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ROGER P. STEWART
DIRECTOR
1900 - 9th AVE
TAMPA, FLORIDA 33605
TELEPHONE (813) 272-5960

Rec'd - Tampa
AUG 15 1989

M E M O R A N D U M

DATE: August 10, 1989
TO: George Richardson *GR* THRU J. Harry Kerns, P.E.
FROM: Arthur J. Wells *AW* THRU Jerry Campbell, *JC* P.E.
RE: Operating Permit for Tampa Electric Company,
F.J. Gannon Station Combustion Turbine, A029-160272

Tampa Electric Company (TECO) has submitted an application for renewal of their permit to operate the above-referenced air pollution source at the company's F.J. Gannon Station Facility in Tampa.

The compliance test shall consist of an EPA Method 9, Determination of Opacity of Emissions. To show my justification for not requiring annual particulate stack testing, please refer to the calculations below:

From AP-42, TSP emission factor =
5 lbs./10³ gal. of distillate oil burned.
(Confidence Level = B)

Maximum hourly TSP emission rate =
5 lbs./10³ gal. x 44.88 BBLs/hr. x $\frac{42 \text{ gal.}}{1 \text{ BBL}}$ = 9.4 lbs./hr.

Allowable TSP emission rate =
 $0.03 \frac{\text{gr.}}{\text{dscf}} \times 475,000 \frac{\text{dscf}}{\text{min.}} \times \frac{60}{7000} = 122.14 \text{ lbs./hr.}$

Comparing the actual and the allowable rates, I can safely say, the mass emission standard cannot be exceeded.

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Furthermore, based on my inspection conducted on February 23, 1989, no on-site deficiencies were noted.

Also note that annual compliance testing could be waived on a year by year basis should the annual hours of operation of the combustion turbine be less than 400 hours pursuant to Subsection 17-2.700(2)(a)8., F.A.C. This is a new rule addition which can be found in Corrective Amendments II.

Finally, note the minor changes in wording from the normal standard language in various specific conditions of this permit. These changes were requested by the permittee and are acceptable to the Environmental Protection Commission of Hillsborough County.

I recommend approval to issue a RACT operating permit for the above source. Enclosed for your review is the draft of the proposed permit and a diskette.

