



November 18, 1986

Dr. Richard D. Garrity  
Manager, Southwest District  
Florida Department of  
Environmental Regulation  
7601 Highway 301 North  
Tampa, Florida 33610

Re: Gannon Generating Station Unit No.1-Application  
for Operation Permit

Dear Dr. Garrity:

On October 20, 1986, we received the enclosed letter from representatives of the Hillsborough County Environmental Protection Commission (HCEPC) acknowledging receipt of our application for a DER operation permit for Gannon Generating Station Unit No. 1. The letter also apparently is intended to notify us that the permit application is being treated as incomplete pending receipt of additional information from Tampa Electric Company. As we have discussed with you and others at the DER in the past, we do not believe that the procedures being utilized by the DER and HCEPC with respect to permit applications complies with the requirements of Chapter 120 or 403 of the Florida Statutes concerning processing of permit applications. Consequently, it is our position that the enclosed letter did not toll the processing time and the permit application must be considered to be complete upon receipt by the DER.

Nevertheless, we have pursued the matters raised by HCEPC in the enclosure. As you can see, we were requested to address concerns raised by DER concerning a specific condition of a separate permit requiring submittal of procedures for determining sulfur variability of coal. This is a matter that had been under discussion for some time with representatives of DER in Tallahassee. Although we did not respond in writing to Mr. Campbell's July 29, 1986, letter, we had been in contact with DER concerning this matter.

As required in the enclosed letter, we discussed with Mr. Larry George of DER in Tallahassee the concerns of your agency regarding the sulfur variability protocol. Based upon this discussion we have determined that the issues relating to the protocol are not matters that will be pursued by DER in the context of the application for a permit to operate the Gannon Generating Station Unit No. 1. Expeditious processing of the permit application would therefore seem appropriate.

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Dr. Richard D. Garrity  
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Please let me know if you have any questions concerning the foregoing.

Sincerely,



A. Spencer Autry  
Manager  
Environmental Planning

ASA/jst/053/JS

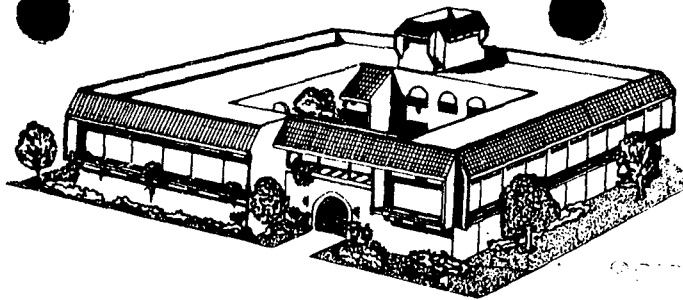
Enclosure

cc: Mr. Larry George  
Mr. Bill Thomas  
Mr. Iwan Choronenko

HILLSBOROUGH COUNTY  
ENVIRONMENTAL PROTECTION

COMMISSION

RODNEY COLSON  
RON GLICKMAN  
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TELEPHONE (813) 272-5960

October 17, 1986

Certified Mail# P 146 727 373

Mr. A. Spencer Autry, Manager  
Environmental Planning  
Tampa Electric Company  
Post Office Box 111  
Tampa, FL 33601

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ENVIRONMENTAL  
PLANNING

Dear Mr. Autry:

The staffs of Hillsborough County Environmental Protection Commission (HCEPC) and Florida Department of Environmental Regulation (FDER) acknowledge the receipt of your application for permit to operate TECO Gannon Station's coal fired unit designated as Unit #1.

I would like to call your attention to a July 29, 1986 letter written to you by Mr. Jerry Campbell of our Agency. The letter was written as a follow-up to specific condition 5.a. of permit A029-80043. The specific condition stipulates that the procedures for determining sulfur variability of the coal requires the approval of FDER and HCEPC. The procedures were submitted by your organization on December 11, 1984.

An attachment to Mr. Campbell's letter above lists FDER's concerns and recommendations in response to TECO's protocol. The letter requests that you review the recommendations suggested by FDER and that you determine whether either option is acceptable to TECO. The letter also requests for a meeting if you disagree to either option. Whether you agree or disagree, we still need you to inform us of your written response. As of this date, neither FDER nor our Agency have received any feedback from TECO regarding the letter.

We have reviewed 1984-1985 coal purchase reports provided by the Department of Energy, fuel reports obtained by the Florida Public Service Commission during an investigation of Gatliff Coal Co. (1984-1985), and a coal supply agreement between TECO and CAL-GLO COAL, Inc. which was also obtained from the Public Service Commission. Information in these documentations indicate that a significant percentage of the coal supplied to the Gannon station does not originate from

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the same mine. The information therefore leads us to speculate whether the variability of the Gannon coal indeed remains and will indeed continue to remain unchanged. FDER is concerned that the use of any different set of coals may cause greater fluctuation, not only in autocorrelation, but also in the mean and relative variability of the sulfur content. Thus, any statistical test based on the assumed constancy of these quantities would not mean very much when the assumptions are violated. Perhaps more powerful tests with less restrictive assumptions should be implemented to check the actual sulfur variability of the coal.

Based on the documentation mentioned above and based on FDER's concerns, we believe that the protocol submitted in December, 1984 provides HCEPC and FDER no reasonable assurance that SO<sub>2</sub> emissions from Unit #1 and SO<sub>2</sub> emissions from the Gannon station, during the burning of coal, are in compliance with the requirements of Subsection 17-2.600(5)(b)3.b.(i), F.A.C.. Pursuant to Section 17-4.07(1), F.A.C. and Chapter 1-3.21(2) of the HCEPC rules, you are notified that the application is deemed incomplete. Further processing of your operating permit application is temporarily held in abeyance until TECO shows HCEPC and the Department reasonable assurance that all applicable SO<sub>2</sub> emission standards are being met. Pursuant to Sec.17-4.07(2), F.A.C. we request that you respond to Mr Campbell's letter within 30 days of receipt of this letter.

If you have any questions regarding the concerns and recommendations posed by FDER, please contact Larry George of the Bureau of Air Quality Management in Tallahassee. Any other questions, please contact me or Jerry Campbell.

Sincerely,

*Victor San Agustin*

Victor San Agustin  
Air Engineering  
Hillsborough County Environmental  
Protection Commission

cc: Larry George, BAQM  
Bill Thomas, SWFDER