

Check Sheet

Company Name: Tampa Electric Company
Permit Number: AC 29-114676
PSD Number: _____
Permit Engineer: _____

Application:

- Initial Application
- Incompleteness Letters
- Responses
- Waiver of Department Action
- Department Response
- Other

Cross References:

- AO 29-094044
-
-

Intent:

- Intent to Issue
- Notice of Intent to Issue
- Technical Evaluation
- BACT or LAER Determination
- Unsigned Permit

Correspondence with:

- EPA
- Park Services
- Other
- Proof of Publication
- Petitions - (Related to extensions, hearings, etc.)
- Waiver of Department Action
- Other

Final

Determination:

- Final Determination
- Signed Permit
- BACT or LAER Determination
- Other

Post Permit Correspondence:

- Extensions/Amendments/Modifications
- Other

State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION



Interoffice Memorandum

TO: Dale Twachtmann
THRU: Howard Rhodes *[Signature]*
FROM: Clair Fancy *[Signature]*
DATE: May 14, 1987
SUBJ: Approval of Air Construction Permit

FOR ROUTING TO OTHER THAN THE ADDRESSEE	
To: _____	Locn: _____
To: _____	Locn: _____
To: _____	Locn: _____
From: _____	Date: _____

RECEIVED
MAY 18 1987

Office of the Secretary

Attached for your approval and signature is the air construction permit for Tampa Electric Company (TECO) to authorize the modification of the existing Gannon Station coal yard at the applicant's existing facility in Tampa, Hillsborough County, Florida. A meeting was held on April 28, 1987, with representatives of TECO and the Bureau to resolve any controversies associated with the proposed permit. TECO's comments are addressed in the Final Determination.

Day 90, after which the permit would be issued by default, is June 5, 1987.

The bureau recommends your approval and signature.

CF/ks

Attachment

P 408 531 217
 RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED—
 NOT FOR INTERNATIONAL MAIL

(See Reverse)

Sent to Jerry L. Williams	
Tampa Electric Company	
P.O. Box 111	
P.O., State and ZIP Code Tampa, FL 33601-0111	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to whom and Date Delivered	
Return Receipt Showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	\$
Postmark or Date 5/21/87 AC 29-114676	

PS Form 3800, Feb. 1982

PS Form 3811, July 1983 447-845

DOMESTIC RETURN RECEIPT

SENDER: Complete items 1, 2, 3 and 4.

Put your address in the "RETURN TO" space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for service(s) requested.

1. Show to whom, date and address of delivery.
 2. Restricted Delivery.

3. Article Addressed to:
 Jerry L. Williams
 Tampa Electric Company
 P.O. Box 111
 Tampa, Florida 33601-0111

4. Type of Service:	Article Number
<input type="checkbox"/> Registered <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD <input type="checkbox"/> Express Mail	P 408 531 217


Always obtain signature of addressee or agent and **DATE DELIVERED.**

5. Signature - Addressee
 X *H6*

6. Signature - Agent
 X *[Signature]*

7. Date of Delivery

8. Addressee's Address (ONLY if requested and fee paid)



File Copy

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32399-2400



BOB MARTINEZ
GOVERNOR
DALE TWACHTMANN
SECRETARY

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION
NOTICE OF PERMIT

Mr. Jerry L. Williams
Director, Environmental
Tampa Electric Company
P. O. Box 111
Tampa, Florida 33601-0111


May 14, 1987

Enclosed is construction permit No. AC 29-114676 to Tampa Electric Company for a modification to the Gannon Station coal yard to allow an increase in annual coal throughput to the yard to 2.85 million tons. This permit is issued pursuant to Section 403, Florida Statutes.

Any Party to this permit has the right to seek judicial review of the permit pursuant to Section 120.68, Florida Statutes, by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the Department in the Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400; and by filing a copy of the Notice of Appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The Notice of Appeal must be filed within 30 days from the date this permit is filed with the Clerk of the Department.

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION



C. H. Fancy, P.E.
Deputy Chief
Bureau of Air Quality Management

Copy furnished to:

Dan Williams
Victor San Agustin
Lynn F. Robinson, P.E.

CERTIFICATE OF SERVICE

This is to certify that this NOTICE OF PERMITS and all copies were mailed before the close of business on May 21, 1987 to the listed persons.

FILING AND ACKNOWLEDGEMENT
FILED, on this date, pursuant to
§120.52(9), Florida Statutes, with
the designated Department Clerk,
receipt of which is hereby
acknowledged.

R. Bruce Mitchell
Clerk

5/21/87
Date

Final Determination

Tampa Electric Company (TECO)
Tampa, Florida
Hillsborough County

Permit Number:
AC 29-114676

Florida Department of Environmental Regulation
Bureau of Air Quality Management
Central Air Permitting

May 14, 1987

Final Determination

The Technical Evaluation and Preliminary Determination for the modification of the Gannon Coal Yard to increase the annual throughput of coal to the coal yard from 2.4 million tons to 2.85 million tons was distributed on April 8, 1987. The Notice of Proposed Agency Action on the permit application was published in the Tampa Tribune on April 18, 1987. Following a meeting with representatives from the company on April 28, 1987, the Bureau received letters on April 29 and May 7, 1987, requesting a change to a requirement listed as a specific condition in the draft permit. No other comments were received. Day ninety, after which the permit would be issued by default, is June 5, 1987.

Our response to Tampa Electric Company's (TECO) comments are discussed below:

Tampa Electric Company requested a change in Specific Condition No. 5 and a clarification of the rationale for requiring this condition.

Specific Condition No. 5 states that water sprays, chemical wetting agents and stabilizers will be applied to both live and dead storage piles as necessary to maintain an opacity of less than or equal to 5 percent. TECO does not believe that water spray or chemical additives are necessary to meet the opacity limitation that is applicable to the storage pile. TECO's suggested change in wording states that water sprays or chemical wetting agents and stabilizers are acceptable methods to be used on both live and dead storage piles as necessary to maintain an opacity of less than or equal to 5 percent.

The bureau agrees with this request and has reworded Specific Condition No. 5 to reflect the suggested change. The Bureau's rationale for this condition is further clarified by stating that this condition is not to require purchasing or installation of on-site control systems, but to state what potential control methods are acceptable to the Department as corrective measures should the specified opacity standard not be met.

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32399-2400



BOB MARTINEZ
GOVERNOR
DALE TWACHTMANN
SECRETARY

PERMITTEE:
Tampa Electric Company
P. O. Box 111
Tampa, Florida 33601-0111

Permit Number: AC 29-114676
Expiration Date: September 30, 1987
County: Hillsborough
Latitude/Longitude: 27° 54' 25" N
82° 25' 21" W
Project: Gannon Station Coal Yard
Modification

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Rule(s) 17-2 and 17-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the Department and made a part hereof and specifically described as follows:

For the modification of the Gannon coal yard. Throughput of coal to the coal yard is to be increased from 2.4 million tons per year to 2.85 million tons per year.

The project shall be in accordance with the attached permit application, plans, documents, and drawings, except as noted in the Specific Conditions of this permit.

Attachments:

1. Hillsborough County's comments received on December 23, 1985.
2. Application to Construct Air Pollution Sources, DER Form 17-1.202(1), received January 10, 1986.
3. Hillsborough County's comments received on January 31, 1986.
4. DER's incompleteness letter to TECO, dated February 7, 1986.
5. TECO's response to DER, received on March 3, 1986.
6. DER's incompleteness letter to TECO, dated April 2, 1986.
7. TECO's response to DER, received on January 30, 1987.
8. Hillsborough County's comments received on March 27, 1987.
9. TECO's response to proposed construction permit and technical evaluation and preliminary determination, received on April 29, 1987.
10. TECO's response to proposed construction permit and technical evaluation and preliminary determination, received on May 7, 1987.

PERMITTEE:
Tampa Electric Company

Permit Number: AC 29-114676
Expiration Date: September 30, 1987

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth herein are "Permit Conditions" and as such are binding upon the permittee and enforceable pursuant to the authority of Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is hereby placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of the "Permit Conditions" by the permittee, its agents, employees, servants or representatives.

2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.

3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Nor does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit does not constitute a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.

4. This permit conveys no title to land or water, does not constitute state recognition or acknowledgement of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the state. Only the Trustees of the Internal Improvement Trust Fund may express state opinion as to title.

5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, plant or aquatic life or property and penalties therefore caused by the construction or operation of this permitted source, nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.

PERMITTEE:
Tampa Electric Company

Permit Number: AC 29-114676
Expiration Date: September 30, 1987

GENERAL CONDITIONS:

6. The permittee shall at all times properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.

7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law, access to the premises, at reasonable times, where the permitted activity is located or conducted for the purpose of:

- a. Having access to and copying any records that must be kept under the conditions of the permit;
- b. Inspecting the facility, equipment, practices, or operations regulated or required under this permit; and
- c. Sampling or monitoring any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately notify and provide the Department with the following information:

- a. a description of and cause of non-compliance; and
- b. the period of noncompliance, including exact dates and times; or, if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance.

PERMITTEE:
Tampa Electric Company

Permit Number: AC 29-114676
Expiration Date: September 30, 1987

GENERAL CONDITIONS:

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source, which are submitted to the Department, may be used by the Department as evidence in any enforcement case arising under the Florida Statutes or Department rules, except where such use is proscribed by Sections 403.73 and 403.111, Florida Statutes.

10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.

11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 17-4.12 and 17-30.30, as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.

12. This permit is required to be kept at the work site of the permitted activity during the entire period of construction or operation.

13. This permit also constitutes:

- () Determination of Best Available Control Technology (BACT)
- () Determination of Prevention of Significant Deterioration (PSD)
- () Compliance with New Source Performance Standards.

14. The permittee shall comply with the following monitoring and record keeping requirements:

- a. Upon request, the permittee shall furnish all records and plans required under Department rules. The retention period for all records will be extended automatically, unless otherwise stipulated by the Department, during the course of any unresolved enforcement action.

PERMITTEE:
Tampa Electric Company

Permit Number: AC 29-114676
Expiration Date: September 30, 1987

GENERAL CONDITIONS:

- b. The permittee shall retain at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation), copies of all reports required by this permit, and records of all data used to complete the application for this permit. The time period of retention shall be at least three years from the date of the sample, measurement, report or application unless otherwise specified by Department rule.
- c. Records of monitoring information shall include:
 - the date, exact place, and time of sampling or measurements;
 - the person responsible for performing the sampling or measurements;
 - the date(s) analyses were performed;
 - the person responsible for performing the analyses;
 - the analytical techniques or methods used; and
 - the results of such analyses.

15. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be submitted or corrected promptly.

SPECIFIC CONDITIONS:

1. Construction shall be in accordance with the attached permit application and additional information except as otherwise noted in the following conditions.
2. Reasonable precautions to prevent fugitive particulate emissions at the site, such as coating of roads and construction sites used by contractors and regrassing or watering areas of disturbed soils or coal, shall be taken by the permittee.
3. The hours of operation may be up to 24 hours per day, 7 days per week, 52 weeks per year or 8,760 hours per year.

PERMITTEE:
Tampa Electric Company

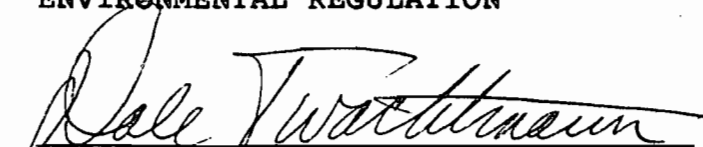
Permit Number: AC 29-114676
Expiration Date: September 30, 1987

SPECIFIC CONDITIONS:

4. Visible emissions caused by fugitive or unconfined particulate from coal handling systems and storage areas shall not be greater than 5 percent opacity at 90% of design capacity demonstrated in accordance with DER Method 9 (Rule 17-2.700(6)(a)9, FAC).
5. Water sprays or chemical wetting agents and stabilizers are acceptable methods to be used on both live and dead coal storage piles as necessary to maintain an opacity of less than or equal to 5 percent. Other appropriate methods may be applied to maintain this opacity, after they are approved by the Department.
6. Dead storage coal pile shall not be used on day to day activities. Its use shall be restricted to those times when normal deliveries cannot supply boiler requirements.
7. Prior to 90 days before the expiration of this permit, a complete application for an operating permit shall be submitted to the Hillsborough County Environmental Protection Commission office. Full operation of the source may then be conducted in compliance with the terms of this permit until its expiration or until receipt of an operating permit.
8. The annual coal throughput shall not exceed 2.85 million tons per year.

Issued this 19 day of May, 1987

STATE OF FLORIDA DEPARTMENT OF
ENVIRONMENTAL REGULATION


Dale Twachtmann, Secretary

___ pages attached.

PM
5-5-87
Tampa, FL

File Copy



DER

May 5, 1987

MAY 7 1987

BAQM

Mr. Clair H. Fancy
Deputy Chief
Bureau of Air Quality Management
Florida Department of
Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32301

RE: Tampa Electric Company - Comments on Proposed Construction Permit
Number AC29-114676

Dear Mr. Fancy:

On April 10, 1987, we received your letter transmitting the Department's intent to issue a permit for the modification to the Gannon Generating Station coal yard. We have reviewed the material and, in accordance with your letter and our meeting at your offices on April 28, 1987, we wish to have considered by the Department the comments that follow.

In the Technical Evaluation and Preliminary Determination prepared by the Department, on page 2 under Subheading III, Emissions and Controls, there is a paragraph that indicates that water sprays or chemical wetting agents and stabilizers would be applied to the storage piles during dry periods to maintain an opacity of less than or equal to five percent, and that this condition is necessary to justify the 50 to 70 percent control efficiencies that apply to the live and dead coal storage piles at the facility. Based on our recent discussions with the Department, it is our understanding that the rationale for specifying additional coal pile conditions is to provide acceptable control methods that may be used at the facility as corrective measures if opacity standards cannot be met. This condition also provides the Department with reasonable assurance that Tampa Electric will maintain acceptable particulate emissions. Wet sprays, chemical wetting agents or stabilizers have not been brought to our attention as means to justify control efficiencies. In addition, spraying on dry days when opacity standards can be maintained seems overly burdensome and contrary to our past discussions. We feel this rationale will add confusion to the intent of Specific Condition #5 of the proposed construction permit. It would be most helpful if you could provide us with a clarification of the rationale in your final evaluation.

On page 6 of 6 in the proposed permit, Specific Condition #5 states that water sprays or chemical wetting agents and stabilizers will be applied to the live and dead coal storage piles as necessary to maintain the opacity of less than or equal to five percent, and that other methods may be utilized if approved by the Department. We are concerned with the language of this condition and its future implications. As we have discussed with

Mr. Fancy
April, 1987
Page Two

the Department, we do not believe that water spray systems or other chemical additives are necessary to meet the opacity limitation that is applicable to the storage pile. Consequently, we question the appropriateness of this condition in the permit. If, however, the condition remains we suggest a minor change as follows:

5. Water sprays or chemical wetting agents and stabilizers ~~will-be-applied-to~~ are acceptable methods to be used on both live and dead coal storage piles as necessary to maintain an opacity of less than or equal to 5 percent. Other appropriate methods may also be applied to maintain this opacity, after they are approved by the Department.

(Strike-throughs are suggested deletions;
underlined text is suggested addition.)

The above change will clarify what was explained to us at our April 28, 1987 meeting, that the condition is not to require purchasing or installation of on-site control systems, but to state what potential control methods are acceptable to the Department, if necessary.

We appreciate the time and effort the Department has put into reviewing our request for modification, and your help in resolving our concerns. We would like to thank you and Steve Smallwood for meeting with us on such short notice to help us resolve our concerns. If you have any questions, please give me a call.

Sincerely,



Jerry Williams
Director
Environmental

JLW/jst/025/LL

cc: Steve Smallwood (FDER, Tallahassee)

copied:

Cleve Holladay 5-7-87 BSM

~~Letter~~
~~Letter~~

5-7-87

I have copied Cleve.
Return for filing.

Bm

File Copy

DER

DRAFT

APR 29 1987

BAQM

April, 1987

Mr. Clair H. Fancy
Deputy Chief
Bureau of Air Quality Management
Florida Department of
Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32301

RE: Tampa Electric Company - Comments on Proposed Construction Permit
Number AC29-114676

Dear Mr. Fancy:

On April 10, 1987, we received your letter transmitting the Department's intent to issue a permit for the modification to the Gannon Generating Station coal yard. We have reviewed the material and, in accordance with your letter and our meeting at your offices on April 28, 1987, we wish to have considered by the Department the comments that follow.

In the Technical Evaluation and Preliminary Determination prepared by the Department, on page 2 under Subheading III, Emissions and Controls, there is a paragraph that indicates that water sprays or chemical wetting agents and stabilizers would be applied to the storage piles during dry periods to maintain an opacity of less than or equal to five percent, and that this condition is necessary to justify the 50 to 70 percent control efficiencies that apply to the live and dead coal storage piles at the facility. Based on our recent discussions with the Department, it is our understanding that the rationale for specifying additional coal pile conditions is to provide acceptable control methods that may be used at the facility as corrective measures if opacity standards cannot be met. This condition also provides the Department with reasonable assurance that Tampa Electric will maintain acceptable particulate emissions. Wet sprays, chemical wetting agents or stabilizers have not been brought to our attention as means to justify control efficiencies. In addition, spraying on dry days when opacity standards can be maintained seems overly burdensome and contrary to our past discussions. We feel this rationale will add confusion to the intent of Specific Condition #5 of the proposed construction permit. It would be most helpful if you could provide us with a clarification of the rationale in your final evaluation.

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DRAFT

Mr. Fancy
 April, 1987
 Page Two

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 underlined text is suggested addition.)

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We appreciate the time and effort the Department has put into reviewing our request for modification, and your help in resolving our concerns. We would like to thank you and Steve Smallwood for meeting with us on such short notice to help us resolve our concerns. If you have any questions, please give me a call.

Sincerely,

Jerry

JLW/jst/025/LL

copied:

Cleve Holladay }
 William C. Thomas } 4-29-87 RAM
 Iwan Choronenko }

Julia Cobb, Esquire
April 24, 1987
Page 2

Please let me know if you have any questions.

Sincerely,

A handwritten signature in cursive script, appearing to read "Lawrence N. Curtin".

Lawrence N. Curtin

LNC/jrh

cc: Mr. Jerry L. Williams
Mr. Patrick Ho
Mr. Steve Smallwood

LAW OFFICES
AURELL, FONS, RADEY & HINKLE
SUITE 1000, MONROE-PARK TOWER
101 NORTH MONROE STREET
POST OFFICE DRAWER 11307
TALLAHASSEE, FLORIDA 32302

TELEPHONE 681-7766
AREA CODE 904

April 24, 1987

DER

APR 28 1987

BAQM

HAND DELIVERY

Julia Cobb, Esquire
Florida Department of
Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32301

Re: Tampa Electric Company -- Modification to Gannon
Generating Station Coal Yard -- DER File No. AC29-
114676

Dear Julia:

By letter dated April 8, 1987, Tampa Electric Company was transmitted a copy of the Technical Evaluation and Preliminary Determination and a proposed permit to construct a modification to its Gannon Generating Station coal yard facility in Hillsborough County, Florida. The documents indicate that the permit would become final within 14 days of receipt of the notice unless some action was taken by Tampa Electric Company. The Company has reviewed the proposed permit conditions and has questions concerning the propriety of some of the conditions regulating opacity and related matters.

Representatives of Tampa Electric Company have discussed the situation with Steve Smallwood, the Chief of the Bureau of Air Quality Management, concerning a possible resolution. A meeting is scheduled for next week in Tallahassee to discuss the situation in more detail. In the meantime, it is necessary to either request an administrative hearing on the permit or an extension of time in which to file an administrative hearing request to preserve the Company's rights. Mr. Smallwood has no objection to the extension request in light of the circumstances.

Accordingly, pursuant to the provisions of Rule 17-103.070, Florida Administrative Code (FAC), we hereby request that the Department enter an order extending until May 22, 1987, the time to petition for an administrative hearing on the referenced Notice of Intent.

~~BITT~~
Files

File Copy



April 23, 1987

DER
APR 27 1987
JAQM

Mr. Clair Fancy, P.E.
Florida Department of
Environmental Regulation
Twin Towers Office Bldg.
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Re: F.J. Gannon Coal Yard
AC 29-114676
Proof of Publication

Dear Mr. Fancy:

Please find attached a notarized proof of publication of a Notice of Proposed Agency Action regarding the above referenced permit. The Public Notice was published in the Tampa Tribune newspaper on April 18, 1987.

Please call me if you have any questions.

Sincerely,

Jerry L. Williams
Director
Environmental

JLW/jst/022/LL

Attachment

THE TAMPA TRIBUNE

Published Daily
Tampa, Hillsborough County, Florida

State of Florida }
County of Hillsborough } 68.

Before the undersigned authority personally appeared
G. T. Gleason, who on oath says that he is, Controller of The Tampa Tribune, a daily
newspaper published at Tampa in Hillsborough County, Florida; that the attached copy
of advertisement being a

LEGAL NOTICE

in the matter of NOTICE OF INTENT

was published in said newspaper in the issues of
APRIL 18, 1987

Affiant further says that the said The Tampa Tribune is a newspaper published at
Tampa, in said Hillsborough County, Florida, and that the said newspaper has
heretofore been continuously published in said Hillsborough County, Florida, each day
and has been entered as second class mail matter at the post office in Tampa, in said
Hillsborough County, Florida, for a period of one year next preceding the first publica-
tion of the attached copy of advertisement; and affiant further says that he has neither
paid nor promised any person, firm, or corporation any discount, rebate, commission or
refund for the purpose of securing this advertisement for publication in the said
newspaper.

G. T. Gleason

Sworn to and subscribed before me, this 18th day
of APRIL, A.D. 19 87

Hester A. Realta

(SEAL)

Notary Public, State of Florida
My Commission Expires Nov. 23, 1990
Bonded thru Troy Fahn - Insurance Inc.

Department of Environmental
Regulation
Notice of Intent

The Department gives notice of its intent to issue a permit to Tampa Electric Company to construct a modification to the Gannon Station coal yard to allow an increase in annual coal throughput to the yard to 2.85 million tons in Tampa, Hillsborough County, Florida.

A determination of Best Available Control Technology was not required.

Persons whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative determination (hearing) in accordance with Section 120.57, Florida Statutes. The petition must conform to the requirements of Chapters 17-103 and 28-5, Florida Administrative Code, and must be filed (received) in the Department's Office of General Counsel, 2600 Blair Stone Road, Twin Towers Office Building, Tallahassee, Florida 32399-2400, within fourteen (14) days of publication of this notice. Failure to file a petition within this time period constitutes a waiver of any right such person has to request an administrative determination (hearing) under Section 120.57, Florida Statutes.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the proposed agency action. Therefore, persons who may not wish to file a petition may wish to intervene in the proceeding. A petition for intervention must be filed pursuant to Rule 28-5.207, Florida Administrative Code, at least five (5) days before the final hearing and be filed with the hearing officer if one has been assigned at the Division of Administrative Hearings, Department of Administration, 2009, Apalachee Parkway, Tallahassee, Florida 32301. If no hearing officer has been assigned, the petition is to be filed with the Department's Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400. Failure to petition to intervene within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, Florida Statutes.

The application is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

DER Bureau of Air Quality Management
Twin Towers -
2600 Blair Stone Rd.
Tallahassee, Florida
32399-2400
DER Southwest District
7601 Highway 301 North
Tampa, Florida 33610
Hillsborough County
Environmental
Protection Commission
1900 9th Avenue
Tampa, Florida 33605

Any person may send written comments to Mr. Bill Thomas at the department's Tallahassee address. All comments mailed within 14 days of the publication of this notice will be considered in the department's final determination.
2153 4/18/87

PS Form 3811, July 1983 447-845

SENDER: Complete items 1, 2, 3 and 4.
 Put your address in the "RETURN TO" space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for service(s) requested.

1. Show to whom, date and address of delivery.
 2. Restricted Delivery.

3. Article Addressed to:
 Jerry L. Williams
 Tampa Electric Company
 P.O. Box 111
 Tampa, FL. 33601-0111

4. Type of Service:	Article Number
<input type="checkbox"/> Registered <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD <input type="checkbox"/> Express Mail	P 408 531 575

Always obtain signature of addressee or agent and **DATE DELIVERED.**

5. Signature - Addressee
 X

6. Signature - Agent
 X *Kenna Bullus*

7. Date of Delivery

8. Addressee's Address (ONLY if requested and fee paid)

DOMESTIC RETURN RECEIPT

P 408 531 575
 RECEIPT FOR CERTIFIED MAIL
 NO INSURANCE COVERAGE PROVIDED—
 NOT FOR INTERNATIONAL MAIL
 (See Reverse)

Sent to	
Jerry L. Williams	
Tampa Electric Company	
P.O. Box 111	
P.O., State and ZIP Code	
Tampa, FL 33601-0111	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to whom and Date Delivered	
Return Receipt Showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	\$
Postmark or Date	
4/8/87	
AC 29-114676	

PS Form 3800, Feb. 1982

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32399-2400



BOB MARTINEZ
GOVERNOR
DALE TWACHTMANN
SECRETARY

April 8, 1987

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

Mr. Jerry L. Williams
Director, Environmental
Tampa Electric Company
P. O. Box 111
Tampa, Florida 33601-0111

Dear Mr. Williams:

Attached is one copy of the Technical Evaluation and Preliminary Determination, and proposed permit to construct a modification to the Gannon Station coal yard to allow an increase in annual coal throughput to the yard to 2.85 million tons.

Please submit, in writing, any comments which you wish to have considered concerning the department's proposed action to Mr. Bill Thomas of the Bureau of Air Quality Management.

Sincerely,

C. H. Fancy, P.E.
Deputy Chief
Bureau of Air Quality
Management

CHF/ks

Attachments

cc: Dan Williams
Victor San Agustin
Lynn F. Robinson, P.E.

BEFORE THE STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

In the Matter of
Application for Permit by:

Tampa Electric Company (TECO)
P. O. Box 111
Tampa, Florida 33601-0111

DER File No. AC 29-114676

INTENT TO ISSUE

The Department of Environmental Regulation hereby gives notice of its intent to issue a permit (copy attached) for the proposed project as detailed in the application specified above. The Department is issuing this Intent to Issue for the reasons stated in the attached Technical Evaluation and Preliminary Determination.

The applicant, Tampa Electric Company (TECO) applied on January 10, 1986, to the Department of Environmental Regulation for a permit to modify the annual coal throughput to their Gannon Station coal yard. The throughput will be increased to 2.85 million tons per year.

The Department has permitting jurisdiction under Chapter 403, Florida Statutes and Florida Administrative Code Rules 17-2 and 17-4. The project is not exempt from permitting procedures. The Department has determined that an air construction permit was needed for the proposed work.

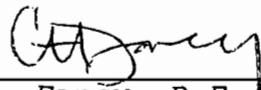
Pursuant to Section 403.815, F.S. and DER Rule 17-103.150, FAC, you (the applicant) are required to publish at your own expense the enclosed Notice of Proposed Agency Action on permit application. The notice must be published one time only in a section of a major local newspaper of general circulation in the county in which the project is located and within thirty (30) days from receipt of this intent. Proof of publication must be provided to the Department within seven days of publication of

the notice. Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permit.

The Department will issue the permit with the attached conditions unless petition for an administrative proceeding (hearing) is filed pursuant to the provisions of Section 120.57, F.S. A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes. Petitions must comply with the requirement of Florida Administrative Code Rules 17-103.155 and 28-5.201 (copies enclosed) and be filed with (received by) the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400. Petitions filed by the permit applicant must be filed within fourteen (14) days of receipt of this intent. Petitions filed by other persons must be filed within fourteen (14) days of publication of the public notice or within fourteen (14) days of receipt of this intent, whichever first occurs. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, Florida Statutes, concerning the subject permit application. Petitions which are not filed in accordance with the above provisions will be dismissed.

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION



C. H. Fancy, P.E.
Deputy Chief
Bureau of Air Quality
Management

Copies furnished to:

Jerry Williams
Dan Williams
Victor San Augustin

CERTIFICATE OF SERVICE

The undersigned duly designated deputy clerk hereby certifies that this NOTICE OF INTENT TO ISSUE and all copies were mailed before the close of business on April 8, 1987.

FILING AND ACKNOWLEDGEMENT
FILED, on this date, pursuant to
§120.52(9), Florida Statutes, with
the designated Department Clerk,
receipt of which is hereby
acknowledged.

R. Bruce Atchell
Clerk

4/8/87
Date

State of Florida
Department of Environmental Regulation
Notice of Intent

The Department gives notice of its intent to issue a permit to Tampa Electric Company to construct a modification to the Gannon Station coal yard to allow an increase in annual coal throughput to the yard to 2.85 million tons in Tampa, Hillsborough County, Florida.

A determination of Best Available Control Technology was not required.

Persons whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative determination (hearing) in accordance with Section 120.57, Florida Statutes. The petition must conform to the requirements of Chapters 17-103 and 28-5, Florida Administrative Code, and must be filed (received) in the Department's Office of General Counsel, 2600 Blair Stone Road, Twin Towers Office Building, Tallahassee, Florida 32399-2400, within fourteen (14) days of publication of this notice. Failure to file a petition within this time period constitutes a waiver of any right such person has to request an administrative determination (hearing) under Section 120.57, Florida Statutes.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the proposed agency action. Therefore, persons who may not wish to file a petition may wish to intervene in the proceeding. A petition for intervention must be filed pursuant to Rule 28-5.207, Florida Administrative Code, at least five (5) days before the final hearing and be filed with the hearing officer if one has been assigned at the Division of Administrative Hearings, Department of Administration, 2009, Apalachee Parkway, Tallahassee, Florida 32301. If no hearing officer has been assigned, the petition is to be filed with the Department's Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400. Failure to petition to intervene within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, Florida Statutes.

The application is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

DER Bureau of Air Quality Management
Twin Towers - 2600 Blair Stone Rd.
Tallahassee, Florida 32399-2400

DER Southwest District
7601 Highway 301 North
Tampa, Florida 33610

Hillsborough County Environmental
Protection Commission
1900 9th Avenue
Tampa, Florida 33605

Any person may send written comments on the proposed action to Mr. Bill Thomas at the department's Tallahassee address. All comments mailed within 14 days of the publication of this notice will be considered in the department's final determination.

RULES OF THE ADMINISTRATIVE COMMISSION
MODEL RULES OF PROCEDURE
CHAPTER 28-5
DECISIONS DETERMINING SUBSTANTIAL INTERESTS

28-5.15 Requests for Formal and Informal Proceedings

- (1) Requests for proceedings shall be made by petition to the agency involved. Each petition shall be printed, typewritten or otherwise duplicated in legible form on white paper of standard legal size. Unless printed, the impression shall be on one side of the paper only and lines shall be double spaced and indented.
- (2) All petitions filed under these rules should contain:
 - (a) The name and address of each agency affected and each agency's file or identification number, if known;
 - (b) The name and address of the petitioner or petitioners;
 - (c) All disputed issues of material fact. If there are none, the petition must so indicate;
 - (d) A concise statement of the ultimate facts alleged, and the rules, regulations and constitutional provisions which entitle the petitioner to relief;
 - (e) A statement summarizing any informal action taken to resolve the issues, and the results of that action;
 - (f) A demand for the relief to which the petitioner deems himself entitled; and
 - (g) Such other information which the petitioner contends is material.

Technical Evaluation
and
Preliminary Determination

Tampa Electric Company (TECO)
Tampa, Florida
Hillsborough County

Permit Number:
AC 29-114676

Florida Department of Environmental Regulation
Bureau of Air Quality Management
Central Air Permitting

April 8, 1987

I. Applicant and Source Location

A. Applicant

Tampa Electric Company (TECO)
P. O. Box 111
Tampa, Florida 33601-0111

B. Location

The proposed modification will occur at Tampa Electric Company's Gannon station in Hillsborough County. The plant is located on Port Sutton Road in Tampa, Florida. The UTM coordinates of the plant are: zone 360.0 km East and 3087.5 km North.

II. Project Description

The Gannon coal yard facility originally supplied coal to Gannon Units 5 and 6. In 1983, TECO received a construction permit (AC 29-61276) to allow modification of the Gannon coal yard to also supply Gannon Units 1, 2, 3, and 4 with an annual coal throughput to the coal yard of 2.4 million tons per year. The modification proposed now will increase the coal throughput to 2.85 million tons per year.

This modification will allow for maximum stockpiling and reclaiming of various sulfur content coals and will provide the flexibility necessary for blending the coals to achieve the required sulfur content and heating values.

III. Emissions and Controls

As proposed by TECO, this modification to increase coal throughput to the coal yard will result in an increase in fugitive dust emissions from the coal handling system and storage areas. The increase in particulate emissions from this modification and the earlier modification to the coal yard permitted in 1983, will result in an increase in particulate matter, which is less than the applicable significant emission increase of 25 tons per year (Table 500-2, 17-2.500, FAC).

The particulate emissions from the proposed modification in annual coal throughput to 2.85 million tons per year and the particulate emissions from the coal yard which existed prior to the 1983 modification, as submitted by TECO, are as follows:

System	Total	
	tons/yr	lbs/hr
Existing	156.97	43.30
Proposed	180.94	50.35
Increase	23.97	7.05

Mitigation and control measures specified by the 1983 construction permit are still applicable to the Gannon coal facility with this proposed modification. These measures are the following:

- (1) The belts conveying material being enclosed by a hood cover.
- (2) Underground reclaim systems being used for coal stack out.
- (3) Wet spray dust suppression at the new transfer points providing additional control, especially during dry periods.
- (4) Coal pile management being improved by (a) direct throughput (10%) to the bunkers, (b) ability to stack out above the underground reclaim system, thus eliminating bulldozer activity during unloading to the live storage pile, and (c) by reclaiming from storage through an increased number of reclaim areas.

An additional condition is being required for this modification: water sprays or chemical wetting agents and stabilizers will be applied to storage piles during dry periods to maintain an opacity of less than or equal to 5 percent. This condition is necessary to justify the 50% and 70% control efficiencies claimed by TECO for their live and dead coal storage piles, respectively.

IV. Rule Applicability

The proposed project is subject to preconstruction review under the provisions of Chapter 403, Florida Statutes, and Rule 17-2, Florida Administrative Code (FAC), because it constitutes a modification to a major facility as defined in Rule 17-2.100.

The modification to the coal yard is within the particulate nonattainment area in Hillsborough County. The particulate emission increase will be less than 25 tons per year, the applicable significant emission rate listed in Table 500-2. Therefore, the modification is not subject to the Preconstruction Review Requirements 17-2.510(4).

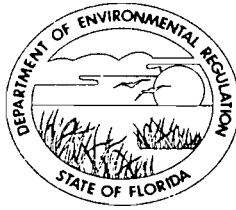
The proposed and existing coal handling systems are subject to the RACT rule, Section 17-2.650(2)(c)11, which limits visible emissions to 5%.

V. Conclusions

Based on the Technical Evaluation of the application and the additional information submitted by TECO, the department has made a preliminary determination that compliance with Florida's air pollution regulations will be achieved, provided certain general and specific conditions are met as set forth in the attached draft permit (AC 29-114676).

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32399-2400



BOB MARTINEZ
GOVERNOR
DALE TWACHTMANN
SECRETARY

PERMITTEE:
Tampa Electric Company
P. O. Box 111
Tampa, Florida 33601-0111

Permit Number: AC 29-114676
Expiration Date: September 30, 1987
County: Hillsborough
Latitude/Longitude: 27° 54' 25" N
82° 25' 21" W
Project: Gannon Station Coal Yard
Modification

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Rule(s) 17-2 and 17-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the department and made a part hereof and specifically described as follows:

For the modification of the Gannon coal yard. Throughput of coal to the coal yard is to be increased from 2.4 million tons per year to 2.85 million tons per year.

The project shall be in accordance with the attached permit application, plans, documents, and drawings, except as noted in the specific conditions of this permit.

Attachments:

1. Hillsborough County's comments received on December 23, 1985.
2. Application to Construct Air Pollution Sources, DER Form 17-1.202(1), received January 10, 1986.
3. Hillsborough County's comments received on January 31, 1986.
4. DER's incompleteness letter to TECO, dated February 7, 1986.
5. TECO's response to DER, received on March 3, 1986.
6. DER's incompleteness letter to TECO, dated April 2, 1986.
7. TECO's response to DER, received on January 30, 1987.
8. Hillsborough County's comments received on March 27, 1987.

PERMITTEE:
Tampa Electric Company

Permit Number: AC 29-114676
Expiration Date: September 30, 1987

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth herein are "Permit Conditions" and as such are binding upon the permittee and enforceable pursuant to the authority of Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is hereby placed on notice that the department will review this permit periodically and may initiate enforcement action for any violation of the "Permit Conditions" by the permittee, its agents, employees, servants or representatives.
2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the department.
3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Nor does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit does not constitute a waiver of or approval of any other department permit that may be required for other aspects of the total project which are not addressed in the permit.
4. This permit conveys no title to land or water, does not constitute state recognition or acknowledgement of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the state. Only the Trustees of the Internal Improvement Trust Fund may express state opinion as to title.
5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, plant or aquatic life or property and penalties therefore caused by the construction or operation of this permitted source, nor does it allow the permittee to cause pollution in contravention of Florida Statutes and department rules, unless specifically authorized by an order from the department.

PERMITTEE:
Tampa Electric Company

Permit Number: AC 29-114676
Expiration Date: September 30, 1987

GENERAL CONDITIONS:

6. The permittee shall at all times properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by department rules.

7. The permittee, by accepting this permit, specifically agrees to allow authorized department personnel, upon presentation of credentials or other documents as may be required by law, access to the premises, at reasonable times, where the permitted activity is located or conducted for the purpose of:

- a. Having access to and copying any records that must be kept under the conditions of the permit;
- b. Inspecting the facility, equipment, practices, or operations regulated or required under this permit; and
- c. Sampling or monitoring any substances or parameters at any location reasonably necessary to assure compliance with this permit or department rules.

Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately notify and provide the department with the following information:

- a. a description of and cause of non-compliance; and
- b. the period of noncompliance, including exact dates and times; or, if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance.

PERMITTEE:
Tampa Electric Company

Permit Number: AC 29-114676
Expiration Date: September 30, 1987

GENERAL CONDITIONS:

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the department for penalties or revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source, which are submitted to the department, may be used by the department as evidence in any enforcement case arising under the Florida Statutes or department rules, except where such use is proscribed by Sections 403.73 and 403.111, Florida Statutes.

10. The permittee agrees to comply with changes in department rules and Florida Statutes after a reasonable time for compliance, provided however, the permittee does not waive any other rights granted by Florida Statutes or department rules.

11. This permit is transferable only upon department approval in accordance with Florida Administrative Code Rules 17-4.12 and 17-30.30, as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the department.

12. This permit is required to be kept at the work site of the permitted activity during the entire period of construction or operation.

13. This permit also constitutes:

- () Determination of Best Available Control Technology (BACT)
- () Determination of Prevention of Significant Deterioration (PSD)
- () Compliance with New Source Performance Standards.

14. The permittee shall comply with the following monitoring and record keeping requirements:

- a. Upon request, the permittee shall furnish all records and plans required under department rules. The retention period for all records will be extended automatically, unless otherwise stipulated by the department, during the course of any unresolved enforcement action.

PERMITTEE:
Tampa Electric Company

Permit Number: AC 29-114676
Expiration Date: September 30, 1987

GENERAL CONDITIONS:

- b. The permittee shall retain at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation), copies of all reports required by this permit, and records of all data used to complete the application for this permit. The time period of retention shall be at least three years from the date of the sample, measurement, report or application unless otherwise specified by department rule.
- c. Records of monitoring information shall include:
 - the date, exact place, and time of sampling or measurements;
 - the person responsible for performing the sampling or measurements;
 - the date(s) analyses were performed;
 - the person responsible for performing the analyses;
 - the analytical techniques or methods used; and
 - the results of such analyses.

15. When requested by the department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the department, such facts or information shall be submitted or corrected promptly.

SPECIFIC CONDITIONS:

1. Construction shall be in accordance with the attached permit application and additional information except as otherwise noted in the following conditions. This permit only amends construction permit AC 29-61276 with respect to an increase in coal throughput. All mitigation and control measures previously specified by AC 29-61276 are still applicable to the Gannon Coal facility.
2. Reasonable precautions to prevent fugitive particulate emissions at the site, such as coating of roads and construction sites used by contractors and regrassing or watering areas of disturbed soils or coal, shall be taken by the permittee.
3. The hours of operation may be up to 24 hours per day, 7 days per week, 52 weeks per year or 8,760 hours per year.

PERMITTEE:
Tampa Electric Company

Permit Number: AC 29-114676
Expiration Date: September 30, 1987

SPECIFIC CONDITIONS:

4. Visible emissions caused by fugitive or unconfined particulate from coal handling systems and storage areas shall not be greater than 5 percent opacity at 90% of design capacity demonstrated in accordance with DER Method 9 (Rule 17-2.700(6)(a)9, FAC).
5. Water sprays or chemical wetting agents and stabilizers will be applied to both live and dead coal storage piles as necessary to maintain an opacity of less than or equal to 5 percent. Other appropriate methods may be applied to maintain this opacity, after they are approved by the Department.
6. Dead storage coal pile shall not be used on day to day activities. Its use shall be restricted to those times when normal deliveries cannot supply boiler requirements.
7. Prior to 90 days before the expiration of this permit, a complete application for an operating permit shall be submitted to DER Southwest District office. Full operation of the source may then be conducted in compliance with the terms of this permit until its expiration or until receipt of an operating permit.
8. The annual coal throughput shall not exceed 2.85 million tons per year.

Issued this _____ day of _____, 19____

STATE OF FLORIDA DEPARTMENT OF
ENVIRONMENTAL REGULATION

Dale Twachtman, Secretary

_____ pages attached.

ENVIRONMENTAL PROTECTION COMMISSION

OF
HILLSBOROUGH COUNTY

RODNEY COLSON
PAM IORIO
RUBIN E. PADGETT
JAN KAMINIS PLATT
HAVEN POE
JAMES D. SELVEY
PICKENS C. TALLEY II



ROGER P. STEWART
DIRECTOR

1900 - 9th AVE
TAMPA, FLORIDA 33605

TELEPHONE (813) 272-5960

DER

MAR 27 1987

BAQM

MEMORANDUM

Date March 26, 1987

To Cleve Holliday thru Bill Thomas

From Victor San Agustin thru Jerry Campbell ^{VSA} *JC*

Subject: Permit Modification to TECO's Gannon Coal Yard

The purpose of this memo is to request that you incorporate our comments to the above permit modification project.

Due to the bare nature of the source description page of AC29-61276, we recommend that description page of permit AC29-114676 be drafted in a manner similar to the existing operation permit A029-94044. For the source description page, we suggest the following wording:

"For the modification of the bituminous coal yard serving the Gannon station units one through six. The modification is for the increase of coal through put rate from 2.4 million tons per year to 2.85 million tons per year. All yard activities including barge and railcar unloading of coal, truck unloading of limestone, and transfer and storage of both materials are covered under this permit. This includes but is not limited to the following:

<u>Source Designator</u>	<u>Particulate Control Method</u>	<u>Efficiency Rating at Design Capacity</u>	<u>Maximum Design Material Handling Rate (TPH)</u>
Barge to East Grab Bucket	Grab Bucket	--	1500
East Grab Bucket to East Hopper	Windshield	25%	1500
Barge to West Grab Bucket	Grab Bucket	--	1500
West Grab Bucket to West Hopper	Windshield	25%	1500
East Hopper to Feeder	--	--	1500



USE THIS AIRBILL FOR DOMESTIC SHIPMENTS WITHIN THE CONTINENTAL U.S.A., ALASKA AND HAWAII.
COMPLETE PURPLE AREAS. FOR ASSISTANCE, CALL 800-238-5355 TOLL FREE.
SEE BACK OF FORM SET FOR COMPLETE PREPARATION INSTRUCTIONS.

SENDER'S FEDERAL EXPRESS ACCOUNT NUMBER

1149-3914-5

DATE

3/26/87

From (Your Name) **VICTOR SALAMONSON** Your Phone Number (Very Important) **(813) 973-7960**

Company **ENVIRONMENTAL PROTECTION COMMISSION OF FLORIDA** Department/Floor No. _____

Street Address **1900 9th AVE**

City **TAMPA** State **FL**

To (Recipient's Name) **CLEVE HOLLIDAY** Recipient's Phone Number (Very Important) **(904) 411-1344**

Company **BUREAU OF AIR QUALITY MANAGEMENT, CAPS** Department/Floor No. _____

Exact Street Address (Use of P.O. Boxes or P.O. Zip Codes Will Delay Delivery And Result in Extra Charge.) **2600 BLAIR STONE ROAD**

City **TALLAHASSEE** State **FL**

AIRBILL NO. **710361982**

ZIP Zip Code Required For Correct Invoicing

33605

32301

ZIP Street Address Zip Required (No P.O. Box Zip Code)

3 YOUR BILLING REFERENCE INFORMATION (FIRST 24 CHARACTERS WILL APPEAR ON INVOICE.)
ENVIRONMENTAL PROTECTION COMMISSION OF FLORIDA

HOLD FOR PICK-UP AT THIS FEDERAL EXPRESS STATION:
Street Address (See Service Guide or Call 800-238-5355)

PAYMENT Bill Shipper Bill Recipient's FedEx Acct. No. Bill 3rd Party FedEx Acct. No. Bill Credit Card

Cash FedEx Acct. No. or Major Credit Card No. **1149-3914-5**

Federal Express Use

Base Charges

Declared Value Charge

Origin Agent Charge

4 SERVICES CHECK ONLY ONE BOX

1 **PRIORITY 1** Overnight Delivery Using Your Packaging
2 **Courier-Pak** Overnight Envelope 12" x 15 1/2"
3 **Overnight Box** 12 1/2" x 17 1/2" x 3" A
4 **Overnight Tube** 38" x 6" x 6" x 6" B
5 **STANDARD AIR** Delivery not later than second business day

DELIVERY AND SPECIAL HANDLING CHECK SERVICES REQUIRED

1 **HOLD FOR PICK-UP** Give the Federal Express address where you want package held in Section II at right.

2 **DELIVER WEEKDAY**

3 **DELIVER SATURDAY** (Extra charge applies.)

4 **RESTRICTED ARTICLES SERVICE (RAS)** (Standard Air Packages only; Extra charge applies.)

5 **CONSTANT SURVEILLANCE SERVICE (CSS)** (Extra charge applies.)

6 **DRY ICE** _____ Lbs.

7 **OTHER SPECIAL SERVICE** _____

8 _____

9 **SATURDAY PICK-UP OR SATURDAY DROP-OFF** (Extra charge applies.)

PACKAGES	WEIGHT	YOUR DECLARED VALUE	OVER SIZE
Total	Total	Total	

Received At
 Shipper's Door
 Regular Stop
 On-Call Stop
 FedEx Loc.

Federal Express Corp. Employee No. **724800**

Date/Time For Federal Express Use **3/26 1306**

ZIP Zip Code of Street Address Required

Emp. No. _____ Date _____

Cash Received

Return Shipment

Third Party Chg. To Del. Chg. To Hold

Street Address _____

City _____ State _____ Zip _____

Received By: **X**

Date/Time Received _____ FedEx Employee Number _____

Total Charges

PART #2041738900
FEC-S-750-25
REVISION DATE 10/85
PRINTED U.S.A. NCR

RECIPIENT'S COPY

<u>Source Designator</u>	<u>Particulate Control Method</u>	<u>Efficiency Rating at Design Capacity</u>	<u>Maximum Design Material Handling Rate (TPH)</u>
West Hopper to Feeder	--	--	1500
Feeder to Conveyor B	Enclosure	50%	1500
Conveyor B to Conveyor C	Enclosure	50%	1500
Conveyor C to Conveyor D1/D2	Enclosure & Wet Sprays	95%	1500
Rail Car to Hopper	Enclosure (two sides open)	40%	1500
Hopper to Feeder	Enclosure	50%	1500
Feeder to Conveyor L	Enclosure	50%	1500
Conveyor L to Conveyor D1/D2	Enclosure	95%	1500
Conveyor D1/D2 to Conveyor M1/M2	Enclosure & Wet Sprays	95%	1500
Conveyor M1/M2 to Conveyor E1/E2	Enclosure & Wet Sprays	95%	1500
Conveyor E1/E2 to Stockpile	--	--	1500
Live Coal Stockpile	Wet Sprays	50%	--
Dead Coal Stockpile	Wet Sprays and Compaction	70%	--
Live Limestone Stockpile	--	--	--
Reclaim Pile to Conveyors F1/F2/F3/F4	Enclosure	85%	1600
Conveyors F1/F2/F3/F4 to Conveyors G1/G2	Enclosure & Wet Sprays	95%	1600

<u>Source Designator</u>	<u>Particulate Control Method</u>	<u>Efficiency Rating at Design Capacity</u>	<u>Maximum Design Material Handling Rate (TPH)</u>
Conveyors G1/G2 to Hammermill Crushers	Enclosure	70%	1600
Hammermill Crusher to Conveyor H1/H2	Enclosure	70%	1600
Conveyors H1/H2 to Conveyor J1/J2	Enclosure	70%	1600
Conveyor J1/J2 to Bunkers	Enclosure	70%	1600
Conveyor D1/D2 to G1/G2	Enclosure & Wet Sprays	95%	1500
Vehicular Entrainment	- -	- -	- -
Stockpile Maintenance	Wet Sprays	50%	- -

Location: Port Sutton Road, Port Sutton

UTM: 17-360.0E 3087.5N NEDS No.: 0040 Point ID: 08

Replaces Permit No: AC29-61276 & A029-94044

As for the specific conditions, two changes are proposed. The rest of the conditions should stay the same as AC29-61276.

Add a Specific Condition 9. which should be worded as:

"The annual coal throughput shall not exceed 2.85 million tons per year."

Change Specific Condition 7. to read as follows:

"Dead storage coal piles shall not be used in day to day activities. Its use shall be restricted to those times when normal deliveries cannot supply system requirements. All stockpile maintenance shall be in accordance with the plan stated in the application for A029-94044. Both live and dead storage coal piles shall be watered on an as needed basis to maintain no visible emissions from the coal piles."

Add a specific condition 10 which states,

"Within 30 days of achieving the capability of watering the live and dead coal stockpiles or at least 60 days prior to the expiration date of this permit whichever occurs first, the permittee shall submit a completed Certificate of Completion of Construction form and three copies with original seals and signatures to the Environmental Protection Commission of Hillsborough County."

VSA/ch

cc: Clem - B.A.M. } 3-27-87 P
B.Thomas TPA }

DEPARTMENT OF ENVIRONMENTAL REGULATION

SOUTHWEST DISTRICT

7601 HIGHWAY 301 NORTH
TAMPA, FLORIDA 33610



BOB GRAHAM
GOVERNOR

VICTORIA J. TSCHINKEL
SECRETARY

DR. RICHARD D. GARRITY
DISTRICT MANAGER

October 25, 1985

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

Dear Mr. Autry:

Re: Hillsborough County - AP
Gannon Coal Yard

Attached is Permit No. A029-94044. Should you object to the issuance of this permit or the specific conditions of the permit, you have a right to petition for a hearing pursuant to the provisions of Section 120.57, Florida Statutes. The petition must be filed within fourteen (14) days from receipt of this letter. The petition must comply with the requirements of Section 17-103.155 and Rule 28-5.201, Florida Administrative Code, (copies attached) and be filed pursuant to Rule 17-103.155(1) in the Office of General Counsel of the Department of Environmental Regulation at 2600 Blair Stone Road, Tallahassee, Florida 32301. Petitions which are not filed in accordance with the above provisions are subject to dismissal by the Department.

In the event a formal hearing is conducted pursuant to Section 120.57(1), all parties shall have an opportunity to respond, to present evidence and argument on all issues involved, to conduct cross-examination of witnesses and submit rebuttal evidence, to submit proposed findings of facts and orders, to file exceptions to any order or hearing officer's recommended order, and to be represented by counsel.


If an informal hearing is requested, the agency, in accordance with its rules of procedure, will provide affected persons or parties or their counsel an opportunity, at a convenient time and

Mr. A. Spencer Autry
Tampa, FL

Page Two

place, to present to the agency or hearing officer, written or oral evidence in opposition to the agency's action or refusal to act, or a written statement challenging the grounds upon which the agency has chosen to justify its action or inaction, pursuant to Section 120.57(2), Florida Statutes.

Sincerely,

A handwritten signature in black ink, appearing to read 'J. W. Estler', written in a cursive style.

James Wm. Estler
Air Permitting Engineer

JWE/js

Attachment: as stated

cc: HCEPC

DEPARTMENT OF ENVIRONMENTAL REGULATION

SOUTHWEST DISTRICT

7601 HIGHWAY 301 NORTH
TAMPA, FLORIDA 33610



BOB GRAHAM
GOVERNOR

VICTORIA J. TSCHINKEL
SECRETARY

DR. RICHARD D. CARRITY
DISTRICT MANAGER

PERMITTEE:

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

PERMIT/CERTIFICATION

Permit No.: A029-94044
County: Hillsborough
Expiration Date: 9-25-90
Project: Gannon Coal Yard

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Rules 17-2 & 17-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents, attached hereto or on file with the department and made a part hereof and specifically described as follows:

For the operation of the bituminous coal yard serving the Gannon station units one through six. All yard activities including barge and railcar unloading of coal, truck unloading of limestone, and transfer and storage of both materials are covered under this permit. This includes but is not limited to the following:

<u>Source Designator</u>	<u>Particulate Control Method</u>	<u>Efficiency Rating at Design Capacity</u>	<u>Maximum Design Material Handling Rate (TPH)</u>
Barge to East Grab Bucket	Grab Bucket	- -	1500
East Grab Bucket to East Hopper	Windshield	25%	1500
Barge to West Grab Bucket	Grab Bucket	- -	1500
West Grab Bucket to West Hopper	Windshield	25%	1500

PERMITTEE:
Tampa Electric Company

Permit/Certification No.: A029-94044
Project: Gannon Coal Yard

<u>Source Designator</u>	<u>Particulate Control Method</u>	<u>Efficiency Rating at Design Capacity</u>	<u>Maximum Design Material Handling Rate (TPH)</u>
East Hopper to Feeder	- -	- -	1500
West Hopper to Feeder	- -	- -	1500
Feeder to Conveyor B	Enclosure	50%	1500
Conveyor B to Conveyor C	Enclosure	50%	1500
Conveyor C to Conveyor D1/D2	Enclosure & Wet Sprays	95%	1500
Rail Car to Hopper	Enclosure (two sides open)	40%	1500
Hopper to Feeder	Enclosure	50%	1500
Feeder to Conveyor L	Enclosure	50%	1500
Conveyor L to Conveyor D1/D2	Enclosure	95%	1500
Conveyor D1/D2 to Conveyor M1/M2	Enclosure & Wet Sprays	95%	1500
Conveyor M1/M2 to Conveyor E1/E2	Enclosure & Wet Sprays	95%	1500
Conveyor E1/E2 to Stockpile	- -	- -	1500
Live Coal Stockpile	Moisture Content (Approximately 8-11%)	50%	- -
Dead Coal Stockpile	Moisture Content (Approximately 8-11%) & Compaction	70%	- -

PERMITTEE:
Tampa Electric Company

Permit/Certification No.: A029-94044
Project: Gannon Coal Yard

<u>Source Designator</u>	<u>Particulate Control Method</u>	<u>Efficiency Rating at Design Capacity</u>	<u>Maximum Design Material Handling Rate (TPH)</u>
Live Limestone Stockpile	- -	- -	- -
Reclaim Pile to Conveyors F1/F2/F3/F4	Enclosure	85%	1600
Conveyors F1/F2/F3/F4 to Conveyors G1/G2	Enclosure & Wet Sprays	95%	1600
Conveyors G1/G2 to Hammermill Crushers	Enclosure	70%	1600
Hammermill Crusher to Conveyor H1/H2	Enclosure	70%	1600
Conveyors H1/H2 to Conveyor J1/J2	Enclosure	70%	1600
Conveyor J1/J2 to Bunkers	Enclosure	70%	1600
Conveyor D1/D2 to G1/G2	Enclosure & Wet Sprays	95%	1500
Vehicular Entrainment	- -	- -	- -
Stockpile Maintenance	Moisture Content (Approximately 8-11%)	50%	- -

Location: Port Sutton Road, Port Sutton

UTM: 17-360.0 E 3087.5 N NEDS No.: 0040 Point ID: 08

Replaces Permit No.: AC29-61276

PERMITTEE:
Tampa Electric Company

Permit/Certification No.: A029-94044
Project: Gannon Coal Yard

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth herein are "Permit Conditions" and as such are binding upon the permittee and enforceable pursuant to the authority of Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is hereby placed on notice that the department will review this permit periodically and may initiate the enforcement action for any violation of the "Permit Conditions" by the permittee, its agents, employees, servants or representatives.

2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the department.

3. As provided in Subsections 403.087(6) and 403.712(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Nor does it authorize any injury to public or private property or any invasion of personal rights, nor infringement of federal, state or local laws or regulations. This permit does not constitute a waiver of or approval of any other department permit that may be required for other aspects of the total project which are not addressed in the permit.

4. This permit conveys no title to land or water, does not constitute state recognition or acknowledgement of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the state. Only the Trustees of the Internal Improvement Trust Fund may express state opinion as to title.

5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, plant or aquatic life or property and penalties therefore caused by the construction or operation of this permitted source, nor does it allow the permittee to cause pollution in contravention of Florida Statutes and department rules, unless specifically authorized by any order from the department.

PERMITTEE:
Tampa Electric Company

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Project: Gannon Coal Yard

6. The permittee shall at all times properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by department rules.

7. The permittee, by accepting this permit, specifically agrees to allow authorized department personnel, upon presentation of credentials or other documents as maybe required by law, access to the premises, at reasonable times, where the permitted activity is located or conducted for the purposes of;

a. Having access to and copying any records that must be kept under the conditions of the permit:

b. Inspecting the facility, equipment, practices, or operations regulated or required under this permit; and

c. Sampling or monitoring any substances or parameters at any location reasonably necessary to assure compliance with this permit or department rules.

Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately notify and provide the department with the following information:

(a) a description of and cause of non-compliance; and

(b) the period of non-compliance, including exact dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the department for penalties or revocation of this permit.

PERMITTEE:
Tampa Electric Company

Permit/Certification No.: A029-94044
Project: Gannon Coal Yard

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source, which are submitted to the department, may be used by the department as evidence in any enforcement case arising under the Florida Statutes or department rules, except where such use is proscribed by Section 403.73 and 403.111, Florida Statutes.

10. The permittee agrees to comply with changes in department rules and Florida Statutes after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by Florida Statutes or department rules.

11. This permit is transferable only upon department approval in accordance with Florida Administrative Code Rules 17-4.12 and 17-30.30, as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the department.

12. This permit is required to be kept at the work site of the permitted activity during the entire period of construction or operation.

13. This permit also constitutes:

- () Determination of Best Available Control Technology (BACT)
- () Determination of Prevention of Significant Deterioration (PSD)
- () Certification of Compliance with State Water Quality Standards (Section 401. PL 92-500)
- () Compliance with New Source Performance Standards

14. The permittee shall comply with the following monitoring and record keeping requirements:

a. Upon request, the permittee shall furnish all records and plans required under department rules. The retention period for all records will be extended automatically, unless otherwise stipulated by the department, during the course of any unresolved enforcement action.

PERMITTEE:
Tampa Electric Company

Permit/Certification No.: A029-94044
Project: Gannon Coal Yard

14. (con't)

b. The permittee shall retain at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation), copies of all reports required by this permit, and records of all data used to complete the application for this permit. The time period of retention shall be at least three years from the date of the sample, measurement, report or application unless otherwise specified by department rule.

c. Records of monitoring information shall include:

- the date, exact place, and time of sampling or measurements;
- the person responsible for performing the sampling or measurements;
- the date(s) analyses were performed;
- the person responsible for performing the analyses;
- the analytical techniques or methods used; and
- the results of such analyses.

15. When requested by the department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the department, such facts or information shall be submitted or corrected promptly.

SPECIFIC CONDITIONS:

1. Visible emissions caused by fugitive or unconfined particulate from coal handling systems and storage areas serving Gannon units 1 through 6 shall not exceed five percent opacity (Section 17-2.650(2)(c)11., F.A.C.).

2. At 12 month intervals from or ninety days prior to April 30, 1985, the permittee shall conduct thirty minute visible emission tests on the following operations: the east bucket to the east hopper, the west bucket to the west hopper, the rail car to the hopper, either the conveyor E1 or E2 to their respective stockpiles where the initial freefall is at least thirty feet, the hammermill crusher to either the conveyor H1 or H2, the conveyors D1 or D2 to either the conveyors G1 or G2, and either the conveyors J1 or J2 to their respective bunkers.

PERMITTEE:
Tampa Electric Company

Permit/Certification No.: A029-94044
Project: Gannon Coal Yard

SPECIFIC CONDITIONS (con't):

3. Should the Department have reason to believe the visible emission standard is not being met, the Department may require that compliance with the applicable emission standard be demonstrated by testing in accordance with Section 17-2.700, F.A.C.
 4. All compliance testing shall be conducted during normal operating conditions and at the maximum rate attainable during the test period.
 5. All controls listed in the application with regard to the transfer points (i.e. the grab buckets, the windshield, the enclosures and the wet spray systems) shall be maintained to the extent that the capture efficiencies credited will be achieved.
 6. Dead storage coal piles shall not be used in day to day activities. Its use shall be restricted to those times when normal deliveries cannot supply system requirements. All stockpile maintenance shall be in accordance with the plan stated in the application.
 7. The annual coal throughput shall not exceed 2.4 million tons per year.
 8. All reasonable precautions shall be taken to prevent and control generation of unconfined emissions of particulate matter from vehicular movements in accordance with the provisions listed in Section 17-2.610(3), F.A.C.
 9. The Hillsborough County Environmental Protection Commission shall be notified 15 days prior to compliance testing.
 10. Submit for this facility, each calendar year, on or before March 1, an emission report for the preceding calendar year containing the following information as per Section 17-4.14, F.A.C.
 - (A) Annual amount of materials and/or fuels utilized.
 - (B) Annual emissions (note calculation basis).
 - (C) Any changes in the information contained in the permit application.
- Duplicate copies of all reports shall be submitted to the Hillsborough County Environmental Protection Commission.
11. An application to renew this operating permit shall be submitted to the Hillsborough County Environmental Protection Commission 60 days prior to expiration date of this permit.

PERMITTEE:
Tampa Electric Company

Permit/Certification No.: A029-94044
Project: Gannon Coal Yard

SPECIFIC CONDITIONS (con't):

12. Operation and Maintenance plan for particulate control (Section 17-2.650(2), F.A.C.)

A. Process Parameters:

1. For all sources the operation schedule: 24 hours/day; 7 days/week; 52 weeks/year
2. Equipment data:
 - i. Conveyor hoods consist of corrugated aluminum.
 - ii. Transfer point enclosures consist of carbon steel.
 - iii. Wet dust suppression surfactant is Compound JB from Dust Suppression Systems, Inc. of Kansas City, Missouri.
 - iv. The wet dust suppression system use a type PP mixer proportioner.

B. The following observations, checks and operations apply to the coal yard and shall be conducted on the schedule specified:

Daily

The conveyor hoods are visually inspected.

Monthly

1. Lubricate crankpin bearing on the proportioning pump every 100 hours of operation or monthly.
2. Drain and refill proportioning pump gear reducer lubricant at intervals of 1000 hours.
3. The chutework system for the transfer points are visually inspected.

Three Months

1. Inspect nozzles for proper operation. Clean or replace if necessary.
2. Flush strainers in spray flow control enclosure. A blowdown valve is provided for easy cleaning of strainer screen.
3. Clean strainers located at each spray manifold assembly and spray header assembly.

Six Months

1. Inspect nozzles for proper operation. Clean or replace if necessary.
2. Clean strainer in spray nozzle housing by removing 1" brass hexagonal plug. Spray nozzle housings are located on spray manifold assemblies at application points and hold the spray jets. (Necessary only where hard water is used in system.)

PERMITTEE:
Tampa Electric Company

Permit/Certification No.: A029-94044
Project: Gannon Coal Yard

SPECIFIC CONDITIONS (con't):

Nine Months

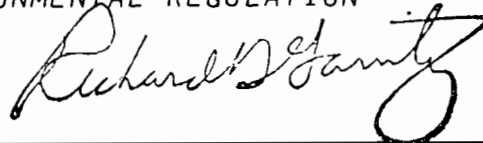
Repeat the procedure required at three months.

Twelve Months

1. Repeat maintenance procedure for six months.
2. Inspect hose assemblies and rotary ball joints for wear or potential leaks.

Issued this 23 day of October
1985

STATE OF FLORIDA DEPARTMENT OF
ENVIRONMENTAL REGULATION



Richard D. Garrity, Ph.D.
District Manager

CERTIFICATE OF SERVICE

This is to certify that this NOTICE OF PERMIT and all copies were mailed before the close of business on October 29, 1985 to the listed persons.

Clerk Stamp

FILING AND ACKNOWLEDGEMENT
FILED, on this date, pursuant to
§120.52(9), Florida Statutes, with
the designated Department Clerk,
receipt of which is hereby
acknowledged.

Jean Scherata 10/29/85
Clerk Date

Best Available Copy

RUN DATE 03/26/87
DISTRICT: SOUTHWEST
COUNTY: HILLSBOROUGH

DEPARTMENT OF ENVIRONMENTAL REGULATION
AIR POLLUTANT INFORMATION SYSTEM
MASTER DETAIL REPORT

PAGE 1
FILE AIRFO9

FACILITY ID: 40HIL290040

FACILITY INFORMATION RECORD

***** FACILITY INFORMATION *****

STATUS: A = ACTIVE DATE OF PERMANENT SHUTDOWN: .. / .. / .. # OF SRC: 012
OWNER: TECO OWNER CODE: P = PRIVATE
NAME/LOC: GANNON PORT SUTTON ROAD ZIP CODE: 33601
CITY: TAMPA CITY CODE: 4360 MAJOR FAC: Y (Y OR N)
TYPE: 01 = STEAM ELECTRIC PLANT TABLE 500-1: . (Y OR N)
UTM ZONE: 17 EAST: 360 . 0 (KM) NORTH: 3087 . 5 (KM)
LATITUDE: 28 : 02 : 31 LONGITUDE: 82 : 25 : 31
CDS: 1 = A1A VOC: . = ... FINAL COMPLIANCE DATE: .. / .. / ..
COMMENT: 6 COAL FIRED BOILS, 2 GAS TURB., COAL YARD & FLYASH S

***** OWNER/AUTHORIZED REPRESENTATIVE INFORMATION *****

NAME: A. S. AUTRY (LAST NAME FIRST)
DRG/FIRM:
ADDRESS: P O BOX 111 CITY: TAMPA
STATE: FL ZIP CODE: 33601 PHONE: (...)
CONTACT: PHONE: (...)

Best Available Copy

RUN DATE 03/26/87
DISTRICT: SOUTHWEST
COUNTY: HILLOBOROUGH

DEPARTMENT OF ENVIRONMENTAL REGULATION
AIR POLLUTANT INFORMATION SYSTEM
MASTER DETAIL REPORT

PAGE 2

FILE AIRF09

FACILITY SOURCE ID: 40HIL29004008

SOURCE INFORMATION RECORD

***** CONSTRUCTION PERMIT/PPS INFORMATION *****

PERMIT #: PPS #: 0000 FEE PAID: (PERMIT ONLY)
DATE ISSUED: 03 / 09 / 83 DATE EXPIRES: 12 / 31 / 84
APP COMPLETE: .. / .. / ..

***** OPERATION PERMIT INFORMATION *****

PERMIT #: A029 - -94044 FEE PAID: AOR REQUIRED: . . (Y OR N)
DATE ISSUED: 10 / 25 / 85 DATE EXPIRES: 09 / 25 / 90

***** SOURCE DESCRIPTION/TRACKING INFORMATION *****

DESCRIPTION: COAL YARD/SERVING UNITS 1-6/BARGE RRCAR UNLDG-TRNFR-STORAGE
STATUS: A = ACTIVE # OF SCC: 005 # OF POLLUTANT: 002 MAJOR SRC: . (Y OR N)
INITIAL CONSTRUCTION DATE: 01 / 01 / 57 TYPE: .. =
SIC: 4911 = ELECTRIC GENERATION/DISTRIBUTION
NSPS: ... NESHAP: ... 111D: ... PSD: ... NAA/NSR: ... RACT: X
COMMENT: PERMIT FOR THIS YARD COVERS 27 TRANSFER POINTS.

START UP DATE: .. / .. / .. SHUT DOWN DATE: .. / .. / ..

SOURCE SCHEDULE/RATE RECORD

***** OPERATING SCHEDULE INFORMATION *****

TYPICAL OPERATING SCHEDULE: 24 (HR/DAY) 7 (DAY/WK) 52 (WK/YR)
TYPICAL % OPERATING BY SEASON: 25 (DJF) 25 (MAM) 25 (JJA) 25 (SON)
PERMITTED OPERATING SCHEDULE: 24 (HR/DAY) 7 (DAY/WK) 52 (WK/YR) 8760 (HR/YR)
AOR YR: 86 OPERATING SCHEDULE: 24 (HR/DAY) 7 (DAY/WK) 52 (WK/YR) 8736 (HR/YR)

***** OPERATING RATE INFORMATION *****

MAX PROCESS RATE: 0001600 UNITS: TONP
MAX PRODUCTION RATE: UNITS: N/A

SOURCE EMISSION POINT RECORD

***** EMISSION POINT INFORMATION *****

EMISSION POINT TYPE: 4 = POINTS REGULATED SEPERATELY
STACK HEIGHT: ... (FT) EXIT DIA: ... (FT) EXIT TEMP: 0077 (F)
ACTUAL VOLUME FLOW RATE: (ACFM) DRY STANDARD FLOW RATE: (DSCFM)
EXIT VEL: (FT/SEC) NONSTK EMIS HT: 0010 (FT) BLDG HT: WD: (FT)
POINT UTM: EAST: ... (KM) NORTH: ... (KM) GEP STK HT: ... (FT)
COMMENT: 28 COAL TRANSFER POINTS IN THIS SOURCE

***** CONTROL EQUIPMENT INFORMATION *****

CONTROL A:
CONTROL B:
CAPITAL COST: A \$ B \$ TOTAL AOR COST \$ AOR YR: 86

RUN DATE 03/20/87
DISTRICT:CONNECT
COUNTY:HILLSBOROUGH

DEPARTMENT OF ENVIRONMENTAL REGULATION
AIR POLLUTANT INFORMATION SYSTEM
FACTORY DETAIL REPORT

PAGE 3
FILE: AIRFO:

FACILITY SOURCE ID: 40HIL29004608

SOURCE SCC RECORD

SCC #: 3-05-103-03 = OPEN STOCKPILE COAL
UNITS: TONP = TONS PROCESSED MAX HOURLY RATE: ANNUAL LIMIT:
ESTIMATE ANNUAL RATE: %S: %ASH: MMBTU:
ACTUAL AOR YR: 86 ANNUAL RATE: ***** %S: %ASH: MMBTU:
COMMENTS:

SOURCE SCC RECORD

SCC #: 3-05-010-11 = MIN PROD COAL HANDLING COAL TRANSFER
UNITS: TONT = TONS TRANS/HAND MAX HOURLY RATE: **** . *** ANNUAL LIMIT: 1835000
ESTIMATE ANNUAL RATE: %S: %ASH: MMBTU:
ACTUAL AOR YR: 86 ANNUAL RATE: ***** %S: %ASH: MMBTU:
COMMENTS: ALL UNCONFINED TRANSFER POINTS-NO STACKS

SOURCE SCC RECORD

SCC #: 3-05-010-10 = MIN PROD COAL HANDLING CRUSHING
UNITS: TONT = TONS TRANS/HAND MAX HOURLY RATE: **** . *** ANNUAL LIMIT: 1835000
ESTIMATE ANNUAL RATE: %S: %ASH: MMBTU:
ACTUAL AOR YR: 86 ANNUAL RATE: ***** %S: %ASH: MMBTU:
COMMENTS:

SOURCE SCC RECORD

SCC #: 3-05-010-09 = MIN PROD COAL HANDLING RAW COAL STORAGE
UNITS: TONT = TONS TRANS/HAND MAX HOURLY RATE: ANNUAL LIMIT: 1835000
ESTIMATE ANNUAL RATE: %S: %ASH: MMBTU:
ACTUAL AOR YR: 86 ANNUAL RATE: ***** %S: %ASH: MMBTU:
COMMENTS:-APPROXIMATELY 80% IN DEAD STORAGE (460000 TONS TOTAL IN YARD)

SOURCE SCC RECORD

SCC #: 3-05-010-08 = MIN PROD COAL HANDLING UNLOADING
UNITS: TONT = TONS TRANS/HAND MAX HOURLY RATE: **** . *** ANNUAL LIMIT: 1835000
ESTIMATE ANNUAL RATE: %S: %ASH: MMBTU:
ACTUAL AOR YR: 86 ANNUAL RATE: %S: %ASH: MMBTU:
COMMENTS: BARGE AND RAILCAR UNLOADING

RUN DATE 03/26/87
DISTRICT: SOUTHWEST
COUNTY: HILLSBOROUGH

DEPARTMENT OF ENVIRONMENTAL REGULATION
AIR POLLUTANT INFORMATION SYSTEM
MASTER DETAIL REPORT

PAGE 4
FILE AIRF09

FACILITY SOURCE ID: 40HIL29004008

SOURCE POLLUTANT RECORD

***** POLLUTANT/CONTROL INFORMATION *****

POLLUTANT ID: PM = PARTICULATE MATTER % EFF: 40 . 0
PRI: 061 = DUST SUPP BY WATER SPRAY SEC: ... =

***** EMISSION INFORMATION *****

POTENTIAL EMISSION: 00044 . 0000 (LB/HR) 000192 . 0000 (TON/YR)
ESTIMATED EMISSION: 000149 . 0000 (TON/YR) EST CODE: *
ACTUAL EMISSION: 000149 . 0000 (TON/YR) ADR CODE: . ADR YR: 86
ALLOWABLE EMISSION: (LB/HR) (TON/YR)
ALLOWABLE EMISSION: (.....) OTHER UNIT
REGULATION CODE: RACT = REASON AVAILB CONTROL TCH CEM?: . (Y OR N)
TEST FREQUENCY: 1 = ANNUALLY FREQUENCY BASE DATE: 04 / 30 / 85
COMMENT: 650(2)(C)11.

SOURCE VE/TEST RECORDS

***** VE INFORMATION *****

POLLUTANT ID: VE = VISIBLE EMISSIONS
ALLOW % OPACITY: NORMAL: 005 EXCEPT: ... TIME: ... (MIN)
REG CODE: RACT = REASON AVAILB CONTROL TCH CEM ? N (Y OR N)
TEST FREQ: 1 = ANNUALLY FREQ BASE DATE: 04 / 30 / 87

***** TEST INFORMATION *****

CURRENT TEST DATE: 04 / 30 / 86 NEXT TEST DATE: 04 / 30 / 87
OBSERVER NAME: 3
TEST LENGTH: 030 (MIN) TEST PASS ? . (Y OR N)
TEST % OPACITY: NORMAL: 005 EXCEPT: ... TIME: ... (MIN)
COMMENTS: 650(2)(C)11.

***** TEST INFORMATION *****

CURRENT TEST DATE: 04 / 29 / 86 NEXT TEST DATE: 04 / 29 / 87
OBSERVER NAME: MARTIN DUFF OF TECO GANNON
TEST LENGTH: 030 (MIN) TEST PASS ? Y (Y OR N)
TEST % OPACITY: NORMAL: ... EXCEPT: ... TIME: ... (MIN)
COMMENTS: TEST RESULT IS FOR BARGE UNLOADING OF COAL ONLY. TEST RESULT
S ON 27 OTHER TRANSFER POINTS ARE IN COMPLIANCE.

***** TEST INFORMATION *****

CURRENT TEST DATE: 06 / 10 / 85 NEXT TEST DATE: 04 / 30 / 87
OBSERVER NAME: 3
TEST LENGTH: 030 (MIN) TEST PASS ? . (Y OR N)
TEST % OPACITY: NORMAL: 001 EXCEPT: ... TIME: ... (MIN)
COMMENTS: 650(2)(C)11

RUN DATE 03/26/87
DISTRICT: SOUTHWEST
COUNTY: HILLSBOROUGH

DEPARTMENT OF ENVIRONMENTAL REGULATION
AIR POLLUTANT INFORMATION SYSTEM
MASTER DETAIL REPORT

PAGE 5
FILE AIRFO9

FACILITY SOURCE ID: 40HIL29004008

***** TEST INFORMATION *****

CURRENT TEST DATE: 06 / 10 / 85 NEXT TEST DATE: 04 / 30 / 87
OBSERVER NAME: 3
TEST LENGTH: 030 (MIN) TEST PASS ? . (Y OR N)
TEST % OPACITY: NORMAL: 001 EXCEPT: ... TIME: ... (MIN)
COMMENTS: 650(2)(C)11.

.....
.....

SOURCE FUGITIVE EMISSION RECORD

POLLUTANT ID: PM = PARTICULATE MATTER

***** FUGITIVE EMISSION SOURCE AND CONTROL INFORMATION *****
FUGITIVES FROM THE COAL YARD WILL BE ESTIMATED AFTER COMPLETION OF THE
1986 AIR POLLUTANT EMISSION INVENTORY.

QUANTIFIABLE FUGITIVE EMISSION: 000374 . 0740 (TON/YR)

PA1
1-30-87
Tampa, FL



January 29, 1987

DER
FEB 2 1987
BAQM

Mr. Roger Stewart
Hillsborough County Environmental
Protection Commission
1900 - 9th Avenue
Tampa, Florida 33605

Re: Gannon Coal Yard
AC29-61276 (AC29-114676)

Dear Mr. Stewart:

Please find enclosed a check for \$385.00 payable to the Hillsborough County Board of County Commissioners. This check is submitted to you in reference to the modification to the above permit. A request to modify AC29-61276 was submitted to the Florida Department of Environmental Regulation, Tallahassee on January 8, 1986.

Sincerely,

Jerry L. Williams
Director
Environmental

JLW/baw/003/LL

Enclosure

cc: ✓Clair Fancy, FDER,
Tallahassee
Bill Thomas, FDER
Tampa

~~BHT~~ BT
Clene | by;
Patty - forfile



January 29, 1987

DER
JAN 30 1987
BAQM

Mr. Clair Fancy, P.E.
Florida Department of
Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32301-8241

Re: Request for Additional Information
Air Construction Permit Application
AC29-61276 (AC29-114676)
F.J. Gannon Station Coal Yard

Dear Mr. Fancy:

As a result of our meeting and discussions on January 26, 1987, please find below responses to your second letter of incompleteness for the above referenced source.

- 1) Grab bucket spillage emissions - provide the expected emissions at the maximum barge throughput.

There seems to be some confusion as to what the emissions from the grab bucket spillage represents and how these are estimated. The 10% spillage represents the coal that is expected to fall back into the barge during each grab bucket operation. The 10% spillage thus would be the quantity of coal that could potentially generate dust as it falls from the grab bucket. The emissions were based on this free-fall, batch unloading type scenario. Please note that improvements are being made that will further minimize wind induced emissions from the unloading system, such as enclosing unloader equipment.

Your request for an emission estimate using the maximum throughput from the barge system (i.e. 100% spillage) would lead to an erroneous estimate, as this would imply no coal being conveyed through the entire barge conveyance system to the yard. If there was 100% spillage for the entire year, the controlled emissions would be ten times the estimated controlled emissions at 10% spillage. The controlled emissions at 100% spillage would be 3.44 tons/yr and 9.57 lbs./hr.

- 2) What is the surface moisture of the coal "as-received". Provide emissions estimate of all emission points using the coal surface moisture.

The surface moisture content of the as-received coal to Gannon Station is the total as-received moisture content minus the inherent moisture content. Based on the source of Gannon's coal, we would expect inherent

Mr. Clair Fancy, P.E.
January 29, 1987
Page 2

moisture for coal received by rail to be 2.0% and by barge 3.4%. The total as-received moisture content, as used in past emissions estimates, is 8.12% for rail and 11.96% for barge. Thus, the coal surface moisture content is 6.12% for rail and 8.56% for barge.

The past emission analyses were erroneously done using the as-received total moisture content. Corrected emissions estimates are attached for your review. The significant emissions increase level of 25 tons/year would not be exceeded if annual throughput remained below 2.87 million tons/year. (See Attachments 1, 2 and 4.)

Tampa Electric respectfully requests that permit number AC29-61276 be modified to allow an annual coal throughput of 2.85 million tons. At this throughput the incremental emissions are expected to be 23.97 tons/year. (See Attachment 3.)

- 3) Provide the statistical assumptions, sample sizes, number of samples, sampling techniques, and frequency of values used in deriving all control efficiencies and emission rates.

The control efficiencies and emission rates were obtained from three EPA references:

- 1) Fugitive Emissions from Integrated
Iron and Steel Plants
March 1978
EPA 600/2-78-050
- 2) Particulate Emission Factors Applicable
to the Iron and Steel Industry
September, 1979
EPA 450/4-79-028
- 3) Iron and Steel Plant Open Source
Fugitive Emission Evaluation
May, 1979
EPA 600/2-79-103

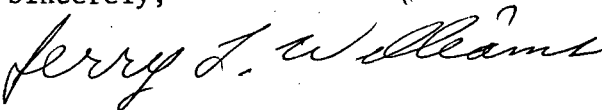
Because of the complexity of your request, we suggest that the department consult the above EPA references. To paraphrase EPA's documents on such a technical and lengthy question could likely lead to a miscommunication of the extensiveness of EPA's methodology in their derivation process.

Mr. Clair Fancy, P.E.
January 29, 1987
Page 3

I would like to thank you and your staff for meeting with us, especially on such short notice. I am sure you will agree that this meeting was very productive and helped tremendously in clarifying and resolving the above items of application incompleteness.

Please call me or Patrick Ho at (813) 228-4836 if you should have any further questions.

Sincerely,



Jerry L. Williams
Director
Environmental

JLW/jst/021/EE1

Enclosures

cc: Bill Thomas, FDER
Tampa, (w/enc.)
Jerry Campbell, HCEPC
(w/enc.)

FEDERAL EXPRESS
276596600

PARTICULATE EMISSIONS ESTIMATE

GANNON STATION COAL YARD

(PRE-MODIFICATION)

COMMENTS :

- (1) PRE-MODIFICATION SYSTEM
- (2) CORRECTED SURFACE MOISTURE

COAL THROUGHPUT : 1269950 TONS/YR RAIL MOIST. (%) : 6.12
 LIMESTONE THROUGHPUT : 0 TONS/YR BARGE MOIST. (%) : 8.56
 VEHICULAR TRAFFIC MILEAGE : 9125 MILES AVG. MOIST. (%) : 7.04

SOURCE	THROUGHPUT (Tons/Yr)	RAIL (Tons/Yr)	BARGE (Tons/Yr)	TO PLANT (Tons/Yr)	TO YARD (Tons/Yr)	TO LIVE & ACTIVE (Tons/Yr)	TO DEAD STORE (Tons/Yr)	PERIOD IN LIVE & ACTIVE (Days)	PERIOD IN DEAD STORE (Days)
COAL	1269950	1092000	178000	0	1269950	1119950	150000	26.00	365
LIMESTONE	0				0				

#	Particulate Emission Source	Throughput		Uncontrolled Emission Factor (Lbs/Ton)	Uncontrolled Emissions		Efficiency (%)	Controlled Emissions	
		(Tons/Yr)	(Tons/Hr)		(Tons/Yr)	(Lbs/Hr)		(Tons/Yr)	(Lbs/Hr)
1	Grab bucket to barge	17800	150	0.006442	0.057	0.966	0	0.057	0.966
2	Bucket to hopper	178000	1500	0.000429	0.038	0.644	25	0.029	0.483
3	Hopper to feeder	178000	1500	0.000635	0.003	0.053	0	0.003	0.053
4	Feeder to conveyor B	178000	1500	0.000264	0.023	0.395	50	0.012	0.198
5	Conveyor B to conveyor C	178000	1500	0.000176	0.016	0.264	50	0.008	0.132
6	Conveyor C to D1/D2	178000	1500	0.000457	0.641	0.685	70	0.012	0.206
7	Rail car to hopper	1092000	1500	0.002753	1.503	4.130	40	0.902	2.478
8	Hopper to feeder	1092000	1500	0.000070	0.038	0.106	50	0.019	0.053
9	Feeder to conveyor L	1092000	1500	0.000018	0.010	0.026	50	0.005	0.013
10	Conveyor L to D	1092000	1500	0.000986	0.538	1.479	70	0.161	0.444
11	Conveyor D to radial stacker E	1269950	1500	0.000718	0.456	1.077	0	0.456	1.077
12	Stacker E to stockpile	1269950	1500	0.000082	0.052	0.123	0	0.052	0.123
13	Coal stockpile live	1119950	8760 (Hr/Yr)	0.063700	35.670	8.144	50	17.835	4.072
	dead	150000	8760 (Hr/Yr)	0.894000	67.050	15.308	70	20.115	4.592
14	Underground reclaim to F1/F2	1269950	1000	0.000018	0.011	0.018	85	0.002	0.003
15	F1/F2 to G1/G2	1269950	1000	0.000013	0.008	0.013	70	0.002	0.004
16	G1/G2 to crusher	1269950	1000	0.000076	0.048	0.076	70	0.014	0.023
17	Crusher to H1/H2	1269950	1000	0.000023	0.015	0.023	70	0.004	0.007
18	H1/H2 to J1/J2	1269950	1000	0.000334	0.212	0.334	70	0.064	0.100
19	J1/J2 to bunker	1269950	1000	0.000694	0.441	0.694	70	0.132	0.208
20	Vehicular entrainment	9125 (mi)	730 (Hr/Yr)	0.124 (lb/mi)	0.566	1.551	0	0.566	1.551
21	Stockpile maintenance	1269950	8760 (Hr/Yr)	0.367000	233.036	53.205	50	116.518	26.602
	TOTAL				339.833	89.314		156.97	43.39

Reference : Technical Evaluation and Preliminary Determination
 Tampa Electric Company - Gannon Coal Yard
 Permit Number AC 29-61276
 Florida Dept. of Environmental Regulation - BAQM - CAP
 March 9, 1983

PARTICULATE EMISSIONS ESTIMATE

GANNON STATION COAL YARD

COMMENTS :
 (1) THROUGHPUT @ INCREMENT L.T. 25 T/Y
 (2) CORRECTED SURFACE MOISTURE

COAL THROUGHPUT : 2870000 TONS/YR RAIL MOIST. (%) : 6.12
 LIMESTONE THROUGHPUT : 57000 TONS/YR BARGE MOIST. (%) : 8.56
 VEHICULAR TRAFFIC MILEAGE : 9125 MILES AVG. MOIST. (%) : 7.04

SOURCE	THROUGHPUT (Tons/Yr)	RAIL (Tons/Yr)	BARGE (Tons/Yr)	TO PLANT (Tons/Yr)	TO YARD (Tons/Yr)	TO LIVE & ACTIVE (Tons/Yr)	TO DEAD STORE (Tons/Yr)	PERIOD IN LIVE & ACTIVE (Days)	PERIOD IN DEAD STORE (Days)
COAL	2870000	1793750	1076250	287000	2583000	2283000	300000	12.79	365
LIMESTONE	57000				57000				

#	Particulate Emission Source	Throughput		Uncontrolled Emission Factor (Lbs/Ton)	Uncontrolled Emissions		Efficiency (%)	Controlled Emissions	
		(Tons/Yr)	(Tons/Hr)		(Tons/Yr)	(Lbs/Hr)		(Tons/Yr)	(Lbs/Hr)
1	Grab bucket to barge	107625	150	0.006442	0.347	0.966	0	0.347	0.966
2	Bucket to hopper	1076250	1500	0.000429	0.231	0.644	25	0.173	0.483
3	Hopper to feeder	1076250	1500	0.000035	0.019	0.053	0	0.019	0.053
4	Feeder to conveyor B	1076250	1500	0.000264	0.142	0.395	50	0.071	0.198
5	Conveyor B to conveyor C	1076250	1500	0.000176	0.095	0.264	50	0.047	0.132
6	Conveyor C to D1/D2	1076250	1500	0.000439	0.236	0.659	95	0.012	0.033
7	Rail car to hopper	1793750	1500	0.002753	2.469	4.130	40	1.482	2.478
8	Hopper to feeder	1793750	1500	0.000070	0.063	0.106	50	0.032	0.053
9	Feeder to conveyor L	1793750	1500	0.000018	0.016	0.026	50	0.008	0.013
10	Conveyor L to D1/D2	1793750	1500	0.001056	0.947	1.584	95	0.047	0.079
11	D1/D2 to H1/H2	2583000	3000	0.000599	0.773	1.796	95	0.039	0.090
12	H1/H2 to E1/E2	2583000	3000	0.000282	0.364	0.845	95	0.018	0.042
13	E1/E2 to stockpile	2583000	3000	0.001109	1.432	3.327	0	1.432	3.327
14	Coal stockpile live	2283000	8760 (Hr/Yr)	0.031336	35.770	8.167	50	17.885	4.083
	dead	300000	8760 (Hr/Yr)	0.894000	134.100	30.616	70	40.230	9.185
15	Limestone live	57000	8760 (Hr/Yr)	0.000391	0.011	0.003	0	0.011	0.003
16	Reclaim to F1/F2/F3/F4	2583000	1600	0.000411	0.531	0.658	85	0.080	0.099
17	F1/F2/F3/F4 to G1/G2	2583000	1600	0.000617	0.797	0.987	95	0.040	0.049
18	G1/G2 to crusher	2870000	1600	0.000514	0.738	0.823	70	0.221	0.247
19	Crusher to H1/H2	2870000	1600	0.000154	0.221	0.247	70	0.066	0.074
20	H1/H2 to J1/J2	2870000	1600	0.000334	0.480	0.535	80	0.096	0.107
21	J1/J2 to bunker	2870000	1600	0.000694	0.996	1.111	95	0.050	0.056
22	D1/D2 to G1/G2 bypasses store	287000	160	0.001452	0.208	0.232	95	0.010	0.012
23	Vehicular entrainment	9125 (mi)	730 (Hr/Yr)	0.124 (lb/mi)	0.566	1.551	0	0.566	1.551
24	Stockpile maintenance	2583000	8760 (Hr/Yr)	0.184000	237.636	54.255	50	118.818	27.127
	TOTAL				419.188	113.978		181.800	50.539

Reference : Technical Evaluation and Preliminary Determination
 Tampa Electric Company - Gannon Coal Yard
 Permit Number AC 29-61276
 Florida Dept. of Environmental Regulation - BARM - CAP
 March 9, 1983

Emissions	Tons/Yr	Lbs/Hr
Pre-modification	156.97	43.30
Proposed	181.80	50.54
Increment	24.83	7.24

PARTICULATE EMISSIONS ESTIMATE

GANNON STATION COAL YARD

COMMENTS :

- (1) THROUGHPUT = 2.85 MILLION T/Y
- (2) CORRECTED SURFACE MOISTURE

COAL THROUGHPUT : 2050000 TONS/YR RAIL MOIST. (%) : 6.12
 LIMESTONE THROUGHPUT : 57000 TONS/YR BARGE MOIST. (%) : 8.56
 VEHICULAR TRAFFIC MILEAGE : 9125 MILES AVG. MOIST. (%) : 7.04

SOURCE	THROUGHPUT (Tons/Yr)	RAIL (Tons/Yr)	BARGE (Tons/Yr)	TO PLANT (Tons/Yr)	TO YARD (Tons/Yr)	TO LIVE & ACTIVE (Tons/Yr)	TO DEAD STORE (Tons/Yr)	PERIOD IN LIVE & ACTIVE (Days)	PERIOD IN DEAD STORE (Days)
COAL	2850000	1781250	1068750	285000	2565000	2265000	300000	12.89	365
LIMESTONE	57000				57000				

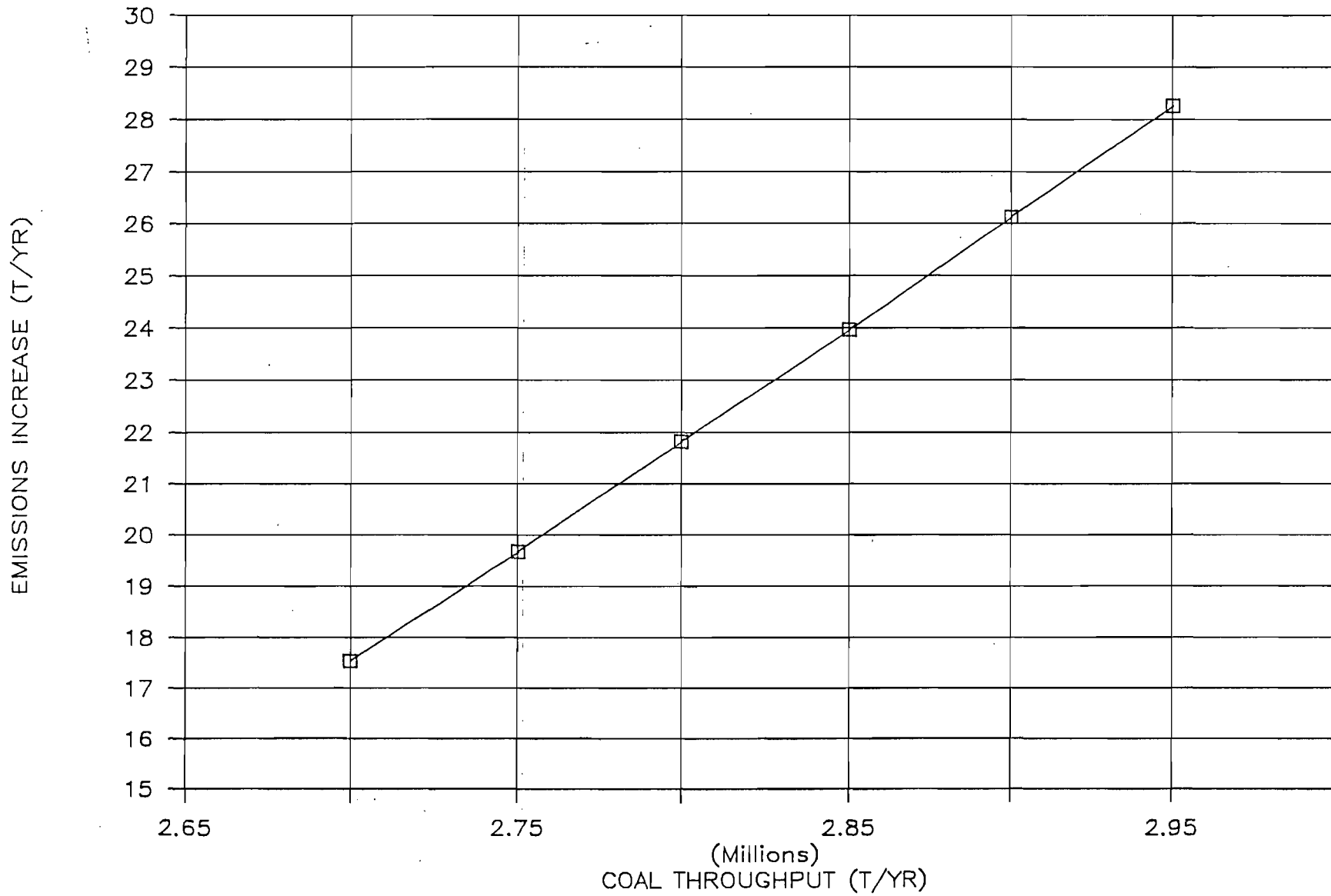
#	Particulate Emission Source	Throughput		Uncontrolled Emission Factor (Lbs/Ton)	Uncontrolled Emissions		Efficiency (%)	Controlled Emissions	
		(Tons/Yr)	(Tons/Hr)		(Tons/Yr)	(Lbs/Hr)		(Tons/Yr)	(Lbs/Hr)
1	Grab bucket to barge	106875	150	0.006442	0.344	0.966	0	0.344	0.966
2	Bucket to hopper	1068750	1500	0.000429	0.230	0.644	25	0.172	0.483
3	Hopper to feeder	1068750	1500	0.000035	0.019	0.053	0	0.019	0.053
4	Feeder to conveyor B	1068750	1500	0.000264	0.141	0.395	50	0.070	0.198
5	Conveyor B to conveyor C	1068750	1500	0.000176	0.094	0.264	50	0.047	0.132
6	Conveyor C to D1/D2	1068750	1500	0.000439	0.235	0.659	95	0.012	0.033
7	Rail car to hopper	1781250	1500	0.002753	2.452	4.130	40	1.471	2.478
8	Hopper to feeder	1781250	1500	0.000070	0.063	0.106	50	0.031	0.053
9	Feeder to conveyor L	1781250	1500	0.000018	0.016	0.026	50	0.008	0.013
10	Conveyor L to D1/D2	1781250	1500	0.001056	0.941	1.584	95	0.047	0.079
11	D1/D2 to M1/M2	2565000	3000	0.000599	0.768	1.796	95	0.038	0.090
12	M1/M2 to E1/E2	2565000	3000	0.000282	0.361	0.845	95	0.018	0.042
13	E1/E2 to stockpile	2565000	3000	0.001109	1.422	3.327	0	1.422	3.327
14	Coal stockpile live	2265000	8760 (Hr/Yr)	0.031585	35.770	8.167	50	17.885	4.083
	Coal stockpile dead	300000	8760 (Hr/Yr)	0.894000	134.100	30.616	70	40.230	9.185
15	Limestone live	57000	8760 (Hr/Yr)	0.000391	0.011	0.003	0	0.011	0.003
16	Reclaim to F1/F2/F3/F4	2565000	1600	0.000411	0.527	0.658	85	0.079	0.099
17	F1/F2/F3/F4 to G1/G2	2565000	1600	0.000617	0.791	0.987	95	0.040	0.049
18	G1/G2 to crusher	2850000	1600	0.000514	0.733	0.823	70	0.220	0.247
19	Crusher to H1/H2	2850000	1600	0.000154	0.220	0.247	70	0.066	0.074
20	H1/H2 to J1/J2	2850000	1600	0.000334	0.476	0.535	80	0.095	0.107
21	J1/J2 to bunker	2850000	1600	0.000694	0.989	1.111	95	0.049	0.056
22	D1/D2 to G1/G2 bypasses store	285000	160	0.001452	0.207	0.232	95	0.010	0.012
23	Vehicular entrainment	9125 (mi)	730 (Hr/Yr)	0.124 (lb/mi)	0.566	1.551	0	0.566	1.551
24	Stockpile maintenance	2565000	8760 (Hr/Yr)	0.184000	235.980	53.877	50	117.990	26.938
	TOTAL				417.455	113.600		180.942	50.350

Reference : Technical Evaluation and Preliminary Determination
 Tampa Electric Company - Gannon Coal Yard
 Permit Number AC 29-61276
 Florida Dept. of Environmental Regulation - BAQM - CAP
 March 9, 1983

Emissions	Tons/Yr	Lbs/Hr
Pre-modification	156.97	43.30
Proposed	180.94	50.35
Increment	23.97	7.05

EMISSIONS INCREASE : THROUGHPUT

GANNON STATION COAL YARD



~~For evaluation~~ 1/30

Bill T.

As we have discussed,
I would like Cleve to
process quickly - but
thoroughly.

Cleve has a
copy!

Clm

State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

INTEROFFICE MEMORANDUM

For Routing To District Offices And/Or To Other Than The Addressee		
To: _____	Loctn.: _____	
To: _____	Loctn.: _____	
To: _____	Loctn.: _____	
From: _____	Date: _____	
Reply Optional []	Reply Required []	Info. Only []
Date Due: _____	Date Due: _____	

TO: Bill Thomas
FROM: Julie Cobb
DATE: April 2, 1986
RE: Hillsborough County/TECO/Permit Fee

DER
APR 3 1986
BAQM

QUESTION: Whether the Department can enforce the payment of a Hillsborough County Local Program permit processing fee for a permit application being reviewed and acted upon by CAPS?

ANSWER: No.

EXPLANATION: Section 403.182(6), Florida Statutes, authorizes the Department to enforce stricter, or more stringent rules, regulations or orders which have been adopted by local program. Application fee schedules, which have been adopted by Hillsborough County are not the type of stricter or more stringent rules, regulations or orders which the Department can legally enforce.

Further, the Operating Agreement entered into by the District and the HCEPC on January 26, 1984, states clearly that the CAPS will process and take final action on all major source construction and modification permit applications. Paragraph 3.1.9 (pages 4-5).

Even if the Department could legally enforce a higher permit fee being charged by a local program, I believe that the Operating Agreement could be interpreted to mean that Hillsborough County is not involved in the processing of major source permits being reviewed and acted upon by CAPS, and is without authority to charge a processing fee in those circumstances.

cc: Steve Smallwood
E. Gary Early
Ed Svec

DEPARTMENT OF ENVIRONMENTAL REGULATION

**ROUTING AND
TRANSMITTAL SLIP**

ACTION NO

ACTION DUE DATE

1. TO: (NAME, OFFICE, LOCATION)

Edward Svec

Initial

Date

2.

BAQM

Initial

Date

3.

Initial

Date

4.

Initial

Date

REMARKS:

INFORMATION

Review & Return

Review & File

Initial & Forward

DISPOSITION

Review & Respond

Prepare Response

For My Signature

For Your Signature

Let's Discuss

Set Up Meeting

Investigate & Report

Initial & Forward

Distribute

Concurrence

For Processing

Initial & Return

DER
APR 3 1986
BAQM

FROM:

Julie Cobb / Renee Horn

DATE

4/2/86

PHONE

8-9730

P 408 533 206
 RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED—
 NOT FOR INTERNATIONAL MAIL

(See Reverse)

Sent to Mr. A. Spencer Autry	
Street and No.	
P.O., State and ZIP Code	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to whom and Date Delivered	
Return Receipt Showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	\$
Postmark or Date	4/2/86

PS Form 3800, Feb. 1982

PS Form 3811, July 1983

SENDER: Complete items 1, 2, 3 and 4.

Put your address in the "RETURN TO" space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for service(s) requested.

1. Show to whom, date and address of delivery.

2. Restricted Delivery *FA*

3. Article Addressed to:
 Mr. A. Spencer Autry
 Tampa Electric Company
 P. O. Box 111
 Tampa, FL 33601

4. Type of Service:	Article Number
<input type="checkbox"/> Registered <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD <input type="checkbox"/> Express Mail	P 408 533 206

Always obtain signature of addressee or agent and **DATE DELIVERED.**

5. Signature - Addressee
 X *J. Spencer Autry*

6. Signature - Agent
 X

7. Date of Delivery
 APR 2 1986

8. Addressee's Address (ONLY if requested and fee paid)

DOMESTIC RETURN RECEIPT

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301-8241



BOB GRAHAM
GOVERNOR
VICTORIA J. TSCHINKEL
SECRETARY

April 2, 1986

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

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

Dear Mr. Autry:

Re: Air Construction Permit Application AC 29-114676

The Bureau of Air Quality Management has received your response to our February 7, 1986, letter of incompleteness. After reviewing the response, the application is still deemed incomplete for the following points:

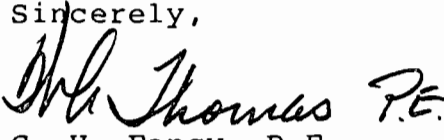
1. Since the total amount of spillage for the grab bucket from the barge is dependent on total barge throughput, provide the expected emissions at the maximum barge throughput, showing all assumptions and calculations.
2. Your response to question 4 states that the moisture value of 8.12 percent is the "as received" moisture content of the coal. What is the surface moisture of the coal "as received" by rail as well as by barge? Provide the emission estimates of all emission points using the coal surface moisture, showing all assumptions and calculations.
3. Provide the statistical assumptions, sample sizes, number of samples, sampling technique, and frequency of values used in deriving all control efficiencies and emission rates.

The Hillsborough County Environmental Protection Commission has informed us that the review fee of \$385.00 has not been received.

Mr. A. Spencer Autry
Page Two
April 2, 1986

When all the requested information is received, we will resume processing your application. If you have any questions, please write to me at the above address or call Edward Svec, Review Engineer, at (904)488-1344.

Sincerely,

for  P.E.
C. H. Fancy, P.E.
Deputy Chief
Bureau of Air Quality
Management

CHF/ES/s

cc: J. Campbell, HCEPC
J. Estler, SW District

P 408 533 736

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED—
NOT FOR INTERNATIONAL MAIL

(See Reverse)

Sent to Mr. A. Spencer Autry	
Street and No.	
P.O., State and ZIP Code	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to whom and Date Delivered	
Return Receipt Showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	\$
Postmark or Date 2/7/86	

PS Form 3800, Feb. 1982

PS Form 3811, July 1983

SENDER: Complete items 1, 2, 3 and 4.

Put your address in the "RETURN TO" space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for service(s) requested.

- Show to whom, date and address of delivery.
- Restricted Delivery.

3. Article Addressed to:
Mr. A. Spencer Autry
Tampa Electric Company
P. O. Box 18019
Tampa, FL 32229

4. Type of Service:	Article Number
<input type="checkbox"/> Registered <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD <input type="checkbox"/> Express Mail	P 408 533 736

Always obtain signature of addressee or agent and **DATE DELIVERED.**

5. Signature - Addressee
X

6. Signature - Agent
X *[Signature]*

7. Date of Delivery

8. Addressee's Address (ONLY if requested and fee paid):

FEB 1986

DOMESTIC RETURN RECEIPT

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301-8241



BOB GRAHAM
GOVERNOR
VICTORIA J. TSCHINKEL
SECRETARY

February 7, 1986

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. A. Spencer Autry, Manager
Environmental Planning
Tampa Electric Company
P. O. Box 111
Tampa, Florida 33601

Dear Mr. Autry:

Re: Air Construction Permit Application AC 29-114676

The Bureau of Air Quality Management has received your application to modify the construction permit for the Gannon Station Coal Yard. Our initial review has deemed the application to be incomplete for the following reasons:

1. The Hillsborough County Environmental Protection Commission has informed us that the application review fee of \$385.00, payable to the Hillsborough County Board of County Commissioners, has not been received for this permit. Please remit this review fee to Hillsborough County and provide us with proof of payment.
2. The application assumes spillage to be a constant amount for all throughput rates. Provide the basis for this assumption. If this is not correct, provide the expected emission estimates, showing all assumptions and calculations.
3. The application assumes vehicular entrainment to be constant amount for all throughput rates. Provide the basis for this assumption. If this is not correct, provide the expected emission estimates, showing all assumptions and calculations.
4. In the calculations, a moisture value of 8.12 percent is used. Justify the basis for this assumption.

Mr. A. Spencer Autry
Page Two
February 7, 1986

5. The flow diagram shows four hammermill crushers, however, there are no emission estimates for these crushers. Provide the emission estimates for the hammermill crushers, showing all assumptions and calculations.
6. Item 14 of attachment #1 to the application claims efficiencies of 50 percent and 70 percent based on conditioning and compaction. Recent inspections of the coal yard revealed that the dead storage piles are compacted, but the conditioning claimed was not evident. Justify the 50 percent efficiency for conditioning in the absence of a sprinkler system, which would be necessary to maintain the surface moisture of the coal for an extended period.
7. Provide a derivation or an explanation for the 70 percent efficiency claimed for the dead storage piles.

When all the requested information is received, we will resume processing your application. If you have any questions, please write to me at the above address or call Edward Svec, Review Engineer, at (904)488-1344.

Sincerely,



C. H. Fancy, P.E.
Deputy Chief
Bureau of Air Quality
Management

CHF/ES/s

cc: J. Campbell, HCEPC
J. Estler, SW District



February 27, 1986

DER
MAR 3 1986
BAQM

Mr. Clair Fancy, P.E.
Bureau of Air Quality Management
Florida Department of
Environmental Regulation
Twin Towers Building
2600 Blair Stone Road
Tallahassee, Florida 32301-8241

Re: Amendment to Air Construction Permit
Permit #AC29-114676
F.J. Gannon Station Coal Yard

Dear Mr. Fancy:

Tampa Electric Company has received your letter of incompleteness dated February 7, 1986 for the above referenced source.

As explained below, all of the technical information concerning emissions calculations can be found in the Department's Technical Evaluation and Preliminary Determination document for the coal yard modification permit (AC29-61276) dated March 9, 1983. This document was referenced in our permit modification application dated January 8, 1986.

As you are aware, the above evaluation report contains, in addition to the Department's correspondence, the official submittals and responses by Tampa Electric Company that were used by the Department to review and approve our requested coal yard construction modification. It contains the technical information which was the basis for our construction permit issued April 12, 1983 by the Department's Tallahassee office, and our subsequent operation permit issued October 25, 1985, by the Department's Southwest District office.

For the above reasons we were surprised that the focus of the incompleteness letter was questions on past, DER approved, assumptions and calculations. However, in order to clarify any misunderstanding, the following responses are provided:

- (1) Review Fee to Hillsborough County Environmental Protection Commission (HCEPC)

Tampa Electric Company does not believe a review fee to the HCEPC is required for our permit modification request.

The interagency agreement between the HCEPC and the Department's Southwest District office specifically states that the Department's Central Permitting Section (CAP's) will process and take final action on all major source modification permit applications. Mr. Steve Smallwood further clarified this permit review/processing issue and the specific delegation of Department's functions to HCEPC in a letter to Mr. Jerry Williams dated December 5, 1985.

It is our understanding, based on items (1) and (6) of Mr. Smallwood's letter, that the Central Air Permitting (CAPs) Section of the Bureau of Air Quality Management (BAQM), receives and processes all modifications to construction permits for major air facilities. In addition, HCEPC is authorized to conduct "technical and administrative review" for the Department only on air permits processed by the district office of the Department.

For the above reasons, Tampa Electric has not submitted an application review fee to HCEPC.

2. Barge Unloading - Assumed Spillage Rate

The spillage rate for the grab bucket from the barge was assumed to be 10% of the total barge throughput to the yard. The 10% assumption was used in all previous estimates at the approved 2.4 million tons per year coal throughput. (See DER's Technical Evaluation and Preliminary Determination - AC29-61276 - March 9, 1983).

3. Emissions Changes - Vehicular Entrainment

The vehicular entrainment emissions are those expected from dust generated on the site roads of the coal yard. It is not expected that the level of use on the site roads will increase as a result of an increase in coal throughput to the yard.

4. Coal Moisture Content

A moisture content of 8.12% was used to estimate the emissions from all rail related activities. The 8.12% moisture content represents the "as received" moisture content from our rail supplier. (See November 27, 1982 letter to you, in DER's Technical Evaluation and Preliminary Determination - AC29-61276 - March 9, 1983.)

5. Emissions - Crusher House

Because of the fully enclosed nature of the hammermill crushers, dusting is expected to occur only at the inlet conveyors to the crusher house and the outlet conveyors from the crusher house.

The estimated emissions for the inlet and outlet conveyors are identified in items 18 (G1/G2 to crusher), and 19 (crusher to H1/H2) of Attachment 1 to our permit application. (See also - DER's Technical Evaluation and Preliminary Evaluation AC29-61276 - March 9, 1983).

Mr. Clair Fancy, P.E.

February 27, 1986

Page 3

6. Assumed Conditioning Efficiency

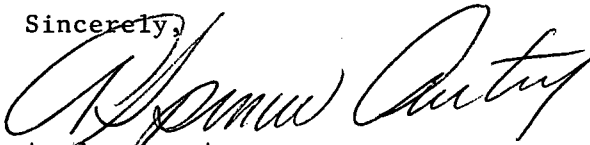
As explained in our initial application for Permit #AC29-61276, we have allowed 50% control efficiency since the incoming coal is wet (i.e. conditioned against a certain amount of particulate loss). The 50% efficiency is assumed based on an estimated control efficiency of 80% for regularly watered piles. (See DER's Technical Evaluation and Preliminary Determination - AC29-61276 - March 9, 1983).

7. Assumed Compaction Efficiency

As explained in our initial application for permit #AC29-61276, the dead storage is conditioned on arrival and compacted for long term storage. We have estimated 70% for the combined controls. (See DER's Technical Evaluation and Preliminary Determination - AC29-61276 March 9, 1983.)

Please call me if you have any questions.

Sincerely,



A. Spencer Autry
Manager
Environmental Planning

ASA/jst/022/EE1

~~Clayton~~, Bill 3/4

Incompleteness
response -

Ed S., Dist. &
HCEPC copied.

Please return
for file -

Patty

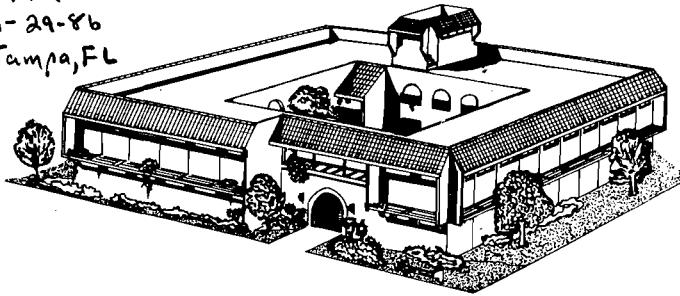
W3-27-66 letter
To CH Family
RCD 3-3-86

HILLSBOROUGH COUNTY
ENVIRONMENTAL PROTECTION

COMMISSION

RODNEY COLSON
RON GLICKMAN
PAM IORIO
RUBIN E. PADGETT
JAN KAMINIS PLATT
JAMES D. SELVEY
PICKENS C. TALLEY II

PM
1-29-86
Tampa, FL



ROGER P. STEWART
DIRECTOR

1900 - 9th AVE
TAMPA, FLORIDA 33605

DER TELEPHONE (813) 272-5960

JAN 31 1986

BAQM

MEMORANDUM

Date January 28, 1986

To Ed Svec

From Jerry Campbell *JE*

Subject: Gannon Coal Yard Modification

As we discussed over the telephone, I have reviewed TECO's application and offer the following items for inclusion in your letter of incompleteness:

1. If the Bureau views this application as an amendment request to their construction permit, then TECO owes the County a technical review fee of \$340.00. On the other hand, if the Bureau intends to handle this as a modification of the original permit to construct, then the County is owed an application review fee of \$385.00. In either case the check should be made payable to the Hillsborough County Board of County Commissioners.
2. Item 14 of attachment #1 to the application claims efficiencies of fifty and seventy percent based on conditioning and compaction. Recent inspections of the coal yard revealed that dead storage piles are compacted, but the conditioning claimed due to the high moisture content upon receipt was not evident. Ask TECO to justify the fifty percent efficiency for conditioning in the absence of a sprinkler system, which would be necessary to maintain the surface moisture of the coal for an extended period. They should provide a derivation or an explanation for the seventy percent efficiency claimed on the dead storage piles.
3. As detailed in my memorandum of December 19, 1985 to Clair Fancy, I feel that TECO should address the questions of total moisture versus surface moisture and emissions from the hammermill crushers.

If you have any questions concerning the contents of this memorandum, please contact me.

cc: Bill Thomas

JC/ch

1-21986

CHECK NO.

21986



POST OFFICE BOX 111
TAMPA, FLORIDA 33601

631

PAY:

DATE

ONE THOUSAND AND NO/100 DOLLARS ***** 01 03 86 \$ *****1,000.00

TO THE ORDER OF
FLORIDA DEPT OF ENVIRONMENTAL
REGULATION

W. H. Stoll
ONLY ONE SIGNATURE REQUIRED ON CHECKS OF \$2500.00 OR LESS

NCNB NATIONAL BANK OF FLORIDA • TAMPA, FLORIDA

THE ACCOMPANYING CHECK IS IN FULL PAYMENT OF ITEMS BELOW - DETACH BEFORE CASHING

INVOICE NO.	DATE	VOUCHER	GROSS AMOUNT	DISCOUNT	NET AMOUNT
122385	122385	126524	PERMIT APPLICATION FEE 1,000.00		1,000.00
CHECK NO.	DATE	VENDOR NO.	VENDOR NAME	TOTAL AMOUNT	
21986	010386	FL0004	FLORIDA DEPT OF ENVIR	1,000.00	

TAMPA ELECTRIC COMPANY • P.O. BOX 111 TAMPA, FL. 33601 • (813) 228-4111

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

No. 76104

RECEIPT FOR APPLICATION FEES AND MISCELLANEOUS REVENUE

Received from Tampa Electric Date Jan. 15, 1986

Address P.O. Box 111 Tampa FL 33601 Dollars \$ 1,000.00

Applicant Name & Address Same as above

Source of Revenue _____

Revenue Code 001031 Application Number AC 29-114670

By Patricia G. Adams



DER

JAN 10 1986

BAQM

January 8, 1986

Mr. Clair Fancy
Florida Department of
Environmental Regulation
Twin Towers Building
2600 Blair Stone Road
Tallahassee, Florida 32301-8241

Re: Amendment to Air Construction Permit
AC29-6276
F.J. Gannon Station Coal Yard

Dear Mr. Fancy:


Please find enclosed an original and four (4) copies of an amended Application to Operate/Construct Air Pollution Sources for the above referenced coal yard. Also enclosed is an authorization letter for the applicant and a check for \$1000.00 made payable to the Florida Department of Environmental Regulation.

Tampa Electric Company is requesting an amendment to the above referenced construction permit to allow a throughput rate of 2.89 million tons coal per year. No modification to the constructed facility is proposed.

Tampa Electric would appreciate an expeditious review of our request as it is our understanding that an amendment to the construction permit is necessary in order to amend our pending operation permit.

If you have any questions, please call.

Sincerely,



A. Spencer Autry
Manager
Environmental Planning

ASA/jlm/011/phl

Enclosure



January 7, 1986

TO WHOM IT MAY CONCERN:

Please be advised that A. Spencer Autry, Manager of Environmental Planning, is the authorized representative of Tampa Electric Company concerning matters with which this permit application deals.

Very truly yours,

Heywood A. Turner
Senior Vice President
Production

HAT/tb

DER

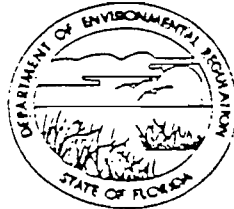
JAN 10 1986

BAQM

AC 29-114676

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301



BOB GRAHAM
GOVERNOR

VICTORIA J. TSCHINKEL
SECRETARY

DER

JAN 10 1986

BAQM

APPLICATION TO OPERATE/CONSTRUCT AIR POLLUTION SOURCES

SOURCE TYPE: Air Pollution [] New¹ [X] Existing¹

APPLICATION TYPE: [] Construction [] Operation [X] Modification

COMPANY NAME: Tampa Electric Company COUNTY: Hillsborough

Identify the specific emission point source(s) addressed in this application (i.e. Line
Kiln No. 4 with Venturi Scrubber; Peaking Unit No. 2, Gas Fired) Gannon Station
Coal Yard

SOURCE LOCATION: Street Port Sutton Road City Tampa

UTM: East 360,000 North 3,087,500

Latitude 27 ° 54 ' 25 "N Longituda 82 ° 25 ' 21 "W

APPLICANT NAME AND TITLE: A. Spencer Autry, Manager, Environmental Planning

APPLICANT ADDRESS: P.O. Box 111, Tampa, FL 33601 Attn: Environmental Planning

SECTION I: STATEMENTS BY APPLICANT AND ENGINEER

A. APPLICANT

I am the undersigned owner or authorized representative* of Tampa Electric Company

I certify that the statements made in this application for a modification permit are true, correct and complete to the best of my knowledge and belief. Further, I agree to maintain and operate the pollution control source and pollution control facilities in such a manner as to comply with the provision of Chapter 403, Florida Statutes, and all the rules and regulations of the department and revisions thereof. I also understand that a permit, if granted by the department, will be non-transferable and I will promptly notify the department upon sale or legal transfer of the permitted establishment.

*Attach letter of authorization

Signed: *A. Spencer Autry*
 A. Spencer Autry
 Manager, Environmental Planning
Name and Title (Please Type)

Date: 1/8/86 Telephone No. 228-4638

B. PROFESSIONAL ENGINEER REGISTERED IN FLORIDA (where required by Chapter 471, F.S.)

This is to certify that the engineering features of this pollution control project have been designed/examined by me and found to be in conformity with modern engineering principles applicable to the treatment and disposal of pollutants characterized in the permit application. There is reasonable assurance, in my professional judgment, that

See Florida Administrative Code Rule 17-2.100(57) and (104)

the pollution control facilities, when properly maintained and operated, will discharge an effluent that complies with all applicable statutes of the State of Florida and the rules and regulations of the department. It is also agreed that the undersigned will furnish, if authorized by the owner, the applicant a set of instructions for the proper maintenance and operation of the pollution control facilities and, if applicable, pollution sources.

Signed _____

Lynn F. Robinson, P.E.

Name (Please Type)

Tampa Electric Company

Company Name (Please Type)

P.O. Box 111, Tampa, Florida 33601

Mailing Address (Please Type)

Florida Registration No. 20786

Date: 1/8/86

Telephone No. (813) 228-4111

SECTION II: GENERAL PROJECT INFORMATION

- A. Describe the nature and extent of the project. Refer to pollution control equipment, and expected improvements in source performance as a result of installation. State whether the project will result in full compliance. Attach additional sheet if necessary.

Amendment of the coal throughput to the Gannon Coal Yard facility from the initial design throughput rate of 2.4 million tons/year to a revised maximum operation rate of 2.89 million tons/year. There will be no physical construction on site that will increase the coal yard emissions. Existing dust controls such as conveyor and transfer point enclosures and a wet dust suppressant system will be used to minimize emissions and maintain opacity levels below the applicable standards.

- B. Schedule of project covered in this application (Construction Permit Application Only)

Start of Construction None

Completion of Construction None

- C. Costs of pollution control system(s): (Note: Show breakdown of estimated costs only for individual components/units of the project serving pollution control purposes. Information on actual costs shall be furnished with the application for operation permit.)

Conveyor Hoods - \$ 69,800

Transfer Point Enclosures - \$259,865

Wet Dust Suppression System - \$ 57,935

- D. Indicate any previous DER permits, orders and notices associated with the emission point, including permit issuance and expiration dates.

AC29 - 61276 - Issued: April 12, 1983 Expired: December 31, 1984

A029 - 94044 - Issued: October 25, 1985, no final agency action taken.

E. Requested permitted equipment operating time: hrs/day 24 ; days/wk 7 ; wks/yr 52 ;
if power plant, hrs/yr 8760; if seasonal, describe: Not Applicable

F. If this is a new source or major modification, answer the following questions.
(Yes or No)

1. Is this source in a non-attainment area for a particular pollutant? Yes*
- a. If yes, has "offset" been applied? No
- b. If yes, has "Lowest Achievable Emission Rate" been applied? No**
- c. If yes, list non-attainment pollutants. Particulate
2. Does best available control technology (BACT) apply to this source?
If yes, see Section VI. No
3. Does the State "Prevention of Significant Deterioration" (PSD)
requirement apply to this source? If yes, see Sections VI and VII. No
4. Do "Standards of Performance for New Stationary Sources" (NSPS)
apply to this source? No
5. Do "National Emission Standards for Hazardous Air Pollutants"
(NESHAP) apply to this source? No
- H. Do "Reasonably Available Control Technology" (RACT) requirements apply
to this source? Yes
- a. If yes, for what pollutants? Particulate
- b. If yes, in addition to the information required in this form,
any information requested in Rule 17-2.650 must be submitted.

Attach all supportive information related to any answer of "Yes". Attach any justifi-
cation for any answer of "No" that might be considered questionable.

* FAC Section 17-2.410(2)1 - Hillsborough County particulate non-attainment area defined.

**The modification in the throughput rate is not expected to produce a "Significant
Net Emission Increase" in particulates. (See attached emissions analysis.) Thus,
pursuant to FAC 17-2.510(2)(d)4a, Preconstruction Review Requirements, including
"Lowest Achievable Emission Rate", are not applicable.

SECTION III: AIR POLLUTION SOURCES & CONTROL DEVICES (Other than Incinerators)

A. Raw Materials and Chemicals Used in your Process, if applicable: Not Applicable

Description	Contaminants		Utilization Rate - lbs/hr	Relate to Flow Diagram
	Type	% Wt		

B. Process Rate, if applicable: (See Section V, Item 1) Not Applicable

1. Total Process Input Rate (lbs/hr): _____

2. Product Weight (lbs/hr): _____

C. Airborne Contaminants Emitted: (Information in this table must be submitted for each emission point, use additional sheets as necessary)

Name of Contaminant	Emission ¹		Allowed Emission Rate per Rule 17-2	Allowable ³ Emission lbs/hr	Potential ⁴ Emission		Relate to Flow Diagram
	Maximum lbs/hr	Actual T/yr			lbs/hr	T/yr	
Particulate	47.0	180.8	Not Applicable	Not Applicable	106.2	416.4	See Figure 1
Opacity	--	--	5%*	--	--	--	--

¹See Section V, Item 2.

²Reference applicable emission standards and units (e.g. Rule 17-2.600(5)(b)2. Table II, E. (1) - 0.1 pounds per million BTU heat input)

³Calculated from operating rate and applicable standard.

⁴Emission, if source operated without control (See Section V, Item 3).

* FAC 17-2.650(2)(c)11b.(i)

D. Control Devices: (See Section V, Item 4)

Name and Type (Model & Serial No.)	Contaminant	Efficiency	Range of Particles Size Collected (in microns) (If applicable)	Basis for Efficiency (Section V Item 5)
Enclosed Transfers	Particulate	70 - 80%	Not Applicable	See
Enclosed Conveyors	Particulate	40 - 50%	Not Applicable	Attachment
Wet Dust Suppressant	Particulate	95%	Not Applicable	1

E. Fuels Not Applicable

Type (Be Specific)	Consumption*		Maximum Heat Input (MMBTU/hr)
	avg/hr	max./hr	

*Units: Natural Gas--MMCF/hr; Fuel Oils--gallons/hr; Coal, wood, refuse, other--lbs/hr.

Fuel Analysis:

Percent Sulfur: _____ Percent Ash: _____

Density: _____ lbs/gal Typical Percent Nitrogen: _____

Heat Capacity: _____ BTU/lb _____ BTU/gal

Other Fuel Contaminants (which may cause air pollution): _____

F. If applicable, indicate the percent of fuel used for space heating. Not Applicable

Annual Average _____ Maximum _____

G. Indicate liquid or solid wastes generated and method of disposal. Not Applicable

H. Emission Stack Geometry and Flow Characteristics (Provide data for each stack): Not Applicable

Stack Height: _____ ft. Stack Diameter: _____ ft.

Gas Flow Rate: _____ ACFM _____ DSCFM Gas Exit Temperature: _____ °F.

Water Vapor Content: _____ % Velocity: _____ FPS

SECTION IV: INCINERATOR INFORMATION Not Applicable

Type of Waste	Type 0 (Plastics)	Type I (Rubbish)	Type II (Refuse)	Type III (Garbage)	Type IV (Pathological)	Type V (Liq. & Gas By-prod.)	Type VI (Solid By-prod.)
Actual lb/hr Incinerated							
Uncontrolled (lbs/hr)							

Description of Waste _____

Total Weight Incinerated (lbs/hr) _____ Design Capacity (lbs/hr) _____

Approximate Number of Hours of Operation per day _____ day/wk _____ wks/yr.

Manufacturer _____

Date Constructed _____ Model No. _____

	Volume (ft) ³	Heat Release (BTU/hr)	Fuel		Temperature (°F)
			Type	BTU/hr	
Primary Chamber					
Secondary Chamber					

Stack Height: _____ ft. Stack Diameter: _____ Stack Temp. _____

Gas Flow Rate: _____ ACFM _____ DSCFM* Velocity: _____ FPS

*If 50 or more tons per day design capacity, submit the emissions rate in grains per standard cubic foot dry gas corrected to 50% excess air.

Type of pollution control device: Cyclone Wet Scrubber Afterburner
 Other (specify) _____

Brief description of operating characteristics of control devices: _____

Ultimate disposal of any effluent other than that emitted from the stack (scrubber water, ash, etc.):

NOTE: Items 2, 3, 4, 6, 7, 8, and 10 in Section V must be included where applicable.

SECTION V: SUPPLEMENTAL REQUIREMENTS

Please provide the following supplements where required for this application.

1. Total process input rate and product weight -- show derivation [Rule 17-2.100(127)]
Not Applicable
2. To a construction application, attach basis of emission estimate (e.g., design calculations, design drawings, pertinent manufacturer's test data, etc.) and attach proposed methods (e.g., FR Part 60 Methods 1, 2, 3, 4, 5) to show proof of compliance with applicable standards. To an operation application, attach test results or methods used to show proof of compliance. Information provided when applying for an operation permit from a construction permit shall be indicative of the time at which the test was made.
Not Applicable
3. Attach basis of potential discharge (e.g., emission factor, that is, AP42 test).
See Attachment 1
4. With construction permit application, include design details for all air pollution control systems (e.g., for baghouse include cloth to air ratio; for scrubber include cross-section sketch, design pressure drop, etc.)
Not Applicable
5. With construction permit application, attach derivation of control device(s) efficiency. Include test or design data. Items 2, 3 and 5 should be consistent: actual emissions = potential (1-efficiency).
Not Applicable
6. An 8 1/2" x 11" flow diagram which will, without revealing trade secrets, identify the individual operations and/or processes. Indicate where raw materials enter, where solid and liquid waste exit, where gaseous emissions and/or airborne particles are evolved and where finished products are obtained. See Figure 1
7. An 8 1/2" x 11" plot plan showing the location of the establishment, and points of airborne emissions, in relation to the surrounding area, residences and other permanent structures and roadways (Example: Copy of relevant portion of USGS topographic map).
See Figure 2
8. An 8 1/2" x 11" plot plan of facility showing the location of manufacturing processes and outlets for airborne emissions. Relate all flows to the flow diagram.
See Figure 3

9. The appropriate application fee in accordance with Rule 17-4.05. The check should be made payable to the Department of Environmental Regulation.
10. With an application for operation permit, attach a Certificate of Completion of Construction indicating that the source was constructed as shown in the construction permit.

SECTION VI: BEST AVAILABLE CONTROL TECHNOLOGY Not Applicable

A. Are standards of performance for new stationary sources pursuant to 40 C.F.R. Part 60 applicable to the source?

Yes No

Contaminant	Rate or Concentration

B. Has EPA declared the best available control technology for this class of sources (If yes, attach copy)

Yes No

Contaminant	Rate or Concentration

C. What emission levels do you propose as best available control technology?

Contaminant	Rate or Concentration

D. Describe the existing control and treatment technology (if any).

- | | |
|---------------------------|--------------------------|
| 1. Control Device/System: | 2. Operating Principles: |
| 3. Efficiency:* | 4. Capital Costs: |

*Explain method of determining

5. Useful Life:

6. Operating Costs:

7. Energy:

8. Maintenance Cost:

9. Emissions:

Contaminant

Rate or Concentration

Contaminant	Rate or Concentration

10. Stack Parameters

a. Height:

ft.

b. Diameter:

ft.

c. Flow Rate:

ACFM

d. Temperature:

°F.

e. Velocity:

FPS

E. Describe the control and treatment technology available (As many types as applicable, use additional pages if necessary).

1.

a. Control Device:

b. Operating Principles:

c. Efficiency:¹

d. Capital Cost:

e. Useful Life:

f. Operating Cost:

g. Energy:²

h. Maintenance Cost:

i. Availability of construction materials and process chemicals:

j. Applicability to manufacturing processes:

k. Ability to construct with control device, install in available space, and operate within proposed levels:

2.

a. Control Device:

b. Operating Principles:

c. Efficiency:¹

d. Capital Cost:

e. Useful Life:

f. Operating Cost:

g. Energy:²

h. Maintenance Cost:

i. Availability of construction materials and process chemicals:

¹Explain method of determining efficiency.

²Energy to be reported in units of electrical power - KWH design rate.

- j. Applicability to manufacturing processes:
- k. Ability to construct with control device, install in available space, and operate within proposed levels:

3.

- a. Control Device:
- b. Operating Principles:
- c. Efficiency:¹
- d. Capital Cost:
- e. Useful Life:
- f. Operating Cost:
- g. Energy:²
- h. Maintenance Cost:
- i. Availability of construction materials and process chemicals:
- j. Applicability to manufacturing processes:
- k. Ability to construct with control device, install in available space, and operate within proposed levels:

4.

- a. Control Device:
- b. Operating Principles:
- c. Efficiency:¹
- d. Capital Costs:
- e. Useful Life:
- f. Operating Cost:
- g. Energy:²
- h. Maintenance Cost:
- i. Availability of construction materials and process chemicals:
- j. Applicability to manufacturing processes:
- k. Ability to construct with control device, install in available space, and operate within proposed levels:

F. Describe the control technology selected:

- 1. Control Device:
- 2. Efficiency:¹
- 3. Capital Cost:
- 4. Useful Life:
- 5. Operating Cost:
- 6. Energy:²
- 7. Maintenance Cost:
- 8. Manufacturer:
- 9. Other locations where employed on similar processes:
- a. (1) Company:
- (2) Mailing Address:
- (3) City:
- (4) State:

Explain method of determining efficiency.

Energy to be reported in units of electrical power - KWH design rate.

(5) Environmental Manager:

(6) Telephone No.:

(7) Emissions:¹

Contaminant	Rate or Concentration

(8) Process Rate:¹

b. (1) Company:

(2) Mailing Address:

(3) City:

(4) State:

(5) Environmental Manager:

(6) Telephone No.:

(7) Emissions:¹

Contaminant	Rate or Concentration

(8) Process Rate:¹

10. Reason for selection and description of systems:

¹Applicant must provide this information when available. Should this information not be available, applicant must state the reason(s) why.

SECTION VII - PREVENTION OF SIGNIFICANT DETERIORATION Not Applicable

A. Company Monitored Data

1. _____ no. sites _____ TSP _____ () SO₂ _____ Wind spd/dir

Period of Monitoring _____ / _____ / _____ to _____ / _____ / _____
month day year month day year

Other data recorded _____

Attach all data or statistical summaries to this application.

Specify bubbler (B) or continuous (C).

2. Instrumentation, Field and Laboratory

- a. Was instrumentation EPA referenced or its equivalent? Yes No
- b. Was instrumentation calibrated in accordance with Department procedures?
 Yes No Unknown

B. Meteorological Data Used for Air Quality Modeling

- 1. _____ Year(s) of data from _____ / _____ / _____ to _____ / _____ / _____
month day year month day year
- 2. Surface data obtained from (location) _____
- 3. Upper air (mixing height) data obtained from (location) _____
- 4. Stability wind rose (STAR) data obtained from (location) _____

C. Computer Models Used

- 1. _____ Modified? If yes, attach description.
- 2. _____ Modified? If yes, attach description.
- 3. _____ Modified? If yes, attach description.
- 4. _____ Modified? If yes, attach description.

Attach copies of all final model runs showing input data, receptor locations, and principle output tables.

D. Applicants Maximum Allowable Emission Data

Pollutant	Emission Rate
TSP	_____ grams/sec
SO ²	_____ grams/sec

E. Emission Data Used in Modeling

Attach list of emission sources. Emission data required is source name, description of point source (on NEDS point number), UTM coordinates, stack data, allowable emissions, and normal operating time.

F. Attach all other information supportive to the PSD review.

G. Discuss the social and economic impact of the selected technology versus other applicable technologies (i.e., jobs, payroll, production, taxes, energy, etc.). Include assessment of the environmental impact of the sources.

H. Attach scientific, engineering, and technical material, reports, publications, journals, and other competent relevant information describing the theory and application of the requested best available control technology.

PARTICULATE EMISSIONS ESTIMATE

ATTACHMENT I

GANNON STATION COAL YARD

COAL THROUGHPUT : 2890000 TONS/YR
 LIMESTONE THROUGHPUT : 57000 TONS/YR
 VEHICULAR TRAFFIC MILEAGE : 9125 MILES

SOURCE	THROUGHPUT (Tons/Yr)	RAIL (Tons/Yr)	BARGE (Tons/Yr)	TO PLANT (Tons/Yr)	TO YARD (Tons/Yr)	TO LIVE & ACTIVE (Tons/Yr)	TO DEAD STORE (Tons/Yr)	PERIOD IN LIVE & ACTIVE (Days)	PERIOD IN DEAD STORE (Days)
COAL	2890000	1806250	1083750	289000	2601000	2301000	300000	12.69	365
LIMESTONE	57000				57000			26.81	

#	Particulate Emission Source	Throughput		Uncontrolled Emission Factor (lbs/ton)	Uncontrolled Emissions		Efficiency (%)	Controlled Emissions	
		(Tons/Yr)	(Tons/Hr)		(Tons/yr)	(Lbs/Hr)		(Tons/yr)	(Lbs/Hr)
1	Grab bucket from Barge	108375	150	0.003300	0.179	0.495	0	0.179	0.495
2	Bucket to Hopper	1083750	1500	0.000220	0.119	0.330	25	0.089	0.248
3	Hopper to Feeder	1083750	1500	0.000018	0.010	0.027	0	0.010	0.027
4	Feeder to Conveyor B	1083750	1500	0.000135	0.073	0.203	50	0.037	0.101
5	Conveyor B to Conveyor C	1083750	1500	0.000090	0.049	0.135	50	0.024	0.068
6	Conveyor C to D1/D2	1083750	1500	0.000225	0.122	0.338	95	0.006	0.017
7	Rail car to Hopper	1806250	1500	0.001564	1.412	2.346	40	0.847	1.408
8	Hopper to Feeder	1806250	1500	0.000040	0.036	0.060	50	0.018	0.030
9	Feeder to Conveyor L	1806250	1500	0.000010	0.009	0.015	50	0.005	0.008
10	Conveyor L to D1/D2	1806250	1500	0.000600	0.542	0.900	95	0.027	0.045
11	D1/D2 to M1/M2	2601000	3000	0.000340	0.442	1.020	95	0.022	0.051
12	M1/M2 to E1/E2	2601000	3000	0.000160	0.208	0.480	95	0.010	0.024
13	E1/E2 to Stockpile	2601000	3000	0.000630	0.819	1.890	0	0.819	1.890
14	Coal Stockpile Live	2301000	8760(Hr/Yr)	0.031091	35.770	8.167	50	17.885	4.083
	Coal Stockpile Dead	300000	8760(Hr/Yr)	0.094250	134.138	30.625	70	40.241	9.188
15	Limestone Live	57000	8760(Hr/Yr)	0.000391	0.011	0.003	0	0.011	0.003
16	Reclaim to F1/F2/F3/F4	2601000	1600	0.000272	0.354	0.435	85	0.053	0.065
17	F1/F2/F3/F4 to G1/G2	2601000	1600	0.000408	0.531	0.653	95	0.027	0.033
18	G1/G2 to Crusher	2890000	1600	0.000340	0.491	0.544	70	0.147	0.163
19	Crusher to H1/H2	2890000	1600	0.000102	0.147	0.163	70	0.044	0.049
20	H1/H2 to J1/J2	2890000	1600	0.000221	0.319	0.354	80	0.064	0.071
21	J1/J2 to Bunker	2890000	1600	0.000459	0.663	0.734	95	0.033	0.037
22	D1/D2 to G1/G2 by-passes stor.	289000	160	0.000960	0.139	0.154	95	0.007	0.008
23	Vehicular entrainment	9125(mi)	730(Hr/Yr)	0.124 lb/mi	0.566	1.551	0	0.566	1.551
24	Stockpile Maintenance	2601000	8760(Hr/Yr)	0.184000	239.292	54.633	50	119.646	27.316
	TOTAL				416.442	106.253		180.819	46.976

Reference : Technical Evaluation and Preliminary Determination
 Tampa Electric Company - Gannon Coal Yard
 Permit Number AC 29-61276
 Florida Dept. of Environmental Regulation - BADM - CAP
 March 9, 1983

Emissions	Tons/Yr	Lbs/Hr
(1) Pre-construction	156.17	41.55
(2) Permitted	160.12	43.79
(3) Proposed	180.82	46.98
Increment		
(3) - (1)	24.65	5.43

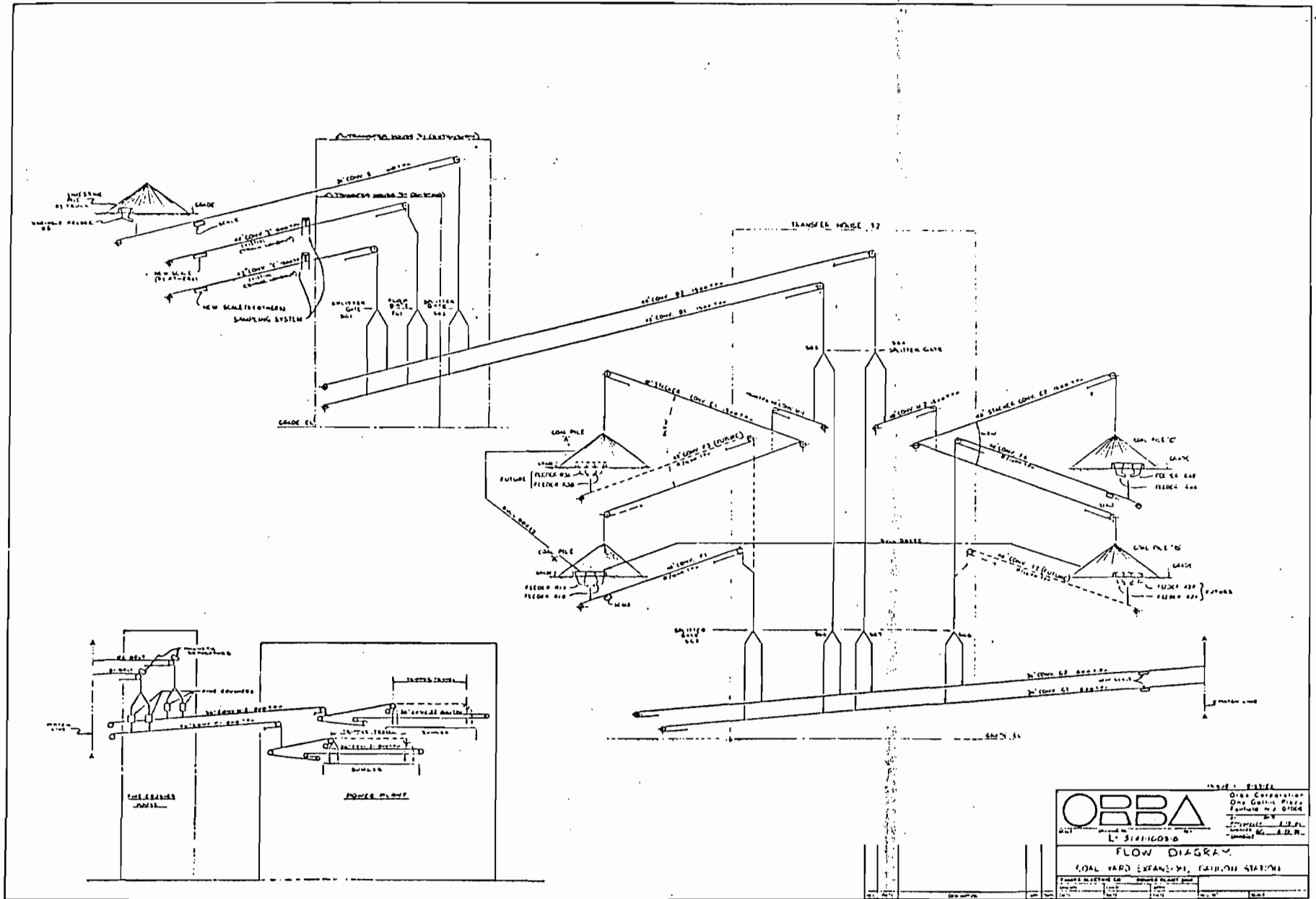
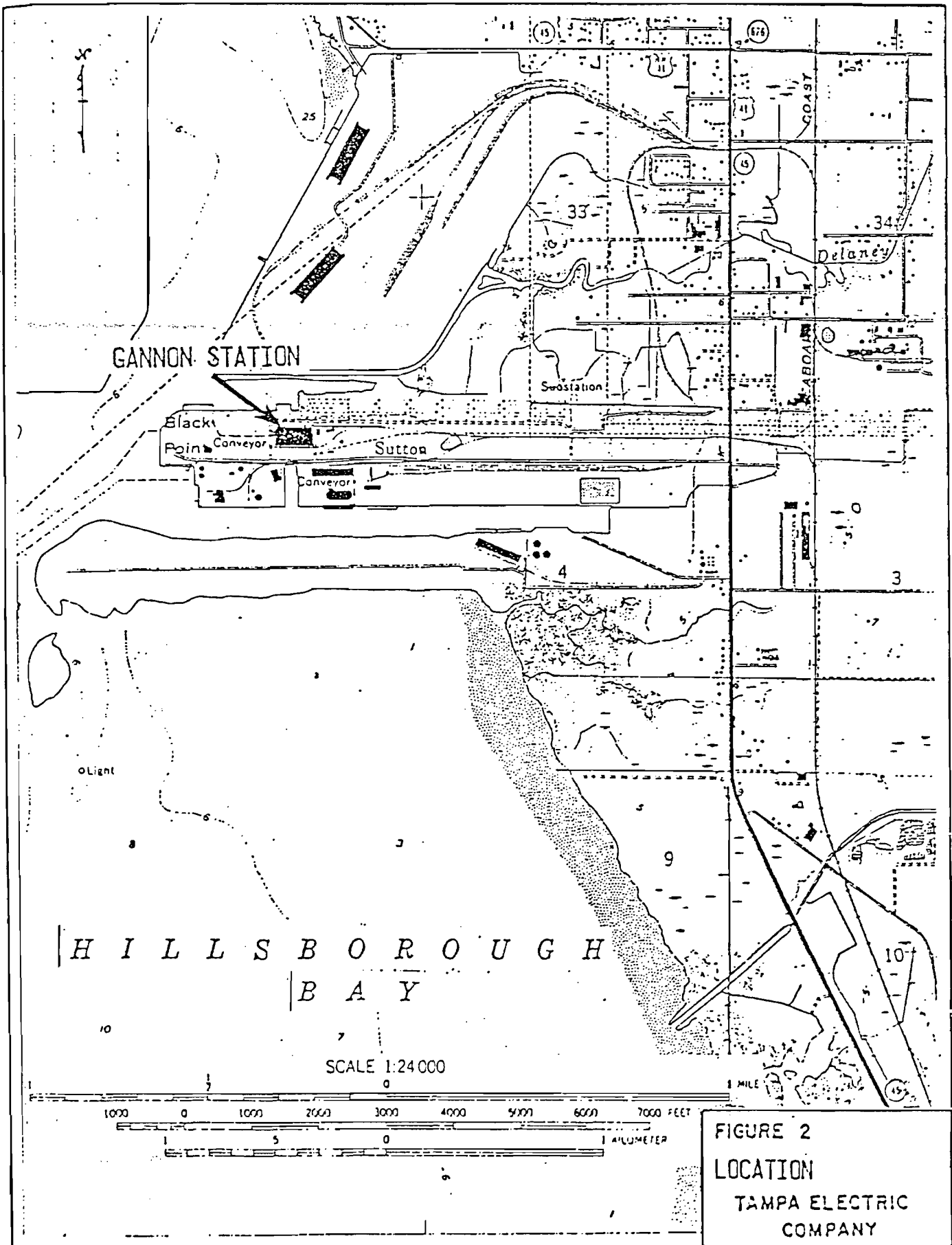


Figure 1



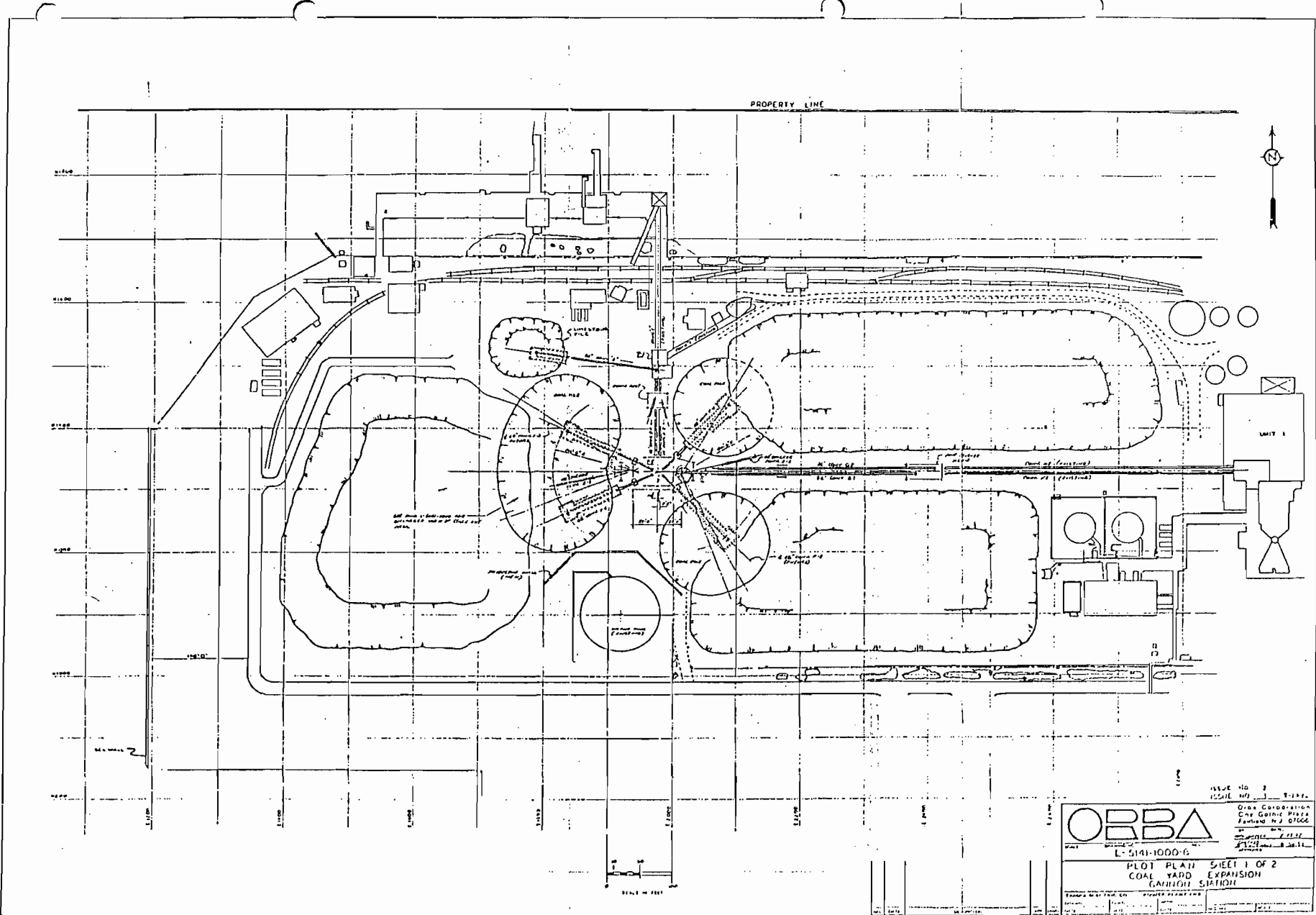
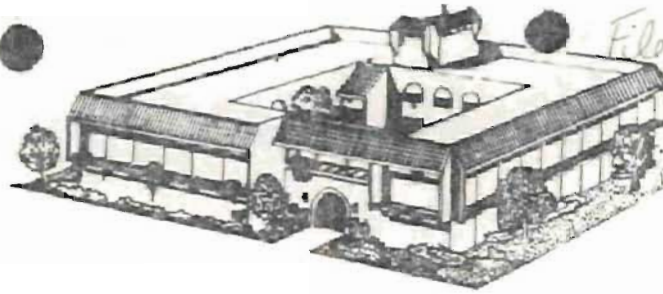


Figure 3

HILLSBOROUGH COUNTY
ENVIRONMENTAL PROTECTION

COMMISSION

RODNEY COLSON
RON GLICKMAN
PAM IORIO
RUBIN E. PADGETT
JAN KAMINIS PLATT
JAMES D. SELVEY
PICKENS C. TALLEY II



7-62
File TECO
General Correspondence
Attn: Ed Suec
JC 1/2/86
ROGER P. STEWART
DIRECTOR
1900 - 9th AVE
TAMPA, FLORIDA 33605
TELEPHONE (813) 272-5960

December 30, 1985

Attachment #1
Correspondence on
delegation between
TECO, DER & EPC.

Steve Smallwood, Chief, BAQM
Department of Environmental Regulation
2600 Blair Stone Road
Tallahassee, Florida 32302-8241

RE: TECO LETTER 12/19/85 REGARDING DELEGATION TO LOCAL PROGRAMS

Dear Mr. Smallwood:

It appears that Mr. Williams continues to be confused. It would, of course, be more logical if Mr. Williams would ask HCEPC when it is acting on behalf of the Department.

Regarding his questions on the applicability of Chapter 120 (we were not provided a copy of the "brief memorandum"), HCEPC is not subject thereto when it administers its own rules under its enabling act. Although HCEPC does not enforce County ordinances, it does cooperate with the County on several. Neither HCEPC nor the County are subject to Chapter 120 on those matters unless the ordinance specifically so provides. By agreement, HCEPC does process certain permits on behalf of DER. In those circumstances alone is HCEPC subject to the provisions of Chapter 120 to the extent that DER remains bound by the time limitations. HCEPC's recommendation to DER regarding the issuance or non-issuance of a permit is effected pursuant to its own authority to work with other agencies and is, therefore, not a decision subject to Chapter 120 challenge. Interpretations of Department rules are at the discretion of the Department (while interpretations of HCEPC rules are at the discretion of the HCEPC). HCEPC does its best to apply Department rules according to Department interpretation and, in circumstances of doubt, always attempts to obtain clarification from the Department.

Sincerely,

Sara M. Fotopulos

Sara M. Fotopulos
Chief Counsel

SMF/ljh

cc: Dr. R. Garrity
(SM/SS)

DER
MAR 28 1986
BAQM



RECEIVED

DEC 26 1985

H.C.E.P.C.

December 19, 1985

Mr. Steve Smallwood
Chief, Bureau of
Air Quality Management
Florida Department of
Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32301

DER
MAR 28 1986
BAQM

Re: Delegation of Department Functions
to Local Air Programs

Dear Mr. Smallwood:

Thank you for your letter of December 5, 1985, responding to my inquiries concerning the relationship between the Department of Environmental Regulation (Department) and the Hillsborough County Environmental Protection Commission (HCEPC) under the local program delegation. Although you certainly have adequately delineated the responsible permit issuing agency and have identified the individuals that would be involved in various levels of decision making within the Department and HCEPC, your letter does not answer definitively the questions that we attempted to pose to you. As you suggested in your letter, I am requesting additional clarification. It would be helpful to us if you could respond to the items that follow.

You state in your letter that Chapter 120 of the Florida Statutes applies to permit issuance regardless of who is processing the permit. We have reviewed the statutes and your interagency agreements and have discussed the matter with our attorney. It is not clear to us that Chapter 120 does apply to HCEPC actions. I have enclosed a brief memorandum from one of our lawyers that concludes that Chapter 120 does not appear to apply to HCEPC either when it administers its own ordinances and local laws, or when it is acting on behalf of the Department under various agreements. Since your opinion differs, it would be helpful to me if you could provide us with the basis for your statement that the Chapter 120 procedures apply.

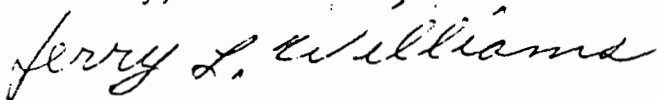
In my original letter, when I asked you various questions about the relationship between the Department and HCEPC, I was trying to determine how we could know when the HCEPC was acting as the Department's agent

and when it was not. It is sometimes not clear when HCEPC is acting under the Department's programs or under its own ordinances. We would like to learn from the Department how we can make a determination of the role of the county when these situations arise. The interagency agreements are not particularly specific. I read your letter to say that HCEPC performs for the Department a function relating to permit processing that culminates in the recommendation of conditions that may or may not be imposed by the district. I take it from this that the HCEPC's authority would end at the point the recommendation is made. I also understand from your letter that questions concerning the Department's program can be definitively answered only by the Department. Perhaps you can confirm whether I am correctly reading your letter.

The answers to these questions are important to us because from time to time we do have disagreements concerning the interpretation of the Department's rules, and this sometimes arises when HCEPC is processing an operation permit for us. It is helpful for us to understand how these positions have been formulated by HCEPC and whether when representations are made by that group that it is acting for the Department, the Department would stand behind that interpretation that has been made. It does not simplify matters to contact several people at the county and then contact several people at the Department concerning the same matter. We were hoping that the process could somehow be streamlined so that these matters could be quickly resolved.

Concerning your questions about the specific individuals to contact when communicating with Tampa Electric Company concerning air pollution control matters, for your purposes, the individuals responsible are Jerry Williams, Director of Environmental, and A. Spencer Autry, Manager of Environmental Planning who reports to me.

Sincerely,



Jerry L. Williams
Director
Environmental

JLW/jst/JS1

Enclosure

cc: Mr. Clair Fancy
Dr. Richard Garrity
Mr. Roger Stewart
Lawrence Curtin, Esquire

STATE OF FLORIDA
 DEPARTMENT OF ENVIRONMENTAL REGULATION

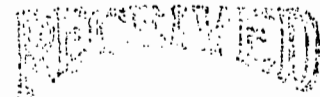
TWIN TOWERS OFFICE BUILDING
 2600 BLAIR STONE ROAD
 TALLAHASSEE, FLORIDA 32301-8241



BOB GRAHAM
 GOVERNOR

VICTORIA J. TSCHINKEL
 SECRETARY

December 5, 1985



DEC 9 1985

Mr. Jerry L. Williams
 Director
 Environmental
 Tampa Electric Company
 Post Office Box 111
 Tampa, Florida 33601

Dear Mr. Williams:

RE: Delegation of Department Functions to Local Air Programs

In your October 15, 1985 letter concerning the role of the Hillsborough County Environmental Protection Commission in implementing the state's air program within Hillsborough County, you asked me to provide you with a description of HCEPC's specific duties in the air permitting area. You stated that you remain confused about the division of responsibilities between the county and the department and the procedures that should be followed in processing air permit applications. You also noted that there have been instances in which your company has received an incompleteness letter from the county and another incompleteness letter from the district concerning the same application.

I hope the following will clearly answer your questions. If you need additional information on some of the points discussed, please call Dr. Richard Garrity in Tampa, the department's District Manager for the SW District, or me to further discuss any questions you may have concerning air permitting or, for that matter, any other aspect of the department's or the county's air program activities.

I have discussed the questions you raised in your letter with both county and district personnel. Both Iwan Choronenko, who is the Manager of the HCEPC Air Section, and Bill (W.C.) Thomas, the district air engineer who supervises the district air staff, agree with you that each incompleteness letter your company receives should reflect both the county's and the district's assessment. Mr. Thomas and Mr. Choronenko have assured me that the letters you have received have represented both the district and county's position. On one occasion, the district did send you a second incompleteness letter. The letter

Mr. Jerry L. Williams
Page Two
December 5, 1985

was sent because both the county and district permitting staff concluded that your response to the first incompleteness letter (sent by the county) still left your application incomplete and the county permit engineer was on vacation. In such cases, it is appropriate to send a second incompleteness letter. If an adequate response is not provided to a second incompleteness letter, we would normally move to deny the permit unless we were provided with some reason to believe that adequate information would be provided within a reasonable time. In this case, however, we do agree that it would eliminate some possible confusion if you always received incompleteness letters from either the district or the county. In the future you will receive all incompleteness letters from the county. If there is ever a need to change or deviate from this general policy, you will be so notified in writing by the district manager. If you have questions about the contents of any incompleteness letters you receive from the county, call the HCEPC Air Section Manager or Air Permit Engineer. If you are ever in doubt about who you need to talk to about any air program matters, call Bill (W.C.) Thomas at our Tampa office.

The working relationship between the county, the district, the bureau, and your company with respect to air permit applications and permit issuance is as follows:

(1) By definition (in the department's rules) a major air facility is an installation that has the potential to emit more than 5 tons per year of lead or more than 100 tons per year of any other regulated air pollutant. Your company's power plants are major air facilities.

(2) All construction permits and modifications to construction permits for major air facilities are processed by the Central Air Permitting staff (CAPs) within the Bureau of Air Quality Management. Intents to Issue or Deny with respect to those permits are issued by C. H. Fancy, Deputy Bureau Chief, on my behalf. The permit issuing authority with respect to those permits is the Secretary.

(3) The district office is responsible for issuing all minor facility construction permits and all operating permits.

(4) If a condition is included in a construction permit, whether it be issued by CAPs or by the district, to avoid PSD or nonattainment area new source review, that condition--by rule--cannot be changed in the operating permit. The condition must

Mr. Jerry L. Williams
Page Three
December 5, 1985

first be amended in the construction permit. This prevents circumvention of the new source review requirements. If the construction permit was issued by CAPs, then CAPs will handle the amendment to the construction permit. Should a requested change result in an increase of potential emissions above the PSD or nonattainment new source review threshold values, the project will be repermited by CAPs pursuant to the now applicable PSD or nonattainment rules.

(5) The permit issuing authority for minor source construction permits and all operating permits in the SW District is Dr. Richard Garrity, District Manager, Tampa Office.

(6) The department has not delegated permit issuing authority to any county. The department has delegated to Hillsborough County the authority to receive air permit applications which are to be acted upon by the district manager. Permit applications which are to be processed by CAPs are to be filed with CAPs. The department has delegated authority to the county to conduct technical and administrative review of air permit applications for facilities within the county for which the district manager is the permit issuing authority. For such applications, the county's air staff is authorized to make completeness determinations and send incompleteness letters regarding these determinations. The county provides the district office with draft permits and recommended permit conditions. The county coordinates its evaluations and recommendations with the district air permitting staff. The district manager is not obligated to accept the county's recommendations on any permit any more than he is obligated to accept the recommendations of his own staff. If you are ever unclear about what the district manager has authorized the county to do on his behalf, ask him.

The county and district receives a copy of any permit applications filed with the bureau. The county and district are given an opportunity to review and comment on all air permit applications being processed by CAPs for facilities within the county. In making a determination on what conditions to include in a permit or whether to issue or deny the permit, the Deputy Bureau Chief for CAPs and the Secretary take the county's and the district's recommendations into account but are not bound by them any more than they are bound by the recommendations of the CAPs staff.

The bureau and the district manager generally agree with the county's technical assessments and generally accept their

Mr. Jerry L. Williams
Page Four
December 5, 1985

recommendations on air permitting actions. Should the district manager not agree, then the district staff will complete the analyses and draft any district issued permit in accordance with instructions from the district manager.

The provisions of Chapter 120, Florida Statutes, apply to air permit processing regardless of who is processing the permit. If you file a permit application with the county for a permit that can be issued by the district manager, the Section 120.60 (2), Florida Statutes time clock begins when the application is marked received at the county office. The thirty days for completeness review begins with that date. The 90 day clock for final department action begins on the date that the application is ruled complete.

It is to your company's advantage to work closely with the county, whether the permit application is for a district issued permit or a headquarters issued permit. The district staff will primarily rely on the county's advise for district issued permits. CAPs gives considerable weight to the evaluations and recommendations of the county and district in issuing CAPs permits.

If you have specific questions about specific permits or about air permitting procedures, I suggest you do the following: First talk with Iwan Chronenko, Manager, Air Program, Hillsborough County. If he is unable to answer your questions to your satisfaction, then talk with Bill (W.C.) Thomas, Tampa District Office. If it is a permitting matter that involves a CAP's issued permit, talk with William (W.A.) Thomas of CAPs, who is in charge of the Stationary Source Control Section or talk with Clair Fancy, the Deputy Bureau Chief for CAP's. If none of these people can answer your question, call Dr. Richard Garrity or me.

The air permitting procedures that the department uses have been established for many years. The people I have identified for you are knowledgeable about these procedures, as are their counterparts in other county and district offices. If you will talk with these people on a routine basis, they will be glad to explain the details of our rules and procedures to you. If you think any of these individuals are misinformed on a particular matter, talk with their supervisor; then if you still are not satisfied, have your attorney contact one of our air attorneys, Gary Early or Julie Cobb. They will discuss your questions with

Mr. Jerry L. Williams
Page Five
December 5, 1985

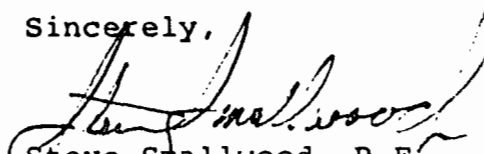
me and, if necessary, we will provide you with a formal written answer.

I will be glad to talk with you about any questions you may have about the air program. However, if your questions involve making a decision on a particular permitting or enforcement case, I will insist that you deal directly with the appropriate county or district personnel. If you reach an impasse with any of these people, then I will be glad to meet with you with them present.

I hope this letter has cleared up any remaining misunderstandings you have about how to properly process air permits for your company's facilities. If it has not, please let me know what additional specific clarification or information you need.

The department and HCEPC staff would appreciate you providing me with a letter that describes your company's organization structure and the specific individuals to contact and the protocol you would like us to follow in communicating with your company about air pollution control matters.

Sincerely,



Steve Smallwood, P.E.
Chief,
Bureau of Air Quality
Management

SS: jr

cc: Clair Fancy
Bill Thomas, Tallahassee
Iwan Choronenko ✓
Bill Thomas, Tampa
Dr. Richard Garrity
Clabe Polk
John Brown
Gary Early
Julie Cobb
Steve Fox
Howard Rhodes
Alfred B. Devereaux, Jr.
Heywood A. Turner

COUNTY



OF HILLSBOROUGH

MEMORANDUM

Attachment #2
Portions of our Act
& Rules pertaining to fees.
Date July 12, 1984

To: All EPC Staff
From: Sara Fotopulos SMF
Subject: ACT #NUMBERED

Effective since June 16, 1984, our Environmental Protection Act is renumbered and should be cited as:

Chapter 84-446, Laws of Florida

[it is no longer Chapter 67-1504]

Please note that some of the section numbers (specifically those after section 14) have changed so that when you cite a section, be sure it is the correct one.

SME/ljh

cc: Roger
Iwan ✓
Rick ✓
Ed ✓

Terry —
Please insure your staff
is aware of the changes,
Most important for
Anthony.

Thanks
T.C.

ENROLLED

1984 Legislature

HB 1026, 2nd Engrossed

An act relating to Hillsborough County; creating and establishing the Hillsborough County Environmental Protection Commission for the purpose of controlling and regulating pollution of air, water, soil, property, and noise; providing legislative intent; providing method and manner of appointing members of the commission; providing for its powers, functions, privileges, duties, and responsibilities; providing for its adoption of rules and regulations; providing for appointment of a hearing officer and an environmental director and their respective powers and duties; providing for appeals; providing for reporting of pollution sources; providing for issuance of permits; providing for sampling and testing; prohibiting open burning; providing for issuance of citation and emergency orders; prohibiting nuisances, pollution, and violation of an order; declaring a violation to be a misdemeanor; providing enforcement procedure and remedies; providing for additional liability and damages; creating a pollution recovery fund; providing for appropriation of funds; repealing chapters 67-1504, 69-1149, 71-681, 72-563, and 73-496, Laws of Florida, relating to the Hillsborough County Environmental Protection Commission; providing an effective date.

1

CODING: Words in ~~struck through~~ type are deletions from existing law; words underlined are additions.

ENROLLED

1984 Legislature

HB 1026, 2nd Engrossed

Be It Enacted by the Legislature of the State of Florida:

Section 1. Short title.--This act may be known and cited as the "Hillsborough County Environmental Protection Act."

Section 2. Declaration of legislative intent.--The Legislature finds and declares that the reasonable control and regulation of activities which are causing or may reasonably be expected to cause pollution or contamination of air, water, soil, and property, or cause excessive and unnecessary noise may be necessary for the protection and preservation of the public health, safety, and welfare. It is the intent and purpose of this act to designate the board of county commissioners as the environmental protection commission of Hillsborough County to provide and maintain for the citizens and visitors of said county standards which will insure the purity of all waters consistent with public health and public enjoyment thereof, the propagation and protection of wildlife, birds, game, fish, and other aquatic life and atmospheric purity and freedom of the air from contaminants or synergistic agents injurious to human, plant, or animal life and excessive and unnecessary noise, which unreasonably interfere with comfortable enjoyment of life or property or the conduct of business.

Section 3. Definitions.--As used in this act and said rules and regulations, the following words and phrases shall have the following meanings unless some other meaning is plainly indicated:

- (1) "County" means Hillsborough County, Florida.
- (2) "Air contaminants" means a particulate matter as defined herein, gas, or odor, including, but not limited to,

2

CODING: Words in ~~struck through~~ type are deletions from existing law; words underlined are additions.

industrial, agricultural, recreational, or other legitimate beneficial uses, or to livestock, wild animals, birds, fish, or other aquatic life.

(22) "Compliance tests" means tests made to determine compliance with the provisions of this act and the rules and regulations promulgated hereunder.

(23) "Open burning" means any fire wherein the products of combustion are emitted into the open air, and are not directed thereto through a stack or chimney.

(24) "Rules and regulations" means rules and regulations adopted pursuant to this act.

(25) "Board" means the board of county commissioners of Hillsborough County.

(26) "Commission" means the environmental protection commission of Hillsborough County.

(27) "Hearing officer" means that person appointed by the commission in the manner prescribed herein.

(28) "Noise pollution" means the presence of noise in excessive or unnecessary amount or of such duration, wave frequency or intensity as to be injurious to human or animal life or property; or which unreasonably interferes with the comfortable enjoyment of life or property, or other conduct of business.

Section 4. Creation of Hillsborough County Environmental Protection Commission.--The Environmental Protection Commission is hereby created and established. The commission shall consist of the duly elected members of the Hillsborough County Board of County Commissioners.

Section 5. Environmental protection commission; duties and powers.--The commission shall have the following duties, functions, powers, and responsibilities:

7

CODING: Words in streak through type are deletions from existing law; words underlined are additions.

(1) To implement and enforce the provisions of this act;

(2) To adopt, revise and amend from time to time appropriate rules and regulations reasonably necessary for the implementation and effective enforcement, administration and interpretation of the provisions of this act and to provide for the effective and continuing control and regulation of air, water and noise pollution in the county within the framework of this act, and to provide for appropriate fees to be charged by the commission for the services rendered under the provisions of this act. No such rules or regulations shall be adopted or become effective, including amendments, until after a public hearing has been held by the commission pursuant to notice published in a newspaper of general circulation in the county at least 10 days prior to the hearing, and then until the rules and regulations have been filed pursuant to law.

(3) To make continuing studies and periodic reports and recommendations for the improvement of air, water and noise in the county, and to work in cooperation with the Department of Environmental Regulation and other appropriate agencies and groups interested in the field of air, water and noise pollution.

(4) To investigate air pollution, water pollution and noise pollution control programs and activities in operation in other areas and to make recommendations for the improvement of the regulation, administration and enforcement of pollution controls in the county; to publicize the importance of adequate pollution controls, to hold public hearings, discussions, forums and institutes, and arrange programs for the presentation of information by experts in the field of

8

CODING: Words in streak through type are deletions from existing law; words underlined are additions.

TITLE

A RULE AMENDING CHAPTER 1-3 OF THE RULES OF THE HILLSBOROUGH COUNTY ENVIRONMENTAL PROTECTION COMMISSION RELATING TO AIR POLLUTION; PROVIDING FOR A STATEMENT OF INTENT AND DECLARATION OF LEGISLATIVE FINDINGS; PROVIDING PROHIBITIONS; REQUIRING PERMITS AND NECESSARY PRECAUTIONS; PROVIDING FOR EXCESS EMISSIONS; PROVIDING AMBIENT AIR QUALITY STANDARDS, MAXIMUM ALLOWABLE INCREASES AND AIR POLLUTION EPISODES; PROVIDING FOR PREVENTION OF SIGNIFICANT DETERIORATION; PROVIDING EMISSION LIMITING AND PERFORMANCE STANDARDS INCLUDING PARTICULATE, VISIBLE AND SPECIFIC SOURCE EMISSION LIMITS; PROVIDING FOR SOURCE SAMPLING AND MONITORING; PROVIDING FOR MOBILE SOURCES; AND PROVIDING FOR SEVERABILITY AND THE EFFECTIVE DATE.

WHEREAS, Chapter 84-446, Laws of Florida authorizes the Commission to adopt, revise and to amend from time to time rules and regulations necessary for the implementation of the Act, and

WHEREAS, the Commission is the head of an approved local program pursuant to Section 403.182 Florida Statutes and is obligated to enforce standards at least as strict as those required by the Florida Department of Environmental Regulation, and

WHEREAS, the Commission finds that the following rules and regulations are reasonably necessary to provide for the effective and continuing control and regulation of air pollution in Hillsborough County,

NOW, THEREFORE, the Environmental Protection Commission of Hillsborough County, in meeting this 26th day of February, 1986, enacted the following:

Section 1. Chapter 1-3 of the Rules of the Hillsborough County Environmental Protection Commission, Air Pollution, shall be amended to read as follows:

Rules of the Hillsborough County

Environmental Protection Commission

Chapter 1-3

Air Pollution

	PART 1
1-3.10	Statement of Intent
1-3.11	Declaration of Legislative Findings
1-3.12	Definitions
	PART 2
1-3.20	Circumvention Prohibited
1-3.21	Permits Required
1-3.22	Prohibitions
1-3.23	Necessary Precautions
1-3.24	(Reserved)
1-3.25	Excess Emissions
	PART 3
1-3.30	Ambient Air Quality Standards
1-3.31	Maximum Allowable Increases
1-3.32	Air Pollution Episodes
	PART 4
	(Reserved)
	PART 5
1-3.50	New Source Review
	PART 6
1-3.60	Emission Limiting and Performance Standards
1-3.61	Particulate Emissions
1-3.62	Visible Emissions
1-3.63	Specific Source Emissions
	PART 7
1-3.70	Source Sampling and Monitoring
	PART 8
1-3.80	Mobile Sources

PART 1

1-3.10 Statement of Intent:

(1) The Commission promulgates this rule for the purpose of implementing the intent of the Florida Legislature as declared in Chapter 84-446, Laws of Florida to insure the atmospheric purity and freedom of the air of Hillsborough County from contaminants or synergistic agents injurious to human, plant, or animal life, which unreasonably interfere with comfortable enjoyment of life or property or the conduct of business. In so doing, the Commission recognizes that the Florida Department of Environmental Regulation has environmental regulatory and enforcement authority pursuant to Chapter 403, Florida Statutes. It is the intent of the Commission to require compliance with the Department's permitting rules and emission limits in Hillsborough County, except as may be otherwise provided herein, so as to further the policies of preventing significant deterioration, protecting air quality existing at the time the Department adopted its standards, and of upgrading or enhancing air quality. Where a new or

Increased source of air pollution poses a possibility of degrading existing high air quality or ambient air quality established by this rule. the Director shall not recommend issuance of a Department permit for such source or proposed source until he has received reasonable assurance that such source, construction or development will not violate this rule.

(2) Standards and provisions of the Department, as here adopted, are incorporated in the form existing on the date of adoption of this rule or relevant amendment.

(3) Department rules, as adopted herein and incorporated by reference, shall be interpreted consistently with official Department policy. For purposes of this rule, official Department policy shall include written policy statements signed by the Secretary of the Department, Chief of the Bureau of Air Quality Management or the Manager of the Southwest District Office. Other documented representations of Department policy may be used in support of a policy interpretation, but shall not themselves be official policy.

1-3.11 Declaration of Legislative Findings:

The Commission hereby finds that emissions into the atmosphere of Hillsborough County in excess of, or contributing to an exceedance of, the standards hereinafter provided may reasonably be expected to cause air pollution prohibited by Section 17 of the Act. The Commission also finds that emissions, while in compliance with source specific emission limiting standards, may at times constitute nuisances as defined by Section 3(12) and prohibited by Section 16 of the Act.

1-3.12 Definitions:

(1) Definitions contained in Chapter 84-446, Laws of Florida, apply to this rule.

(2) With the exception of the definitions for "Air Pollution", "Odor", "Particulate Matter", and "Standard Conditions", definitions contained in Section 17-2.100, F.A.C., shall, to the extent applicable apply to this rule.

(3) The following specific definitions shall apply to this rule:

(a) "Commission" shall mean the Hillsborough County Environmental Protection Commission.

(b) "Director" shall mean the Director of the Commission or his authorized agent.

PART 2

1-3.20 Circumvention Prohibited:

No person shall circumvent any air pollution control device, or allow the emission of air pollutants without the applicable air pollution control device operating properly.

1-3.21 Permits Required:

(1) No air pollution source may be constructed, modified or operated in Hillsborough County without a valid permit as may be required by the Department pursuant to Section 17-2.210, F.A.C., Chapter 17-17, F.A.C., or as may be otherwise required by these rules.

(2) Application for or renewal of a Department permit, or copy where appropriate, shall be submitted to the Director for his review pursuant to Department requirements and recommendation according to this rule. Reasonable assurances shall be provided that all Department and Commission standards have or will be met by the applicant or the activity sought to be permitted. Activities under Citation at the time of application shall have the Citation resolved prior to the Director recommending approval of an application involving the same activity.

(3) No air pollution source may be constructed, modified or operated in Hillsborough County in violation of any conditions specified on the permit, whether issued by the Commission or by the Department, or certification authorizing the activity or as may be incorporated by reference within the conditions of the permit authorizing the activity. Violation of any such permit or certification condition is a violation of this rule.

1-3.22 Prohibitions:

(1) No person may build, erect, construct, or implant any new source or

SERVICES-FEE SCHEDULE

1-6.01 DECLARATION AND INTENT

It is the intent of the Commission to establish reasonable charges for services performed by the Environmental Protection Commission Director, and his duly authorized agents and employees in the review of applications and other technical materials, in the investigation of cases involving violation of the Code, and in the conduct of inspections.

Said charges are for the purpose of defraying expenses incurred by the Environmental Protection Commission in performing professional services necessitated by the actions of others. All funds collected for said services shall become funds of Hillsborough County and shall be deposited in the General Revenue Fund.

1-6.02 FEE SCHEDULE

AIR

1. Application to Construct or Modify an Air Pollution Source	\$385.00
2. Application to Operate an Air Pollution Source	\$345.00
3. Petition to Revise an Air Permit	\$340.00
4. Alternative Air Emission Plan	\$360.00
5. Open Burning Permit Application	\$ 70.00

WATER

6. Industrial Wastewater Source Permit Application.	
a. Construction with Groundwater Monitoring	\$540.00
b. Construction	\$415.00
c. Operation or Temporary Operation	\$315.00

7. Domestic Wastewater Source Permit Application	
a. Construction with Groundwater Monitoring	\$315.00
b. Construction	\$190.00
c. Operation or Temporary Operation	\$150.00
8. Collection System Permit Application	
a. General - less than 50,000 gallons/day	\$ 55.00
b. General - greater than or equal to 50,000 gallons/day	\$ 95.00
c. Standard - less than 50,000 gallons/day	\$100.00
d. Standard - greater than or equal to 50,000 gallons/day	\$125.00
9. Solid Waste Resource Recovery and Management Facility Permit Application	
a. DER Classes I and II	\$420.00
b. DER Class III	\$310.00
10. Construction/Demolition Debris Landfill Application	\$260.00
11. Sludge Disposal Application	\$ 95.00
*12. Land Excavation Permit Application	
a. New and Expansion	\$235.00
b. Extension and Renewal	\$180.00
*13. Rezoning Application	
a. CU, CP, IP, MHP/RVP, Conditional Use	\$145.00
b. All others	\$ 80.00
*14. Subdivision Application	
a. Preliminary	\$160.00
b. Master Plan	\$ 50.00
c. Construction Plan	\$ 65.00
d. Final Plat	\$ 40.00
e. Waivers	\$ 35.00
15. Dredge and Fill Permit Application (ACOE, DER AND TPA)	
a. Minor Form	\$ 55.00
b. Standard Form	\$170.00

*16. Phosphate Mining	
a. Annual Review and Inspection	\$120.00
b. Unit Review and Reclamation	\$120.00
c. Bimonthly Inspections (five per year)	\$105.00
*17. Development of Regional Impact Application	\$435.00
*18. Commercial Site Application	\$ 80.00
*19. Building Permit Application	\$ 80.00
*20. Site Clearing/Alteration Permit Application	\$ 80.00
*21. House Bill Application	\$ 80.00
22. Wetland Delineation	
a. Office	\$ 45.00
b. Field	\$160.00
23. Enforcement Costs	Hourly/ \$ 20.00

*These Environmental Protection Commission Fees will be collected by the Hillsborough County Department of Development Coordination or the Hillsborough County Building Department, as appropriate.

(ACT/FEE)

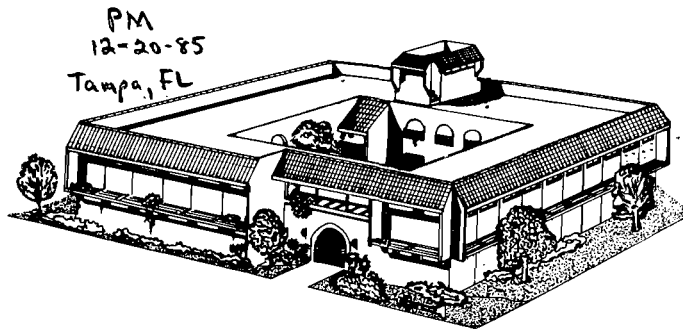
:Adopted 2/28/85

Effective 3/15/85

HILLSBOROUGH COUNTY
ENVIRONMENTAL PROTECTION

COMMISSION

RODNEY COLSON
RON GLICKMAN
PAM IORIO
RUBIN E. PADGETT
JAN KAMINIS PLATT
JAMES D. SELVEY
PICKENS C. TALLEY II



ROGER P. STEWART
DIRECTOR

DER
1900 - 9th AVE
TAMPA, FLORIDA 33605

DEC 23 1985
TELEPHONE (813) 272-5960

BAQM

MEMORANDUM

Date December 19, 1985

To Clair Fancy

From Jerry Campbell *JC*

Subject: Gannon Coal Yard Modification

Although TECO has not submitted an application to modify the coal yard, I will comment on their proposal detailed in Jerry Williams letter to you dated 11/14/85. Contrary to our conversation, I now understand that TECO did sign a waiver thus delaying acceptance of the operating permit.

The calculations in the proposal appear to be consistent with the equations used in the original construction application with three exceptions (two of them minor). The original application assumed ten percent spillage on the grab bucket from the barge (item 1). This amounted to 0.149 tons per year (tpy) emissions. Their proposal fixes the spillage at 90000 tpy for all throughput rates. At 2.9 million tpy, TECO projects 1087500 tpy delivery by barge. Ten percent spillage of this figure would result in 0.179 tpy emissions instead of the 0.149 tpy figure reported. Again under item 23, vehicular entrainment, they held the miles traveled constant for all throughputs. It would seem that as you increase the throughput, the miles traveled would increase as well. Since I do not know how the 9125 figure was arrived at, I cannot offer an adjustment.

A more important variable in the calculations is the surface moisture content of the coal. It is not clear to me whether TECO used the total moisture content of the coal or just the surface moisture as intended. If the figure of 8.12 percent used in their calculations is the total moisture, then their calculated emissions would be biased low. The extent of the bias could be significant. This distinction between surface and total moisture was explained to me during a recent telephone conversation with Charlie Sedman of EPA (see attached conversation record). It is probably too late to question the original construction application, but TECO should address this item for any future modifications.

In addition to the emissions from the handling processes, there should be consideration for the emissions from the coal crushing. The four hammermill crushers are listed on the flow diagram between conveyors G1/G2 and H1/H2, but there are no estimates of their emissions in TECO's proposal. This fact was apparently overlooked during both the construction and the operating permit reviews. A recent inspection of the yard revealed that the crushers are not vented to any control equipment and

Memorandum
December 19, 1985
Page 2

they appear to be completed enclosed. Any emissions would probably escape as the coal drops from the crushers to conveyors H1/H2. The initial visible emission test conducted on this point by TECO personnel was inconclusive. We intend to follow up on this matter and conduct our own opacity readings. There is no emission factor for coal crushing in AP-42, but Charlies Sedman assures me it could be a significant source. TECO should account for any emissions from this source for any future modifications. If the crushing is found to be a significant source then this would raise the question about their original application. I am not sure what options would be available to us, so I will withhold any recommendations at this time.

If you have any questions concerning the contents of this memorandum, then please contact me.

JC/ch

cc: Bill Thomas

HILLSBOROUGH COUNTY
ENVIRONMENTAL PROTECTION COMMISSION

DER
DEC 23 1985
BAQM

CONVERSATION RECORD

Date 12/19/85 Subject Coal Crushing
Time PM Permit No. J
M Dale Farley Section _____
Telephone No. 304-348-4023
Representing State of West Virginia
 Telephoned Me Was Called Scheduled Meeting Unscheduled Meeting
Other Individuals Involved in Conversation/Meeting _____

Summary of Conversation/Meeting Dale says his experience with coal crushers was not as extensive as Charlie lead me to believe. He recommended the emission factor in the SCC code 3-05-010-10 of 0.02 #/ton. We both agreed this was probably for primary jaw or roller crushers, not really representative of the finer hammermill crushing at TECO. He was not aware of any other factor. He suggested I speak with Bob Weser of their compliance section who has a great deal of field experience with coal prep plants.

(continue on another sheet, if necessary)

Signature Jerry Campbell
Title _____

HILLSBOROUGH COUNTY
ENVIRONMENTAL PROTECTION COMMISSION

DER

DEC 23 1985

CONVERSATION RECORD

BAQM

Date 12/17/85

Subject Coal Crushing

Time AM

Permit No. J

Section _____

M Charlie Sedman

Telephone No. 919-541-7700

Representing EPA

Telephoned Me Was Called Scheduled Meeting Unscheduled Meeting

Other Individuals Involved in Conversation/Meeting _____

Summary of Conversation/Meeting Was referred to Charlie by the emissions branch as the coal expert. He will send info to obtain a copy of NTIS report called "Technical Guidance For Estimating Fugitive Dust Impacts for Coal Handling." This DOE report does not have a factor for crushing but he says it is very good at estimating handling emissions. He will also attempt to find a crushing factor for western Kentucky coal he saw in an old EIS. I asked him if coal crushing could be a significant source and he said yes. Most coal prep plants at the mines control crushing with a baghouse. He said the key is the surface moisture not the total moisture. A surface moisture of 2% or less is considered bone dry and is a problem to handle. A reasonable surface moisture is 4-8%. If the coal is piled and left to dry (as it is in the Gannon yard), then he claims the surface moisture could drop significantly. He says a more environmentally

(continue on another sheet, if necessary)

Signature Jerry Campbell (over)

Title _____

Sound operation would be to crush the coal at receipt to the yard when the surface moisture is consistently at 4-8%.

State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION



Interoffice Memorandum

FOR ROUTING TO OTHER THAN THE ADDRESSEE

To: _____ LOCTN: _____
To: _____ LOCTN: _____
To: _____ LOCTN: _____
From: _____ DATE: _____

TO: File
FROM: Bill Thomas *BT*
DATE: November 15, 1985
SUBJ: TECO, Gannon Station Coal Yard

Although 2.4×10^6 TPY is not spelled out as a specific condition, it was specified in application and therefore is a legal condition of the construction permit. I have already taken that position with Jerry Campbell that it cannot be done in an operating permit.

If they want to submit calculations which we can check, we may amend or consider it to be a modification, but no easing of any other limits. In fact, 2.4×10^6 TPY is a federally enforceable permit condition and this would increase emissions. It would have to be a minor modification to a major facility. (no letter over Vicki Tschinkel's signature). I suggest they submit an application and fee.

I think an operating permit should be issued with 2.4 throughput limit until we can issue appropriate construction permit or no commercial operation.

BT/pa



DER
NOV 15 1985
BAQM

November 14, 1985

Mr. Clair Fancy
Florida Department of
Environmental Regulation
2600 Blainstone Road
Tallahassee, FL 32301-8241

Re: Permit No. A029-94044
(Gannon Station Coal Yard)

Dear Clair:

This will follow up on our conversation of yesterday regarding the referenced operating permit for the coal yard at our Gannon Station. The permit includes a specific permit condition that was not included in the construction permit and is objectionable to us. More particularly, Specific Condition No. 7 limits the volume of coal that may be transferred through the coal yard to 2.4 million tons per year. This condition represents a restriction on operation which is not based on an environmental restriction.

We prefer that the operating permit not include conditions that would limit our production flexibility, but we recognize the Department's desire to ensure compliance with applicable rules and statutes. As you recall, during the construction permit application process, Tampa Electric Company provided information on the coal throughput rate which was the design basis of the coal yard modification. This number (2.4 million tons/year) was used to determine whether the expected increase in emissions would be greater than the significance level of 25 tons/year, and thus trigger a LAER review. Based on evaluations using DER's equations, it was determined that the increase in emissions would be 3.95 tons/year over pre-modification levels, which is much lower than the significant increase level.

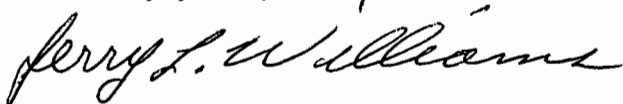
Using the same technique for estimating the emissions as previously submitted, we have concluded that 2.9 million tons of coal can pass through the coal yard in a year without exceeding the applicable significance level. (See attachment).

Members of my staff have discussed this matter with a representative of the local program, and the local program representative has advised us that the Department will require us to first revise our construction permit to allow for the additional throughput. We do not understand this, since there will be no modification to the contracted facilities and since the applicable significance level will not be exceeded. Nonetheless, as I indicated to you on the phone, I would appreciate the Department taking the appropriate steps to revise the throughput rate to 2.9 million tons per year.

In order to preserve our rights, and at your suggestion, we have requested a 30-day extension of the time on our operating permit. We feel confident that, within this time frame, we can resolve any problems the Department may have, and provide you with reasonable assurance that revising our throughput rate to allow us flexibility will not be to the detriment of the environment.

We appreciate your cooperation and should you have any questions, please do not hesitate to call.

Sincerely yours,



Jerry L. Williams
Director
Environmental

JLW/jst/035/10

Attachment

cc: Bill Thomas, DER-SWD
Jerry Campbell, HCEPC

3/10

Bill T -
Ho file. We have
application -

File Copy

DER

NOV 15 1985

BAQM

THE EFFECTS OF CHANGES IN COAL
THROUGHPUT TO PARTICULATE EMISSIONS

F.J. GANNON COAL YARD

TAMPA ELECTRIC COMPANY
NOVEMBER, 1985

INTRODUCTION

In any environmental construction permitting process, a crucial element in the permit evaluation is the impact of the proposed facility to the environment. Significant pollutant emission levels are established in the regulations to differentiate between significant and insignificant projects.

In the case of the Gannon Coal Yard Modification project, which began in 1982 and was completed in June, 1984, the applicable significant emissions increase of particulate matter is 25 tons/year.

OBJECTIVE

The purpose of this analysis is to determine the coal throughput level at which the increase in emissions over pre-modification levels would reach 25 tons/year.

METHODOLOGY

Utilizing a spreadsheet type computer program, a framework was established whereby the total coal yard emissions could be calculated for any given coal throughput. The throughput was varied until the increase in emissions over pre-modification levels was 25 tons/year. See Tables 1 thru 9 and Figure 1.

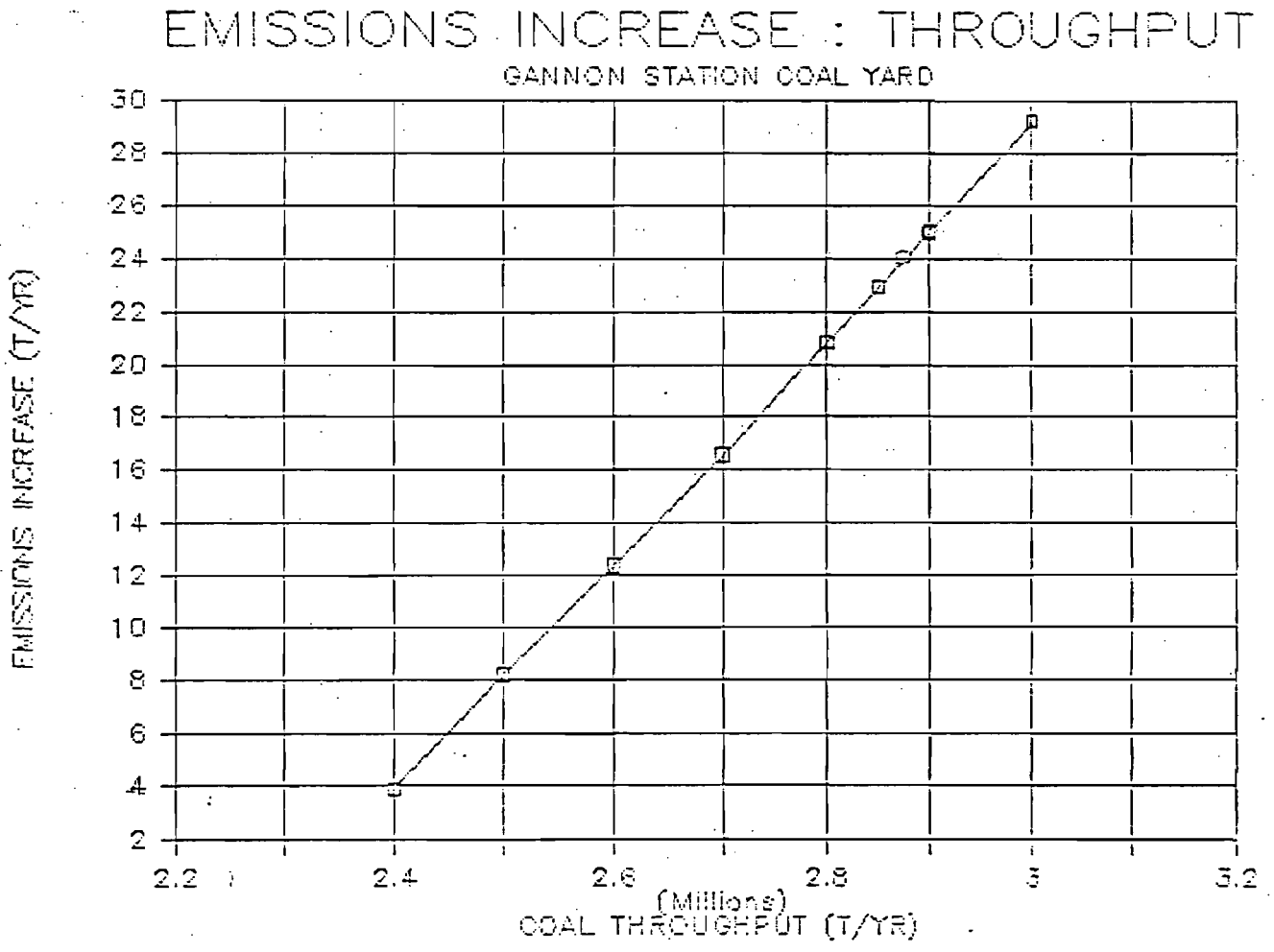
The emission factors used were obtained from "Supplement #2, Emissions Analysis of Coal Handling Modification at the Gannon Coal Yard, Noble and Associates". The above emissions analysis was submitted in connection with the construction permit for the coal yard. The summary tables from the report, including the appropriate emission factors are attached. See Tables 10 thru 12.

No adjustment was made for possible changes in the limestone throughput. Although the limestone needs would vary as the plant's coal needs vary, the emissions from the limestone pile are minimal, and any changes to the limestone emissions would be insignificant when compared to the total coal yard emissions.

RESULTS

At a coal throughput rate of 2.9 million tons/year, the expected increase in emissions over pre-modification levels is 25 tons/year.

FIGURE 1



PARTICULATE EMISSIONS ESTIMATE

TABLE 1

GANNON STATION COAL YARD

COAL THROUGHPUT : 2400000 TONS/YR
 LIMESTONE THROUGHPUT : 57000 TONS/YR
 VEHICULAR TRAFFIC MILEAGE : 9125 MILES

SOURCE	THROUGHPUT (T/YR)	RAIL (T/YR)	BARGE (T/YR)	TO PLANT (T/YR)	TO YARD (T/YR)	TO LIVE & ACTIVE (T/YR)	TO DEAD STORE (T/YR)	PERIOD IN LIVE & ACTIVE (DAYS)	PERIOD IN DEAD STORE (DAYS)
COAL	2400000	1500000	900000	240000	2160000	1860000	300000	15.70	365
LIMESTONE	57000				57000			26.81	

#	Particulate Emission Source	Throughput (Ton/Yr)	Uncontrolled Emission Fact (lbs/ton)	Uncontrolled Emissions (Tons/yr)	Efficiency	Controlled Emissions (Tons/yr)
1	Grab bucket from Barge	90000	0.003300	0.149	0	0.149
2	Bucket to Hopper	900000	0.000220	0.099	25	0.074
3	Hopper to Feeder	900000	0.000018	0.008	0	0.008
4	Feeder to Conveyor B	900000	0.000135	0.061	50	0.030
5	Conveyor B to Conveyor C	900000	0.000090	0.041	50	0.020
6	Conveyor C to D1/D2	900000	0.000225	0.101	95	0.005
7	Rail car to Hopper	1500000	0.001564	1.173	40	0.704
8	Hopper to Feeder	1500000	0.000040	0.030	50	0.015
9	Feeder to Conveyor L	1500000	0.000010	0.008	50	0.004
10	Conveyor L to D1/D2	1500000	0.000600	0.450	95	0.023
11	D1/D2 to H1/H2	2160000	0.000340	0.367	95	0.018
12	H1/H2 to E1/E2	2160000	0.000160	0.173	95	0.009
13	E1/E2 to Stockpile	2160000	0.000630	0.680	0	0.680
14	Coal Stockpile Live	1860000	0.038462	35.770	50	17.885
	Coal Stockpile Dead	300000	0.894250	134.138	70	40.241
15	Limestone Live	57000	0.000391	0.011	0	0.011
16	Reclaim to F1/F2/F3/F4	2160000	0.000272	0.294	85	0.044
17	F1/F2/F3/F4 to G1/G2	2160000	0.000408	0.441	95	0.022
18	G1/G2 to Crusher	2400000	0.000340	0.408	70	0.122
19	Crusher to H1/H2	2400000	0.000102	0.122	70	0.037
20	H1/H2 to J1/J2	2400000	0.000221	0.265	80	0.053
21	J1/J2 to Bunker	2400000	0.000459	0.551	95	0.028
22	D1/D2 to G1/G2 by-passes stor.	240000	0.000960	0.115	95	0.006
23	Vehicular entrainment (Miles)	9125	0.124000	0.566	0	0.566
24	Stockpile Maintenance	2160000	0.184000	198.720	50	99.360
					TOTAL	160.114

INCREASE OVER PRE-MODIFICATION :

3.9 TONS/YR

PARTICULATE EMISSIONS ESTIMATE

TABLE 2

GANNON STATION COAL YARD

COAL THROUGHPUT : 2500000 TONS/YR
 LIMESTONE THROUGHPUT : 57000 TONS/YR
 VEHICULAR TRAFFIC MILEAGE : 9125 MILES

SOURCE	THROUGHPUT (T/YR)	RAIL (T/YR)	BARGE (T/YR)	TO PLANT (T/YR)	TO YARD (T/YR)	TO LIVE & ACTIVE (T/YR)	TO DEAD STORE (T/YR)	PERIOD IN LIVE & ACTIVE (DAYS)	PERIOD IN DEAD STORE (DAYS)
COAL	2500000	1562500	937500	250000	2250000	1950000	300000	14.97	365
LIMESTONE	57000				57000			26.81	

#	Particulate Emission Source	Throughput (Ton/Yr)	Uncontrolled Emission Fact (lbs/ton)	Uncontrolled Emissions (Tons/yr)	Efficiency	Controlled Emissions (Tons/yr)
1	Grab bucket from Barge	90000	0.003300	0.149	0	0.149
2	Bucket to Hopper	937500	0.000220	0.103	25	0.077
3	Hopper to Feeder	937500	0.000018	0.008	0	0.008
4	Feeder to Conveyor B	937500	0.000135	0.063	50	0.032
5	Conveyor B to Conveyor C	937500	0.000090	0.042	50	0.021
6	Conveyor C to D1/D2	937500	0.000225	0.105	95	0.005
7	Rail car to Hopper	1562500	0.001564	1.222	40	0.733
8	Hopper to Feeder	1562500	0.000040	0.031	50	0.016
9	Feeder to Conveyor L	1562500	0.000010	0.008	50	0.004
10	Conveyor L to D1/D2	1562500	0.000600	0.469	95	0.023
11	D1/D2 to M1/M2	2250000	0.000340	0.383	95	0.019
12	M1/M2 to E1/E2	2250000	0.000160	0.180	95	0.009
13	E1/E2 to Stockpile	2250000	0.000630	0.709	0	0.709
14	Coal Stockpile Live	1950000	0.036687	35.770	50	17.885
	Dead	300000	0.094250	134.138	70	40.241
15	Limestone Live	57000	0.000391	0.011	0	0.011
16	Reclaim to F1/F2/F3/F4	2250000	0.000272	0.306	85	0.046
17	F1/F2/F3/F4 to G1/G2	2250000	0.000408	0.459	95	0.023
18	G1/G2 to Crusher	2500000	0.000340	0.425	70	0.128
19	Crusher to H1/H2	2500000	0.000102	0.128	70	0.038
20	H1/H2 to J1/J2	2500000	0.000221	0.276	80	0.055
21	J1/J2 to Bunker	2500000	0.000459	0.574	95	0.029
22	D1/D2 to G1/G2 by-passes stor.	250000	0.000960	0.120	95	0.006
23	Vehicular entrainment (Miles)	9125	0.124000	0.566	0	0.566
24	Stockpile Maintenance	2250000	0.184000	207.000	50	103.500
					TOTAL	164.333

INCREASE OVER PRE-MODIFICATION :

8.2 TONS/YR

PARTICULATE EMISSIONS ESTIMATE

TABLE 3

GANNON STATION COAL YARD

COAL THROUGHPUT : 2600000 TONS/YR
 LIMESTONE THROUGHPUT : 57000 TONS/YR
 VEHICULAR TRAFFIC MILEAGE : 9125 MILES

SOURCE	THROUGHPUT (T/YR)	RAIL (T/YR)	BARGE (T/YR)	TO PLANT (T/YR)	TO YARD (T/YR)	TO LIVE & ACTIVE (T/YR)	TO DEAD STORE (T/YR)	PERIOD IN LIVE & ACTIVE (DAYS)	PERIOD IN DEAD STORE (DAYS)
COAL	2600000	1625000	975000	260000	2340000	2040000	300000	14.31	365
LIMESTONE	57000				57000			26.81	

#	Particulate Emission Source	Throughput (Ton/Yr)	Uncontrolled Emission Fact (lbs/ton)	Uncontrolled Emissions (Tons/yr)	Efficiency	Controlled Emissions (Tons/yr)
1	Grab bucket from Barge	90000	0.003300	0.149	0	0.149
2	Bucket to Hopper	975000	0.000220	0.107	25	0.080
3	Hopper to Feeder	975000	0.000018	0.009	0	0.009
4	Feeder to Conveyor B	975000	0.000135	0.066	50	0.033
5	Conveyor B to Conveyor C	975000	0.000070	0.044	50	0.022
6	Conveyor C to D1/D2	975000	0.000225	0.110	95	0.005
7	Rail car to Hopper	1625000	0.001564	1.271	40	0.762
8	Hopper to Feeder	1625000	0.000040	0.033	50	0.016
9	Feeder to Conveyor L	1625000	0.000010	0.008	50	0.004
10	Conveyor L to D1/D2	1625000	0.000600	0.487	95	0.024
11	D1/D2 to M1/M2	2340000	0.000340	0.398	95	0.020
12	M1/M2 to E1/E2	2340000	0.000160	0.187	95	0.009
13	E1/E2 to Stockpile	2340000	0.000630	0.737	0	0.737
14	Coal Stockpile Live	2040000	0.035069	35.770	50	17.885
	Dead	300000	0.894250	134.138	70	40.241
15	Limestone Live	57000	0.000391	0.011	0	0.011
16	Reclaim to F1/F2/F3/F4	2340000	0.000272	0.318	85	0.048
17	F1/F2/F3/F4 to G1/G2	2340000	0.000408	0.477	95	0.024
18	G1/G2 to Crusher	2600000	0.000340	0.442	70	0.133
19	Crusher to H1/H2	2600000	0.000102	0.133	70	0.040
20	H1/H2 to J1/J2	2600000	0.000221	0.287	80	0.057
21	J1/J2 to Bunker	2600000	0.000459	0.597	95	0.030
22	D1/D2 to G1/G2 by-passes stor.	260000	0.000960	0.125	95	0.006
23	Vehicular entrainment (Miles)	9125	0.124000	0.566	0	0.566
24	Stockpile Maintenance	2340000	0.184000	215.280	50	107.640
					TOTAL	168.552

INCREASE OVER PRE-MODIFICATION :

12.4 TONS/YR

PARTICULATE EMISSIONS ESTIMATE

TABLE 4

GAHNON STATION COAL YARD

COAL THROUGHPUT : 2700000 TONS/YR
 LIMESTONE THROUGHPUT : 57000 TONS/YR
 VEHICULAR TRAFFIC MILEAGE : 9125 MILES

SOURCE	THROUGHPUT (T/YR)	RAIL (T/YR)	BARGE (T/YR)	TO PLANT (T/YR)	TO YARD (T/YR)	TO LIVE & ACTIVE (T/YR)	TO DEAD STORE (T/YR)	PERIOD IN LIVE & ACTIVE (DAYS)	PERIOD IN DEAD STORE (DAYS)
CDAL	2700000	1687500	1012500	270000	2430000	2130000	300000	13.71	365
LIMESTONE	57000				57000			26.81	

#	Particulate Emission Source	Throughput (Ton/Yr)	Uncontrolled Emission Fact (lbs/ton)	Uncontrolled Emissions (Tons/yr)	Efficiency	Controlled Emissions (Tons/yr)
1	Grab bucket from Barge	90000	0.003300	0.149	0	0.149
2	Bucket to Hopper	1012500	0.000220	0.111	25	0.084
3	Hopper to Feeder	1012500	0.000018	0.009	0	0.009
4	Feeder to Conveyor B	1012500	0.000135	0.068	50	0.034
5	Conveyor B to Conveyor C	1012500	0.000090	0.046	50	0.023
6	Conveyor C to D1/D2	1012500	0.000225	0.114	95	0.006
7	Rail car to Hopper	1687500	0.001564	1.320	40	0.792
8	Hopper to Feeder	1687500	0.000040	0.034	50	0.017
9	Feeder to Conveyor L	1687500	0.000010	0.008	50	0.004
10	Conveyor L to D1/D2	1687500	0.000600	0.506	95	0.025
11	D1/D2 to M1/M2	2430000	0.000340	0.413	95	0.021
12	M1/M2 to E1/E2	2430000	0.000160	0.194	95	0.010
13	E1/E2 to Stockpile	2430000	0.000630	0.765	0	0.765
14	Coal Stockpile Live	2130000	0.033507	35.770	50	17.885
	Dead	300000	0.894250	134.138	70	40.241
15	Limestone Live	57000	0.000391	0.011	0	0.011
16	Reclaim to F1/F2/F3/F4	2430000	0.000272	0.330	85	0.050
17	F1/F2/F3/F4 to G1/G2	2430000	0.000408	0.496	95	0.025
18	G1/G2 to Crusher	2700000	0.000340	0.459	70	0.138
19	Crusher to H1/H2	2700000	0.000102	0.138	70	0.041
20	H1/H2 to J1/J2	2700000	0.000221	0.298	80	0.060
21	J1/J2 to Bunker	2700000	0.000459	0.620	95	0.031
22	D1/D2 to G1/G2 by-passes stor.	270000	0.000960	0.130	95	0.006
23	Vehicular entrainment (Miles)	9125	0.124000	0.566	0	0.566
24	Stockpile Maintenance	2430000	0.184000	223.560	50	111.780
					TOTAL	172.771

INCREASE OVER PRE-MODIFICATION :

16.6 TONS/YR

TABLE 5

PARTICULATE EMISSIONS ESTIMATE

GANDH STATION COAL YARD

COAL THROUGHPUT : 2000000 TONS/YR
 LIMESTONE THROUGHPUT : 57000 TONS/YR
 VEHICULAR TRAFFIC MILEAGE : 9125 MILES

SOURCE	THROUGHPUT (T/YR)	RAIL (T/YR)	BARGE (T/YR)	TO PLANT (T/YR)	TO YARD (T/YR)	TO LIVE & ACTIVE (T/YR)	TO DEAD STORE (T/YR)	PERIOD IN LIVE & ACTIVE (DAYS)	PERIOD IN DEAD STORE (DAYS)
COAL	2000000	1750000	1050000	200000	2520000	2270000	300000	13.15	365
LIMESTONE	57000				57000			26.81	

#	Particulate Emission Source	Throughput (Ton/Yr)	Uncontrolled Emission Fact (lbs/ton)	Uncontrolled Emissions (Tons/yr)	Efficiency	Controlled Emissions (Tons/yr)
1	Grab bucket from Barge	90000	0.003300	0.149	0	0.149
2	Bucket to Hopper	1050000	0.000220	0.116	25	0.087
3	Hopper to Feeder	1050000	0.000018	0.009	0	0.009
4	Feeder to Conveyor B	1050000	0.000135	0.071	50	0.035
5	Conveyor B to Conveyor C	1050000	0.000090	0.047	50	0.024
6	Conveyor C to D1/D2	1050000	0.000225	0.118	95	0.006
7	Rail car to Hopper	1750000	0.001564	1.369	40	0.821
8	Hopper to Feeder	1750000	0.000040	0.035	50	0.018
9	Feeder to Conveyor L	1750000	0.000010	0.009	50	0.004
10	Conveyor L to D1/D2	1750000	0.000400	0.525	95	0.026
11	D1/D2 to M1/M2	2520000	0.000340	0.428	95	0.021
12	M1/M2 to E1/E2	2520000	0.000160	0.202	95	0.010
13	E1/E2 to Stockpile	2520000	0.000630	0.794	0	0.794
14	Coal Stockpile Live	2220000	0.032225	35.770	50	17.885
	Dead	300000	0.894250	134.138	70	40.241
15	Limestone Live	57000	0.000391	0.011	0	0.011
16	Reclaim to F1/F2/F3/F4	2520000	0.000272	0.343	85	0.051
17	F1/F2/F3/F4 to G1/G2	2520000	0.000408	0.514	95	0.026
18	G1/G2 to Crusher	2800000	0.000340	0.476	70	0.143
19	Crusher to H1/H2	2800000	0.000102	0.143	70	0.043
20	H1/H2 to J1/J2	2800000	0.000221	0.309	80	0.062
21	J1/J2 to Bunker	2800000	0.000459	0.643	95	0.032
22	D1/D2 to G1/G2 by-passes stor.	280000	0.000960	0.134	95	0.007
23	Vehicular entrainment (Miles)	9125	0.124000	0.566	0	0.566
24	Stockpile Maintenance	2520000	0.184000	231.840	50	115.920
					TOTAL	176.991

INCREASE OVER PRE-MODIFICATION :

20.8 TONS/YR

TABLE 6

PARTICULATE EMISSIONS ESTIMATE

GANNON STATION COAL YARD

COAL THROUGHPUT : 2850000 TONS/YR
 LIMESTONE THROUGHPUT : 57000 TONS/YR
 VEHICULAR TRAFFIC MILEAGE : 9125 MILES

SOURCE	THROUGHPUT (T/YR)	RAIL (T/YR)	BARGE (T/YR)	TO PLANT (T/YR)	TO YARD (T/YR)	TO LIVE & ACTIVE (T/YR)	TO DEAD STORE (T/YR)	PERIOD IN LIVE & ACTIVE (DAYS)	PERIOD IN DEAD STORE (DAYS)
COAL	2850000	1781250	1068750	285000	2565000	2265000	300000	12.89	365
LIMESTONE	57000				57000			26.81	

#	Particulate Emission Source	Throughput (Ton/Yr)	Uncontrolled Emission Fact (lbs/ton)	Uncontrolled Emissions (Tons/yr)	Efficiency	Controlled Emissions (Tons/yr)
1	Grab bucket from Barge	90000	0.003300	0.149	0	0.149
2	Bucket to Hopper	1068750	0.000220	0.118	25	0.088
3	Hopper to Feeder	1068750	0.000018	0.010	0	0.010
4	Feeder to Conveyor B	1068750	0.000135	0.072	50	0.036
5	Conveyor B to Conveyor C	1068750	0.000090	0.048	50	0.024
6	Conveyor C to D1/D2	1068750	0.000225	0.120	95	0.006
7	Rail car to Hopper	1781250	0.001564	1.393	40	0.836
8	Hopper to Feeder	1781250	0.000040	0.036	50	0.018
9	Feeder to Conveyor L	1781250	0.000010	0.009	50	0.004
10	Conveyor L to D1/D2	1781250	0.000600	0.534	95	0.027
11	D1/D2 to M1/M2	2565000	0.000340	0.436	95	0.022
12	M1/M2 to E1/E2	2565000	0.000160	0.205	95	0.010
13	E1/E2 to Stockpile	2565000	0.000630	0.808	0	0.808
14	Coal Stockpile Live	2265000	0.031585	35.770	50	17.885
	Dead	300000	0.894250	134.138	70	40.241
15	Limestone Live	57000	0.000391	0.011	0	0.011
16	Reclaim to F1/F2/F3/F4	2565000	0.000272	0.349	85	0.052
17	F1/F2/F3/F4 to G1/G2	2565000	0.000408	0.523	95	0.026
18	G1/G2 to Crusher	2850000	0.000340	0.485	70	0.145
19	Crusher to H1/H2	2850000	0.000102	0.145	70	0.044
20	H1/H2 to J1/J2	2850000	0.000221	0.315	80	0.063
21	J1/J2 to Bunker	2850000	0.000459	0.654	95	0.033
22	D1/D2 to G1/G2 by-passes stor.	285000	0.000960	0.137	95	0.007
23	Vehicular entrainment (Miles)	9125	0.124000	0.566	0	0.566
24	Stockpile Maintenance	2565000	0.184000	235.900	50	117.990
					TOTAL	179.100

INCREASE OVER PRE-MODIFICATION :

22.9 TONS/YR

PARTICULATE EMISSIONS ESTIMATE

TABLE 7

GANNON STATION COAL YARD

COAL THROUGHPUT : 2875000 TONS/YR
 LIMESTONE THROUGHPUT : 57000 TONS/YR
 VEHICULAR TRAFFIC MILEAGE : 9125 MILES

SOURCE	THROUGHPUT (T/YR)	RAIL (T/YR)	BARGE (T/YR)	TO PLANT (T/YR)	TO YARD (T/YR)	TO LIVE & ACTIVE (T/YR)	TO DEAD STORE (T/YR)	PERIOD IN LIVE & ACTIVE (DAYS)	PERIOD IN DEAD STORE (DAYS)
COAL	2875000	1796875	1078125	287500	2587500	2287500	300000	12.77	365
LIMESTONE	57000				57000			26.81	

#	Particulate Emission Source	Throughput (Ton/Yr)	Uncontrolled Emission Factor (lbs/ton)	Uncontrolled Emissions (Tons/yr)	Efficiency	Controlled Emissions (Tons/yr)
1	Grab bucket from Barge	90000	0.003300	0.149	0	0.149
2	Bucket to Hopper	1078125	0.000220	0.119	25	0.089
3	Hopper to Feeder	1078125	0.000018	0.010	0	0.010
4	Feeder to Conveyor B	1078125	0.000135	0.073	50	0.036
5	Conveyor B to Conveyor C	1078125	0.000090	0.049	50	0.024
6	Conveyor C to D1/D2	1078125	0.000225	0.121	95	0.006
7	Rail car to Hopper	1796875	0.001564	1.405	40	0.843
8	Hopper to Feeder	1796875	0.000040	0.036	50	0.018
9	Feeder to Conveyor L	1796875	0.000010	0.009	50	0.004
10	Conveyor L to D1/D2	1796875	0.000600	0.539	95	0.027
11	D1/D2 to H1/H2	2587500	0.000340	0.440	95	0.022
12	H1/H2 to E1/E2	2587500	0.000160	0.207	95	0.010
13	E1/E2 to Stockpile	2587500	0.000630	0.815	0	0.815
14	Coal Stockpile Live	2287500	0.031274	35.770	50	17.885
	Coal Stockpile Dead	300000	0.894250	134.138	70	40.241
15	Limestone Live	57000	0.000391	0.011	0	0.011
16	Reclaim to F1/F2/F3/F4	2587500	0.000272	0.352	85	0.053
17	F1/F2/F3/F4 to G1/G2	2587500	0.000408	0.528	95	0.026
18	G1/G2 to Crusher	2875000	0.000340	0.489	70	0.147
19	Crusher to H1/H2	2875000	0.000102	0.147	70	0.044
20	H1/H2 to J1/J2	2875000	0.000221	0.318	80	0.064
21	J1/J2 to Bunker	2875000	0.000459	0.660	95	0.033
22	D1/D2 to G1/G2 by-passes stor.	287500	0.000960	0.138	95	0.007
23	Vehicular entrainment (Miles)	9125	0.124000	0.566	0	0.566
24	Stockpile Maintenance	2587500	0.184000	238.050	50	119.025
					TOTAL	180.155

INCREASE OVER PRE-MODIFICATION :

24.0 TONS/YR

TABLE 8

PARTICULATE EMISSIONS ESTIMATE

GANNON STATION COAL YARD

COAL THROUGHPUT : 2900000 TONS/YR
 LIMESTONE THROUGHPUT : 57000 TONS/YR
 VEHICULAR TRAFFIC MILEAGE : 9125 MILES

SOURCE	THROUGHPUT (T/YR)	RAIL (T/YR)	BARGE (T/YR)	TO PLANT (T/YR)	TO YARD (T/YR)	TO LIVE & ACTIVE (T/YR)	TO DEAD STORE (T/YR)	PERIOD IN LIVE & ACTIVE (DAYS)	PERIOD IN DEAD STORE (DAYS)
COAL	2900000	1812500	1087500	290000	2610000	2310000	300000	12.64	365
LIMESTONE	57000				57000			26.81	

#	Particulate Emission Source	Throughput (Ton/Yr)	Uncontrolled Emission Factor (lbs/ton)	Uncontrolled Emissions (Tons/yr)	Efficiency	Controlled Emissions (Tons/yr)
1	Grab bucket from Barge	90000	0.003300	0.149	0	0.149
2	Bucket to Hopper	1087500	0.000220	0.120	25	0.090
3	Hopper to Feeder	1087500	0.000018	0.010	0	0.010
4	Feeder to Conveyor B	1087500	0.000135	0.073	50	0.037
5	Conveyor B to Conveyor C	1087500	0.000090	0.049	50	0.024
6	Conveyor C to D1/D2	1087500	0.000225	0.122	95	0.006
7	Rail car to Hopper	1812500	0.001564	1.417	40	0.850
8	Hopper to Feeder	1812500	0.000040	0.036	50	0.018
9	Feeder to Conveyor L	1812500	0.000010	0.009	50	0.005
10	Conveyor L to D1/D2	1812500	0.000600	0.544	95	0.027
11	D1/D2 to M1/H2	2610000	0.000340	0.444	95	0.022
12	M1/H2 to E1/E2	2610000	0.000160	0.209	95	0.010
13	E1/E2 to Stockpile	2610000	0.000630	0.822	0	0.822
14	Coal Stockpile Live	2310000	0.030970	35.770	50	17.885
	Dead	300000	0.894250	134.138	70	40.741
15	Limestone Live	57000	0.000391	0.011	0	0.011
16	Reclaim to F1/F2/F3/F4	2610000	0.000272	0.355	85	0.053
17	F1/F2/F3/F4 to G1/G2	2610000	0.000408	0.532	95	0.027
18	G1/G2 to Crusher	2900000	0.000340	0.493	70	0.148
19	Crusher to H1/H2	2900000	0.000102	0.148	70	0.044
20	H1/H2 to J1/J2	2900000	0.000221	0.320	80	0.064
21	J1/J2 to Bunker	2900000	0.000459	0.666	95	0.033
22	D1/D2 to G1/G2 by-passes stor.	2900000	0.600960	0.139	95	0.007
23	Vehicular entrainment (Miles)	9125	0.124000	0.566	0	0.566
24	Stockpile Maintenance	2610000	0.184000	240.120	50	120.060
					TOTAL	181.210

2,900,000 x 0.02 = 29 TYP
 hammer mill crusher
 if use

INCREASE OVER PRE-MODIFICATION :

25.0 TONS/YR

PARTICULATE EMISSIONS ESTIMATE

TABLE 9

GANNON STATION COAL YARD

COAL THROUGHPUT : 3000000 TONS/YR
 LIMESTONE THROUGHPUT : 57000 TONS/YR
 VEHICULAR TRAFFIC MILEAGE : 9125 MILES

SOURCE	THROUGHPUT (T/YR)	RAIL (T/YR)	BARGE (T/YR)	TO PLANT (T/YR)	TO YARD (T/YR)	TO LIVE & ACTIVE (T/YR)	TO DEAD STORE (T/YR)	PERIOD IN LIVE & ACTIVE (DAYS)	PERIOD IN DEAD STORE (DAYS)
COAL	3000000	1875000	1125000	300000	2700000	2400000	300000	12.17	365
LIMESTONE	57000				57000			26.81	

I	Particulate Emission Source	Throughput (Ton/Yr)	Uncontrolled Emission Factor (lbs/ton)	Uncontrolled Emissions (Tons/yr)	Efficiency	Controlled Emissions (Tons/yr)
1	Grab bucket from Barge	90000	0.003300	0.149	0	0.149
2	Bucket to Hopper	1125000	0.000220	0.124	25	0.093
3	Hopper to Feeder	1125000	0.000018	0.010	0	0.010
4	Feeder to Conveyor B	1125000	0.000135	0.076	50	0.038
5	Conveyor B to Conveyor C	1125000	0.000090	0.051	50	0.025
6	Conveyor C to D1/D2	1125000	0.000225	0.127	95	0.006
7	Rail car to Hopper	1875000	0.001564	1.466	40	0.880
8	Hopper to Feeder	1875000	0.000040	0.038	50	0.019
9	Feeder to Conveyor L	1875000	0.000010	0.009	50	0.005
10	Conveyor L to D1/D2	1875000	0.000600	0.563	95	0.028
11	D1/D2 to M1/M2	2700000	0.000340	0.459	95	0.023
12	M1/M2 to E1/E2	2700000	0.000160	0.216	95	0.011
13	E1/E2 to Stockpile	2700000	0.000630	0.851	0	0.851
14	Coal Stockpile Live	2400000	0.029808	35.770	50	17.885
	Dead	300000	0.894250	134.138	70	40.241
15	Limestone Live	57000	0.000391	0.011	0	0.011
16	Reclaim to F1/F2/F3/F4	2700000	0.000272	0.367	85	0.055
17	F1/F2/F3/F4 to G1/G2	2700000	0.000408	0.551	95	0.028
18	G1/G2 to Crusher	3000000	0.000340	0.510	70	0.153
19	Crusher to H1/H2	3000000	0.000102	0.153	70	0.046
20	H1/H2 to J1/J2	3000000	0.000221	0.332	80	0.066
21	J1/J2 to Bunker	3000000	0.000459	0.689	95	0.034
22	D1/D2 to G1/G2 by-passes stor.	300000	0.000960	0.144	95	0.007
23	Vehicular entrainment (Miles)	9125	0.124000	0.566	0	0.566
24	Stockpile Maintenance	2700000	0.184000	248.400	50	124.200
					TOTAL	185.429

INCREASE OVER PRE-MODIFICATION :

29.3 TONS/YR

BEST AVAILABLE COPY

PARTICULATE EMISSIONS

TABLE 10

PROPOSED SYSTEM

articulate mission ource	Throughput (Million Tons)	Emission Factor (lbs/ton) (x10 ⁻⁶)	Height of Drop (feet)	Emission Factor (lbs/ton) (x10 ⁻⁶)	Uncontrolled Emissions (tons/year)	Controls		Control Emission (tons/yea
						Type	Efficiency (%)	
Grab bucket from Barge	0.09 (Spillage)	110h	30	3300	0.148	Grab bucket	--	0.148
Bucket to Hopper	0.9	110h	2	220	0.099	Windshield	25 ¹	0.074
Hopper to Feeder	0.9	9h 36	2	18	0.008		--	0.008
Feeder to Convey- or B	0.9	9h 36	15	135	0.061	Enclosure	50 ²	0.030
Conveyor B to Conveyor C	0.9	9h 36	10	90	0.041	"	50	0.020
Conveyor C to D ₁ /D ₂	0.9	9h 36	25	225	0.101	Wetsprays	95	0.005
Ball car to hopper	1.5	22h	17	1564	1.173	Enclosure (open-ended)	40 ⁴	0.704
Hopper to Feeder	1.5	20h	2	40	0.030	Enclosure	50	0.015
Feeder to Conveyr. L	1.5	20h	1	10	0.0075	"	50	0.004
Conveyor L to D ₁ /D ₂	1.5	20h	30	600	0.450	"	95	0.023
D ₁ /D ₂ to M ₁ /M ₂	2.160	20h	17	340	0.367	"	95	0.018
M ₁ /M ₂ to E ₁ /E ₂	2.16	20h	8	160	0.173	"	95	0.009
								1.058

TABLE 11

Particulate Emission Source	Throughput (Million Tons)	Emission Factor (lbs/ton) ($\times 10^{-6}$)	Height of Drop (feet)	Emission Factor (lbs/ton) ($\times 10^{-6}$)	Uncontrolled Emissions (tons/year)	Controls		Controlled Emissions (tons/year)
						Type	Efficiency (x)	
1/E ₂ to Stockpile	2.16	20h	31.5 (avg. fall)	630	0.680	--	--	0.680
Coal Stockpile								
Live	1.860	38,500	--	38,500	35.81	Conditioned ⁵	50	17.90
Dead	0.3	894,000	--	894,000	134.10	Cond/Compact ⁶	70	40.23
Limestone Live	0.057	390	--	390	0.01	--	--	0.01
Reclaim to F ₁ /F ₂ /F ₃ /F ₄	2.16	17h	16	272	0.294	Enclosure	85 ⁷	0.044
1/F ₂ /F ₃ /F ₄ to G ₁ /G ₂	2.16	17h	24	408	0.441	Wetsprays	95	0.022
1/G ₂ to Crusher	2.4	17h	20	340	0.408	Enclosure	70	0.122
Crusher to H ₁ /H ₂	2.4	17h	6	102	0.122	"	70	0.037
1/H ₂ to J ₁ /J ₂	2.4	17h	13	221	0.265	"	80-85 ⁸	0.053
1/J ₂ to Bunker	2.4	17h	27	459	0.551	"	95	0.027
1/D ₂ to G ₁ /G ₂								
By-passes storage	0.240	17h	56.5	960	0.115	Wetsprays	95	0.006
vehicular entrainment	9,125mi	0.124 lbs/vehicle mi	---	---	0.566	---	---	0.566
Stockpile maintenance	2.16		---	0.184	190.72	Conditioned	50	99.36
					374.74			160.115 160.075

TABLE 12

SUMMARY

The new totals are summarized in the following table:

Controlled Emissions
(tons/year)

<u>System</u>	<u>Point Sources</u>	<u>Stockpiles</u>	<u>Total</u>
Existing	1.15	155.02	156.17
Proposed	2.06 2.06	158.06	160.12 160.12
Increment	0.91 0.91	3.04	3.95 3.95

CONCLUSION

The incremental increase in particulate emission due to the proposed modification

$$= \frac{3.95}{3.95} \text{ tons/year}$$