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Department of Environmental Protection  
SOUTHWEST DISTRICT

September 1, 1994

Mr. Jerry Kessel  
Florida Department of  
Environmental Protection  
3804 Coconut Palm Drive  
Tampa, Florida 33605

**Facsimile Transmission**  
**Certified Mail # P 278 133 799**  
**Return Receipt Requested**

**Re: Tampa Electric Company (TEC)**  
**F.J. Gannon Station**  
**Permit Amendment Request for Units 1, 3-6**

Dear Mr. Kessel:

Pursuant to your conversation with Janice Taylor on August 31, 1994, TEC requests Air Operating Permits No. AO29-204434, AO29-172179, AO29-160269, AO29-203511 and AO29-203512 be amended to be consistent with all of TEC's Air Operating Permits.

**Change Specific Condition from:**

This source shall be stack tested for particulate matter (under both soot blowing and non soot blowing operating conditions), sulfur dioxide and visible emissions at intervals of 12 months from the date of (Insert Source's Test Window) or within a ninety (90) day period prior to this date. All testing procedures shall be consistent with the requirements of Rule 17-2.700, F.A.C. (as applicable to fossil fuel steam generators under Rule 17-2.600(5) (a), F.A.C. in Table 700-1, F.A.C.). The DER Method 9 observation period shall be at least 60 minutes in duration and conducted during sootblowing conditions. In situations where DER Method No.9 visible emissions testing is not possible during particulate matter testing, such as under overcast days, independent visible emissions testing may be performed up to 5 days later. Reasons for non-simultaneous testing must be provided in the test report. Testing procedures shall be consistent with the requirements of Rule 17.2.700, F.A.C. A copy of the test data shall be submitted to both the Environmental Protection Commission of Hillsborough County and the Florida Department of Environmental Protection within 45 days of such testing. [Rules 17-2.700(2) (a)2. and 17-2.700(2) (a)4., F.A.C.]

**To:**

This source shall be stack tested for particulate matter and visible emissions, under both sootblowing and non-sootblowing operation conditions, at intervals of 12 months from the date of (Insert Source's Test Window), or within a 90 day period prior to that

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annual date. **A test under sootblowing conditions which demonstrates compliance with a non-sootblowing emission limitation will be accepted as proof of compliance with that non-sootblowing emission limitation.** The visible emissions DER Method No. 9 test period for this source shall be at least 60 minutes in duration. Visible emissions testing shall be conducted simultaneously with particulate matter testing unless visible emissions testing is not required. In situations where DER Method No. 9 visible emissions testing is not possible during particulate matter testing, such as under overcast days, independent visible emissions testing may be performed at a later date within but not more than 5 days. Reasons for non-simultaneous testing must be provided in the test report. Testing procedures shall be consistent with the requirements of Rule 17-2.700, F.A.C. A copy of the test data shall be submitted to both the Environmental Protection Commission of Hillsborough County and the Florida Department of Environmental Protection within 45 days of such testing.

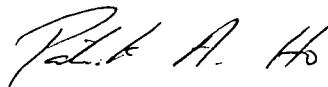
The following table lists each unit, the corresponding permit no. and applicable specific condition for your use.

<u>Unit No.</u>	<u>Permit No.</u>	<u>Specific Condition No.</u>
1	AO29-204434	6
3	AO29-172179	5
4	AO29-160269	5
5	AO29-203511	6
6	AO29-203512	6

As discussed, Gannon Unit 3 is currently scheduled for its annual stack test on September 20, 1994. It is TEC's understanding, that provided the Department has no objection to these amendments, the Department would allow Unit 3 to follow the proposed testing conditions prior to final permit amendment.

Should you require further information, please feel to call me or Ms. Taylor at 228-4839. TEC appreciates your expeditious review.

Sincerely,



Patrick A. Ho, P.E.  
Manager  
Environmental Planning

cc/QQ666

c: Richard Kirby, EPC-Tampa