

File = Hills 6-10p

ENVIRONMENTAL PROTECTION

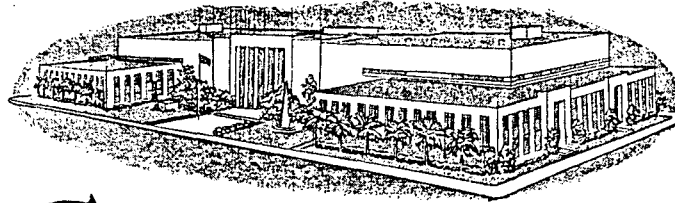
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COUNTY of HILLSBOROUGH

Tampa, Florida 33601



D.E.R.

SEP 22 1980

SOUTHWEST DISTRICT
TAMPA

September 17, 1980

Steve Smallwood, Chief
 BAQM
 Department of Environmental Regulation
 2600 Blair Stone Road
 Twin Towers Office Building
 Tallahassee, Florida 32301

Dear Steve:

Reference is made to the proposed rule pertaining to the reconversion of Gannon Units 1, 2, 3, and 4. The following are suggestions and questions concerning the conversion:

- 1) The basic argument TECO has against a daily fuel analysis is that the coal's sulfur variability may show several violations of the 2.4 lbs/MBTU limit. In fact, the study they had performed, indicated on a daily averaging time greater than 60 exceedances of the standard per year. They state that while some numbers may be higher than 2.4 lbs/MBTU there is likely to be as many numbers below 2.4 so that the average is 2.4 or less. I am not aware of any rule that allows sources to average their emissions. The process weight table states emission limits. How do weekly averages fit into the rule? Granted, it has been done in the past; it raises a situation which other industrial sources may find unfair.
- 2) Installation of continuous SO₂ monitoring equipment on Units 1, 2, 3, 4, 5 and 6. While it is true that monitoring equipment will only give them an instantaneous reading and will not show a violation until it has occurred, TECO will have added reason to insure the coal and generating rates are acceptable. It will allow regulatory agencies a more timely enforcement tool. Granted, monitors cost several thousand dollars but I believe monitors will keep TECO personnel more aware of the operation and the parameters.
- 3) The 10.6 ton/hour capacity should be on a daily basis and not on a weekly basis.

Steve Smallwood
September 17, 1980

Page 2.

Basically, I am suggesting a tighter full analysis program and the use of continuous monitors.

If you have any questions or comments please call.

Sincerely,



Joe Griffiths
Air Engineering Department
Hillsborough County Environmental
Protection Commission

JG/fd

cc: Dan Williams - DER ✓

File Hills Co-AP



POST OFFICE BOX 111 TAMPA, FLORIDA 33601 TELEPHONE (813) 879-4111

September 17, 1980

D.E.R.

SEP 24 1980

SOUTHWEST DISTRICT
TAMPA

Mr. Joe Griffiths
Hillsborough County Environmental
Protection Commission
1900 9th Avenue
Tampa, Florida 33605

RE: Stack Emission Test
Gannon Unit No. 1
Tampa Electric Company

Dear Joe:

Enclosed please find two (2) copies of a stack test report for a compliance test performed on Gannon Unit No. 1 on July 23, 1980.

As stated in the Summary of Results, the average particulate emission rate for three test runs was 0.01 lbs. per million BTU, which is in compliance with Florida Administrative Code, Chapter 17-2.05 (6)(e)(1)(b)2.b of 0.1 lbs. per million BTU.

Included in the Summary of Results, the average sulfur dioxide emission rate from fuel analysis conducted by our Central Testing Laboratory was 1.05 lbs. per million BTU which is in compliance with Florida Administrative Code, Chapter 17-2.05 (6)(e)(1)(b)2.b of 1.1 lbs. per million BTU.

Also included are nitrogen dioxide results, a process statement, and visible emission report. If you have any questions, please call.

Yours truly,

Jerry L. Williams

Jerry L. Williams
Manager
Environmental Planning

JLW:as
enclosures
cc: Dan Williams, FDER ✓