

RECEIVED

AUG 17 2000

BUREAU OF AIR REGULATION

August 15, 2000

Mr. Joseph Kahn, P.E.  
Florida Department of Environmental Protection  
111 South Magnolia Drive, Suite 4  
Tallahassee, Florida 32301

Via FedEx  
Airbill No. 7911 2744 3360

**Re: Tampa Electric Company  
Gannon/Bayside Station  
New Fuel Oil Storage Tank  
Additional Information Response**

Dear Mr. Kahn:

In response to your Request for Additional Information letter dated August 4, 2000 regarding the exemption from permitting for the above referenced project, please find below Tampa Electric Company's (TEC) response.

**FDEP Question 1**

**Please provide the basis for the annual throughput calculation. The Department is interested in reviewing this calculation under both assumed plant configurations and notes that only one existing emission unit is permitted to combust new No. 2 fuel oil for 8760 hours per year.**

**TEC Response**

*The basis for the annual throughput of 130,000,000 gallons per year used in the EPA Tanks 4.0 is as follows:*

*Maximum annual fuel oil consumption for up to seven Bayside Station combustion turbines (CT) at 876 hours per year each. This accounts for approximately 89,000,000 gallons per year.*

*Maximum recent annual fuel oil consumption for the current Gannon Station configuration. This accounts for approximately 4,600,000 gallons per year.*

*The remainder of the 130,000,000 is a very conservative estimate of fuel throughput that could possibly be transferred through this tank for use at the Polk Power Station facility.*

*In general, the 130,000,000 gallons per year value is assumed to be overly conservative throughput value. This value was used as a screening value for the purposes of running the EPA TANKS program. Since this screening model run did not show potential VOC emissions greater than the five ton per year level, further refinement of the throughput value was not conducted.*

*For the purposes of the screening model run, both the maximum recent actual Gannon Station usage and the maximum potential Bayside Station usage were combined. In reality, it is not expected that this will ever occur, as there will be a transition period during the conversion from Gannon to Bayside that will not allow both configurations to operate at full capacity at the same time.*

*In regard to the note that "only one existing emission unit is permitted to combust new No. 2 fuel oil for 8760 hours per year", the existing Gannon Station CT is currently allowed to operate in this manner. In addition, the six existing Gannon Station boilers are allowed to consume new No. 2 oil for the purposes of startup, shutdown and flame stabilization. These uses are identified in the Title V Air Operations permit (0570040-002-AV) for the facility.*

**FDEP Question 2**

**Please provide historical oil throughputs for the most recent (2-year) period of facility operation, such that Department records may be verified.**

TEC Response

*Actual fuel oil use for Gannon Station, as reported in the facility's Annual Operating Report (AOR), for 1998 and 1999 is 3,840,390 gallons and 2,819,950 gallons respectively.*

**FDEP Question 3**

**Please provide information on the existing fuel oil tank(s) dimensions and characteristics.**

TEC Response

*The following is information related to the existing No. 2 fuel oil tank:*

Diameter	40 ft. Nominal
Height	32 ft. Nominal
Volume/Capacity	7000 BBL Nominal (300,000 gallons)
Tank Color	Grey Paint
Type Roof	Fixed
Tank Condition	Excellent

**FDEP Question 4**

**Is the proposed tank intended to replace any existing tanks?**

TEC Response

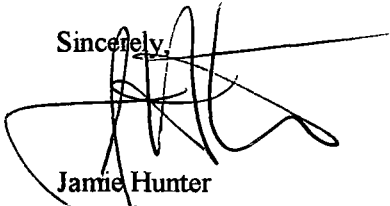
*The new tank will, in part, serve to replace the existing tank. From the end of 2001 to May 2003, its sole purpose will be to replace the existing tank. Subsequently, as Bayside Unit 1 is placed in service in spring of 2003, it will serve the dual duty of supplying both the Bayside CTs and the Gannon steam unit needs. At the end of 2004, the Gannon services, with the exception of the supply to the existing small CT, will be phased out.*

Mr. Joseph Kahn, P.E.  
August 15, 2000  
Page 3 of 3

Hopefully, the above responses provide you with the information necessary to provide written concurrence that this project is exempt from permitting requirements under Rule 62-210.300(3) (b)1., F.A.C.

Thank you for your attention to this matter. If you have any concerns or questions feel free to contact me at (813) 641-5033.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jamie Hunter', written over the word 'Sincerely,'.

Jamie Hunter  
Consulting Engineer  
Environmental Affairs

EP\gm\JJH931

c: Mr. Al Linero -FDEP  
Mr. Jerry Campbell -EPCHC