

Jeb Bush  
Governor

# Department of Environmental Protection

Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400  
May 15, 2002

David B. Struhs  
Secretary

CERTIFIED MAIL – Return Receipt Requested

Ms. Karen A. Sheffield  
General Manager - F. J. Gannon Station  
Tampa Electric Company  
Post Office Box 111  
Tampa, FL 33601-0111

Re: DEP File No. 0570040-017-AC  
Unit Nos. 1-4 Wood Derived Fuel

Dear Ms. Sheffield:

The Department received your Title V permit revision application to allow for the continued operation of Unit Nos. 1-4 on wood-derived fuel (WDF) on April 15, 2002. Based on our review of your application we have deemed it incomplete. Please submit the following information including all calculations, assumptions and reference material, and the Department will resume processing your application:

1. On pages 31, 32, 57, 58, 83, 84, 109, and 110 of the permit application, the applicant requested a 100% opacity limit be authorized. Rules 62-296.405(1)(a) and 62-210.700(1) through (3), F.A.C. are cited. Rule 62-296.405(1)(a), F.A.C. does not allow a facility to operate while emitting visible emissions at an opacity of 100% or any other opacity for a duration of 24-minutes per hour. Rules 62-210.700(1) through (3), F.A.C. address excess emissions. Specifically, Rule 62-210.700(3) allows visible emissions above 60 percent opacity for no more than 4, six (6)-minute periods, during a 3-hour period for excess emissions from boiler cleaning and load changes.

You requested authorization to operate up to 60 minutes per hour at an opacity of 100%. Operating at 100% opacity for an hour is not considered to constitute best operational practices or considered to minimize the duration of excess emissions as required by Rule 62-210.700(3), F.A.C.

TECO is allowed to operate in accordance with Rule 62-296.405(1)(a), F.A.C. (visible emissions less than 20% opacity except for one six-minute period per hour during which the opacity shall not exceed 27%). TECO is required to operate in accordance with Rule 62-296.700(1) through (3), F.A.C. by addressing excess emissions as written in the "Rule", and not by the establishment of a 1-hour period during which the boiler(s) may be operated at an opacity of 100%.

*"More Protection, Less Process"*

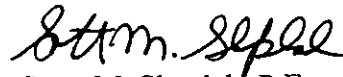
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2. The term "fluxing agent" was used to describe some constituent of the fuels which may be charged into the boilers. Additionally a "non-hazardous boiler chemical cleaning waste" is authorized for injection into the boilers (pages 17, 43, 69, and 95). What are these constituents? Please list the fluxing agents and the non-hazardous boiler chemical cleaning wastes charged into the boilers.

3. Please submit the "Compliance Report" referenced in DEP Form No. 62-210.900(1), block 14. and the corresponding "Compliance Certification" referenced in block 15. for this project. As a guide, see your initial application for Title V permit and statements made in the "INTRODUCTION" for this application.

Permit applicants are advised that Rule 62-4.055(1), F.A.C., now requires applicants to respond to requests for information with 90 (ninety) days. If you have any questions regarding this matter, please call me at 850/921-9532.

Sincerely,



Scott M. Sheplak, P.E.

Administrator

Title V Section

cc: Jerry Campbell, P.E., EPCHC  
Jim Cleary, DEP SWD  
Thomas W. Davis, P.E., ECT  
Raiza Calderon, TECO

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Ms. Karen A. Sheffield

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