MEMORANDUM

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°	Jim Estler, D.E.R. through Bill Thomas, D.E.R.	
rom	Jerry Campbell, E.P.C.	, , , , , , , , , , , , , , , , , , ,
ubject: _	TECO'S APPLICATIONS FOR THE ECONOMIZER ASH SILO, THE FLYASH	SILO 1-4 AND THE
	FLYASH SILO 5-6 FOR THE GANNON STATION	

Having reviewed the applications and the related correspondence, I recommend approval for these sources to be issued individual permits. I further recommend that the operating permits include the following specific conditions:

ECONOMIZER ASH SILO

- 1. The maximum allowable particulate emission from this source shall be .03 gr/dscf up to 0.33 pounds per hour based on the design flow rate of 126 EACFM (F.A.C. 17-2.650 (2)(c) 11.).
- 2. The maximum opacity from this source shall be 5% (F.A.C. 17-2.650(2)(c)11.).
- 3. The compliance test shall be a visible emission test which shall be conducted every 12 months from 12/83. This test shall be at least 30 minutes in duration.
- 4. The compliance test shall be conducted at approximately the maximum permitted process rate of 1500 pounds of ash per hour.
- 5. The Hillsborough County E.P.C. shall be notified 15 days in advance of any compliance test conducted on this source.
- 6. Two copies of the annual operating report shall be submitted to the Hillsborough County E.P.C. on or before March 1 of each year of this permit.

FLYASH SILO 1-4

- 1. The maximum allowable particulate emissions from the two baghouses on silo 1-4 shall be .03gr/dscf up to 1.32 pounds per hour based on the combined design flow of 5146 dscfm(F.A.C. 17-2.650(2)(c) 11.).
- 2. The maximum opacity from either of the two baghouses, which share 3 common stacks, shall not exceed 5% (F.A.C. 17-2.650 (2)(c) 11.).

- 3. Compliance with the opacity standard shall be demonstrated by conducting a 30 minute visible emission test as units #3, #2 and #1 are converted to coal and begin utilizing this silo. By 11/15/84, 60 days prior to the expiration of construction permit #AC29-41941, a visible emission test shall be submitted while loading the silo from units #3 and #4. By 1/15/86, 60 days prior to the expiration of construction permit #AC29-41942, a visible emission test shall be submitted while loading the silo from units #2, #3 and #4. By 1/15/87, 60 days prior to the expiration of construction permit #AC29-4193, a visible emission test shall be submitted while loading the silo from units #1,#2,#3, and #4. Thereafter, visible emissions tests shall be conducted while loading the silo from all 4 units at 12 month intervals and within 10% of the maximum permitted process rate of 14.4 tons of flyash into the silo per hour.
- 4. The compliance test shall be conducted while running a single baghouse or both baghouses simultaneously, depending on the baghouse capacity required for the number of units feeding into the silo for any particular test. All compliance tests shall be conducted while loading the silo at approximately the maximum feed rate.
- 5. Same as #5 above.
- 6. Same as #6 above.

FLYASH SILÜ 5-6

- 1. The maximum allowable particulate emission from this source shall be 2.91 pounds per hour based on the design flow rate of 11,300 acfm (F.A.C. 17-2.650(2)(c) 11.).
- 2. The maximum opacity from this source shall be 5% (F.A.C. 17-2.650 (2) (c) 11.).
- 3. The compliance test shall be a visible emission test which shall be conducted every 12 months from 11/83. This test shall be 30 minutes in duration.
- 4. The compliance test shall be conducted within 10% of the maximum permitted process rate of 13.1 tons of flyash into the silo per hour.
- 5. Same as #5 above.
- 6. Same as #6 above.

I have contacted E.T.A. concerning procedures for conducting a V.E. on a source with 3 stacks (flyash silo 1-4). We will discuss next week and I will follow up with a proposed method based on their recommendations.

If you have any questions on any of this, please contact me.





April 12, 1984

Mr. Jerry Campbell Hillsborough County Environmental Protection Commission 1900 - 9th Avenue Tampa, FL 33605

Re: Air Operating Permit
Gannon Station Flyash Silo 5-6

Dear Mr. Campbell:

Per your telephone request on March 11, 1984, please find attached the manufacturers assurance on the Units 5 and 6 flyash silo baghouse emission rate.

I understand this additional information will complete the application. If you have any questions, please call me at 228-4838.

Sincerely,

66hn B. Ramil, P.E.

Manager

Environmental Planning

JBR/tb