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Administrative Offices, Legal & Water Management Division The Roper J. Stewart Environmental Center 1900 - 9th Ave. - Tamps, FL N805 Th (813) 272-5960 - Fax (813) 272-5157

Executive Director Richard D. Garrity, Ph.D.

ENVIRONMENTAL PROTECTION COMMISSION of Hillsborough County

FAX Transmittal Sheet

DATE: 1/ar > , Jesty	
TO: Scott Sheplak	
/	Voice Phone:
TOTAL NUMBER OF PAGES IN	CLUDING THIS COVER PAGE: _///
EPC FAX Transmission Line: (For retransmission or an	813) 272-5605
FROM: Role Stolet	
(Circle applicable secti	on below)
Air Division	
-Compliance	-Enforcement/Analysis
-Monitoring/Toxics	-Permitting
SPECIAL INSTRUCTIONS:	al Delien by Duck - TEC

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AN APPRIMATIVE ACTION - EQUAL OPPORTUNITY EMPLOYER



30/10



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

Re:

Tampa Electric Company F.J. Gannon Station DEP File No. 0570040-002-AV Coal Delivery by Trucks Via FedEx Airbill No. 7919 6701 5619



007 20 2602

EPO 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.I. Gamman 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. Gamon 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. Gamon 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 B. C. COX J.11 - TAMPA, PL 38601-0111

(RIS) # 28-4111

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, Lawak Crock

Laura R. Crouch

Manager - Air Programs Environmental Affairs

EA/bmr/DNL136

Enclosure

Mr. Jerry Kissel - FDEP SW

Attachment A

PAGE

95

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

EPC AIR MANAGEMENT

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 hy 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)., 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 FJ. 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. Gamma 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 using applicable procedures from EPA's AP-42 document, Compilation of Air Pollutant Emission Factors, Fifth Edition. Specifically, potential PM/PM₁₀ emissions from coal dump truck unloading were estimated using procedures obtained from AP-42. Section 13.2.4, Aggregate Handling and Storage

3701 Northwest 98th Sheet Gaineaville, FL 32606

> (352) 332-0444

FAX (352) 332-6722 Ms. Dru Latchman October 24, 2002 Page 2 of 2

Piles. Potential PM/PM₁₀ 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/PM₁₀ 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 PM₁₀, 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

Date

Attachment C

Tampa Electric Company
F.J. Gannon Station
Coal Truck PM/PM₁₀ Emission Estimates

	Emission Point ID	Potential Emission Rates				
Emission Point		PN	PM		10 -	
Description		(lb/hr)	(lpy)	(lb/hr)	(lpy)	
Coal Truck Unloading at Southwest Storage Pile	FH-045	0.23	0.12	0.11	0.0	
Coal Trucks (Empty)	FH-046a	0.11	0.06	0.02	0.0	
Coal Trucks (Full)	FH-046b	0.46	0.24	0,09	0.0	
Totals		0.80	0,42	0.22	0.	

Source: ECT, 2002.

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Emission Control Method(s)/ID No.(s):	Watering,	As Necessary						
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Coal Trucks (Empty)	PH-046a	0,215	224	14,0	90.0	0.02	11	0.01
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Governor

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, 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, 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,

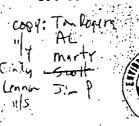
Administrator

Title V Section

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

Coznoin







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 Huitrogen oxide (NOx) 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 entrophication 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,

If 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:

	Maximum System-wide Annual	Average
Affected Units	NOx Emission Rate	
	Eff. 01/01/98 Eff. 01/01/99	Eff. 01/01/00
Gannon 3, 4, 5, 6		
and	1.03 0.96	0.91
Rig Rend 1-23		

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 E	Electric Company	,
Official Si	enature: \Communications	
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For the Environ	mental Protection Commission	
Executive	Director Signature:	√ .
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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, Director Energy Advocacy Program

Gail Kamaras

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BUREAU OF AIR REGULATION