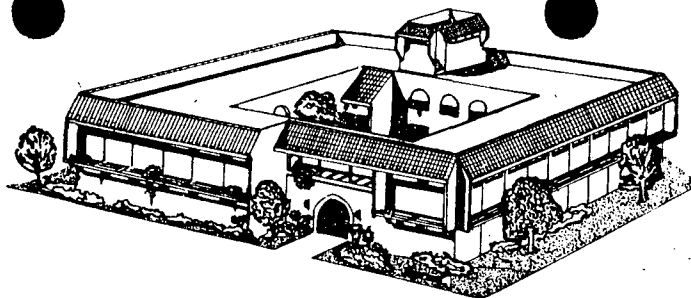


HILLSBOROUGH COUNTY  
ENVIRONMENTAL PROTECTION

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October 17, 1986

Certified Mail# P 146 727 373

Mr. A Spencer Autry, Manager  
Environmental Planning  
Tampa Electric Company  
Post Office Box 111  
Tampa, FL 33601

D. E. R.

OCT 22 1986

SOUTH WEST DISTRICT  
TAMPA

Dear Mr. Autry:

The staffs of Hillsborough County Environmental Protection Commission (HCEPC) and Florida Department of Environmental Regulation (FDER) acknowledge the receipt of your application for permit to operate TECO Gannon Station's coal fired unit designated as Unit #1.

I would like to call your attention to a July 29, 1986 letter written to you by Mr. Jerry Campbell of our Agency. The letter was written as a follow-up to specific condition 5.a. of permit A029-80043. The specific condition stipulates that the procedures for determining sulfur variability of the coal requires the approval of FDER and HCEPC. The procedures were submitted by your organization on December 11, 1984.

An attachment to Mr. Campbell's letter above lists FDER's concerns and recommendations in response to TECO's protocol. The letter requests that you review the recommendations suggested by FDER and that you determine whether either option is acceptable to TECO. The letter also requests for a meeting if you disagree to either option. Whether you agree or disagree, we still need you to inform us of your written response. As of this date, neither FDER nor our Agency have received any feedback from TECO regarding the letter.

We have reviewed 1984-1985 coal purchase reports provided by the Department of Energy, fuel reports obtained by the Florida Public Service Commission during an investigation of Gatliff Coal Co. (1984-1985), and a coal supply agreement between TECO and CAL-GLO COAL, Inc. which was also obtained from the Public Service Commission. Information in these documentations indicate that a significant percentage of the coal supplied to the Gannon station does not originate from

the same mine. The information therefore leads us to speculate whether the variability of the Gannon coal indeed remains and will indeed continue to remain unchanged. FDER is concerned that the use of any different set of coals may cause greater fluctuation, not only in autocorrelation, but also in the mean and relative variability of the sulfur content. Thus, any statistical test based on the assumed constancy of these quantities would not mean very much when the assumptions are violated. Perhaps more powerful tests with less restrictive assumptions should be implemented to check the actual sulfur variability of the coal.

Based on the documentation mentioned above and based on FDER's concerns, we believe that the protocol submitted in December, 1984 provides HCEPC and FDER no reasonable assurance that SO<sub>2</sub> emissions from Unit #1 and SO<sub>2</sub> emissions from the Gannon station, during the burning of coal, are in compliance with the requirements of Subsection 17-2.600(5)(b)3.b.(i), F.A.C.. Pursuant to Section 17-4.07(1), F.A.C. and Chapter 1-3.21(2) of the HCEPC rules, you are notified that the application is deemed incomplete. Further processing of your operating permit application is temporarily held in abeyance until TECO shows HCEPC and the Department reasonable assurance that all applicable SO<sub>2</sub> emission standards are being met. Pursuant to Sec.17-4.07(2), F.A.C. we request that you respond to Mr Campbell's letter within 30 days of receipt of this letter.

If you have any questions regarding the concerns and recommendations posed by FDER, please contact Larry George of the Bureau of Air Quality Management in Tallahassee. Any other questions, please contact me or Jerry Campbell.

Sincerely,

*Victor San Agustin*  
Victor San Agustin  
Air Engineering  
Hillsborough County Environmental  
Protection Commission

cc: Larry George, BADM  
Bill Thomas, SWFDER