

D. E. R.

HILLSBOROUGH COUNTY
ENVIRONMENTAL PROTECTION COMMISSION

NOV 14 1986

CONVERSATION RECORD

SOUTH WEST DISTRICT
TAMPA

Date 11/10/86

Subject Gannon Compliance Plan

Time AM

Permit No. _____

Section _____

By Larry George

Telephone No. 278-1344

Representing BAQM

Telephoned Me Was Called Scheduled Meeting Unscheduled Meeting

Other Individuals Involved in Conversation/Meeting: _____

Summary of Conversation/Meeting: Larry says they met w/ TECO (J. Willam H. Smith + U.X.C. statisticians) on the 30th. TECO repeated their previous position + did not offer anything. The Bureau stated that the existing test is based on the coal population staying the same and it has changed since the original 78-79 study. Apparently, the mtg was not real productive. Larry proposes that the Bureau send TECO a ltr stating that: 1. the mtg will satisfy Victor's letter + the application is now complete. 2. because we require reasonable assurance we intend to add a condition to their permit. The condition would accept the seven day variability test as long as the weekly avg is less than 2.2 #SO₂/MMBTU. If the avg exceeds 2.2 or they fail the annual 7 day test, then further action on our part will be initiated. That action could include daily analysis at a station load of less than 83%. I said it sounded like

(continue on another sheet, if necessary)

Signature Jerry Campbell

Title _____

reasonable as long as we had the opportunity to
view a draft first. Larry concurred.



TO: TOM JOHN

November 18, 1986

D. E. R.

NOV 20 1986

SOUTH WEST DISTRICT
TAMPA

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.

Dr. Richard D. Garrity

November 18, 1986

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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 Chronenko