CK File

Department of Environmental Protection

Lawton Chiles
Governor

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Virginia B. Wetherell
Secretary

CERTIFIED MAIL - Return Receipt Requested

March 20, 1997

Mr. John Duff
General Manager
Tampa Electric Company (TEC)
P.O. Box 111
Tampa, Florida 33601-0111

RE: Request for Additional Information Regarding Initial Title V Permit Application
File No. 0570040-002-AV
F. J. Gannon Station, Hillsborough County

Dear Mr. Duff:

On February 21, 1997, the Department received your response to our first request for additional information.

In order to continue processing your permit application, the Department will need the additional information below pursuant to Rule 62-213.420(1)(b)3., F.A.C., and Rule 62-4.070(1), F.A.C. The additional information requested is organized by topic. Should your response to any of the items below require new calculations, please submit the new calculation, assumptions, reference material and appropriate revised pages of the application form.

Coal Yard and Storage Sources

1. Standards of Performance for New Stationary Sources (NSPS), 40 C.F.R. 60, Subpart Y, is applicable to coal preparation plants that process more than 200 tons per day and commences construction or modification after October 24, 1974. The Department is aware that the Gannon Station was originally constructed to utilize coal as a primary fuel well before the promulgation of any applicable NSPS. In permit AC 29-61276, the Department approved the modification of the Gannon Coal Yard to accommodate the reconversion of Units 1 through 4 from oil-fired back to coal-fired. According to our records, this approval was done on April 12, 1983. Furthermore, the modification increased the annual coal processed to 2,400,000 (i.e., 6575 ton/day). The coal yard appears to be subject to NSPS, Subpart Y. Please provide documentation that the Gannon Coal Yard is not subject to NSPS, Subpart Y.

P 174 053 111

US Postal Service
Receipt for Certified Mail
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PS Form **3800**, April 1995

Is your **RETURN ADDRESS** completed on the reverse side?

SENDER:
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Consult postmaster for fee.

3. Article Addressed to:
Mr. John Duff
General Manager
Tampa Electric Company
Post Office Box 111
Tampa, Florida 33601-0111

4a. Article Number
P 174 053 111

4b. Service Type
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MAR 24 1997

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PS Form **3811**, December 1994 Domestic Return Receipt

Thank you for using Return Receipt Service.

List of Proposed Exempt Activities

2. In response to the Department's question 4, TEC stated , "no solvent cleaning machines using the cited solvents are in use at the F.J. Gannon Station." Part (c), apparently, was not answered. Are buckets, pails, and beakers with capacities greater than 7.6 liters (2 gallons) being used? If so, please address appropriately.

Miscellaneous

3. For Unit 6, TEC stated that sulfur trioxide (SO_3) is added to the flue gas prior to the electrostatic precipitator. Please explain how the molten sulfur is generated. If a combustion source is used, please update the application form appropriately.

4. TEC stated in its response to the Department's question 5 that Storage Tank 7 stores a maximum of 4,000 gallons of molten sulfur. Please explain how the sulfur is kept in the liquid phase. a) What is the annual throughput? b) What is the annual sulfur particulate emissions?

Responsible Official (R.O.) Certification Statement: Rule 62-213.420, F.A.C., requires that all Title V permit applications must be certified by a responsible official. Due to the nature of the information requested above, your response should be certified by the responsible official. Please compete and submit a new R.O. certification statement page from the new long application form DEP form No. 62-210.900, effective March 21,1996 (enclosed).

Professional Engineer (P.E.) Certification Statement: Rule 62-4.050(3), F.A.C., requires that all applications for a Department permit must be certified by a professional engineer registered in the State of Florida. This requirement also applies to responses to Department requests for additional information of an engineering nature. As a result, your response above should be certified by a professional engineer registered in the State of Florida. Please complete and submit a new P.E. certification statement page from the new long application form, DEP Form No. 62-210.900, effective March 21, 1996 (enclosed).

The Department must receive a response from you within 90 (ninety) days of receipt of this letter, unless you (the applicant) request additional time under Rule 62-213.420(1)(b)6., F.A.C. **Even though you are entitled to take the full time-frame allowed by rule to respond, it is urged that you provide the requested information as soon as possible in order for us to meet the December 31, 1997 issue date deadline for Acid Rain Sources.** A copy of your response should be sent to Mr. Richard Kirby at the EPCHC.

If you should have any questions, please call Lennon Anderson or Scott Sheplak, P.E. at (904) 488-1344.

Sincerely,

John C. Brown, Jr., P.E.
Administrator
Title V Section

JCB/sms/la

Enclosures

cc: Janice Taylor, TEC
Thomas W. Davis, P.E., ECT
Richard Kirby, EPCHC
Jerry Kissel, SWD

Owner/Authorized Representative or Responsible Official

1. Name and Title of Owner/Authorized Representative or Responsible Official:

2. Owner/Authorized Representative or Responsible Official Mailing Address:

   Organization/Firm:
   Street Address:
   City: State: Zip Code:

3. Owner/Authorized Representative or Responsible Official Telephone Numbers:
   Telephone: ( ) - Fax: ( ) -

4. Owner/Authorized Representative or Responsible Official Statement:

   I, the undersigned, am the owner or authorized representative of the non-Title V source addressed in this Application for Air Permit or the responsible official, as defined in Rule 62-210.200, F.A.C., of the Title V source addressed in this application, whichever is applicable. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof. I understand that a permit, if granted by the Department, cannot be transferred without authorization from the Department, and I will promptly notify the Department upon sale or legal transfer of any permitted emissions unit.*

   Signature Date

* Attach letter of authorization if not currently on file.

4. Professional Engineer Statement:

I, the undersigned, hereby certify, except as particularly noted herein, that:*

(1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this Application for Air Permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; and

(2) To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application.

If the purpose of this application is to obtain a Title V source air operation permit (check here [ ] if so), I further certify that each emissions unit described in this Application for Air Permit, when properly operated and maintained, will comply with the applicable requirements identified in this application to which the unit is subject, except those emissions units for which a compliance schedule is submitted with this application.

If the purpose of this application is to obtain an air construction permit for one or more proposed new or modified emissions units (check here [ ] if so), I further certify that the engineering features of each such emissions unit described in this application have been designed or examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application.

If the purpose of this application is to obtain an initial air operation permit or operation permit revision for one or more newly constructed or modified emissions units (check here [ ] if so), I further certify that, with the exception of any changes detailed as part of this application, each such emissions unit has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with all provisions contained in such permit.

_____ _____

Signature Date

(seal)

* Attach any exception to certification statement.

RECEIVED
FEB 21 1997
BUREAU OF
AIR REGULATION

TAMPA ELECTRIC
A TECO ENERGY COMPANY

February 19, 1997

Mr. John C. Brown, Jr., P.E.
Administrator-Title V Section
Florida Department of Environmental Protection
111 South Magnolia Drive
Tallahassee, Florida 32301

Via FedEx
Airbill No. 2561490971

Re: Tampa Electric Company
F. J. Gannon Station
File No. 0570040-002-AV
Response to Request for Additional Information
Regarding Initial Title V Permit Application

Dear Mr. Brown:

Tampa Electric Company (TEC) received the Florida Department of Environmental Protection's (FDEP) request for additional information for our F. J. Gannon Station on November 22, 1996. In response to the referenced request for additional information, please find enclosed four (4) electronic copies of the updated ELSA files and one (1) hard copy of the application. Please be advised that the ELSA files are being submitted in the ELSA Version 1.2.1 to maintain consistency with the original ELSA submittal. The Responsible Official and Professional Engineer certifications are also enclosed using the new long-application form pages.

In addition, the following narrative to your specific information request is being provided to assist in the Title V application review:

FDEP Question 1:

Although your application states that No. 2 fuel oil is used for ignition during start-up for Solid Fuel-Fired Steam Generator Units Nos. 1 through 3, 5, and 6, the firing of No. 2 fuel oil is not addressed in the current air operation permits for these units. How long has TEC been using No. 2 fuel oil for startup in each unit, and what has been the maximum annual usage of No. 2 fuel oil in each unit? Please submit the Segment (Process/Fuel) Information for No. 2 fuel oil for these emission units as required by DEP Form No. 62-210.900(1) - Instructions (Enclosed).

TEC Response:

Because the cited steam generators are solid fuel-fired, each of the units was designed and constructed for ignition using No. 2 fuel oil. This design has not been modified for any unit. No. 2 fuel oil continues to be used for ignition during start-up for the cited steam generators. The application has been updated to include the requested Segment (Process/Fuel) Information form for each cited steam generator.

The No. 2 fuel oil injection guns used for boiler ignition are not equipped with flow meters. In the past, the No. 2 fuel oil usage reported on the F.J. Gannon Station Annual Operating Report has been determined from the facility's overall No. 2 oil usage (excluding the combustion turbine), divided equally among the 6 solid-fuel fired units. TEC will continue this method of reporting the amount of No. 2 fuel oil used for the solid-fuel fired units' startup operation.

FDEP Question 2:

On August 16, 1996, and September 17, 1996, inspections conducted by the Environmental Protection Commission of Hillsborough County (EPCHC) indicated fugitive emissions from Solid Fuel-Fired Steam Generator Unit No. 3. Please certify that the emissions unit is in compliance pursuant to Rule 62-296.320(4)(c), F.A.C. and specific condition number 2 of air operating permit AO 29255208 or submit a compliance plan pursuant to Rule 62-213.420(3)(j), F.A.C.

TEC Response:

Emissions Unit 3 is in compliance pursuant to Rule 62-296.320(4)(c), F.A.C., and Specific Condition 2 of air operating permit AO29-255208. F.J. Gannon Station has an established procedure of reasonable operating practices in place to identify and control unconfined particulate matter emissions from all steam generating units.

TEC personnel routinely inspect the all operating steam generating units. These inspections include detecting and evaluating fugitive emission leaks. Any problems identified are recorded and, if appropriate, a maintenance job request is generated for the next planned outage. Repairs may also be made during an unanticipated outage, time permitting.

It should be noted that during the August 1996 inspection, the Environmental Protection Commission of Hillsborough County (EPC) inspector was advised of this procedure, shown the inspection reports, and informed Gannon Unit 3 was scheduled for outage within the next 10 days. The EPC inspector appeared to be satisfied with TEC's operating practices at that time.

During the September 17, 1996 inspection, Gannon 3 was offline for the above referenced scheduled outage. The fugitive emissions leaks were repaired during the outage.

FDEP Question 3:

In your application you indicate that there are no emission unit subjects to Standards of Performance for New Stationary Sources (NSPS). The coal yard appears to be subject to NSPS Subpart Y. Please explain why the coal yard is not subject to NSPS Subpart Y. If it is subject to the subpart, submit a compliance plan pursuant to Rule 62-213.420(3)(j), F.A.C., or indicate your response that you are in compliance with Subpart Y.

TEC Response:

As you may be aware, the Gannon Station was originally constructed to utilize coal as as a primary fuel well before the promulgation of any standards of performance for new sources. Four of the units were converted to oil-firing and were subsequently converted back to coal. At the time of reconversion to coal, the units were subject to a proposed prohibition order that was issued by United States Department of Energy, Economic Regulatory Administration. The effect of the order would have been to require that the units be reconverted to coal-firing. When the reconversion was proposed, both the Department of Environmental Regulation and the United States Environmental Protection Agency were consulted concerning regulatory requirements. Both agencies approved the reconversion and determined that the Gannon Station was not subject to NSPS. There have been no changes at the facility that would alter this conclusion.

FDEP Question 4:

40 CFR 63, Subpart T, "National Emission Standards for Hazardous Air Pollutants (NESHAP), applies if you own or operate a solvent cleaning machine that uses a solvent that contains 5 percent or more by weight of any one of any combination of the following halogenated solvents: Carbon tetrachloride, Chloroform, Perchloroethylene, 1,1,1-Trichloroethane, Trichlorethylene, Methylene chloride. a) Are any of the six solvents being used at this facility? b) If yes, what is the amount of solvent (in gallons) used annually at parts-cleaning and degreasing stations? c) Are buckets, pails, and beakers with capacities greater than 7.6 liters (2 gallons) being used?

TEC Response:

No solvent cleaning machines using the cited solvents are in use at F.J. Gannon Station.

FDEP Question 5:

What is being stored in the inorganic storage tanks with storage capacities greater than 550 gallons?

TEC Response:

Six storage tanks with storage capacities greater than 550 gallons (gal) are in use at F.J. Gannon Station. These tanks, the storage capacity, and the material stored are listed below.

Storage Tank 1 - Sodium hydroxide (NaOH) - 8,073 gal
Storage Tank 2 - Sodium hydroxide (NaOH) - 7,520 gal
Storage Tank 3 - Sulfuric acid (H_2SO_4) - 7,500 gal
Storage Tank 4 - Sulfuric acid (H_2SO_4) - 7,500 gal
Storage Tank 5 - Sulfuric acid (H_2SO_4) - 1,146 gal
Storage Tank 6 - Sodium bisulfite (Na_2SO_3) - 8,500 gal
Storage Tank 7 - Molten sulfur - 4,000 gal

FDEP Question 6:

Since the Gannon Station is located in a "maintenance area" for ozone, does the vehicle refueling operation dispense more than 20,000 gallons/month gasoline? If so, Stage I vapor control applies.

TEC Response:

The F.J. Gannon Station vehicle refueling operation does not dispense more than 20,000 gallons/month gasoline.

FDEP Question 7:

The EPCHC has reported to the Department that TEC is currently adding ammonia and sulfur trioxide (SO_3) to flue gases. The SO_3 is being generated from molten sulfur. These processes are not addressed in any of the current air operation permits. How have these additives been addressed in quantifying emissions from these regulated emission units? We need to better understand the potential for additional emissions from transportation, storage, handling, and combustion of these additives.

TEC Response:

Ammonia is not added to the flue gases at F.J. Gannon Station.

Sulfur trioxide (SO_3) is added to the F.J. Gannon Station Unit 6 flue gas prior to the electrostatic precipitator (ESP). The SO_3 serves as a flue gas conditioner to enhance ESP performance. This SO_3 is emitted from the Unit 6 stack as part of the combustion exhaust stream. The Pollutant Information section (Section E) for Emission Unit 6 does include sulfuric acid mist (SAM). The small amount of flue gas conditioning SAM was included with the fuel-generated SAM for the Title V operating permit application.

SO_3 is generated from molten sulfur and is only released into the Unit 6 flue. SO_3 is not used for any other purpose and is not released to the atmosphere from any other location at F.J. Gannon Station.

Other Updates

A newly signed Responsible Official Certification Statement is included in the update package. Please note that the Responsible Official is now Douglas H. Finke. A newly signed Professional Engineer (P.E.) Certification Statement is also included in the update package. The phone and fax numbers for the Responsible Official (Doug Finke), the plant contact (Cindy Barringer) and the application contact (Janice Taylor) have been updated along with my mailing address in this revised permit application. The Emission Point (Stack/Vent) Information (Section E) sheet for Emission Unit 5 has been amended to correct the actual volumetric flow rate (738,606 acfm).

Please telephone me at (813) 641-5039 if you have any questions or require any clarification.

Sincerely,

Janice K. Taylor
Senior Engineer
Environmental Planning

EP\gm\JKT784

Enclosures

c: Mr. Jerry Kissell, DEP - SW District
Mr. Richard Kirby, EPCHC