to ignore the requirements of a State Implementation Plan which has been adopted and approved in accordance with Section 110 of the Clean Air Act, 42 U.S.C. 1857c-5, and require the use of a higher content sulfur fuel in violation of that Plan. Before F.E.A. can use only the Primary Ambient Air Quality Standard as a criteria for an exception, the Plan would have to be modified in accordance with the Clean Air Act, or suspended in accordance with The Energy Supply and Environmental Coordination Act of 1974, Public Law 93-319. This has not been done.

The maximum allowable sulfur content oil that could be used in the subject plants and comply with the Florida Implementation Plan would be approximately 1.0% sulfur. This is calculated by using the emission limiting standard of 1.1 pounds of sulfur dioxide per million BTU input. The maximum allowable sulfur content coal that can be used in the Gannon Units is approximately 1% sulfur to meet the Florida emission limiting standards. The maximum allowable sulfur content fuel

Mr. Thomas Wieker  
January 24, 1975  
Page Three

that can be used at each of the plants to only comply with Federal Primary Standards is currently being calculated by the United States Environmental Protection Agency. As noted above, their report will be sent directly to your agency. However, I would like to point out the complexity of determining the allowable sulfur content at each of the subject plants. Because of the proximity of the two plants the short term ambient levels of sulfur dioxide is a function of the emissions from both plants and other sources in the vicinity. The use of a higher sulfur fuel at one source will necessitate lower sulfur fuels at others. Therefore, specific levels for sulfur content of fuel for each source is difficult to ascertain.

There are essentially two ways to reduce the sulfur dioxide emissions from a fossil fuel burning power plant. The first way is to reduce the sulfur content of the fuel consumed, i.e. the burning of a low sulfur content fuel. The second method is to remove the sulfur dioxide from the exhaust gases, i.e. flue-gas desulfurization. When low sulfur fuels are not available the only alternative is flue-gas desulfurization. For the reasons more fully explained below, flue-gas desulfurization cannot be installed by July 1, 1975, the deadline set forth in the Florida Air Implementation Plan for compliance with ambient and emission standards. Technical experts within the Department state that it would take approximately three and a half years to install flue-gas desulfurization--way beyond the deadline. However, a more important consideration in the installation of flue-gas desulfurization is the physical limitations at the plant sites. There is simply no room available for the necessary facilities. The lack of space for flue-gas desulfurization facilities can be readily ascertained by a perusal of the enclosed blueprints of the subject facilities. Normally the installation of flue-gas clean-up facilities does not impose an economic hardship on utilities or their consumers, however, because of the space limitations of the subject plants it would be a hardship to require installation of the clean-up facilities. Tampa Electric has reported that they would have to close the subject plants if the use of low sulfur petroleum products were not allowed.

Mr. Thomas Wieker  
January 24, 1975  
Page Four

In your undated telegram to Mr. Hicks of Tampa Electric, a copy of which was received by the Department on January 16, 1975, it is stated that "It therefore appears that coal of a sufficiently low sulfur content would be a suitable fuel for the Gannon Station..." Because of the design characteristics of the furnaces at Gannon Station, the use of low sulfur coal will be limited. It will be used in Units 5 and 6. However in Units 1, 2, 3, and 4, suitable low sulfur fuel is not available. Please see enclosed coal design criteria for TECO Gannon Units 1 - 4 which are Babcock and Wilcox cyclone furnaces. Also enclosed is a copy of an evaluation of slag viscosity characteristics of coals for cyclone firing. As you can see from the enclosed review of Investigation of Low Sulfur Coal for Use by Tampa Electric Company there appears to be an insufficient supply of suitable low sulfur coal.

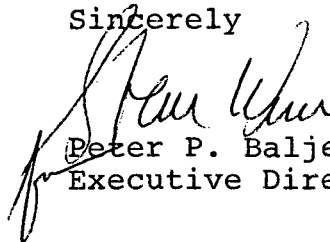
At the present time it would not be feasible to convert the Hooker Point units to coal. See the enclosed statement by A. L. Steinlen, Manager, Power Plant Engineering Projects, Tampa Electric Company.

In the aforesaid telegram you inferred that the Florida Department of Pollution Control must state a determination as to whether an undue economic hardship would result to the utility or its customers. This requirement is outside the certification requirements of F.E.A. regulations. 10 C.F.R. 215.6 requires certification relating only to air quality. As noted above, the denial of exceptions to 10 C.F.R. Sections 215.3 and 215.4 for the subject power plants would create a hardship on the Company and could cost substantial sums. Whether this constitutes an "undue economic hardship" as the term is used in F.E.A. Regulations must be determined by your agency. The Florida Department of Pollution Control concurs with the allegation that an "undue" economic hardship will result, however, the Department has not studied the matter in depth. A proper determination of whether an economic hardship will be imposed on the electric power consumers requires a detailed study of the utility's rate structure, financial situation, cost of all alternatives, etc.

Mr. Thomas Wieker  
January 24, 1975  
Page Five

I trust that the above explanation and the voluminous enclosures adequately provide the necessary information. If not please do not hesitate to contact me directly.

Sincerely



Peter P. Baljet  
Executive Director

PPB:BMW

Enclosures

cc: Steve Rabin  
Office of Exceptions and Appeals, Federal Energy Office

Jack Ravan  
Environmental Protection Agency

Roger Stewart  
Hillsborough County Environmental Protection Commission

W. E. Linne ✓  
West Central Regional Office

J. D. Hicks  
Tampa Electric Company