

COMMISSION  
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Pat Frank  
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Administrative Offices,  
Legal & Water Management Division  
The Roger J. Stewart Environmental Center  
1900 - 9th Ave. - Tampa, FL 33605  
Ph (813) 272-5960 - Fax (813) 272-5157  
Air Management Fax 272-5605  
Waste Management Fax 276-2256  
Wetlands Management Fax 272-7144  
1410 N. 21st Street - Tampa, FL 33605

Executive Director  
Richard D. Garrity, Ph.D.

# ENVIRONMENTAL PROTECTION COMMISSION of Hillsborough County

## FAX Transmittal Sheet

DATE: Nov 5, 2002

TO: Scott Shepleh

FAX Phone: \_\_\_\_\_ Voice Phone: \_\_\_\_\_

TOTAL NUMBER OF PAGES INCLUDING THIS COVER PAGE: 14

EPC FAX Transmission Line: (813) 272-5605  
For retransmission or any FAX problems, call:  
(813) 272-5530 ext. 1288

FROM: Rob Kaleb

(Circle applicable section below)

Air Division

-Compliance

-Enforcement/Analysis

-Monitoring/Toxics

-Permitting

SPECIAL INSTRUCTIONS: Local Delivery by Truck - TEC



**TAMPA ELECTRIC**

October 25, 2002

Mr. Scott Sheplak, P.E.  
 Administrator- Title V Section  
 Florida Department of Environmental Protection  
 111 South Magnolia Drive, Suite 4  
 Tallahassee, FL 32301

Via FedEx  
 Airbill No. 7919 6701 5619

Re: Tampa Electric Company  
 F.J. Gannon Station  
 DEP File No. 0570040-002-AV  
 Coal Delivery by Trucks

RECEIVED

OCT 29 2002

EPC of HO  
 AIR MANAGEMENT

Dear Mr. Sheplak:

Tampa Electric Company (TEC) would like to courtesy notify the Florida Department of Environmental Protection (FDEP) that TEC plans to receive coal by truck at its F.J. Gannon Station. TEC believes that the limited use of trucks to receive coal qualifies for a permitting exemption pursuant to Rule 62-210.300(3)(b)1., F.A.C. and constitutes an "insignificant activity" with respect to the Chapter 62-213, F.A.C. Title V operation permit program. Enclosed in Attachment A is the Responsible Official Signature and in Attachment B is the required Professional Engineer certification regarding potential emission rates and applicability of Rule 62-210.300(3)(b)1., F.A.C.

TEC plans to receive coal by truck on a limited basis to provide diversity in coal delivery methods. Coal received by truck will be treated with a dust suppressant prior to delivery. Coal dump trucks will enter the plant from Port Sutton Road at the west- side of the F.J. Gannon Station and unload at the existing southeast coal storage pile. The coal will then be stored and handled using the existing fuel yard material handling equipment. TEC plans to receive up to 260,000 tons per year of coal by truck as a replacement for coal typically received by barge. Coal truck deliveries may occur for up to five days per week and 26 weeks per year. There will be no increase in the maximum, annual coal yard throughput rate. TEC will continue to comply with all fuel yard operating requirements specified in its current F.J. Gannon Station Title V operating permit.

Emissions associated with the coal truck operations will consist of fugitive particulate matter (PM and PM10). Potential PM/PM10 emissions were estimated total 0.42 and 0.11 tons per year for PM and PM10, respectively. The calculation for these emissions are enclosed in Attachment C. These estimated emission rates are well below the 5.0 ton per year threshold for a generic emission unit permitting exemption specified in Rule 62-210.300(3)(b)1., F.A.C.

TAMPA ELECTRIC COMPANY  
 P. O. BOX 111 TAMPA, FL 33601-0111

(813) 228-4111

AN EQUAL OPPORTUNITY COMPANY  
 HTTP://WWW.TAMPAELECTRIC.COM

CUSTOMER SERVICE:  
 HILLSBOROUGH COUNTY (813) 228-0800  
 OUTSIDE HILLSBOROUGH COUNTY 1 (888) 228-0800

Mr. Scott Sheplak  
October 25, 2002  
Page 2 of 2

TEC appreciates your cooperation in this matter. If it is the FDEP's opinion that permitting is required or if you have any questions, please call Dru Latchman or me at (813) 641-5034.

Sincerely,



Laura R. Crouch  
Manager - Air Programs  
Environmental Affairs

EA/bmr/DNL136

Enclosure

~~Mr. Storm Woodard, FDEP SW~~  
Mr. Jerry Kissel - FDEP SW

# **Attachment A**

**Responsible Official Certification**

I have reviewed this permit exemption notification to transport coal to at F.J. Gannon Station by trucks. I hereby certify that these documents are authentic and accurate to the best of my knowledge.

Date: 10/25/02

Signature: Karen Sheffield  
General Manager  
F.J. Gannon Station

## **Attachment B**



**Environmental Consulting & Technology, Inc.**

October 24, 2002

Ms. Dru Latchman  
Tampa Electric Company  
6944 U.S. Highway 41 North  
Apollo Beach, FL 33572-9200

**Re: Tampa Electric Company  
F. J. Gannon Station  
Delivery of Coal by Truck**

Dear Ms. Latchman:

Tampa Electric Company (TEC) plans to submit correspondence to the Florida Department of Environmental Protection (FDEP) notifying the Department of TEC's plans to receive coal by truck at its F.J. Gannon Station. The notification concludes that the limited use of trucks to receive coal qualifies for a permitting exemption pursuant to Rule 62-210.300(3)(b)1., F.A.C. and constitutes an "insignificant activity" with respect to the Chapter 62-213, F.A.C. Title V operation permit program. As requested, a Professional Engineer certification regarding potential emission rates and applicability of Rule 62-210.300(3)(b)1., F.A.C. is provided.

TEC plans to receive coal by truck on a limited basis to provide diversity in coal delivery methods. Coal received by truck will be treated with a dust suppressant prior to delivery. Coal dump trucks will enter the plant from Port Sutton Road at the west side of the F.J. Gannon Station and unload at the existing southeast coal storage pile. The coal will then be stored and handled using the existing fuel yard material handling equipment. TEC plans to receive up to 260,000 tons per year of coal by truck as a replacement for coal typically received by barge. Coal truck deliveries may occur for up to five days per week and 26 weeks per year.

There will no increase in the maximum annual coal yard throughput rate. TEC will continue to comply with all fuel yard operating requirements specified in its current F.J. Gannon Station Title V operating permit.

Emissions associated with the coal truck operations will consist of fugitive particulate matter (PM and PM<sub>10</sub>). Potential PM/PM<sub>10</sub> emissions were estimated using applicable procedures from EPA's AP-42 document, *Compilation of Air Pollutant Emission Factors, Fifth Edition*. Specifically, potential PM/PM<sub>10</sub> emissions from coal dump truck unloading were estimated using procedures obtained from AP-42, Section 13.2.4, Aggregate Handling and Storage

3701 Northwest  
86<sup>th</sup> Street  
Gainesville, FL  
32606

(352)  
332-0444

FAX (352)  
332-6722

Ms. Dru Latchman  
October 24, 2002  
Page 2 of 2

Piles. Potential PM/PM<sub>10</sub> emissions due to truck traffic on paved plant roadways were estimated using procedures obtained from AP-42, Section 13.2.1, Paved Roads. Details of these potential PM/PM<sub>10</sub> emission rate estimates are attached.

Coal truck operation potential emission rates, using AP-42 procedures, are estimated to total 0.42 and 0.11 tons per year for PM and PM<sub>10</sub>, respectively. These estimated emission rates are well below the 5.0 ton per year threshold for a generic emission unit permitting exemption specified in Rule 62-210.300(3)(b)1., F.A.C.

Please contact me at (352) 332-6230, Ext. 351 if there are any questions regarding this certification.

Sincerely,

**ENVIRONMENTAL CONSULTING & TECHNOLOGY, INC.**

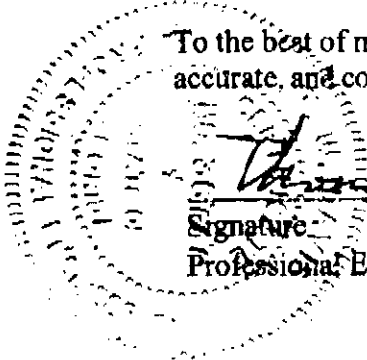


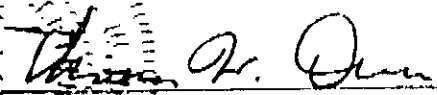
Thomas W. Davis, P.E.  
Principal Engineer

Professional Engineer Statement:

*I, the undersigned, hereby certify that:*

To the best of my knowledge, the emission estimates reported in this certification are true, accurate, and complete based upon reasonable techniques available for estimating emissions.



  
\_\_\_\_\_  
Signature:  
Professional Engineer No. 36777

10/24/02  
\_\_\_\_\_  
Date



# **Attachment C**

**Tampa Electric Company  
 F.J. Gannon Station  
 Coal Truck PM/PM<sub>10</sub> Emission Estimates**

Emission Point Description	Emission Point ID	Potential Emission Rates			
		PM		PM <sub>10</sub>	
		(lb/hr)	(tpy)	(lb/hr)	(tpy)
Coal Truck Unloading at Southwest Storage Pile	FH-045	0.23	0.12	0.11	0.06
Coal Trucks (Empty)	FH-046a	0.11	0.06	0.02	0.01
Coal Trucks (Full)	FH-046b	0.46	0.24	0.09	0.05
<b>Totals</b>		<b>0.80</b>	<b>0.42</b>	<b>0.22</b>	<b>0.11</b>

Source: ECT, 2002.

<b>EMISSION INVENTORY WORKSHEET</b>								<b>FH-045</b>	
Tampa Electric Company - F.J. Gannon Station								Coal Trucks	
<b>EMISSION SOURCE TYPE</b>									
<b>FUGITIVE PM - MATERIAL TRANSFER (DROPS)</b>								Figure:	
<b>FACILITY AND SOURCE DESCRIPTION</b>									
Emission Source Description:		Fugitive PM - Coal Truck Unloading at Southwest Storage Pile (Drops)							
Emission Control Method(s)/ID No.(s):		Moist material							
Emission Point ID:		FH-045							
<b>EMISSION ESTIMATION EQUATIONS</b>									
$PM \text{ Emission (lb/hr)} = 0.74 \times 0.0032 \times [(Wind \ Speed)^{1.5} / (Material \ Moisture \ Content)^{0.5}] \times Material \ Handled \ (ton/hr)$									
$PM \text{ Emission (ton/yr)} = 0.74 \times 0.0032 \times [(Wind \ Speed)^{1.5} / (Material \ Moisture \ Content)^{0.5}] \times Material \ Handled \ (ton/yr) \times (1 \ ton/2,000 \ lb)$									
Source: Section 13.2.4, AP-42, January 1995.									
<b>INPUT DATA AND EMISSIONS CALCULATIONS</b>									
Mean Wind Speed:		0.6 mph		Material Moisture Content:		6.5		weight %	
Material Transfer Point	Source ID	Material Transfer Rates		Uncontrolled Emission Factor (lb PM/ton)	Control Efficiency (%)	Controlled Emission Factor (lb PM/ton)	Potential Emission Rates		
		(ton/hr)	(ton/yr)				(lb/hr)	(ton/yr)	
Coal Truck Unloading at Southwest Storage Pile	FH-045	250.0	280,000	0.000920	0.0	0.000920	0.23	0.12	
						Totals	0.23	0.12	
<b>SOURCES OF INPUT DATA</b>									
Parameter	Data Source								
Mean Wind Speed, mph	Climate of the States (Tampa, FL), Third Edition, 1966.								
Material Moisture Content	TEC, 2002.								
Material Transfer Point Identification	TEC, 2002.								
Material Transfer Rates	TEC, 2002.								
<b>NOTES AND OBSERVATIONS</b>									
1. Material transfer rates based on 8 hrs/day, 5 days/week, and 26 weeks/yr operation.									
<b>DATA CONTROL</b>									
Data Collected by:	D. Latchman					Date:	10/02		
Evaluated by:	T. Davis					Date:	10/02		
Data Entered by:	T. Davis					Date:	10/02		

<b>EMISSION INVENTORY WORKSHEET</b>								<b>FH-048</b>	
Tampa Electric Company - F.J. Gannon Station									
<b>EMISSION SOURCE TYPE</b>								Figure:	
<b>FUGITIVE PM<sub>10</sub> - MATERIAL TRANSFER (DROPS &amp; SCREENING)</b>									
<b>FACILITY AND SOURCE DESCRIPTION</b>									
Emission Source Description:		Fugitive PM <sub>10</sub> - Coal Truck Unloading at Southwest Storage Pile (Drops)							
Emission Control Method(s)/ID No.(s):		Mist material FH-048							
Emission Point ID:		FH-048							
<b>EMISSION ESTIMATION EQUATIONS</b>									
$PM_{10} \text{ Emission (ton/yr)} = 0.35 \times 0.0032 \times ((\text{Wind Speed}/5)^{1.5} / (\text{Material Moisture Content}/2)^{0.5}) \times \text{Material Handled (ton/yr)}$ $PM_{10} \text{ Emission (ton/yr)} = 0.35 \times 0.0032 \times ((\text{Wind Speed}/5)^{1.5} / (\text{Material Moisture Content}/2)^{0.5}) \times \text{Material Handled (ton/yr)} \times (1 \text{ ton}/2,000 \text{ lb})$									
Source: Section 13.2.4, AP-42, January 1996.									
<b>INPUT DATA AND EMISSIONS CALCULATIONS</b>									
Mean Wind Speed:		8.6 mph		Material Moisture Content:		6.6		weight %	
Material Transfer Point	Source ID	Material Transfer Rates		Uncontrolled Emission Factor (lb PM <sub>10</sub> /ton)	Control Efficiency (%)	Controlled Emission Factor (lb PM <sub>10</sub> /ton)	Potential Emission Rates		
		(ton/hr)	(ton/yr)				(lb/hr)	(ton/yr)	
Coal Truck Unloading at Southwest Storage Pile	FH-048	250.0	280,000	0.000435	0.0	0.000435	0.11	0.057	
							Totals	0.11	0.057
<b>SOURCES OF INPUT DATA</b>									
Parameter	Data Source								
Mean Wind Speed, mph	Climate of the States (Tampa, FL), Thirt Fritson, 1995								
Material Moisture Content	TEC, 2002								
Material Transfer Point Identification	TEC, 2002								
Material Transfer Rates	TEC, 2002								
<b>NOTES AND OBSERVATIONS</b>									
1. Material transfer rates based on 8 hrs/dy, 6 days/week, and 26 weeks/yr operation.									
<b>DATA CONTROL</b>									
Data Collected by:	D. Latchman			Date:			10/02		
Evaluated by:	T. Davis			Date:			10/02		
Data Entered by:	T. Davis			Date:			10/02		

<b>EMISSION INVENTORY WORKSHEET</b>							<b>FH-046</b>	
Tampa Electric Company - F.J. Gannon Station							Coal Trucks	
EMISSION SOURCE TYPE								
FUGITIVE PM - TRUCK TRAFFIC ON PAVED ROADS								
FACILITY AND SOURCE DESCRIPTION								
Emission Source Description:			Fugitive PM - Coal Truck Traffic on Paved Roads					
Emission Control Method(s)/ID No.(s):			Watering, As Necessary					
Emission Point ID:			FH-046					
EMISSION ESTIMATION EQUATIONS								
$PM \text{ Emission (lb/hr)} = 0.082 \times (SR \text{ Loading Factor})^{0.95} \times (\text{Truck Weight})^{1.4} \times \text{Vehicle Miles Traveled (VMT)/hr}$								
$PM \text{ Emission (ton/yr)} = 0.082 \times (SR \text{ Loading Factor})^{0.95} \times (\text{Truck Weight})^{1.4} \times \text{Vehicle Miles Traveled (VMT)/yr} \times (1 \text{ ton} / 2,000 \text{ lb})$								
Source: Section 13.2.1, AP-42, October 2002.								
INPUT DATA AND EMISSIONS CALCULATIONS								
Controlled SR Loading Factor:			0.97 g/m <sup>3</sup>					
Operating Hours:			8 hr/dy		5 dy/wk		26 wk/yr	
Coal Received by Truck:			280,000 ton/yr		Truck Travel Distance (one way):		100 ft	
Hourly Truck Count:			11 trucks/hr		Annual Truck Count:		11,818 trucks/yr	
Truck Traffic Type	Source ID	Vehicle Miles Traveled		Vehicle Weight (ton)	Control Efficiency (%)	Potential PM Emission Rates		
		(VMT/hr)	(VMT/yr)			(lb/hr)	(ton/yr)	
Coal Trucks (Empty)	FH-046a	0.215	224	14.0	90.0	0.11	0.058	
Coal Trucks (Full)	FH-046b	0.215	224	36.0	90.0	0.46	0.238	
<b>Totals</b>						<b>0.57</b>	<b>0.296</b>	
SOURCES OF INPUT DATA								
Parameter	Data Source							
Controlled SR Loading Factor	Based on factor for iron and steel production and overall 90% control efficiency, ECT, 2002.							
Vehicle Miles Traveled, VMT	TEC, 2002.							
Truck Weights, ton	TEC, 2002.							
Control Efficiency	Estimated, ECT 2002.							
NOTES AND OBSERVATIONS								
DATA CONTROL								
Data Collected by:	D. Latchman				Date:	10/02		
Evaluated by:	T. Davis				Date:	10/02		
Data Entered by:	T. Davis				Date:	10/02		

<b>EMISSION INVENTORY WORKSHEET</b>							<b>FW-046</b>	
<b>Tampa Electric Company - F.J. Gannon Station</b>							<b>Coal Trucks</b>	
<b>EMISSION SOURCE TYPE</b>								
<b>FUGITIVE PM<sub>10</sub> - TRUCK TRAFFIC ON PAVED ROADS</b>								
<b>FACILITY AND SOURCE DESCRIPTION</b>								
Emission Source Description:			Fugitive PM <sub>10</sub> - Coal Truck Traffic on Paved Roads					
Emission Control Method(s)/ID No.(s):			Watering, As Necessary					
Emission Point ID:			FH 046					
<b>EMISSION ESTIMATION EQUATIONS</b>								
$PM_{10} \text{ Emission (lb/hr)} = 0.016 \times \left[ \frac{\text{Silt Loading Factor}}{2} \right]^{0.66} \times (\text{Truck Weight})^{1.5} \times \text{Vehicle Miles Traveled (VMT)/hr}$								
$PM_{10} \text{ Emission (ton/yr)} = 0.016 \times \left[ \frac{\text{Silt Loading Factor}}{2} \right]^{0.66} \times (\text{Truck Weight})^{1.5} \times \text{Vehicle Miles Traveled (VMT)/yr} \times (1 \text{ ton} / 2,000 \text{ lb})$								
Source: Section 13.2.1, AP-42, October 2002.								
<b>INPUT DATA AND EMISSIONS CALCULATIONS</b>								
Controlled Silt Loading Factor:			0.07 g/m <sup>2</sup>					
Operating Hours:			8 hr/day			5 dy/wk 26 wk/yr		
Coal Received by Truck:			280,000 ton/yr			Truck Travel Distance (one way): 100 ft		
Hourly Truck Count:			11 trucks/hr			Annual Truck Count: 11,016 trucks/yr		
Truck Traffic Type	Source ID	Vehicle Miles Traveled		Vehicle Weight (ton)	Control Efficiency (%)	Potential PM Emission Rates		
		(VMT/hr)	(VMT/yr)			(lb/hr)	(ton/yr)	
Coal Trucks (Empty)	FH-046a	0.215	224	14.0	90.0	0.02	0.011	
Coal Trucks (Full)	FH-046b	0.215	224	36.0	90.0	0.09	0.047	
<b>Totals</b>						<b>0.11</b>	<b>0.058</b>	
<b>SOURCES OF INPUT DATA</b>								
Parameter	Data Source							
Controlled Silt Loading Factor	Based on factor for iron and steel production and overall 90% control efficiency, ECT, 2002							
Vehicle Miles Traveled, VMT	TEC, 2002.							
Truck Weights, ton	TEC, 2002.							
Control Efficiency	Estimated, ECT 2002.							
<b>NOTES AND OBSERVATIONS</b>								
<b>DATA CONTROL</b>								
Data Collected by:	D. Latchman					Date:	10/02	
Evaluated by:	T. Davis					Date:	10/02	
Data Entered by:	T. Davis					Date:	10/02	



Jeb Bush  
Governor

File 1

# Department of Environmental Protection

Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400  
June 7, 2000

David B. Struhs  
Secretary

Mr. Gregory M. Nelson, P.E.  
Designated Representative  
Acid Rain Program  
Tampa Electric Company  
P.O. Box 111  
Tampa, FL 33601-0111

Re: Acid Rain Phase II NO<sub>x</sub> Compliance Plan Revisions  
Big Bend and Gannon Stations; ORIS Codes: 0645 and 0646

Dear Mr. Nelson:

We have received your recent request for the issuance of Acid Rain Permits for the referenced facilities that includes a proposed System Wide NO<sub>x</sub> averaging plan for compliance.

Please note that our letter of January 19, 2000 was not an approval of the compliance plan, but only indicated that the Department deemed your application complete. Approval of acid rain compliance plans is made through the permitting process.

We are currently drafting the format of an appropriate "separate" Acid Rain Permit, based on the recent change in the Florida Statutes. Following this effort, we will evaluate the compliance plan for acceptance, and advise you of formal approval if granted. The earliest effective date of the approval of the plan is January 1, 2001.

If you should have any questions, please contact Tom Cascio at 850/921-9526.

Sincerely,

Scott M. Sheplak, P.E.  
Administrator  
Title V Section

cc: Jenny Jachim, EPA Region 4  
Jerry Campbell, EPCHC  
Bill Thomas, SWD  
Clair Fancy  
Cindy Phillips  
Pat Comer, Esq.

"More Protection, Less Process"

Printed on recycled paper.

TECO  
(Gannon)

copy: Tom Rogers  
AC  
"14 Marty  
Cathy Scott  
Lennon Jim P  
11/5



## Memorandum of Understanding (MOU) Nitrogen Oxide Emissions Rate Reductions

This MOU represents an agreement between the Environmental Protection Commission of Hillsborough County (EPC) and Tampa Electric Company (TEC), that supports TEC's Phase II nitrogen oxide (NO<sub>x</sub>) reduction activities and EPC's desire to partner with local industry to jointly address local environmental issues.

Whereas the EPC is responsible for protecting the quality of the air and the water for the citizens of this County;

Whereas the air borne emissions of nitrogen oxides may contribute to photochemical smog, and ozone, to eutrophication and acidification of surface waters and to degradation of visibility;

Whereas the Tampa Electric Company locally operates ten coal-fired boilers which make up a significant portion of the area's total nitrogen oxide emission inventory;

Whereas the United States EPA has promulgated a nitrogen oxide emission reduction rule requiring tighter limitations for coal-fired boilers as part of their Acid Rain Program;

Whereas seven of the Tampa Electric Company's coal-fired boilers, designated as Gannon Unit 3, Gannon Unit 4, Gannon Unit 5, Gannon Unit 6, Big Bend Unit 1, Big Bend Unit 2, and Big Bend Unit 3 are subject to the EPA's Phase II Nitrogen Oxide Emission Reduction Rule;

Whereas the reductions in this EPA rule are not required until the year 2000 and there are substantial benefits for the area if the Tampa Electric Company were to commit to reduce emissions before the EPA deadline such as fewer precursors available for ozone formation or nitrogen deposition;

Whereas the Tampa Electric Company has already taken the initiative to reduce the nitrogen oxide emissions from some of the individual affected units by more than 20 percent, resulting in an overall reduction of over 10,000 tons from the 1995 levels;



Whereas the EPC believes the combustion modifications and fuel switching proposed by the Tampa Electric Company will address the secondary environmental impacts associated with nitrogen oxide emissions in the Tampa Bay area;

It is therefore agreed that the Tampa Electric Company will voluntarily commit to the EPC to meet the following NOx emission limitations for the Phase II affected units. EPC, in return, will maintain their position that these limits should apply on a federal level. These limitations will be on a system-wide, heat-input weighted, annual average basis, commencing 01/01/98 and extending until such time as one of the signatories voids the MOU as provided below:

Affected Units	Maximum System-wide Annual Average NOx Emission Rate		
	Eff. 01/01/98	Eff. 01/01/99	Eff. 01/01/00
Gannon 3, 4, 5, 6 and Big Bend 1, 2, 3	1.03	0.96	0.91

These nitrogen oxide emission rates reflect that the Tampa Electric Company will maintain the reductions achieved in 1996 through 1998; make an additional 5% reduction in 1999; and make another 5% reduction in 2000. Adherence to this commitment will be determined by the Tampa Electric Company's Continuous Emission Monitors (CEMs) as reported to the EPA.

These limitations are in effect for both parties unless, or until the compliance date upon which, an EPA, a regional, a state or a local ruling requires the boilers to meet a more stringent NOx emission rate. At such time, this MOU may be voided by either party by stating their intention in writing.

This MOU shall take effect upon the date of execution by the Executive Director of the EPC, and shall terminate only as discussed above or upon the date of Tampa Electric Company's compliance with an EPA Phase II NOx Reduction Rule equivalent in stringency to this MOU.

For the Tampa Electric Company

Official Signature: [Signature]

Date: 10/29/97

For the Environmental Protection Commission

Executive Director Signature: [Signature]

Date: 10/27/97



8/26 Scott  
leaf to copy them  
on notices of intent.  
On any we have already sent  
Send them a copy of intent pack  
claim - pls handle claim  
Dr

August 13, 1997

Howard Rhodes, Bureau Chief  
Bureau of Air Resources  
Florida Dept. of Env. Protection  
2600 Blairstone Rd, MS 5500  
Tallahassee, FL 32399

Re: Title V Permits

Dear Mr. Rhodes:

We understand the Bureau is reviewing applications for operating permits pursuant to DEP's authority to administer the Title V program. We are interested in potential permits for Florida's electric utilities, particularly Florida Power & Light, Florida Power Corp., Gulf Power Co., and Tampa Electric Co.

We would like to be added to any list of interested persons to whom notices of intent to issue or deny permits are sent. We would also like to know what opportunities there are for public comment on proposed permits. In addition, if there is a list of pending permits, we would be grateful for a copy. Thank you for your assistance.

Sincerely,

*Gail Kamaras*

Gail Kamaras, Director  
Energy Advocacy Program

**RECEIVED**

AUG 15 1997

BUREAU OF  
AIR REGULATION