

April 12, 2002

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

**RE: Tampa Electric Company (TEC)  
F.J. Gannon Station  
Byproduct Beneficiation and Re-use  
DEP File No. 0570040-016-AC**

Dear Mr. Sheplak:

Per the conversation that took place on April 11, 2002 between the Florida Department of Environmental Protection (FDEP), Environmental Protection Commission of Hillsborough County (EPCHC), and TEC, this letter is intended to provide responses to the following EPCHC comments.

**EPC Comment B) 1.**

**The draft permit and technical evaluation does not specifically identify what the maximum re-injection rate of fly ash for each unit is, or has been historically. The draft permit states the by-product material usage rate shall be less than 100 tpd (Specific Condition No. 3). Please clarify if this is 16.7 tons per day per unit or a facility-wide usage rate.**

**TEC Comment B) 1.**

The maximum re-injection rate of fly ash for each unit historically has been 100%. This can be seen on the performance testing reports and the table attached to the December 20, 2001 additional information response letter. Depending on which unit, the maximum fly ash re-injection rate can range from 360 tons of fly ash/day to 2,544 tons of fly ash/day for Units 1-6. The following table shows the daily maximum amount of fly ash re-injection rate for each unit.

<b>F.J. Gannon Station</b>	<b>Permitted Coal Rate *</b> (tons/hr)	<b>Fly ash Split from Coal Burned</b> (%)	<b>Fly ash Throughput Rate Split</b> (tons/hr)	<b>Fly ash Throughput for a Day</b> (tons/day)
<b>Unit #1</b>	50	30	15	<b>360.00</b>
<b>Unit #2</b>	51	30	15.3	<b>367.20</b>
<b>Unit #3</b>	65	30	19.5	<b>468.00</b>
<b>Unit #4</b>	80	30	24	<b>576.00</b>
<b>Unit #5</b>	93.4	70	65.38	<b>1,569.12</b>
<b>Unit #6</b>	151.4	70	105.98	<b>2,543.52</b>

\* Permitted Coal rate are referenced in the Gannon Title V Permit No. 0570040-002-AV, Condition A.4.A.2., B.5.A.2., and C.4.A.2.

In comparison to the current fly ash re-injection rates, TEC requests the flexibility to burn more than 100 tpd facility-wide of beneficiated byproduct. This will allow more operational flexibility for the byproducts handling system and will not increase the nature or character of emissions from this operation.

Mr. Scott Sheplak  
March 28, 2002  
Page 2 of 4

TEC proposes the following language be substituted in Condition 3 of the Final air construction permit No. 0570040-016-AC:

*“The maximum annual throughput rate of conditioned fly ash and slag shall not exceed ~~100 TPD~~ and 36,500 TPY. The maximum daily throughput rate of conditioned fly ash and slag shall not exceed the sum of 1/3 of the units' operational fly ash re-injection rate nor shall each unit exceed the operational fly ash re-injection rate.”*

Amending the permit to include the proposed language will allow Gannon the operational flexibility to burn more than 100 tpd facility-wide of beneficiated byproduct, but never more than the amount of fly ash that is currently re-injected through each individual unit.

**EPC Comment E)**

**EPC staff believe Specific Condition No. 10 should specify a 30 minute EPA Method 9 test be performed on each transfer point of the by-product material handling system.**

**TEC Comment E)**

Per the Gannon Title V Permit No. 0570040-002-AV, annual visible emission tests are performed in the coal yard (E.U. ID 008) using EPA Method 9. TEC requests to use the annual visible emission tests conducted in the coal yard to comply with Condition 10, since any additional visible emission testing should not be necessary. Should the Department have reason to believe the particulate matter emissions standard is not being met, the Department can require that compliance with the particulate matter emission standard be demonstrated by testing in accordance with Chapter 62-297, F.A.C.

**Draft Permit No. 0570040-016-AC, Condition 11 Revision**

**11. In order to document compliance with Specific Condition No. 3, the permittee shall maintain daily records for each unit of the quantity (tons) of byproduct material fired and with a statement as to the type(s) of byproduct material (i.e. fly ash and coal slag). ~~The permittee shall also keep records, on a monthly basis of the estimated total of byproduct material fired by type (i.e. flyash and coal slag).~~ These records shall be recorded in a permanent form suitable for inspection by the Department upon request, and shall be retained for at least a five (5) year period.**

**TEC Comment**

As discussed per our telephone conversation, TEC requests to delete from the construction permit the requirement to quantify by type (i.e. flyash and coal slag) the amount of material fired.

TEC appreciates the cooperation and consideration of the Department in this matter. If you have any questions or comments pertaining to this request, please direct them to me at (813) 641-5261.

Sincerely,

Raiza Calderon  
Engineer - Air Programs  
Environmental Affairs

## Sheplak, Scott

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**From:** Raiza Calderon [rcalderon@tecoenergy.com]  
**Sent:** Friday, April 12, 2002 4:36 PM  
**To:** Sheplak, Scott; kalch@epchc.org  
**Cc:** Drupatie Latchman; Laura Crouch  
**Subject:** Gannon Byproduct Beneficiated Permit Response to EPC CommentLetter



GN Byproduct  
Beneficiation Re-...

Per our conversation on April 11, 2002, I have attached a word document with Tampa Electric Company's response to the EPC Comment Letter. If you have any questions or comments, please give me a call at (813) 641-5261.

Thanks,

Raiza Calderon  
Engineer  
Environmental Affairs  
Tampa Electric Company  
(813) 641-5261  
rcalderon@tecoenergy.com

COMMISSION

PAT FRANK  
CHRIS HART  
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ADMINISTRATIVE OFFICES, LEGAL &  
WATER MANAGEMENT DIVISION  
1900 - 9TH AVENUE  
TAMPA, FLORIDA 33605  
TELEPHONE (813) 272-5960  
FAX (813) 272-5157

AIR MANAGEMENT DIVISION  
TELEPHONE (813) 272-5530  
WASTE MANAGEMENT DIVISION  
TELEPHONE (813) 272-5788

WETLANDS MANAGEMENT DIVISION  
TELEPHONE (813) 272-7104

EXECUTIVE DIRECTOR  
RICHARD D. GARRITY, Ph.D.

**ENVIRONMENTAL PROTECTION COMMISSION  
of Hillsborough County**

**FAX Transmittal Sheet**

**DATE:** March 28, 2002

**TO:** Scott Sheplak, P.E.

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

**TOTAL NUMBER OF PAGES INCLUDING THIS COVER PAGE:** 3

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

**FROM:** Rob Welch

(Circle applicable section below)

**Air Division**

-Compliance

-Enforcement/Analysis

-Monitoring/Toxics

-Permitting

**SPECIAL INSTRUCTIONS:** Project No. 0570040-016-AC

Hard copy being mailed.

**COMMISSION**

FAT FRANK  
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RICHARD D. GARRITY, Ph.D.



ADMINISTRATIVE OFFICES  
LEGAL & WATER MANAGEMENT DIVISION  
THE ROGER P. STEWART ENVIRONMENTAL CENTER  
1900 - 9TH AVENUE • TAMPA, FLORIDA 33605  
PHONE (813) 272-3960 • FAX (813) 272-5137

AIR MANAGEMENT DIVISION  
FAX (813) 272-5605

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FAX (813) 276-2256

WETLANDS MANAGEMENT DIVISION  
FAX (813) 272-7144

1410 N. 21ST STREET • TAMPA, FLORIDA 33605

March 27, 2002

Scott M. Sheplak, P.E.  
Mail Station No. 5505  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Re: Hillsborough County - AP  
Draft Permit No.: 0570040-016-AC

Dear Mr. Sheplak:

EPC staff received a copy of the draft construction permit for the TEC Gannon Station (Permit No.: 0570040-016-AC) for the combustion of "by-product materials" consisting of flyash and coal slag on March 18, 2002. After reviewing the draft permit, EPC staff has the following comments:

- A) Page 3 of the technical evaluation states, "The facility is located in an Hillsborough County designated "attainment" for all the criteria pollutants (Rule 62-204.360, F.A.C.)", but Hillsborough County is classified "unclassifiable" for PM<sub>10</sub> (Rule 62-204.340(3), F.A.C.) and "maintenance" for ozone, lead, and PM [Rule 62-204.340(4), F.A.C.].
- B) The following comments address the charging rate of by-product materials into Units 1 through 6. Please note, the draft construction permit does not state the by-product material usage rate will be less than the current flyash injection rate, but the technical evaluation and the construction application states it will be less, and the premise there is not an increase in emissions is based on the assumption the by-product material usage will be less than the current flyash re-injection rate. In light of this, EPC staff has the following comments:
  1. The draft permit and technical evaluation does not specifically identify what the maximum re-injection rate of flyash for each unit is, or has been historically. The draft permit states the by-product material usage rate shall be less than 100 tpd (Specific Condition No. 3). Please clarify if this is 16.7 tons per day per unit or a facility-wide usage rate.

[www.epchc.org](http://www.epchc.org)

E-Mail: [epcinfo@epchc.org](mailto:epcinfo@epchc.org)



Scott M. Sheplak, P.E.

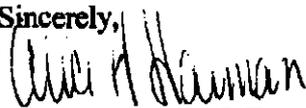
March 25, 2002

Page 2

2. If the 100 tpd is a facility-wide rate, please specify the maximum amount which can be charged in a single unit per day and per year.
  3. The draft permit provided no information which specifies how the by-product material usage rate is to be tracked, or how TEC will establish and regulate the maximum by-product material usage rate. Please provide details on this procedure(s) in the permit.
  4. During the performance testing was TEC operating at 100% of maximum re-injection rate for each unit? If not, what percentage of the maximum re-injection rate for each unit has TEC been operating at?
- C) In our comments emailed January 3, 2002, EPC staff questioned how TEC was determining the by-product material(s) is not a hazardous waste. The draft permit and technical evaluation does not specify what testing protocol is used for this determination (i.e. sample size, number of samples, test method, frequency, etc.)? The permit should contain some language addressing how this will be handled if it becomes necessary at some time in the future.
- D) EPC staff request the following language be included into Specific Condition No. 9: Please note the italicized portion is not suggested language, but is a note to permitting staff.  
Testing of emissions shall be conducted with the source operating at capacity. Capacity is defined as 90-100% of 16.7 tpd (*or some other value tied to a shorter averaging time which corresponds to the test duration*). If it is impracticable to test at capacity, then the source may be tested at less than capacity; in this case subsequent source operation is limited to 110% of the test load until a new test is conducted. Once the unit is so limited, then operation at higher capacities is allowed for no more than fifteen days for purposes of additional compliance testing to regain the rated capacity in the permit, with prior notification to the EPC. Failure to submit the input rates and actual operating conditions may invalidate the test. [Rules 62-4.070(3) and 62-297.310(2)(b), F.A.C.]
- E) EPC staff believe Specific Condition No. 10 should specify a 30 minute EPA Method 9 test be performed on each transfer point of the by-product material handling system.

Thank you for your consideration of the above items. If you have any questions, please feel free to contact Rob Kalch at (813) 272-5530.

Sincerely,



Alice H. Harman, P.E.  
Chief, Air Permitting Section

cc: Ms. Karen A. Sheffield, P.E., Tampa Electric Company



**FJ Gannon Station  
Byproduct Beneficiation & Re-use Non-PSD Permit  
Meeting Agenda  
December 11, 2001**

1. Background
  
2. Review Project Description
  
3. Discuss Responses to Letter Requesting Additional Information
  
4. Other Issues



**TAMPA ELECTRIC**

March 22, 2002

**RECEIVED**

MAR 25 2002

BUREAU OF AIR REGULATION

Mr. Clair Fancy  
Florida Department of Environmental Protection  
111 South Magnolia Drive, Suite 4  
Tallahassee, Florida 32301

**Via Fed Ex**  
**Airbill No. 7918 0081 5239**

**Re: Tampa Electric Company (TEC) – F.J. Gannon Station  
Beneficiation and Combustion of Byproduct Materials in F.J. Gannon Unit Nos. 1-6  
DEP File No. 0570040-016-AC**

Dear Mr. Fancy:

Please find enclosed the original Affidavit of Publication from the Tampa Tribune, as required by 62-110.106(5), F.A.C. This public notice was published in the legal section of the Tampa Tribune on Tuesday March 19, 2002. If you have any questions, please feel free to telephone Raiza Calderon or me at (813) 641-5261.

Sincerely,

Laura R. Crouch  
Manager - Air Programs  
Environmental Affairs

EA/bmr/RC1112

Enclosure

c: Mr. Tom Davis - ECT  
Mr. Buck Oven, FDEP  
Mr. Scott Sheplak, FDEP  
Mr. Jerry Kissel - FDEP SW

State of Florida }  
County of Hillsborough } ss.

Before the undersigned authority personally appeared J. Rosenthal, who on oath says that she is Advertising Billing Manager 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 PUBLIC NOTICE OF INTENT

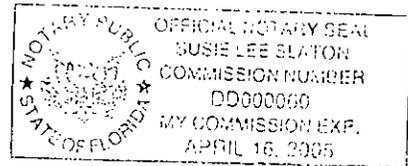
was published in said newspaper in the issues of MARCH 19, 2002

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 publication of the attached copy of advertisement; and affiant further says that she has neither paid nor promised any person, this advertisement for publication in the said newspaper.

*J. Rosenthal*

Sworn to and subscribed by me, this 20 day  
of MARCH, A.D. 20 02

Personally Known  or Produced Identification \_\_\_\_\_  
Type of Identification Produced \_\_\_\_\_



*Susie Lee Slaton*

**PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION**  
Permit No.: 0570040-016-AC  
F. J. Gannon Station Hillsborough County  
The Department of Environmental Protection (Department) gives notice of its intent to issue an air construction permit to Tampa Electric Company, which allows TECO to benefit byproduct materials generated at the Gannon Station and burn them in Gannon Boiler Unit Nos. 1-6. The F. J. Gannon Station is located at Port Sutton Road, Tampa, Hillsborough County.  
The byproduct beneficiation process is a wet process, which will minimize fugitive particulate matter (PM) emissions. Potential fugitive PM and PM10 emissions are calculated to be 22.8 and 10.72 TPY respectively. These values are less than the PSD thresholds of 25 and 15 TPY. Tampa Electric does not anticipate a measurable impact on air emissions due to the combustion of the byproduct material.  
A Best Available Control Technology (BACT) determination was not required pursuant to Rule 62-212.400, F.A.C. and 40 CFR 52.21, Prevention of Significant Deterioration (PSD). The applicant's mailing address is: Tampa Electric Company, P. O. Box 111, Tampa, Florida 33601-0111. The Department will issue the final permit with the attached conditions unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The Department will accept written comments concerning the proposed permit issuance action for a period of 14 (fourteen) days from the date of publication of this Public Notice of Intent to Issue Air Construction Permit. Written comments should be provided to the Department's Bureau of Air Regulation at 2600 Blair Stone Road, Mail Station #5505, Tallahassee, FL 32399-2400. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in the proposed agency action, the Department shall revise the proposed permit and require, if applicable, another Public Notice. The Department will issue the permit with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to sections 120.569 and 120.57 F.S., before the deadline for filing a petition. The procedures for petitioning for a hearing are set forth below. Mediation is not available in this proceeding.  
A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under sections 120.569 and 120.57 of the Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida, 32399-3000. Petitions filed by the permit applicant or any of the parties

listed below must be filed within fourteen days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under section 120.60(3) of the Florida Statutes must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of this notice of intent, whichever occurs first. Under section 120.60(3), however, any person who asked the Department for notice of agency action may file a petition within fourteen days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under sections 120.569 and 120.57 F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205 of the Florida Administrative Code.  
A petition that disputes the material facts on which the Department's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner, the name, address, and telephone num-

ber of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of how and when petitioner received notice of the agency action or proposed action; (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and (g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the agency to take with respect to the agency's proposed action.  
A petition that does not dispute the material facts upon which the Department's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by rule 28-106.301.  
Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Department's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be af-

ected by any such final decision of the Department on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.  
A complete project file 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:  
Dept. of Environmental Protection  
Bureau of Air Regulation  
Suite 4, 111 S. Magnolia Drive  
Tallahassee, Florida, 32301  
Telephone: 850/488-0114  
Fax: 850/922-6979  
Dept. of Environmental Protection  
Southwest District  
3804 Coconut Palm Drive  
Tampa, Florida 33619-8218  
Telephone: 813/744-6100  
Fax: 813/744-6084  
The complete project file includes the application, technical evaluations, Draft permit, and the information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Administrator, Title V Section, at 111 South Magnolia Drive, Suite 4, Tallahassee, Florida 32301, or call 850/921-9532, for additional information.  
1167 3/19/02