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**MANATEE COUNTY
GOVERNMENT**
OFFICE OF THE COUNTY ADMINISTRATOR
"To Serve with Excellence"

November 12, 1999

RECEIVED
Sent Via Facsimile 11/12/99

NOV 17 1999

Rec 11/17

Mr. Howard L. Rhodes, Director, DARM
Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2400

BUREAU OF AIR REGULATION

RE: Initial Title V Air Operation Permit; Tampa Electric Company - Gannon Station

Dear Mr. Rhodes:

On numerous occasions, Manatee County has expressed its concern with the volume of air pollutants emitted by facilities to our north. Modeling shows that we are the downwind recipients of a huge emissions load, consisting primarily of sulfur dioxide (SO₂) and nitrogen oxides (NO_x) from coal-fired power plants in Hillsborough County.

We are aware of the pending Title V permit for TECO's Gannon Station, and realize that the comment period closes today. The Manatee County Commission would like to go on record as objecting to the liberal emission limits in the draft permit, given the impressive advances in pollution control technology since the Gannon plant was built.

The Commission echoes opinions in the lawsuit EPA recently filed against TECO, and agrees that the company has shown bad faith over the years, skirting Clean Air Act provisions by claiming major plant modifications - which would require re-permitting to New Source Performance Standards - were "routine maintenance", thereby extending the plants' life and increasing generating capacity without reducing emissions to the extent achievable by modern technology. Circumvention of the rules has allowed TECO to release massive amounts of SO₂, NO_x and particulate matter into the environment.

In light of the foregoing, the Commission asks that DEP reduce the term of the Gannon Title V permit (to become effective 1/1/00) to no more than two years, pending the outcome of the federal lawsuit. The "grandfathered" status of the Big Bend and Gannon plants has allowed TECO to reap handsome profits, to the detriment of the regional environment. It is beyond time for the plants to conform with today's standards.

Sincerely,

Ernie Padgett
County Administrator

1112 Manatee Avenue West • Bradenton, Florida • (941) 748-4501, Ext. 3717 • FAX (941) 745-3790

MANATEE COUNTY CITIZENS
AGAINST POLLUTION (MCAP)
P. O. BOX 660
PARRISH, FLORIDA 34219
November 9, 1999

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BUREAU OF AIR REGULATION

NOV 17 1999

DIVISION OF AIR
RESOURCES MANAGEMENT

*Chair
of
Howard
11/17
South
City*

Mr. Howard L. Rhodes, Director
Division of Air Resources Management
Department of Environmental Protection
Mail Station #5505
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

RE: Revised DRAFT Permits Numbered: 0570039-002-AV and
0570040-002-AV

Dear Mr. Rhodes:

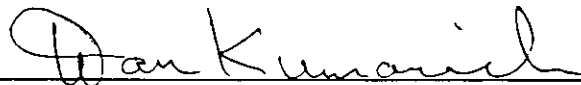
It is our contention that the above referenced permits for the operation of the Tampa Electric Company (TECO) Big Bend and Gannon Stations not be approved for the five year period (January 1, 2000 to December 31, 2004).

Since the United States Environmental Protection Agency (USEPA) has filed a Notice of Violation (NOV—EPA-CAA-2000-04-0007) relative to the operation of these plants, it is suggested that they should now continue to operate on a month to month basis until such time as the issues raised in the NOV are resolved.

Anecdotal information, e.g. press releases, indicate that TECO currently intends to litigate this issue. Given this scenario, and should the courts find in favor of the USEPA, then the DEP would have approved the operation of these plants for another five years when in fact they may be operating illegally.

Thank you for your kind consideration of this matter.

Dr. Dan Kumarich
MCAP President



CC: Governor Jeb Bush
David B. Struhs, DEP Secretary



TAMPA ELECTRIC

November 10, 1999

Mr. Scott M. Sheplak, P.E.
Florida Department of Environmental Protection
111 South Magnolia Drive, Suite 4
Tallahassee, Florida 32301

11/10
Via Facsimile and FedEx
Airbill No. 7918 0765 0387

**Re: Tampa Electric Company
F. J. Gannon Station
Comments on the Revised Draft Title V Permit
FDEP File No. 0570040-002-AV**

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NOV 12 1999

BUREAU OF AIR REGULATION

Dear Mr. Sheplak:

Please find enclosed TEC's detailed comments regarding the above referenced Revised Draft Title V Permit

Please feel free to telephone me at (813) 641-5033, if you have any questions.

Sincerely,

Jamie Hunter
Administrator - Air Programs
Environmental Planning

EP\gmJJH907

Enclosure

c/enc: Mr. Clair Fancy, FDEP-Tallahassee
Mr. Jerry Kissel, FDEP-SW District
Mr. Richard Kirby, EPCHC

**TAMPA ELECTRIC COMPANY
COMMENTS REGARDING THE REVISED DRAFT TITLE V
AIR OPERATION PERMIT FOR F.J. GANNON STATION
FDEP FILE NO. 0570040-002-AV**

Table of Contents

TEC Comment 1:

TEC requests the following change to the Table of Contents:

III. Emissions Units and Conditions

...

E. ~~Coal~~ Fuel Yard

Section I. Facility Information.

TEC Comment 2:

TEC requests the following changes to Subsection B. Summary of Emissions Unit ID Nos. and Brief Descriptions:

- 008 Fuel ~~Coal~~ Yard. . .
- 013 Unit No. 1 Fuel ~~Coal~~ Bunker with Roto-Clone
- 014 Unit No. 2 Fuel ~~Coal~~ Bunker with Roto-Clone
- 015 Unit No. 3 Fuel ~~Coal~~ Bunker with Roto-Clone
- 016 Unit No. 4 Fuel ~~Coal~~ Bunker with Roto-Clone
- 017 Unit No. 5 Fuel ~~Coal~~ Bunker with Roto-Clone
- 018 Unit No. 6 Fuel ~~Coal~~ Bunker with Roto-Clone

TEC Comment 3:

In the listing of "documents on file with the permitting agency", TEC questions the need to list documents changing the Designated Representative. Also, this list should include the letter dated September 30, 1998, withdrawing the Title V DRAFT Permit package.

Section II. Facility-wide Conditions.

TEC Comment 4:

Consistent with the previously issued Title V Air Operations Permit for Hookers Point Station, TEC requests the Appendix I-1, List of Insignificant Emissions Units and/or Activities, as cited in Condition 5, be modified as follows to include:

13. Storage tanks less with than 550 gallons capacity
14. Inorganic substance storage tanks with 550 gallon or greater capacity and not containing a hazardous air pollutant (HAP)
15. No. 2 fuel oil storage tanks
16. Equipment used for steam cleaning
17. Turbine vapor extractors
18. Vehicle Refueling Operations

TEC Comment 5:

TEC requests Condition 7(b) be deleted. The specific conditions for each steam generator include required reasonable precautions to minimize particulate matter emissions. Condition 7(b) duplicates these requirements with less specific language that could cause confusion.

TEC also notes that the cited underlying rule for Condition 7(b), 62-296.320(4)(c)(2), F.A.C., applies to unconfined particulate matter emission sources. This rule is not applicable to the steam generators because these emissions units are confined particulate matter emission sources.

Section III. Regulated Emissions Units Conditions

TEC Comment 6:

TEC requests that Emission Unit 3 description be clarified as follows because the heat recovery system is no longer in service:

.... and is of the cyclone firing type, ~~equipped with an optional flue gas recirculation (heat recovery) system to maintain steam temperature at low loads.~~

TEC Comment 7:

TEC requests that the following sentence be modified as noted in both places it appears in Subsection A.

New No. 2 fuel oil is used as an ignition fuel during startup, shutdown, and combustion stabilization.

Also, the Subsection A permitting note references these units as Phase I Acid Rain units. These units are regulated under the Phase II Acid Rain rules only.

TEC Comment 8:

TEC requests that all emission units listed in Subsections A, B and C be combined into Subsection A. This consolidation will clarify the specific permit condition requirements for these emission units as well as streamline the permit. TEC believes this approach is appropriate because these units have the same basic method of operations.

Should this comment not be incorporated into the final version of this permit, the following comments noted as applying to Subsection A would also apply, as applicable, to Subsections B and C.

TEC Comment 9:

TEC requests Condition A.1 be changed as follows:

The maximum operation permitted heat input rates, on a monthly average basis, are as follows: . . .

TEC Comment 10:

TEC requests Condition A.2 be changed to read as follows to recognize that coal and ignition oil are jointly burned, to allow for the injection of nonhazardous boiler cleaning waste, and to allow on-specification used oil (including oily soil) combustion during normal operations:

- (a) Normal operation: The only fuels allowed to be burned are coal and on-specification used oil.
- (b) Startup; shutdown; malfunctions: In addition to the fuels allowed to be burned during normal operations, each unit may also burn new No. 2 fuel oil during startup, shutdown and malfunctions. This includes but is not limited to the emission unit, a new cyclone/mill or combustion stabilization.
- (c) The injection of nonhazardous boiler chemical cleaning waste is allowed in each unit.

TEC Comment 11:

Consistent with the existing operating permits for F.J. Gannon Station, TEC

requests the following statement be added to Condition A.3:

A test under sootblowing conditions which demonstrates compliance with a non-sootblowing limitation will be accepted as proof of compliance with that non-sootblowing limitation.

In addition, TEC requests that only a visible emissions test under sootblowing conditions be required. TEC believes duplicate testing (sootblowing and non-sootblowing) provides no environmental benefit.

Since compliance with the Sulfur Dioxide limits will be demonstrated through the use of CEM's, TEC requests that the Sulfur Dioxide stack testing requirement be deleted.

Also, TEC requests that the "Annual Date" reference, as well as the note referring to testing "...12 months from the annual date..." be deleted, the following statement be included in the condition:

During each federal fiscal year (October 1 – September 30) Tampa Electric Company shall have formal compliance tests conducted on each Unit.

TEC Comment 12:

TEC requests Condition A.4 be changed as follows to clarify design fuel consumption rates:

A. Process System Performance Parameters:

1. Source Designator: Units Nos. 1-6
2. Design Fuel Consumption Rate at Maximum Continuous Rating:

Unit	Tons/hr (fuel coal)	Fuel Heat Content (Btu/lb)
1	50	<u>12,570</u>
2	51	<u>12,570</u>
3	65	<u>12,300</u>
4	80	<u>11,699</u>
5	93.4	<u>12,227</u>
6	151.4	<u>12,543</u>

All Units:

New No. 2 fuel oil

On-specification used oil - 48 gallons per minute/per boiler; Max 1,000,000 gal/yr per station.

Daily Recorded and Monitored

Fuel input

...

Monthly Recorded or Inspection/Maintenance

Fuel input

~~Inspect insulator compartment heaters/blowers.~~

Units 1-4 Inspect insulator compartment heaters/blowers.

Units 5-6 Inspect penthouse pressurizing fan filters.

TEC Comment 13:

TEC requests Condition B.3 be eliminated because enforcing this condition is neither necessary nor practical. The quantity of SO₂ generated from on-specification used oil combustion is negligible compared to the quantity of SO₂ generated from coal combustion. Segregating and determining the quantity of SO₂ generated from the combustion of each fuel is not possible.

TEC Comment 14:

TEC requests Condition B.6 be changed to Condition A.6 and amended as follows because we believe it will provide clarity and we know of no regulatory requirement mandating recordkeeping completion.

b. Quantity Limitation: This emissions unit is permitted to burn "on-specification" used oil that is generated by TECO ~~the F.J. Gannon Station~~ in the production and distribution of electricity, not to exceed 1,000,000 gallons during any consecutive 12 month period.

f. Record Keeping Requirements: The owner or operator....

- (1) The gallons of on-specification used oil generated and burned each month. ~~(This record shall be completed no later than the fifteenth day of the succeeding month.)~~
- (2) The total gallons of on-specification used oil burned in the preceding consecutive 12-month period. ~~(This record shall be completed no later than the fifteenth day of the succeeding month.)~~

TEC Comment 15:

TEC requests the brief description of the combustion turbine in subsection D

be clarified as follows:

This emissions unit is a simple cycle combustion turbine and is designated Combustion Turbine #1 7. . . .

TEC Comment 16:

TEC requests Condition D.1 be changed as follows:

The maximum ~~operation permitted~~ heat input rate, on a monthly average basis, is as follows: . . .

TEC Comment 17:

TEC recommends Condition D.7 be changed as follows to promote clarity:

Excess emissions from this ~~these~~ emissions units resulting from . . .

TEC Comment 18:

TEC requests this condition D.9 be changed as follows:

The permittee shall demonstrate compliance with the liquid fuel sulfur limit by means of a fuel analysis ~~provided by the vendor upon each fuel delivery~~ or by contract specifications.

TEC Comment 19:

TEC requests Condition D.10 be deleted as unnecessary.

TEC Comment 20:

TEC recommends that Condition D.16 be changed as follows to promote clarity:

Visible Emissions Testing - Annual: By this permit, annual emissions compliance testing for visible emissions is not required ~~for these emissions units~~ while burning ~~only~~ liquid fuels for less than 400 hours per year.

TEC Comment 21:

TEC requests Condition D.22 be clarified as follows:

In order to document compliance with the visible emission testing exemption provided in Specific Condition No. D.16 D-5, ...

TEC Comment 22:

TEC requests the brief description of the fuel yard in Subsection E be clarified as follows:

-008 F.J. Gannon Station Fuel Coal Yard

For the operation of a fuel bituminous-coal yard serving the F.J. Gannon Station boiler units 1 through 6, yard activities including barge (east and west) and railcar unloading of coal, truck/barge/train unloading of flux limestone or iron ore, and transfer and storage of these materials. ~~The iron ore is shipped, stored, and handled in the same manner as limestone. . . .~~

Maximum Design

Material Handling	Particulate Control	Efficiency Rating at
<u>Source Designator</u> <u>Rate (TPH)</u>	<u>Method</u>	<u>Design Capacity</u>
Barge to East Grab 1500 Bucket	Grab Bucket	----
East Grab Bucket to 1500 East Hopper	Side Enclosure	25%
Barge to West 1500 Continuous Unloader	Enclosure	40%
Barge to West Grab 1500 Bucket	Grab Bucket	-----
West Grab Bucket to	Side Enclosure	25%

~~1500~~
~~to West Hopper~~

...

West Hopper to
~~1500~~
Feeder

...

Live Limestone Fluxing
Stockpile

TEC Comment 23:

TEC requests Condition E.1 be clarified as follows:

Permitted Capacity: The maximum permitted process rate is 2.85 million tons/year of coal.

TEC Comment 24:

TEC requests Condition E.4. be deleted because demonstrating compliance with the stated condition is not possible.

TEC Comment 25:

TEC recommends specific Condition E.5. be modified as follows:

A thirty (30) minute visible emissions test shall be performed on the following material transfer operations ~~within 60 days prior to or on December 31~~ during each federal fiscal year:

- A. The...
- ~~B. The west bucket to the west hopper~~
- C. The...

TEC Comment 26:

TEC requests E.6. be modified as follows:

Water sprays or chemical wetting agents and stabilizers are

acceptable methods to be used on ~~both live and dead~~ coal storage piles ...

TEC Comment 27:

TEC requests Condition E.8 be clarified as follows:

- A. Process Parameters:
 - 1. Operation...
 - 2. Equipment...
 - 3. Wet Dust Suppression:
Manufacture: Martin Marietta and/or Benitec

- B. Inspection and Maintenance Procedures:

The ~~fuel coal~~ yard particulate control equipment shall receive regular preventative maintenance as follows: . . .

TEC Comment 28:

TEC requests that Condition E.11 be deleted. All permit modification notifications will be submitted to FDEP, consistent with the Title V Air Operation Permit program.

TEC Comment 29:

TEC requests that Condition E.14 be deleted. This condition is no longer applicable to the fuel yard operations.

TEC Comment 30:

TEC requests that Condition E.15 be deleted. This condition is no longer applicable because the west grab bucket has been retired.

TEC Comment 31:

TEC requests the brief description of the Units 5-6 Fly Ash Silo (No. 1) in Subsection G be clarified as follows:

. . . In addition , fly ash from F.J. Gannon Station Units 1-4 Fly Ash Silo No. 2 (silo No. 2) may be routed via gravity flow to the pugmill where it is "conditioned" by wetting with water and gravity fed into open bed trucks. The fly ash is then transported to an off-site consumer. Fly ash

may also be conveyed from tanker trucks to Fly Ash Silo No. 1 and from Fly Ash Silo No. 1 to Fly Ash Silo No. 2. . . .

TEC Comment 32:

TEC requests that G.4. be modified as follows:

Each federal fiscal year, test the emissions from the fly ash silo/baghouse and truck loading* annually for particulate matter and visible emissions within 60 days to or on March 22.

TEC Comment 33:

Since the testing requirements identified in G.6. only apply to test of the silo/baghouse, TEC requests this condition be modified as follows:

All fly ash silo/baghouse compliance tests...

TEC Comment 34:

TEC requests the brief description of the Units 1-4 Fly Ash Silo (No. 2) in Subsection H be clarified as follows:

. . . In addition, fly ash from silo No. 2 may be routed to the pugmill at F.J. Gannon Station Silo No. 1 where it is "conditioned" by wetting with water and gravity fed into open bed trucks. The fly ash is then transported to an off-site consumer. Fly ash may also be conveyed from tanker trucks to Fly Ash Silo No. 2 and from Fly Ash Silo No. 2 to Fly Ash Silo No. 1. . . .

TEC Comment 35:

TEC requests that H.4. be modified as follows:

Each federal fiscal year, test the emissions from the fly ash silo annually for particulate matter and visible emissions within 60 days to or on March 22.

TEC Comment 36:

TEC requests the brief description of the fuel bunkers with Roto-Clones in Subsection I be clarified as follows:

For the operation of F.J. Gannon station Units 1-6 fuel ~~coal~~ bunkers with exhaust fan/cyclone collector (Roto-Clone) controlling dust emissions from each unit's respective bunker, two moving transfer stations via their respective conveyor belts fuel ~~coal~~ through enclosed chutes to each of the six bunkers. Fuel ~~Coal~~ bunkers No. 1-4 and 6 are each equipped with a 9,600 ACFM American Air Filter Company Type D Roto-Clone to abate dust emissions during ventilation. Fuel ~~Coal~~ bunker No. 5 is equipped with a 5,400 ACFM Type D Roto-clone. A number of vent pipes convey air from each bunker to a Roto-Clone during particulate removal. Particulate matter removed by the Roto-Clones is returned to a fuel ~~coal~~ bunker via a hopper and return line. Units No. 1-6 fuel ~~coal~~ bunkers are situated in a west to east fashion. Unit No. 1 fuel ~~coal~~ bunker is located furthest west and Unit No. 6 fuel ~~coal~~ bunker is located furthest east.

TEC Comment 37:

TEC requests Condition I.2 be clarified as follows:

. . . the maximum allowable particulate matter emission rate from each of the six fuel ~~coal~~ bunkers shall not exceed 0.99 ton/year. Also, the maximum... of the six ~~coal~~ fuel bunkers...

TEC Comment 38:

TEC requests Condition I.3 be clarified as follows:

Visible emissions from each of the six fuel ~~coal~~ bunkers shall not be equal to or greater than 20% opacity.

TEC Comment 39:

TEC requests that Condition I.4 be deleted to avoid confusion because this requirement is adequately addressed in Subsection K.

TEC Comment 40:

TEC requests Condition I.5 be deleted because each rotoclone emits less than 1 tn/yr and therefore by regulations are exempt from RACT requirements.

TEC Comment 41:

TEC needs additional time and information to determine the validity of the 1.35 pounds of sulfur dioxide per million BTU limit identified in Condition J.4.

TEC Comment 42:

TEC requests Condition J.6 be changed as follows:

Visible emissions shall not exceed 20 percent opacity, except for one six ~~two~~-minute period per hour during which the opacity shall not exceed 27 ~~40~~ percent.

TEC Comment 43:

TEC requests J.7. be modified as follows:

...shall not exceed 60 percent opacity, except for up to 4 six-minute periods, during the 3-hours...

TEC Comment 44:

TEC has concern regarding Conditions J.12.a. through J.12.c. and requests that the use of CEM's for demonstrating compliance be based on the Sulfur Dioxide Compliance Plan submitted to the Department in October 1998.

TEC Comment 45:

TEC requests that Condition J.22 be modified as follows:

The permittee shall demonstrate compliance with the liquid fuel sulfur limit by means of a fuel analysis provided by the vendor upon each fuel delivery or by contract specified

TEC Comment 46:

The reference to "**Specific Conditions J.2. through J.7.**" should apply to only Specific Conditions J.6. and J.7.

TEC Comment 47:

TEC requests that Condition J.26 be modified as follows:

~~... The sulfur variability study will be performed on the facility during the last quarter of each year. The results shall be submitted with the quarterly report for that period.~~

TEC Comment 48:

TEC requests that Condition J.31 be deleted. New No. 2 oil, which is fired only during startup, makes a negligible contribution to emissions from these emissions units. the cost of installing and maintaining new flow monitoring equipment is not justified by the benefit received.

TEC Comment 49:

TEC requests the portion of Condition J.34.e (reporting requirements) requiring the quarterly reporting to EPC be deleted because this requirement is unnecessary.

TEC Comment 50:

TEC requests the following changes to Subsection K. Common Conditions:

- 013 Unit No. 1 ~~Fuel Coal~~ Bunker with Roto-Clone
- 014 Unit No. 2 ~~Fuel Coal~~ Bunker with Roto-Clone
- 015 Unit No. 3 ~~Fuel Coal~~ Bunker with Roto-Clone
- 016 Unit No. 4 ~~Fuel Coal~~ Bunker with Roto-Clone
- 017 Unit No. 5 ~~Fuel Coal~~ Bunker with Roto-Clone
- 018 Unit No. 6 ~~Fuel Coal~~ Bunker with Roto-Clone

TEC Comment 51:

TEC requests Condition K.3. be modified to allow for the testing of two (2) rotoclones annually.

Also, it seems that the information in K.3. may be more clearly addressed in the individual Subsection F through I.

TEC Comment 52:

TEC requests that Condition A.8. in the Acid Rain Permit section be deleted.

If this information is made a part of the permit, then the permit will need to be amended each time the designated representative is changed. This is not necessary.

TEC Comment 53:

TEC requests that the relevant conditions of the following air construction permits be incorporated into this Title V permit.

Gannon Station Fuel Yard, Permit No. 0570040-006-AC
Crusher House Modification, Permit No. 0570040-007-AC
Wood Derived Fuel Modification, Permit No. 0570040-008-AC

Scott
FYI only -



TAMPA ELECTRIC

August 3, 1999

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AUG 09 1999

BUREAU OF AIR REGULATION

Mr. Clair Fancy
Florida Department of Environmental Protection
2600 Blair Stone Road
Twin Towers Office Building
Tallahassee, Florida 32399-2400

Re: Tampa Electric Company (TEC) - F.J. Gannon Station
Units 5 and 6 Stack Height Increase Construction Permit Application
FDEP File No. 0570040-009-AC

Dear Mr. Fancy:

With respect to the above referenced permit application, Tampa Electric Company is hereby granting a waiver of the 90-day period in which the Department is required to act on a permit pursuant to Section 120.60(1), Florida Statutes. This waiver supplements the waiver submitted on May 11, 1999 and will extend the period for Department action to and including November 19, 1999.

Please let me know if you have any questions. You can contact me at (813) 641-5033.

Sincerely,

J. James Hunter
Administrator - Air Programs
Environmental Planning

EP\gm\SKT109

- c: Mr. Al Linero - FDEP
- Mr. Cleve Holladay - FDEP
- Mr. Jerry Kissel - FDEP SW
- Mr. Rick Kirby - EPCHC



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

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APR 15 1999

BUREAU OF
AIR REGULATION

4APT-APB

APR 13 1999

Mr. Cleve Holladay
Meteorologist - Bureau of Air Regulation
Florida Department of Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Dear Mr. Holladay:

The March 4, 1999, Tampa Electric Company (TECO) responses to the Region 4 comments of December 8, 1998, have been reviewed. These responses were submitted to the Environmental Protection Agency (EPA) via a fax to Stan Krivo of the Air and Radiation Technology Branch. Region 4's December 1998 comments centered on increasing the existing stack height (i.e., 96 meters (m)) of F. J. Gannon Station Units 5 and 6 to 110 m without a fluid modeling demonstration. The 100 m stack height is apparently needed to avoid pollutant concentrations related to downwash that may adversely impact air quality. The modeling concerning this issue was originally submitted to address title V permit compliance with the sulfur dioxide (SO₂) National Ambient Air Quality Standards (NAAQS) for the Tampa Electric Company's F. J. Gannon Station. Region 4 comments pursuant to the review of the March 4, 1999 response follow.

1. TECO states that the Good Engineering Practice (GEP) formula stack height is 133 m; however, TECO is only proposing to raise the stack height for Units 5 and 6 to 82 percent (%) of the GEP formula height, or 110 m. The use of 110 m would require fluid modeling to justify this height as the GEP stack height for setting an emission limit. As previously stated in Region 4's December 8 1998 comments, according to the GEP stack height regulations, there is no restriction or prohibition against, or demonstration required for raising an existing (or replacing) a stack up to 65 m, provided prohibited dispersion techniques are not employed. Raising a stack above the 65 m *de minimis* height requires evidence that the additional height is necessary to avoid downwash-related pollutant concentrations that raise health and welfare concerns. This evidence can be achieved through either of two methods: (1) demonstrate by fluid modeling, using the existing stack and emission rate (before the stack is raised) and adding in the background air quality, that excessive pollutant concentrations will occur, or (2) show by site-specific information that the existing short stack(s) has in fact caused a local nuisance. EPA does not regulate the actual height of a stack and a company is free to build a stack to any height; however, section 123 of the Clean Air Act provides that the EPA Administrator shall regulate that portion of the stack height that is used in calculating emission limitations. Therefore, to use the stack height in regulatory modeling, the new Units 5 and 6 stack height that TECO proposes must be validated in the manner presented above.

2. The TECO letter cites Rule 62-210.550(3) of the Florida State Implementation Plan (SIP) which provides that EPA or the local air program may require the use of fluid modeling or a field study to verify the GEP stack height for the setting an emission limit. It has been the policy of Region 4 and other EPA Regional Offices to adhere to the requirement of developing, by fluid modeling, the GEP stack height that should be used in modeling if a stack is being raised above the *de minimis* stack height of 65 m. Region 4 continues to use this policy and requires the appropriate fluid modeling to be developed to justify the 110 m stack height for TECO Units 5 and 6. Without this policy, the use of a 110 m stack in regulatory modeling to avoid excessive pollutant concentrations would be considered a prohibitive dispersion technique.

3. Additional air dispersion modeling was performed for Units 5 and 6 based on the current sulfur dioxide (SO₂) allowable emission limits using the 96 m stack height with and without building downwash to address the 40% excessive concentration criteria. Modeling results for the high-second-high concentration for the 24-hour averaging periods was used. Upon further review of the stack height guidance, the 40% excessive concentration criterion can only be demonstrated through fluid modeling. The submitted Industrial Source Complex (ISC3) model modeling does not meet this requirement.

Region 4 looks forward to working with you to resolve the stack height issue and is willing to provide assistance in developing a fluid modeling protocol for the Gannon Unit 5 and 6 stacks. If this assistance is required, please submit future a response to my attention. If questions arise regarding these comments, please contact Brenda Johnson of my staff at (404) 562-9037.

Sincerely,



Linda Anderson-Carnahan
Chief
Air Planning Branch

cc: Stan Krivo, Air and Radiation Technology Branch

cc: File

S. Sheplak, TV