TAMPA ELECTRIC
A TECO ENERGY COMPANY

June 13, 1997

Mr. Scott Sheplak, Jr., P.E.
Administrator-Title V Section
Florida Department of Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Via FedEx
Airbill No. 3793592121

Re: Tampa Electric Company
Gannon Station
Title V Application Submittal
Second Request for Additional Information
FDEP File No. 0570040-002-AV

Dear Mr. Sheplak:

Tampa Electric Company (TEC) received the Florida Department of Environmental Protection's (FDEP) request for additional information for our F.J. Gannon Station on March 31, 1997. With regards to the referenced request for additional information, please find enclosed four (4) copies of our responses. Also, included in this package are new Responsible Official and Professional Engineer certifications. Please note that the Responsible Official at this facility has changed to Mrs. Karen A. Sheffield, P.E.

Please feel free to telephone me at (813) 641-5039, if you have any questions or require any clarification. Thank-you.

Sincerely,

Janice K. Taylor
Senior Engineer
Environmental Planning

EP\gm\JKT803

Enclosures

c: Lennon Anderson, FDEP-Tallahassee
Jerry Kissell, FDEP -SW District
Richard Kirby, EPCHC

ADMINISTRATIVE OFFICES, LEGAL &
WATER MANAGEMENT DIVISION
1900 - 9TH AVENUE
TAMPA, FLORIDA 33605
TELEPHONE (813) 272-5960
FAX (813) 272-5157

AIR MANAGEMENT DIVISION
TELEPHONE (813) 272-5530

WASTE MANAGEMENT DIVISION
TELEPHONE (813) 272-5788

WETLANDS MANAGEMENT DIVISION
TELEPHONE (813) 272-7104

March 21, 1997

John Duff
General Manager
F.J. Gannon Station
Tampa Electric Company
P.O. Box 111
Tampa, FL 33601-0111

Re: F.J. Gannon Station, Title V Operating Permit Application

Dear Mr. Duff:

The Environmental Protection Commission (EPC) of Hillsborough County is charged with protecting air quality in Hillsborough County. The agency has been delegated certain activities, such as lead compliance agency and permit review commenting agency, by the FDEP and U.S. EPA. As such, EPC has reviewed the referenced application and supporting information. In order to insure compliance with applicable laws and rules can be achieved, the following information is required:

1. Chapter 1-3.63c., Rules of the Environmental Protection Commission of Hillsborough County, limits sulfur dioxide emissions to 1.1 pound per million Btu heat input when liquid fuel is burned. In TECO's Title V application for the Gannon Station several liquid fuels are listed as being burned at the facility. Since this rule does not provide special relief while liquid and solid fuels are fired together, TECO should demonstrate how the standard will be met while this co-firing is taking place.

2. In the February 19, 1997 response to FDEP from Janice Taylor of TECO, it is stated that no flow meters exist to determine No. 2 fuel usage in each coal fired boiler. In order to properly evaluate the process and to verify compliance, TECO needs to advise us how you intend to quantify fuel oil usage for each operation within the facility.

3. Included in the February 19 response are application section D segment (Process/Fuel) Information. Under #10, it is stated that No. 2 fuel is used while bringing an additional mill or cyclone into service, maintenance activities, etc. Each operation for which TECO uses No. 2 fuel in coal fired units should be described including the amount of fuel used for the activity and the typical duration or range of liquid fuel burned.

Please contact me at this office if you have any questions.

Sincerely,

Richard C. Kirby IV

Richard C. Kirby, IV, P.E.
Chief, Air Permitting Section

bm

cc: John C. Brown, Jr., P.E., FDEP - Tallahassee

3/26/97 John Brown
Lennon Anderson
File

BEST AVAILABLE COPY

John Brown

ENVIRONMENTAL PROTECTION COMMISSION
HILLSBOROUGH COUNTY

ADMINISTRATIVE OFFICES, LEGAL & WATER MANAGEMENT DIVISION
1900 - 9TH AVENUE
TAMPA, FLORIDA 33605
TELEPHONE (813) 272-5960
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WETLANDS MANAGEMENT DIVISION
TELEPHONE (813) 272-7104

3/26/97
BROTE RA
Barbara (c.c.)
Cindy
Lennon

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BUREAU OF AIR REGULATION

March 21, 1997

John Duff
General Manager
F.J. Gannon Station
Tampa Electric Company
P.O. Box 111
Tampa, FL 33601-0111

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Sincerely,

Richard C. Kirby, IV

Richard C. Kirby, IV, P.E.
Chief, Air Permitting Section

bm

cc: John C. Brown, Jr., P.E., FDEP - Tallahassee

TAMPA ELECTRIC
A TECO ENERGY COMPANY

RECEIVED
NOV 25 1996
BUREAU OF
AIR REGULATION

November 19, 1996

Via FedEx Airbill No. 7748636276

Mr. John C. Brown, P.E.
Administrator-Title V Programs
MS 5505
Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Re: Tampa Electric Company
Polk Power Station
AIRS No. 0530233
Title V Permit Application

Dear Mr. Brown:

Tampa Electric Company (TEC) is in receipt of the Polk Power Station Title V applications your office returned. We have reviewed these applications and believe the latest version of ELSA (1.3.b) has been used. Therefore, enclosed please find the four (4) previously submitted copies of the electronic Title V permit application signed and sealed for the above referenced facility in accordance with 62-4.050 and 62-213.420, F.A.C. Also enclosed for your use, is one (1) hard copy of the Title V application for this source.

In addition, we spoke with Mr. Ed Svec of your office and have agreed the best course of action is to re-submit these applications. This will enable the Department and TEC to concurrently view these electronic forms to resolve any issues regarding the electronic submittal.

Please address any comments or concerns to me, as follows:

Tampa Electric Company
Janice K. Taylor
Senior Engineer
P.O. Box 111
Tampa, FL 33601-0111

Phone No. (813) 641-5039
Fax No. (813) 641-5081

Thank you in advance for your consideration in this matter.

Sincerely,

Janice K. Taylor
Senior Engineer
Environmental Planning

Enclosures

c: Mr. Bruce Mitchell-FDEP
Mr. Ed Svec-FDEP

EP\gm\JKT777

Department of Environmental Protection

Lawton Chiles
Governor

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Virginia B. Wetherell
Secretary

October 28, 1996

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Thomas W. Reese
Attorney at Law
2951 61st Avenue South
St. Petersburg, Florida 33712

Dear Mr. Reese:

RE: Request for Tampa Electric Company's Renewal Dates for Air Permits and Notification of Any Proposed Title V Air Operation Permitting Action

Thank you for your letter of October 8, which requested the renewal dates for Tampa Electric Company's Power Plants. A copy of a permitting history is enclosed for you for the Big Bend facility, the Gannon facility, and the Hookers Point facility. In each of these, you will find the current expiration date for the affected permits. In addition, Rule 62-210.300(2)(a)3.a., F.A.C., extended operation permits for Title V sources subject to Rule 62-213.420(1)(a)1., F.A.C., to 60 days after the due date. Specifically, the due date for these Acid Rain sources was June 15, 1996, pursuant to Rule 62-213.420(1)(a)1.a., F.A.C. The applications for these facilities were received on June 14, 1996. Because of the timely submittal of the initial applications and the initial sufficiency reviews were considered complete, the initial applications were allowed to default to complete 60 days after the June 14 submittal, which was September 12, and Rule 62-213.420(1)(b)2., F.A.C., extended any existing valid permit. The extension of the permits lasts until final agency action is taken on the applications. Copies of the rule citings are enclosed.

The Tampa Electric Company's Polk Power Station facility's construction permit, No. PSD-FL-194, has been extended by amendment (PSD-FL-194A) and expires on June 30, 2000. A copy of the permit extension is enclosed.

Since I specifically work for the Title V Section within the Bureau of Air Regulation, I am assuming that you only desire notification of any proposed agency action regarding the Title V operation permits for the facilities referenced in the preceding paragraph. If this is not accurate, please advise. We have already placed your name on the "to be copied" list in the three proposed Title V permits' Notice of Agency Action documents; and, we will do the same for the Polk Power Station project when it is processed. Therefore, the Department's notification will be mailed to you, the applicant, and others on the same day.

If you desire notification of any proposed air permitting action outside of the Title V Section's, then it is requested that you notify each air permitting authority that might receive and process such a request from the Tampa Electric Company. The following air permitting authorities that might also be involved with the Tampa Electric Company, now and in the future, are:

Department of Environmental Protection
Division of Air Resources Management
Bureau of Air Regulation
2600 Blair-Stone Road
Tallahassee, Florida 32399-2400

Telephone: 904/488-1344
Fax: 904/922-6979

Contacts: C. H. Fancy, Bureau Chief
A. A. Linero, P.E. Administrator, New Source Review Section

****

Department of Environmental Protection
Southwest District
Air Resources Management
3804 Coconut Palm Drive
Tampa, Florida 33619-821

Telephone: 813/744-6100
Fax: 813/744-6084

Contacts: W. C. Thomas, District Air Program Administrator
G. J. Kissel, P.E. III, Air Permitting Section

****

Hillsborough County Environmental Protection Commission
Air Management Division
1410 North 21st Street
Tampa, Florida 33605

Telephone: 813/272-5530
Fax: 813/272-5605

Contacts: Iwan Choronenko, Director
Jerry Campbell, P.E., Assistant Director

I hope that your requests have been answered by this letter and enclosures. If not, please give me a call at 904/488-1344 or write to me at the above letterhead address.

Sincerely,

R. Bruce Mitchell
Environmental Administrator
Title V Section-Bureau of Air Regulation

RBM/m

Enclosures

cc: C. H. Fancy, BAR
A. A. Linero, BAR
Patricia Comer, Esq., DEP
W. C. Thomas, SWD
G. J. Kissel, SWD
I. Choronenko, HCEPC
J. Campbell, HCEPC

THOMAS W. REESE
ATTORNEY AT LAW
2951 61ST AVENUE SOUTH
ST. PETERSBURG, FLORIDA 33712.

(813) 867-8228
FAX (813) 867-2259

October 8, 1996

Bruce Mitchell
Division of Air Resource Management
Permitting and Standards Section
Department of Environmental Regulation
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Re: TECO Power Plant Air Permit Renewal Dates

Dear Mr. Mitchell:

Would you please advise me of the air permit renewal dates for each of TECO's power plant plants, especially including each of the Big Bend and Gannon Units.

Also, would you please provide me with actually timely notice of any proposed DEP agency action on any TECO power plant air permits.

Very truly yours,

Thomas W Reese

Thomas W. Reese

cc: Howard Rhodes, Div. Dir.
Bill Thomas, SW Dist. Off.
Jerry Campbell, HCEPC

Appendix H-1, Permit History/ID Number Changes

Tampa Electric Company
Big Bend

[DRAFT/PROPOSED/FINAL]Permit No.: 0570039-002-AV
Facility ID No.: 0570039

Permit History (for tracking purposes):

E.U. ID No	Description	Permit No.	Issue Date	Expiration Date	Extended Date	Revised Date(s)
-001	Unit 1 Coal Fired Boiler	AO29-219924	11/24/92	12/01/97		
-002	Unit 2 Coal Fired Boiler	AO29-179912	11/19/90	10/18/95	08/14/96	
-003	Unit 3 Coal Fired Boiler	AO29-179911	08/29/90	08/30/95	08/14/96	
-004	Unit 4 Coal Fired Boiler	PSD-FL-040	11/14/81			
-005	Combustion Turbine #2	AO29-174596	03/14/90	03/09/95	08/14/96	
-006	Gas Turbine #3	AO29-174611	05/08/90	04/27/95	08/14/96	
-007	Gas Turbine #1	AO29-160257	01/19/90	07/07/94		
-008	Unit #1 & #2 Flyash Silo	AO29-160255	01/19/90	12/22/94		
-009	Fly Ash Silo for Unit #3	AO29-161082	10/16/91	07/07/94		
-010	Big Bend Coal Yard	PSD-FL-040	11/14/81			
-011	Truck Unloading of Limestone	PSD-FL-040	11/14/81			
-012	Limestone Silo A w/2 baghouses	PSD-FL-040	11/14/81			
-013	Limestone Silo B w/2 baghouses	PSD-FL-040	11/14/81			
-014	Flyash Silo for Unit #4	PSD-FL-040	11/14/81			
-015	Unit 1 Coal Bunker w/Rotoclone	AO29-163788	10/06/89	06/30/94		
-016	Unit 2 Coal Bunker w/Rotoclone	AO29-163788	10/06/89	06/30/94		
-017	Unit 3 Coal Bunker w/Rotoclone	AO29-163788	10/06/89	06/30/94		
-018	Fly Ash Silo for Unit #3	AO29-161082	10/16/91	07/07/94		
-019	Big Bend Station Unit #1 & #2	Ao29-160255	01/19/90	12/22/94		

(if applicable) ID Number Changes (for tracking purposes):

From: **Facility ID No.:** 40HIIL290039

To: **Facility ID No.:** 0570039

Appendix H-1, Permit History/ID Number Changes

Tampa Electric Company
F. J. Gannon

[DRAFT/PROPOSED/FINAL]Permit No.: 0570040-002-AV
Facility ID No.: 0570040

Permit History (for tracking purposes):

E.U. ID No	Description	Permit No.	Issue Date	Expiration Date	Extended Date	Revised Date(s)
-001	Steam Generator	AO29-204434	1/31/92	1/31/97		10/11/94
-002	Boiler	AO29-189206	2/7/91	2/6/96	8/14/96	
-003	Coal Fired Boiler	AO29-172179	4/26/90	4/19/95	8/14/96	10/11/94
-004	Coal Fired Boiler	AO29-255208	12/2/94	10/14/99		
-005	Coal Fired Boiler	AO29-203511	1/1/92	1/1/97		
-006	Coal Fired Boiler	AO29-203512	2/15/92	2/15/97		
-007	Gas Turbine	AO29-252615	8/31/94	8/31/99		
-008	Boiler	AO29-216480	4/23/93	9/12/97		
-009	Economizer Ash Silo	AO29-218858	8/29/89	11/6/97		
-010	Fly Ash Silo	AO29-250137	7/20/94	7/12/99		2/6/95
-011	Fly Ash Silo	AO29-250140	7/20/94	7/12/99		2/6/95
-012	Pug Mill & Truck Loading	AO29-250137	7/20/94	7/12/99		2/6/95
-013	Unit 1 Coal Bunker w/Rotoclone	AO29-250139	7/20/94	7/12/99		2/6/95
-014	Unit 2 Coal Bunker w/Rotoclone	AO29-250139	7/20/94	7/12/99		2/6/95
-015	Unit 3 Coal Bunker w/Rotoclone	AO29-250139	7/20/94	7/12/99		2/6/95
-016	Unit 4 Coal Bunker w/Rotoclone	AO29-250139	7/20/94	7/12/99		2/6/95
-017	Unit 5 Coal Bunker w/Rotoclone	AO29-250139	7/20/94	7/12/99		2/6/95
-018	Unit 6 Coal Bunker w/Rotoclone	AO29-250139	7/20/94	7/12/99		2/6/95

(if applicable) ID Number Changes (for tracking purposes):

From: **Facility ID No.:** 40HIL290040

To: **Facility ID No.:** 0570040

[electronic file name: 0570040h.doc]

Appendix H-1, Permit History/ID Number Changes

Tampa Electric Company
Hooker's Point

[DRAFT/PROPOSED/FINAL]Permit No.: 0570038-001-AV
Facility ID No.: 0570038

Permit History (for tracking purposes):

E.U. ID No.	Description	Permit No.	Issue Date	Expiration Date	Extended Date	Revised Date(s)
-001	Oil-Fired Boiler #1	AO29-203001	12/19/91	12/01/96		
-002	Oil-Fired Boiler #2	AO29-203000	12/19/91	12/01/96		
-003	Oil-Fired Boiler #3	AO29-202999	12/19/91	12/01/96		
-004	Oil-Fired Boiler #4	AO29-202998	12/19/91	12/01/96		
-005	Oil-Fired Steam Generator #6	AO29-202997	12/19/91	12/01/96		

(if applicable) ID Number Changes (for tracking purposes):

From: **Facility ID No.:** 40HIL290038

To: **Facility ID No.:** 0570038

(v) Cyclic, branched, or linear completely methylated siloxanes

(w) Acetone

(x) Perfluorocarbon compounds which fall into these classes:

1. Cyclic, branched, or linear, completely fluorinated alkanes;

2. Cyclic, branched, or linear, completely fluorinated ethers with no unsaturations;

3. Cyclic, branched, or linear, completely fluorinated tertiary amines with no unsaturations; and

4. Sulfur containing perfluorocarbons with no unsaturations and with sulfur bonds only to carbon and fluorine.

(310) "Waste-to-Energy Facility" - A facility that uses an enclosed device using controlled combustion to thermally break down solid, liquid or gaseous combustible solid waste to an ash residue that contains little or no combustible material, and that produces electricity, steam, or other energy as a result. The term does not include facilities that primarily burn fuels other than solid waste, even if the facilities also burn some solid waste as a fuel supplement. The term also does not include facilities that burn vegetative, agricultural, or silvicultural wastes, bagasse, clean dry wood, methane or other landfill gas, wood fuel derived from construction or demolition debris, or waste tires, alone or in combination with fossil fuel. For the purposes of Rule 62-296.416, F.A.C., the term does not include facilities that primarily burn biohazardous or hazardous waste and industria boilers that burn pelletized paper waste as a supplemental fuel.

(311) "Waxy, Heavy Pour Crude Oil" - A crude oil with a pour point of 50 degrees or higher as determined by the American Society for Testing and Materials Standard D97-66, "Test for Pour Point of Petroleum Oils". A copy of the above referenced document is available from the American Society for Testing and Materials, 1916 Race Street, Philadelphia, PA 19103, and may be examined at the Department's Tallahassee office.

(312) "Yard Trash" - Vegetative matter resulting from landscaping and yard maintenance operations which includes materials such as tree and shrub trimmings, grass clippings, palm fronds, trees and tree stumps.

Specific Authority 403.061, FS.
Law Implemented 403.021, 403.031, 403.061, 403.087, FS.
History -- Formerly 17-2.100; Amended 2-9-93, 11-28-93, Formerly 17-210.200, Amended 11-23-94, 4-18-95, 1-2-96, 3-13-96, 3-21-96, 8-15-96.

62-210.300 Permits Required. The owner or operator of any emissions unit which emits or can reasonably be expected to emit any air pollutant shall obtain an appropriate permit from the Department prior to beginning construction, modification, or initial or continued operation of the emissions unit unless exempted pursuant to Department rule or statute. All emissions limitations, controls, and other requirements imposed by such permits shall be at least as stringent as any applicable limitations and requirements contained in or

enforceable under the State Implementation Plan (SIP) or that are otherwise federally enforceable. Issuance of a permit does not relieve the owner or operator of any emissions unit from complying with applicable emission limiting standards or other requirements of the air pollution rules of the Department, or any other applicable requirements under federal, state, or local law.

(1) Air Construction Permits. An air construction permit shall be obtained by the owner or operator of any proposed new or modified facility or emissions unit prior to the beginning of construction or modification, in accordance with all applicable provisions of this chapter, Chapter 62-212 and Chapter 62-4, F.A.C. The construction permit shall be issued for a period of time sufficient to allow construction or modification of the facility or emissions unit and operation while the new or modified facility or emissions unit is conducting tests or otherwise demonstrating initial compliance with the conditions of the construction permit.

(2) Air Operation Permits. Upon expiration of the air operation permit for any existing facility or emissions unit, subsequent to construction or modification and demonstration of initial compliance with the conditions of the construction permit for any new or modified facility or emissions unit, or as otherwise provided in this chapter or Chapter 62-213, the owner or operator of such facility or emissions unit shall obtain a renewal air operation permit, an initial air operation permit, or an administrative correction or revision of an existing air operation permit, whichever is appropriate, in accordance with all applicable provisions of this chapter, Chapter 62-213 (if the facility is a Title V source), and Chapter 62-4, F.A.C.

(a) Minimum Requirements for All Air Operation Permits. At a minimum, a permit issued pursuant to this subsection shall:

1. Specify the manner, nature, volume and frequency of the emissions permitted, and the applicable emission limiting standards or performance standards, if any;

2. Require proper operation and maintenance of any pollution control equipment by qualified personnel, where applicable in accordance with the provisions of any operation and maintenance plan required by the air pollution rules of the Department.

3. Contain an effective date stated in the permit which shall not be earlier than the date final action is taken on the application and be issued for a period, beginning on the effective date, as provided below.

a. The operation permit for an emissions unit which is in compliance with all applicable rules and in operational condition, and which the owner or operator intends to continue operating, shall be issued or renewed for a five-year period, except that, for Title V sources subject to Rule 62-213.420(1)(a)1., F.A.C., operation permits shall be extended until 60 days after the due date for submittal of the facility's Title V permit application as specified in Rule 62-213.420(1)(a)1., F.A.C.

b. Except as provided in Rule 62-210.300(2)(a)3.d., F.A.C., the operation permit for an emissions unit which has been shut down for six months or more

permit may include such emissions unit in the initial application, provided the requirements of Rule 62-213.420(3)(k), F.A.C., are met.

(b) Complete Application.

1. Any applicant for a Title V permit, permit revision or permit renewal must submit an application on form number 62-210.900(1), which must include all the information specified by Rule 62-213.420(3), F.A.C., except that an application for permit revision must contain only that information related to the proposed change. The applicant shall include information concerning fugitive emissions and stack emissions in the application. Each application for permit, permit revision or permit renewal shall be certified by a responsible official in accordance with Rule 62-213.420(4), F.A.C.

2. For those applicants submitting initial permit applications pursuant to Rule 62-213.420(1)(a)1., F.A.C., a complete application shall be an application that substantially addresses all the information required by the application form number 62-210.900(1), and such applications shall be deemed complete within sixty days of receipt of a signed and certified application unless the Department notifies the applicant of incompleteness within that time. For all other applicants, the applications shall be deemed complete sixty days after receipt, unless the Department, within sixty days after receipt of a signed application for permit, permit revision or permit renewal, requests additional documentation or information needed to process the application. An applicant making timely and complete application for permit, or timely application for permit renewal as described by Rule 62-4.090(1), F.A.C., shall continue to operate the source under the authority and provisions of any existing valid permit or Florida Electrical Power Plant Siting Certification, provided the applicant complies with all the provisions of Rule 62-213.420(1)(b)3. and 4. F.A.C. Failure of the Department to request additional information within sixty days of receipt of a properly signed application shall not impair the Department's ability to request additional information pursuant to Rule 62-213.420(1)(b)3. and 4., F.A.C.

3. For those permit applications submitted pursuant to the provisions of Rule 62-213.420(1)(a)1., F.A.C., the Department shall notify the applicant if the Department becomes aware at any time during processing of the application that the application contains incorrect or incomplete information. The applicant shall submit the corrected or supplementary information to the Department within ninety days unless the applicant has requested and been granted additional time to submit the information. Failure of an applicant to submit corrected or supplementary information requested by the Department within ninety days or such additional time as requested and granted shall render the application incomplete.

4. For all applications other than those addressed at Rule 62-213.420(1)(b)3., F.A.C., should the Department become aware, during processing of any application that the application contains incorrect information, or should the Department become aware, as a result of comment from an

affected State, an approved local air program, EPA, or the public that additional information is needed to evaluate the application, the Department shall notify the applicant within 30 days. When an applicant becomes aware that an application contains incorrect or incomplete information, the applicant shall submit the corrected or supplementary information to the Department. If the Department notifies an applicant that corrected or supplementary information is necessary to process the permit, and requests a response, the applicant shall provide the information to the Department within ninety days of the Department request unless the applicant has requested and been granted additional time to submit the information or, the applicant shall, within ninety days, submit a written request that the Department process the application without the information. Failure of an applicant to submit corrected or supplementary information requested by the Department within ninety days, or such additional time as requested and granted, or to demand in writing within ninety days that the application be processed without the information shall render the application incomplete. Nothing in this section shall limit any other remedies available to the Department.

5. All Department requests for additional information shall conform to the requirements of Rule 62-4.055(2), (3), and (4), F.A.C.

6. The Department shall grant requests for additional time to submit supplemental or corrected information as follows:

a. Each source requesting additional time must make a written request prior to the due date for receipt of the information and must specify the number of additional days requested;

b. The Department shall grant up to sixty additional days to any source operating in compliance with the terms and conditions of the source's existing valid permit without the need to show cause;

c. The Department shall grant additional time beyond sixty days or to sources not operating in compliance with existing valid permits only after the source demonstrates good cause. Good cause shall mean any unforeseen situation outside the control of the source such as labor strikes, acts of war, extraordinary or sudden and unexpected acts of nature or accidents beyond the control of the source. If the Department has required, in the request for additional or corrected information, that the source undertake specific testing or investigation, good cause shall also include the requirement to complete any required tests or investigation that cannot be completed within 150 days, so long as the source specifies the expected date of completion in its demonstration of good cause and so long as the estimated time requested is for the work required.

(2) Confidential Information. Whenever an applicant submits information under a claim of confidentiality pursuant to Section 403.111, F.S., the applicant shall also submit a copy of all such information and claim directly to EPA.

(3) Standard Application Form and Required Information. Applications shall be submitted under this chapter on forms provided by the Department and adopted by reference in Rule 62-210.900(1), F.A.C. The information as described in Rule 62-210.900(1), F.A.C., shall be included for the Title V source and each emissions

Department of
Environmental Protection

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Lawton Chiles
Governor

Virginia B. Wetherell
Secretary

February 28, 1995

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. G. F. Anderson
Tampa Electric Company
P. O. Box 111
Tampa, Florida 33601-0111

Dear Mr. Anderson:

RE: Amendment for a Modification to the Auxiliary Boiler and Expiration Date Extension
PSD-FL-194(A)

The Department received your requests of May 12 and June 9, 1994, to modify the auxiliary boiler by increasing the heat input rate, which will require changing some existing specific conditions, and to extend the expiration date of the PSD permit referenced below. The permit is amended as shown:

Permit No. PA-92-32, PSD-FL-194, Tampa Electric Company.

Current Expiration Date: June 1, 1996

New Expiration Date: June 30, 2000

The Department is also modifying the specific conditions as follows:

E. Auxiliary Boiler

The maximum heat input to the auxiliary boiler shall not exceed ~~49.5~~ 120.0 MMBtu/hr when firing No. 2 fuel oil with 0.05 percent maximum sulfur content by weight. All fuel consumption must be continuously measured and recorded for the auxiliary boiler.

G. Fugitive Dust

Fugitive dust emissions during the construction period shall be minimized by covering or watering dust generation areas. Particulate matter emissions from the coal handling equipment shall be controlled by enclosing all coal storage, conveyors and conveyor

transfer points (~~except those directly associated with the coal stacker/reclaimer for which an enclosure is operationally infeasible~~). Fugitive emissions shall be tested as specified in Condition No. J. ~~Inactive coal storage shall be shaped, compacted, and oriented to minimize wind erosion.~~ Water sprays or chemical wetting agents and stabilizers shall be applied to uncovered storage piles, roads, handling equipment, etc. during dry periods and, as necessary, to all facilities to maintain an opacity of less than or equal to five percent. ~~When adding, moving or removing coal from the coal pile, an opacity of 20 percent is allowed.~~

H. Emission Limits

1. The maximum allowable emissions from the IGCC combustion turbine, when firing syngas and low sulfur fuel oil, in accordance with the BACT determination, shall not exceed the following:

Pollutant	Fuel	Basis	Emissions Limitations 7F CT Postdemonstration Period lb/hr	tpy
NO_x	Oil	42 ppmvd	311	N/A
	Syngas	25 ppmvd	~~222.5~~ 220.25	~~1,644~~ 1,032.9

I. Auxiliary Boiler Operation

Normal operation of the auxiliary boiler shall be limited to a maximum of ~~1,000~~ 3,000 hours per year ~~and only during periods of startup and shutdown of the IGCC unit, or when steam from the IGCC unit's heat recovery steam generator is unavailable.~~ The auxiliary boiler may operate continuously (i.e. 8,760 hrs/yr) in the standby mode. The following emission limitations shall apply:

1. NO_x emissions shall not exceed ~~0.16~~ 0.10 lbs/MMBtu for oil firing.
2. Sulfur dioxide emissions shall be limited by firing low sulfur oil with a maximum sulfur content of 0.05 percent by weight.
3. Visible emissions shall not exceed 20 percent opacity (6-minute average) ~~except for one six-minute period per hour during which opacity shall not exceed 27 percent~~, while burning low sulfur fuel oil.

L. Monitoring Requirements

1. IGCC Combustion Turbine

A continuous emission monitoring system (CEMS) shall be installed, operated and maintained in accordance with 40 CFR 60, Appendix F, for the combined cycle unit to monitor nitrogen oxides and a diluent gas (CO_2 or O_2). The applicant shall request that this condition of certification be amended to reflect the Federal Acid Rain Program requirements of 40 CFR 75, if applicable, when those requirements become effective within the state.

~~1.~~ a Each CEMS shall meet the performance specifications of 40 CFR 60, Appendix B.

~~2.~~ b CEMS data shall be recorded and reported in accordance with Rule ~~chapter~~ 62-297.500, F.A.C.; ~~,~~ 40 CFR 60; and, 40 CFR 75, if applicable. The record shall include periods of startup, shutdown, and malfunction.

~~3.~~ c A malfunction means any sudden and unavoidable failure of air pollution control equipment or process equipment to operate in a normal or usual manner. Failures that are caused entirely or in part by poor maintenance, careless operation or any other preventable upset condition, or preventable equipment breakdown shall not be considered malfunctions.

~~4.~~ d The procedures under 40 CFR 60.13 shall be followed for installation, evaluation, and operation of all CEMS.

~~5.~~ e For purposes of the reports required under this permit, excess emissions are defined as any calculated average emission concentration, as determined pursuant to Condition No. H.4 herein, which exceeds the applicable emission limits in Condition No. H.1.

2. Auxiliary Boiler

A CEMS shall be installed, operated and maintained in accordance with 40 CFR 60, Appendix F, for the auxiliary boiler to monitor nitrogen oxides emissions and in accordance with 40 CFR 60.13 to monitor opacity.

a. The CEMS shall meet the performance specifications of 40 CFR 60, Appendix B.

b. CEMS data shall be recorded and reported in accordance with Rule 62-297.500, F.A.C., and 40 CFR 60. The record shall include periods of startup, shutdown and malfunction.

c. A malfunction means any sudden and unavoidable failure of air pollution control equipment or process equipment to operate in a normal or usual manner. Failures that are caused entirely or in part by poor maintenance, careless operation or any other preventable upset condition or preventable equipment breakdown shall not be considered malfunctions.

d. The procedures under 40 CFR 60.13 shall be followed for installation, evaluation, and operation of the CEMS.

N. Applicable Requirements

The project shall comply with all the applicable requirements of Chapters 62-212 and 62-4, F.A.C., and 40 CFR 60, Subparts A, Db and GG.

A copy of this letter shall be attached to the above mentioned permit, No. PSD-FL-194(A), and shall become a part of the permit.

Sincerely,

Howard L. Rhodes

Howard L. Rhodes
Director
Division of Air Resources
Management

HLR/sa/b

cc: B. Thomas, SWD
J. Harper, EPA
J. Bunyak, NPS
H. Oven, PPS
T. Davis, P.E., ECT

ADMINISTRATIVE OFFICES, LEGAL & WATER MANAGEMENT DIVISION
1900 - 9TH AVENUE
TAMPA, FLORIDA 33605
TELEPHONE (813) 272-5960
FAX (813) 272-5157

AIR MANAGEMENT DIVISION
TELEPHONE (813) 272-5530

WASTE MANAGEMENT DIVISION
TELEPHONE (813) 272-5788

WETLANDS MANAGEMENT DIVISION
TELEPHONE (813) 272-7104

M E M O R A N D U M

DATE: September 30, 1996

TO: John Brown, P.E., FDEP

FROM: Alice H. Harman AH THRU: RK Richard C. Kirby, IV, P.E.
Jerry Campbell, P.E.

SUBJECT: Tampa Electric Company, Gannon Title V

The referenced application has been reviewed by EPC engineering staff. A facility inspection was performed on September 17, 1996. Marty Costello of your office was present during the inspection. Based on our review and inspection we offer the following comments:

1. TECO should make a statement of the method(s) used for demonstration compliance for each applicable rule requirement. per 40 CFR 70.5(c)(9)ii and Rule 62-213.420(3)(g).

2. Comment #1 of Rick Kirby's memo regarding the Big Bend Station applies to this facility as well.

3. 40 CFR 75 requires CEM data to be reported quarterly to the Administrator (EPA). Since EPC is the lead agency in determining compliance, we request that this same data be supplied to this office.

4. TECO has requested that compliance with emissions limits be demonstrated through CEM data or fuel analyses, and that this take the place of stack testing. EPC supports the use of CEMs for compliance demonstration. We do not have the same comfort level with fuel sampling. This is based on the variable nature of fuels. i.e., coal from multiple sources, tire derived fuel, and pet coke. Also, we do not have a method for auditing fuel sampling, therefore, we do not have assurance on fuel.

5. TECO has classified fuel handling as one emission unit. They are currently trying several alternate fuels at their facilities. These will have different potential emissions. Because of this it is important to differentiate between the different solid fuels. There should be a throughput limitation based on the type of fuel and supporting calculations.

6. TECO currently has several requests for alternate fuel burning. Only those fuels which have been granted authorization shall be included in the Title V permit. Also, TECO has listed supplemental fuel consisting of used oil materials and the firing of non-hazardous boiler cleaners. These fuels and cleaners need to be quantified for emissions since they have not been included in previous permits.

7. During our inspection of August 16, 1996, significant fugitive emissions were observed coming from Unit #3. TECO should explain corrective actions and provide a maintenance plan to address fugitives in the future.

8. TECO is currently adding ammonia and SO_3 to flue gases. These processes should be thoroughly explained and effects on emissions quantified.

9. TECO uses molten sulfur to generate SO_3. They should fully describe the process and units, quantify emissions, and explain why no permit was obtained prior to installation of the system.

10. Multiple emission points are grouped as a single emission unit in the application for some operations (i.e., coal yard, gypsum handling, etc.). Since each emission point will require testing it is to our advantage and TECO's to list each emission point separately as an emission unit. Our current record keeping system, ARMS, allows input of a certain test only once per emission unit. For example, we would only be able to enter one Method 9 for the coal yard when there are multiple drop points requiring testing. From TECO's standpoint a VE violation at one drop point would put the entire coal yard in violation if it is listed as one unit. It should also be noted that the emission units, as grouped by TECO in the application, do not match the units currently listed in ARMS.

11. In the application, several emission units are listed with visible emissions requested allowables of 20% except for one six minute period during which opacity shall not exceed 27% (Rule 62-296.406). Hillsborough County has a local rule, 1-3.63(d) which limits fossil fuel steam generators to 20% opacity except for excess emissions and except for any two minute period in any hour which opacity to 40% is allowed.

12. Rule 1-3.63(c), Rules of the Environmental Protection Commission of Hillsborough County limits emissions from fossil fuel steam generators to 1.1 pound SO_2 per million Btu heat input when liquid fuel is burned. Since the application includes the burning of used oil and non-hazardous boiler chemical cleaning waste. TECO should provide assurance that the above standard will be met while burning these liquid fuels.

bm

ENVIRONMENTAL PROTECTION COMMISSION
HILLSBOROUGH COUNTY

ADMINISTRATIVE OFFICES, LEGAL & WATER MANAGEMENT DIVISION
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TELEPHONE (813) 272-7104

M E M O R A N D U M

DATE: September 30, 1996

TO: John Brown, P.E., FDEP

FROM: Richard C. Kirby, IV, P.E. THRU: Jerry Campbell, P.E.

SUBJECT: Tampa Electric Company, Big Bend Station Title V

The referenced application has been reviewed by EPC engineering staff. A facility inspection was performed on September 16, 1996. Marty Costello of your office was present during most of the inspection. Based on our review and inspection offer the following comments:

1. The sulfur dioxide standards for Units #1, 2, and 3 in Rule 62-296.405(1)(c)2.b., F.A.C., are not practically enforceable. The multiple standards refer to a group limit of 31.5 TPH on a 3-hour average not to exceed a 6.5 pounds per MMBTU over two hours, and finally a 25 TPH limitation on all three units for a 24-hour average. There is no reasonable way for our inspectors to determine compliance with the convoluted standards, and consequently they would fail any PTE or practically enforceable test. We acknowledge these are in the SIP and did somehow get approved by the EPA over a decade ago. Criteria for standards was different then and we believe Title V anticipated this type of cleanup. We also understand that Title V is not a program for promulgating new standards. However, because these standards are unenforceable and can not be put in a Title V permit, we strongly recommend that they be converted (not strengthened or weakened) to an enforceable form. Since all these units have CEMs, perhaps we should look for a pound per MMBTU over a set averaging time as reported by their continuous instrumentation. TECO Could drop the less effective annual stack testing and fuel sampling programs, and the public would be better protected.

2. On June 6, 1994, during an EPC inspection, a ship repair facility (GC Services, a TECO Transport Company) was found operating along side the Big Bend Station coal yard. TECO previously provided information regarding this operation

following an inspection done on December 6, 1994. During that inspection, EPC was informed that the operations would be included in the Title V application and permit for the power plant. That information is not included.

3. TECO should make a statement of the method(s) used for demonstration compliance for each applicable rule requirement per 40 CFR 70.5(c)(9)ii and Rule 62-213.420(3)(g).

4. 40 CFR 75 requires CEM data to be reported quarterly to the Administrator (EPA). Since EPC is the lead agency in determining compliance, we request that this same data be supplied to our office.

5. TECO has requested that compliance with emissions limits be demonstrated through CEM data or fuel analyses, and that this take the place of stack testing. EPC supports the use of CEMs for compliance demonstration. We do not have the same comfort level with fuel sampling. This is based on the variable nature of fuels, i.e., coal from multiple sources, and pet coke. In addition, we do not have a method for auditing fuel sampling, therefore we do not have assurance on fuel analysis testing.

6. TECO has classified fuel handling as one emission unit. They are currently trying several alternate fuels at their facilities. These will have different potential emissions. Because of this, it is important to differentiate between the different solid fuels. There should be a throughput limitation based on the type of fuel and supporting calculations. The coal headed for the Polk County facility should be included as well.

7. During our inspection, significant fugitive emissions were observed coming from Big Bend #2 furnace. TECO should explain corrective actions and provide a maintenance plan to address fugitives from this unit as well as the other three in the future.

8. TECO is currently adding ammonia and SO_3 to flue gases. These processes should be thoroughly explained and the effects on emissions quantified.

9. TECO uses molten sulfur to generate SO_3 for flue gas conditioning. They should fully describe the storage, process, and units, quantify emissions, and explain why no permit was obtained prior to installation of the system.

10. Multiple emission points are grouped as a single emission unit in the application for some operations (i.e., coal yard, gypsum handling, etc.). Since each emission point will require testing it is to our advantage and TECO's to list each

emission point separately as an emission unit. Our current record keeping system, ARMS, allows input of a certain test only once per emission unit. For example, we would only be able to enter one Method 9 for the coal yard when there are multiple drop points requiring testing. From TECO's standpoint a VE violation at one drop point would put the entire coal yard in violation if it is listed as one unit. It should also be noted that the emission units, as grouped by TECO in the application, do not match the units currently listed in ARMS.

11. Rule 1-3.63(c), Rules of the Environmental Protection Commission of Hillsborough County limits emissions from fossil fuel steam generators to 1.1 pound SO_2 per million Btu heat input when liquid fuel is burned. Since the application includes the burning of used oil and non-hazardous boiler chemical cleaning waste. TECO should provide assurance that the above standard will be met while burning these liquid fuels.

bm

INTEROFFICE MEMORANDUM

Sensitivity: COMPANY CONFIDENTIAL

Date: 08-Feb-1999 11:53am
From: Mary Fillingim TAL
FILLINGIM_M
Dept: Air Resources Management
Tel No: 850/488-0114

To: See Below
Subject: FWD: Title V Permit Withdrawal - 0570040

I am sending this again.

Thanks,
Mary

Distribution:

To:	pierce carla	(pierce.carla@epa.gov@in)
To:	Barbara Boutwell TAL	(BOUTWELL_B)
To:	Scott Sheplak TAL	(SHEPLAK_S)
To:	Terry Knowles TAL	(KNOWLES_T)
To:	danois gracy	(danois.gracy@epa.gov@in)
To:	Elizabeth Walker TAL	(WALKER_E)
To:	huey.joel@epa.gov@in	
To:	BARTLETT.ELIZABETH@EPA.GOV@IN	

INTEROFFICE MEMORANDUM

Sensitivity: COMPANY CONFIDENTIAL

Date: 04-Feb-1999 03:45pm
From: Mary Fillingim TAL FILLINGIM_M
Dept: Air Resources Management
Tel No: 850/488-0114

To: See Below
Subject: Title V Permit Withdrawal - 0570040

The withdrawal of the TECO-Gannon permit has been posted to the Florida Title V Website. If you have any questions, feel free to call us.

TECO - Gannon
0570040
Withdrawn

Distribution:

To:	pierce carla	(pierce.carla@epa.gov@in)
To:	Barbara Boutwell TAL	(BOUTWELL_B)
To:	Scott Sheplak TAL	(SHEPLAK_S)
To:	Terry Knowles TAL	(KNOWLES_T)
To:	danois gracy	(danois.gracy@epa.gov@in)
To:	Elizabeth Walker TAL	(WALKER_E)
To:	huey.joel@epa.gov@in	
To:	BARTLETT.ELIZABETH@EPA.GOV@IN	
CC:	Lennon Anderson WPB	(ANDERSON_L @ A1 @ WPB1)

file

Date: 10/23/98 9:16:49 AM
From: Scott Sheplak TAL
Subject: Media Hot Sheet - Tampa Electric Company Gannon
To: Kristine Roselius TAL
To: Howard Rhodes TAL
To: Dotty Diltz TAL
CC: Clair Fancy TAL

Attached is a media hot sheet based upon last night's telephone interview.

E-MAIL

TO: KRISTINE ROSELIUS, OFFICE OF COMMUNICATIONS
HOWARD L. RHODES, DIRECTOR, DARM
CLAIR FANCY, BUREAU CHIEF

TOPIC: Tampa Electric Company (TEC) Gannon plant's Title V permit

DATE: October 22, 1998 **REPORTERS NAME:** Ameet Sachdev

FROM: St. Petersburg Times **TELEPHONE:** 813/893-8751
(Newspaper, TV Station, Radio, etc.)

PERSON INTERVIEWED: Clair Fancy and Scott Sheplak
TELEPHONE: 850/921-9503 and 850/921-9532
DIVISION/BUREAU/OFFICE: Air Resources Management/Air Regulation/Title V Section

DATE OF INTERVIEW: October 22, 1998 **ACTION TIME NEEDED:**

QUESTIONS ASKED:
1. What is the status of the Gannon plant's Title V permit? What is the deadline to issue the permit?
2. Is a modeled exceedence of ambient air quality standards serious? Should the people that live near the plants be concerned? Are the ambient air quality standards (AAQS) being met? How does the state test emissions?
3. What are the SO_2 ambient air quality standards?

SUMMARY OF CONVERSATION (Use additional pages if necessary)

FOLLOW-UP NEEDED? No. **DEADLINE:**

Jerry Campbell with the Environmental Protection Commission of Hillsborough County referred Mr. Sachdev to us on the subject matter.

1. Based on recent modeling analyses performed by the department, the department withdrew the draft Title V permit issued August 26, 1997. The modeled sulfur dioxide (SO_2) emissions from the Gannon plant exceeded the USEPA and DEP ambient air quality standards (AAQS) for sulfur dioxide. The department asked TEC to submit modeling that would show compliance with the AAQS. Due to the lack of information, the department has been unable to complete the modeling. The department has asked TEC to submit the necessary information, i.e. building geometry, etc. TEC has yet to submit additional information to complete the modeling.

The deadline to issue the Title V permit is October 2000. The Title V permit program is a federal permitting program that essentially consolidates existing applicable air pollution requirements into one permit. Approximately 500 Title V sources are located in Florida and over half of those sources have draft Title V permits.

Mr. Sachdev asked questions about the relationship between stack emission limits and the AAQS. We explained that the modeling utilizes complex mathematical relationships to predict the ground level concentration of an air pollutant.

Mr. Sachdev was informed that the Gannon plant SO_2 emission limits for the six boilers are 2.4 lb/mmBTU heat input on a weekly average and 10.6 tons per hour of sulfur dioxide on a weekly average.

Mr. Sachdev also asked if modeling was a routine activity. We informed him that we are not required to model sources under the Title V permitting process. However, a few of the large SO_2 emitters were modeled. Modeled emissions from the TEC-Big Bend and Gulf Power plants exceeded the AAQS for SO_2. TEC was issued a draft Title V permit for the Big Bend plant. The Big Bend plant allowable SO_2 emissions were reduced by approximately 25% due to the department's modeling results. Completion of the Big Bend modeling is pending.

2. The AAQS are designed to protect the public's health, safety, and welfare. Ensuring compliance with the AAQS is a high priority in the division. Modeling predicts the ground level concentration from the plant's stacks. We informed him that a modeled exceedence does not necessarily mean that there is an actual exceedence of the AAQS. The department has a statewide ambient air monitoring network. The current monitoring network indicates compliance with the AAQS for SO_2.

3. The USEPA (federal) SO_2 AAQS are: 1,300 ug/m^3 3-hour maximum; 365 ug/m^3 24-hour maximum; and, 80 ug/m^3 annual arithmetic mean. The state of Florida standards are: 1,300 ug/m^3 3-hour maximum; 260 ug/m^3 24-hour maximum; and, 60 ug/m^3 annual arithmetic mean.

-6/1-

{ Cleve Holladay has complete submittal these are excerpts }

TECO SM

TAMPA ELECTRIC

October 15, 1998

Mr. Cleve Holladay
Meteorologist - Bureau of Air Regulation
Florida Department of Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Via Hand Delivery

Re: Tampa Electric Company
F. J. Gannon Station
Ambient Sulfur Dioxide (SO_2) Modeling
Draft Title V Air Operation Permit
FDEP File No. 0570040-002-AV

Dear Mr. Holladay:

As requested in the Department's correspondence dated October 1, 1998, and as previously discussed in conjunction with the issuance of a Title V draft permit, please find enclosed TEC's detailed SO_2 modeling analysis for the F.J. Gannon Station. The enclosed analysis reveals that no modeled exceedances of the Florida or National Ambient Air Quality Standards are recorded for any of the selected emission scenarios when using maximum SO_2 emissions of 11.5 tons per hour as a Station cap. The dispersion modeling does assume that Unit 5 and Unit 6 stacks at F.J. Gannon Station will be extended to 110 meters. An aerial photograph describing the nearby receptors is also provided.

Please feel free to telephone me at (813) 641-5034, if you have any questions.

Sincerely,

Theresa J.L. Watley
Consulting Engineer
Environmental Planning

EP\gm\TJLW

Enclosure

c/enc: Mr. Scott Sheplak, FDEP-Tallahassee
Mr. Jerry Kissel, FDEP-SW District
Mr. Lenon Anderson, FDEP-Tallahassee
Mr. Richard Kirby, EPCHC

F.J. GANNON STATION

TITLE V SO_2 AIR DISPERSION MODELING

Prepared for:

TECO
TAMPA ELECTRIC

Prepared by:

ECT
Environmental Consulting & Technology, Inc.
3701 Northwest 98th Street
Gainesville, Florida 32606

ECT No. 98010-0200

October 1998

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1.0 DISPERSION MODELING TECHNIQUES, INPUTS, AND RESULTS

1.1 MODEL SELECTION

The most recent regulatory version of the Industrial Source Complex Short-Term (ISCST3 Version 97363) dispersion model was used in the analyses of ambient sulfur dioxide (SO_2) impacts caused by emissions from F.J. Gannon Station. ISCST3 is a refined model appropriate for use under the following conditions:

- Industrial source complexes (i.e., multiple emission sources).
- Rural or urban areas.
- Flat or rolling terrain.
- Pollutant transport distances less than 50 kilometers (km).
- Multiple averaging periods (i.e., 3-hour, 24-hour, and annual).

ISCST3 was selected because:

- The F.J. Gannon Station analysis falls within the ISCST3 applicability criteria.
- Per Chapter 40, Code of Federal Regulation (CFR), Part 51, Appendix W, the U.S. Environmental Protection Agency (EPA) has designated ISCST3 a preferred model. This designation means that EPA has determined that ISCST3 performs better under the criteria stated above than any other dispersion model.
- The Florida Department of Environmental Protection (FDEP) is also using ISCST3 to model ambient SO_2 levels from F.J. Gannon Station.

Previous dispersion modeling of F.J. Gannon Station has been conducted using other models. For example, SO_2 emissions from F.J. Gannon Station were modeled in 1980 to demonstrate compliance for the reconversion of Units 1 through 4 to coal. This modeling was conducted using the single source (CRSTER) model. Several versions of the SCREEN model have also been applied to F.J. Gannon Station emissions. However,

these older models were not used for this SO_2 ambient impact analysis because EPA and FDEP do not recognize superseded models as valid analytical tools.

1.2 SO_2 EMISSION RATES

The SO_2 emission rates used in the modeling analysis for F.J. Gannon Station are presented in Table 1-1. Because the modeling analysis must evaluate the potential worst-case conditions, four emission rate scenarios were modeled based on the maximum permitted rates that will become applicable per F.J. Gannon Station's Phase II Acid Rain Compliance plan.

1.3 STACK PARAMETERS

The stack parameters used in the modeling analysis for F.J. Gannon Station are presented in Table 1-2. The stack heights and exit temperatures of the boilers were obtained from the appropriate Title V Air Operation Permit application. The dispersion modeling assumes the Unit 5 and Unit 6 stacks will be extended to 110 meters. The stack exit diameters were obtained from the design drawings of each stack. Stack exit velocities for the boilers were calculated from continuous emissions monitoring system (CEMS) volumetric flow measurements, as summarized in Table 1-3.

The combustion turbine stack parameters were obtained from F.J. Gannon Station.

1.4 GOOD ENGINEERING PRACTICE/DOWNWASH CONSIDERATIONS

The 1977 Clean Air Act Amendments (CAAA) require that the degree of emission limitation required for control of any pollutant not be affected by a stack height that exceeds good engineering practice (GEP) or any other dispersion technique. On July 8, 1985, EPA promulgated final stack height regulations (40 CFR 51), in which GEP stack height is defined as the higher of 65 meters, or a height established by applying the formula:

Table 1-1. F. J. Gannon Station Title V - Selected SO_2 Emission Sets

Emissions Unit	Maximum Heat Input	SO_2 Emission Rate											
		Emission Set G			Emission Set F			Emission Set D			Emission Set J		
	(MMBtu/hr)	(lb/MMBtu)	(lb/hr)	(tph)**	(lb/MMBtu)	(lb/hr)	(tph)**	(lb/MMBtu)	(lb/hr)	(tph)**	(lb/MMBtu)	(lb/hr)	(tph)**
Boiler 1	1,257	1.9	2,388.3	1.19	2.20	2,765.4	1.38	2.00	2,514.0	1.26	1.9	2,388.3	1.19
Boiler 2	1,257	1.9	2,388.3	1.19	2.20	2,765.4	1.38	2.00	2,514.0	1.26	1.9	2,388.3	1.19
Boiler 3	1,599	1.9	3,038.1	1.52	1.07	1,710.9	0.86	1.07	1,710.9	0.86	1.6	2,558.4	1.28
Boiler 4, Stack 4E*	1,876	1.9	1,782.2	0.89	1.07	1,003.7	0.50	1.07	1,003.7	0.50	1.6	1,500.8	0.75
Boiler 4, Stack 4W*	1,876	1.9	1,782.2	0.89	1.07	1,003.7	0.50	1.07	1,003.7	0.50	1.6	1,500.8	0.75
Boiler 5	2,284	1.9	4,339.6	2.17	2.00	4,568.0	2.28	2.19	5,002.0	2.50	2.0	4,568.0	2.28
Boiler 6	3,798	1.9	7,216.2	3.61	2.00	7,596.0	3.80	2.19	8,317.6	4.16	2.0	7,596.0	3.80
Total	13,947	N/A	22,934.9	11.47	N/A	21,413.1	10.71	N/A	22,065.8	11.03	N/A	22,500.6	11.25

*Assumes Boiler 4 emissions are equally divided between the two Boiler 4 stacks.
**tons per hour, 24-hour average.

SIP limit is 10.6 TPH

Table 1-2. F.J. Gannon Station Stack Parameters for ISCST3 Dispersion Modeling

Emissions Unit	Stack Height		Stack Gas Temperature		Stack Gas Velocity		Stack Daimeter	
	(ft)	(m)	(°F)	(K)	(ft/min)	(m/sec)	(ft)	(m)
Boiler 1	315	96.0	276	409	7,464	37.93	9.92	3.02
Boiler 2	315	96.0	336	442	7,576	38.50	9.92	3.02
Boiler 3	315	96.0	290	416	6,810	34.60	10.50	3.20
Boiler 4, Stack 4E	315	96.0	277	409	5,824	29.59	9.45	2.88
Boiler 4, Stack 4W	315	96.0	277	409	5,934	30.15	9.45	2.88
Boiler 5	315	96.0	276	409	9,985	50.74	10.33	3.15
Boiler 6	315	96.0	286	414	6,550	33.28	17.46	5.32

Table 1-3. F.J. Gannon Station Stack Exit Velocity Determination

Stack	Diameter		Area		Standard (68 °F) Flow Rate		Temperature		Actual Flow Rate		Velocity	
	(ft)	(m)	(ft^2)	(m^2)	(scf/hr)*	(scm/hr)	(°F)	(K)	(acf/min)	(acm/min)	(fps)	(m/s)
GB1	9.92	3.02	77.29	7.18	24,822,000	702,881	276.60	409.04	577,143	16,343	124.46	37.93
GB2	9.92	3.02	77.29	7.18	24,006,000	679,774	313.00	429.26	585,752	16,587	126.31	38.50
GB3	10.50	3.20	86.59	8.04	25,548,120	723,442	271.40	406.15	589,833	16,702	113.53	34.60
GB4E	9.45	2.88	70.14	6.52	17,288,640	489,560	288.60	415.71	408,531	11,568	97.08	29.59
GB4W	9.45	2.88	70.14	6.52	16,536,420	468,259	337.60	442.93	416,334	11,789	98.93	30.15
GB5	10.33	3.15	83.81	7.79	35,197,578	996,685	293.40	418.37	837,054	23,703	166.46	50.74
GB6	17.46	5.32	239.43	22.24	69,009,840	1,954,141	260.00	399.82	1,568,405	44,412	109.18	33.28

$$Hg = H + 1.5\ L$$

where: Hg = GEP stack height.
H = height of the structure or nearby structure.
L = lesser dimension (height or projected width)of the nearby structure.

Nearby is defined as a distance up to five times the lesser of the height or width dimension of a structure or terrain feature, but not greater than 800 meters. While GEP stack height regulations require that a stack height used in modeling for determining compliance with ambient air quality standards (AAQS) and prevention of significant deterioration (PSD) increments not exceed the GEP stack height, the actual stack height may be greater.

The EPA guidelines for application of the stack height regulations were followed in determining the GEP stack height for each stack.

The complex downwash analysis was performed using the Building Profile Input program (BPIP, version 95086) to determine the appropriate downwash parameters for ISCST3. The F.J. Gannon Station structure locations and heights are provided in Table 1-4 and are presented in Figure 1-1. Stack locations and heights are also provided in the table and figure.

1.5 RECEPTOR LOCATIONS

Receptors were placed at locations considered to be ambient air, which is defined at 40 CFR 50.1(e) as that portion of the atmosphere, external to buildings, to which the general public has access. Those portions of F.J. Gannon Station with restricted access were not considered ambient air.

Receptor locations were selected consistent with the definition of ambient air. Discrete receptors were placed on the restricted area boundaries. Additional discrete receptors were placed at 10 degree (°) increments, beginning at 10° on rings at 250 and 500 meters

Table 1-4. F.J. Gannon Station Stack and Structure Heights and Locations

Stack/Structure Name	Height (ft)	Stack /Structure Location* East/West (ft)	Stack /Structure Location* North/South (ft)	Stack/ Structure Name	Height (ft)	Stack /Structure Location* East/West (ft)	Stack /Structure Location* North/South (ft)
Unit 1 Stack	315	-499	3	Boiler 3 Structure	148	-341	52
Unit 2 Stack	315	-407	3			-341	108
Unit 3 Stack	315	-308	3			-266	108
Unit 4 East Stack	315	-233	26			-266	92
Unit 4 West Stack	315	-213	26			-285	92
Unit 5 Stack	315	-131	3			-285	52
Unit 6 Stack	315	0	0	Boiler 4 Structure	160	-262	52
CT 1 Stack	35	374	200			-262	108
Steam Turbine Structure	95	-548	164			-190	108
		-548	253			-190	52
		79	253	Boiler 5 Structure	174	-164	52
		79	220			-164	108
		43	220			-102	108
		43	164			-102	52
Tripper Structure	165	-508	108	Boiler 6 Structure	204	-39	52
		-508	141			-39	108
		-548	141			39	108
		-548	164			39	52
		43	164				
		43	141				
		59	141				
		59	108				
Boiler 1 Structure	147	-525	52				
		-525	108				
		-456	108				
		-456	95				
		-469	95				
		-469	75				
		-476	75				
		-476	52				
Boiler 2 Structure	148	-433	52				
		-433	75				
		-436	75				
		-436	108				
		-384	108				
		-384	75				
		-387	75				
		-387	52				

*Locations are relative to the Unit 6 stack. Positive directions are east and north. Negative directions are west and south.

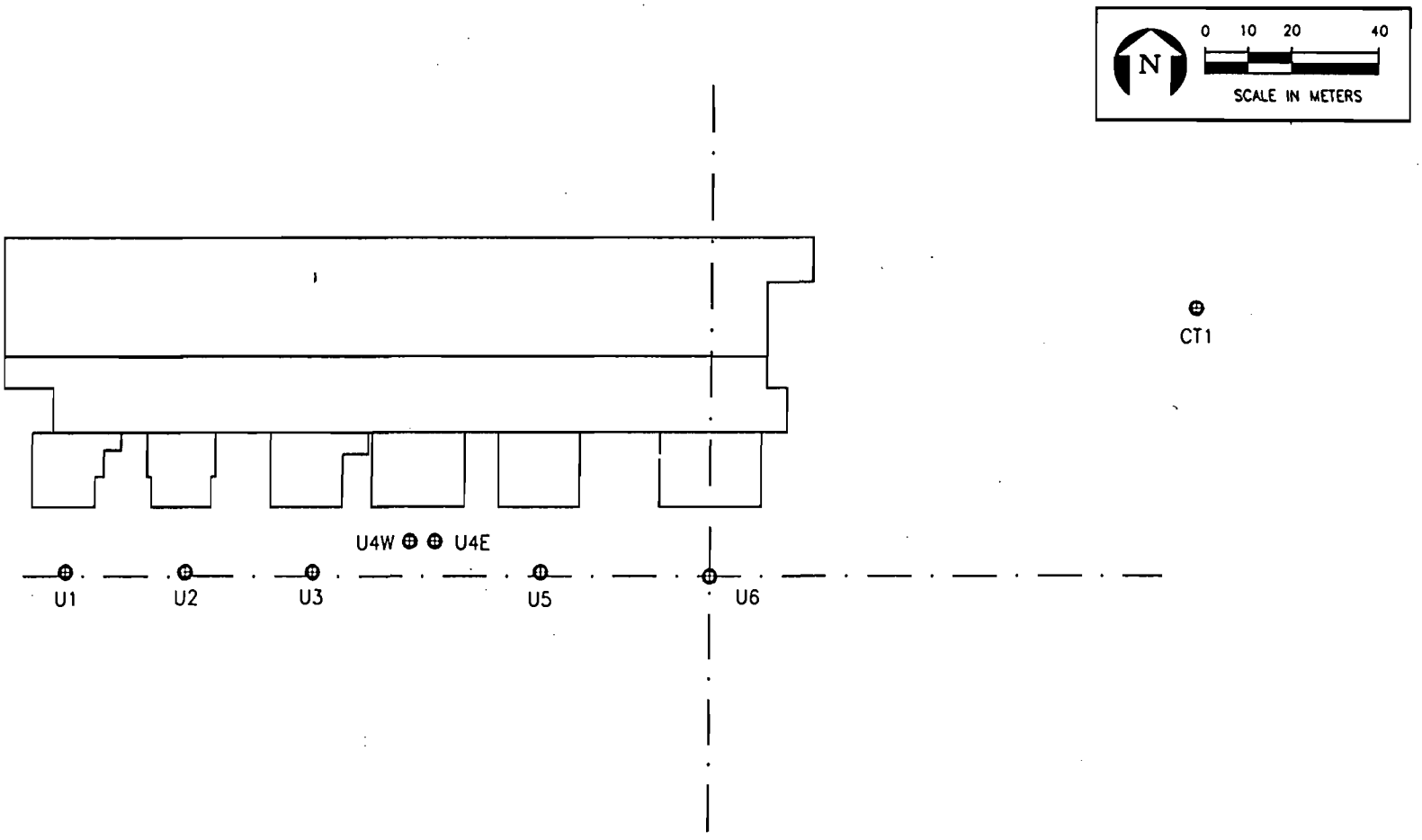

FIGURE 1-1.

F.J. GANNON STATION STRUCTURE LOCATIONS
FOR DOWNWASH ANALYSIS

Source: ECT, 1998.

ECT
Environmental Consulting & Technology, Inc.

if the specific point was an ambient air location. Complete rings with receptors located at 10° increments, beginning at 10°, were located at 250 meter increments from 750 to 7,000 meters, and at 8,000, 9,000, 10,000, and 12,000 meters. This receptor grid was selected to be consistent with the grid used in the FDEP dispersion modeling. An aerial photograph describing the nearby receptors is provided in Figure 1-2.

1.6 METEOROLOGICAL DATA

EPA dispersion modeling guidance recommends that modeling be conducted using one year of onsite meteorological, if available. Otherwise, the guidance recommends that modeling be conducted using the most recently available 5 years of meteorological data collected at a nearby observation station. Following this guidance, the selected meteorological data set included St. Petersburg/Clearwater International Airport (SPG) surface observations and mixing heights derived from SPG surface data and Ruskin (RUS) upper air observations. These data were obtained from the National Climatic Data Center (NCDC) for January 1, 1992, through December 31, 1996. Completeness information for the data as received from NCDC is presented in Table 1-5. Missing data were replaced following EPA guidance. The data were then prepared for use in ISCST3 using the RAMMET preprocessor.

Two other surface weather observation stations were evaluated for possible use in ISCST but were subsequently rejected. Surface data from Tampa International Airport (TPA) are available through 1994. In 1995, the TPA observation station was automated and sky cover observations were terminated. Because sky cover is a required element for ISCST3, the post-1994 TPA data is unsuitable for use. Surface data from McDill Air Force Base is available through 1992. After 1992, surface observations become more sporadic and no longer meet EPA criteria for data recovery. Because SPG appropriate data are available through 1996, SPG surface data were selected for use over TPA and MAC surface data, consistent with EPA guidance.

Table 1-5. St. Petersburg/Ruskin, Florida (Station Nos. 72211/12842) - Data Recovery - January 1, 1992 through December 31, 1996

Year	Data Element									
	Dry-Bulb Temperature		Wind Direction		Wind Speed		Ceiling Height/Sky Cover		Mixing Height	
	Number of Observations	Recovery (pct)	Number of Observations	Recovery (pct)	Number of Observations	Recovery (pct)	Number of Observations	Recovery (pct)	Number of Observations	Recovery (pct)
1992	8,489	96.6	8,522	97.0	8,522	97.0	8,543	97.3	728	99.5
1993	8,407	96.0	8,430	96.2	8,430	96.2	8,433	96.3	721	98.8
1994	8,304	94.8	8,356	95.4	8,356	95.4	8,359	95.4	714	97.8
1995	8,103	92.5	8,161	93.2	8,161	93.2	8,174	93.3	712	97.5
1996	8,365	95.2	8,375	95.3	8,412	95.8	8,385	95.5	714	97.5

1.7 DISPERSION MODELING RESULTS

The F.J. Gannon Station dispersion modeling results are presented in Tables 1-6 through 1-9. During the period January 1, 1992, through December 31, 1996, no modeled exceedances of the Florida or national AAQS were recorded for any of the four emissions scenarios. The dispersion model input and output files are provided in electronic format on a floppy disk.

Table 1-6. F.J. Gannon Station SO_2 Dispersion Modeling Results - Emission Set G - Units 5 and 6 Stacks at 110 m

Averaging Period	Modeled Ambient Impact (µg/m^3) - St. Petersburg International Airport Met Data					Ambient Air Quality Standard (µg/m^3)	
	1992	1993	1994	1995	1996	National	Florida
Annual	16.1	15.8	14.3	16.8	15.7	80	60
Highest 24-Hr	288.0	356.6	287.0	262.8	369.5	None	None
Highest 2nd-Highest 24-Hr	244.5	245.1	219.0	250.2	253.5	365	260
Highest 3-Hr	948.4	763.4	636.1	640.8	833.0	None	None
Highest 2nd Highest 3-Hr	700.2	657.0	575.6	581.0	694.4	1,300	1,300

Table 1-7. F.J. Gannon Station SO_2 Dispersion Modeling Results - Emission Set F - Units 5 and 6 Stacks at 110 m

Averaging Period	Modeled Ambient Impact ($\mu g/m^3$) - St. Petersburg International Airport Met Data					Ambient Air Quality Standard ($\mu g/m^3$)	
	1992	1993	1994	1995	1996	National	Florida
Annual	15.3	11.0	14.3	16.8	15.7	80	60
Highest 24-Hr	229.6	308.3	247.7	220.3	292.5	None	None
Highest 2nd-Highest 24-Hr	193.6	201.0	191.8	215.5	210.4	365	260
Highest 3-Hr	647.4	680.6	566.0	531.6	628.2	None	None
Highest 2nd Highest 3-Hr	575.6	552.4	496.7	487.5	575.8	1,300	1,300

Table 1-8. F.J. Gannon Station SO_2 Dispersion Modeling Results - Emission Set D - Units 5 and 6 Stacks at 110m

Averaging Period	Modeled Ambient Impact (ug/m^3) - St. Petersburg International Airport Met Data					Ambient Air Quality Standard (ug/m^3)	
	1992	1993	1994	1995	1996	National	Florida
Annual	15.3	10.7	14.3	16.8	15.7	80	60
Highest 24-Hr	215.6	289.6	235.9	214.5	279.1	None	None
Highest 2nd Highest 24-Hr	186.1	189.9	182.8	210.2	198.4	365	260
Highest 3-Hr	651.9	690.6	571.5	534.8	603.4	None	None
Highest 2nd Highest 3-Hr	548.4	523.3	477.5	475.0	547.1	1,300	1,300

Table 1-8. F.J. Gannon Station SO_2 Dispersion Modeling Results - Emission Set D - Units 5 and 6 Stacks at 110 m

Averaging Period	Modeled Ambient Impact (µg/m^3) - St. Petersburg International Airport Met Data					Ambient Air Quality Standard (µg/m^3)	
	1992	1993	1994	1995	1996	National	Florida
Annual	15.3	11.0	14.3	16.8	15.7	80	60
Highest 24-Hr	229.6	308.3	247.7	220.3	292.5	None	None
Highest 2nd Highest 24-Hr	193.6	201.0	191.8	215.5	210.4	365	260
Highest 3-Hr	647.4	680.6	566.0	531.6	628.2	None	None
Highest 2nd Highest 3-Hr	575.6	552.4	496.7	487.5	575.8	1,300	1,300

Table 1-9. F.J. Gannon Station SO_2 Dispersion Modeling Results - Emission Set J - Units 5 and 6 Stacks at 110 m

Averaging Period	Modeled Ambient Impact (µg/m^3) - St. Petersburg International Airport Met Data					Ambient Air Quality Standard (µg/m^3)	
	1992	1993	1994	1995	1996	National	Florida
Annual	15.3	13.8	14.3	16.8	15.7	80	60
Highest 24-Hr	254.2	328.5	284.3	244.0	333.8	None	None
Highest 2nd-Highest 24-Hr	222.6	222.7	219.6	234.3	228.0	365	260
Highest 3-Hr	752.5	728.0	616.0	582.3	743.9	None	None
Highest 2nd Highest 3-Hr	639.3	602.1	572.3	533.0	634.7	1,300	1,300

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Co./Dept.	Co. LEAF	
Phone #	Phone # 681-2591	
Fax #	Fax #	

Florida Dept. of Environmental Protection
Div. of Air Resources Management
Magnolia Office Park
Magnolia Ave & Park Ave
Tallahassee, FL 32399

Re: Tampa Electric Co. - Information Request

Dear DEP Staff:

This is a formal request to review all documents, including applications and other filings, meeting notes and other records relating to Tampa Electric Co.'s compliance with nitrogen oxide, ozone and/or particulate matter requirements of federal and state law for 2000 and subsequent years.

It is my understanding that Tampa has filed a Phase II NOx compliance plan for Big Bend and Gannon plants and related documents (eg., evaluation of NOx controls for Tampa's group II wet bottom and cyclone boilers). I would also appreciate being able to review Tampa's Phase II acid rain application for Big Bend, Gannon and Hookers Point, filed Decembr 1995.

Please let me know when it would be convenient for me to review these documents.

Sincerely,

Gail Kamaras, Director
Energy Advocacy Program

TAMPA ELECTRIC

March 19, 1998

Mr. Lenon Anderson
Title V Section
Florida Department of Environmental Protection
Twin Towers Office Building
111 South Magnolia Drive, Suite 4
Tallahassee, Florida 32301

Via FedEx
Airbill No. 800926219607

Re: Tampa Electric Company
F. J. Gannon Station
Draft Title V Air Operation Permit
FDEP File No. 0570040-002-AV

Dear Mr. Anderson:

Please find enclosed TEC's detailed comments regarding the above referenced draft Title V permit. As we discussed, the SO_2 modeling analysis will be submitted under separate cover. In addition, TEC requests that all test windows be ninety (90) days and Gannon Units 1-6 test windows correspond with the Acid Rain RATA testing requirements as follows:

Emission Unit	Annual Date	Frequency
Gannon Unit 1	1st Quarter	Annually
Gannon Unit 2	3rd Quarter	Annually
Gannon Unit 3	4th Quarter	Annually
Gannon Unit 4	2nd Quarter	Annually
Gannon Unit 5	1st Quarter	Annually
Gannon Unit 6	1st Quarter	Annually

Please feel free to telephone me at (813) 641-5039, if you have any questions. Thank you.

Sincerely,

Janice K. Taylor
Senior Engineer
Environmental Planning

EP\gm\JKT830

Enclosure

RECEIVED
MAR 20 1998
BUREAU OF
AIR REGULATION

c/enc: Mr. Scott Sheplak, FDEP-Tallahassee
Mr. Jerry Kissel, FDEP-SW District
Mr. Richard Kirby, EPCHC -
Via FedEx Airbill No. 5060867851

xc: Al Linero — 3/26/98

TAMPA ELECTRIC COMPANY
COMMENTS REGARDING THE TITLE V AIR OPERATION PERMIT FOR
F.J. GANNON STATION
FDEP FILE NO. 0570040-002-AV

Table of Contents

TEC Comment 1:

TEC requests the following change to the Table of Contents:

III. Emissions Units and Conditions
...
E. ~~Coal~~ Fuel Yard

Section I. Facility Information.

TEC Comment 2:

TEC requests the following changes to Subsection B. Summary of Emissions Unit ID Nos. and Brief Descriptions:

-008 Fuel ~~Coal~~ Yard. . .
-013 Unit No. 1 Fuel ~~Coal~~ Bunker with Roto-Clone
-014 Unit No. 2 Fuel ~~Coal~~ Bunker with Roto-Clone
-015 Unit No. 3 Fuel ~~Coal~~ Bunker with Roto-Clone
-016 Unit No. 4 Fuel ~~Coal~~ Bunker with Roto-Clone
-017 Unit No. 5 Fuel ~~Coal~~ Bunker with Roto-Clone
-018 Unit No. 6 Fuel ~~Coal~~ Bunker with Roto-Clone

Section II. Facility-wide Conditions.

TEC Comment 3:

Consistent with the previously issued Title V Air Operations Permit for Hookers Point Station, TEC requests the Appendix E-1, List of Exempt Emissions Units and/or Activities, as cited in Condition 5, be modified as follows to include:

13. Storage tanks less with than 550 gallons capacity
14. Inorganic substance storage tanks with 550 gallon or greater capacity and not containing a hazardous air pollutant (HAP)
15. No. 2 fuel oil storage tanks
16. Equipment used for steam cleaning

17. Turbine vapor extractors

TEC Comment 4:

TEC requests Condition 7 be changed as follows:

(a) Attend to accidental spills (solid fuel ~~coal~~ and fly ash) promptly and effectively.

TEC Comment 5:

TEC requests Condition 7(b) be deleted. The specific conditions for each steam generator include required reasonable precautions to minimize particulate matter emissions. Condition 7(b) duplicates these requirements with less specific language that could cause confusion.

TEC also notes that the cited underlying rule for Condition 7(b), 62-296.320(4)(c)(2), F.A.C., applies to unconfined particulate matter emission sources. This rule is not applicable to the steam generators because these emissions units are confined particulate matter emission sources.

Section III. Regulated Emissions Units Conditions

TEC Comment 6:

TEC requests that Emission Unit 3 description be clarified as follows because the heat recovery system is no longer in service:

.... and is of the cyclone firing type~~, equipped with an optional flue gas recirculation (heat recovery) system to maintain steam temperature at low loads~~.

TEC Comment 7:

The subsection A permitting note references these units as Phase I Acid Rain units. These units are regulated under the Phase II Acid Rain rules only.

TEC Comment 8:

TEC requests that all emission units listed in Subsections A, B and C be combined into Subsection A. This consolidation will clarify the specific permit condition requirements for these emission units as well as streamline the permit. TEC believes this approach is appropriate because these units have the same basic method of operations.

TEC Comment 9:

TEC requests Condition A.1 be changed as follows:

The maximum permitted heat input rate on a monthly average basis for each unit is as follows: . . .

TEC Comment 10:

TEC requests Condition A.2 be changed to read as follows to recognize that coal and ignition oil are jointly burned, to allow for the injection of nonhazardous boiler cleaning waste, and to allow on-specification used oil (including oily soil) combustion during normal operations:

(a) Normal operation: The only fuels allowed to be burned are coal and on-specification used oil.

(b) Startup; shutdown; malfunctions: In addition to the fuels allowed to be burned during normal operations, each unit may also burn new No. 2 fuel oil during startup, shutdown and malfunctions. This includes but is not limited to the emission unit, a new cyclone/mill or combustion stabilization.

(c) The injection of nonhazardous boiler chemical cleaning waste is allowed in each unit.

TEC Comment 11:

Consistent with the existing operating permits for F.J. Gannon Station, TEC requests the following statement be added to Condition A.3:

A test under sootblowing conditions which demonstrates compliance with a non-sootblowing limitation will be accepted as proof of compliance with that non-sootblowing limitation.

In addition, TEC requests that only one visible emissions test be done under sootblowing conditions. TEC believes duplicate testing provides no environmental benefit.

TEC Comment 12:

TEC requests Condition A.4 be changed as follows to clarify design fuel consumption rates:

A. Process System Performance Parameters:

1. Source Designator: Units Nos. 1-6
2. Design Fuel Consumption Rate at Maximum Continuous Rating:

Unit	Tons/hr (fuel ~~coal~~)	Fuel Heat Content (Btu/lb)
1	50	12,570
2	51	12,570
3	65	12,300
4	80	11,699

5	93.4	12,227
6	151.4	12,543

All Units:

On-specification used oil - 48 gallons per minute/per boiler; Max 1,000,000 gal/yr per station

. . .

Monthly Recorded or Inspection/Maintenance

~~Inspect insulator compartment heaters/blowers.~~

Units 1-4 Inspect insulator compartment heaters/blowers.

Units 5-6 Inspect penthouse pressurizing fan filters.

TEC Comment 13:

TEC requests Condition B.3 be eliminated because enforcing this condition is neither necessary nor practical. The quantity of SO_2 generated from on-specification used oil combustion is negligible compared to the quantity of SO_2 generated from coal combustion. Segregating and determining the quantity of SO_2 generated from the combustion of each fuel is not possible.

TEC Comment 14:

TEC requests Condition B.6 be changed to Condition A.6 and amended as follows because we believe it will provide clarity and we know of no regulatory requirement mandating recordkeeping completion.:

b. Quantity Limitation: This emissions unit is permitted to burn "on-specification" used oil that is generated by TECO ~~the F.J. Gannon Station~~ in the production and distribution of electricity, not to exceed 1,000,000 gallons during any consecutive 12 month period.

. . .

e. Testing requirements*: The owner or operator shall sample and analyze each batch of used oil to be burned . . .

*Used oil parameters may be characterized by generator knowledge.

f. Record Keeping Requirements: The owner or operator....
   (1) The gallons of on-specification used oil generated and burned each month. ~~(This record shall be completed no later than the fifteenth day of the succeeding month.)~~
   (2) Consecutive 12-month period. ~~(This record shall be completed no later than the fifteenth day of the succeeding month.)~~

TEC Comment 15:

TEC requests the brief description of the combustion turbine in subsection D be clarified as follows:

This emissions unit is a simple cycle combustion turbine and is designated Combustion Turbine #1 ~~7~~. . . .

TEC Comment 16:

TEC recommends Condition D.7 be changed as follows to promote clarity:

Excess emissions from this ~~these~~ emissions units resulting from . . .

TEC Comment 17:

TEC requests this condition D.9 be changed as follows:

The permittee shall demonstrate compliance with the liquid fuel sulfur limit by means of a fuel analysis ~~provided by the vendor upon each fuel delivery~~ or by contract specifications.

TEC Comment 18

TEC requests Condition D.10 be deleted as unnecessary.

TEC Comment 19:

TEC recommends that Condition D.16 be changed as follows to promote clarity:

Visible Emissions Testing - Annual: By this permit, annual emissions compliance testing for visible emissions is not required ~~for those emissions units~~ while burning ~~c:~~ only liquid fuels for less than 400 hours per year.

TEC Comment 20:

TEC requests Condition D.22 be clarified as follows:

In order to document compliance with the visible emission testing exemption provided in Specific Condition No. D.16 ~~D.5~~, ...

TEC Comment 21:

TEC requests the brief description of the fuel yard in Subsection E be clarified as follows:

-008 F.J. Gannon Station Fuel ~~Coal~~ Yard

For the operation of a fuel ~~bituminous coal~~ yard serving the F.J. Gannon Station boiler units 1 through 6, yard activities including barge (east and west) and railcar unloading of coal, truck/barge unloading of flux ~~limestone or iron ore~~, and transfer and storage

of these materials. ~~The iron ore is shipped, stored, and handled in the same manner as limestone.~~ . . .

Source Designator	Particulate Control Method	Efficiency Rating at Design Capacity	Maximum Design Material Handling Rate (TPH)
Barge to ~~East~~ Grab Bucket	Grab Bucket	-----	1500
~~East~~ Grab Bucket to ~~East~~ Hopper	Side Enclosure	25%	1500
Barge to ~~West~~ Continuous Unloader	Enclosure	40%	1500
~~Barge to West Grab Bucket~~	~~Grab Bucket~~	~~-----~~	~~1500~~
~~West Grab Bucket to to West Hopper~~	~~Side Enclosure~~	~~25%~~	~~1500~~
. . .			
~~West Hopper to Feeder~~	~~-----~~	~~-----~~	~~1500~~
. . .			
Live ~~Limestone~~ Fluxing Stockpile			

TEC Comment 22:

TEC requests Condition E.1 be clarified as follows:

> Permitted Capacity: The maximum permitted process rate is 2.85 million tons/year of coal.

TEC Comment 23:

TEC requests Condition E.4 be deleted because demonstrating compliance with the stated condition is not possible.

TEC Comment 24:

TEC recommends specific Condition E.5., be deleted because the west grab bucket has been retired.

TEC Comment 25:

TEC requests Condition E.8 be clarified as follows:

B. Inspection and Maintenance Procedures:

The fuel ~~coal~~ yard particulate control equipment shall receive regular preventative maintenance as follows: . . .

TEC Comment 26:

TEC requests that Condition E.11 be deleted. All permit modification notifications will be submitted to FDEP, consistent with the Title V Air Operation Permit program.

TEC Comment 27:

TEC requests that Condition E.14 be deleted. This condition is no longer applicable to the fuel yard operations.

TEC Comment 28:

TEC requests that Condition E.15 be deleted. This condition is no longer applicable because the west grab bucket has been retired.

TEC Comment 29:

TEC requests the brief description of the Units 5-6 Fly Ash Silo (No. 1) in Subsection G be clarified as follows:

. . .In addition , fly ash from F.J. Gannon Station Units 1-4 Fly Ash Silo No. 2 (silo No. 2) may be routed via gravity flow to the pugmill where it is "conditioned" by wetting with water and gravity fed into open bed trucks. The fly ash is then transported to an off-site consumer. Fly ash may also be conveyed from tanker trucks to Fly Ash Silo No. 1 and from Fly Ash Silo No. 1 to Fly Ash Silo No. 2. . . .

TEC Comment 30:

TEC requests the brief description of the Units 1-4 Fly Ash Silo (No. 2) in Subsection H be clarified as follows:

. . . In addition, fly ash from silo No. 2 may be routed to the pugmill at F.J. Gannon Station Silo No. 1 where it is "conditioned" by wetting with water and gravity fed into open bed trucks. The fly ash is then transported to an off-site consumer. Fly ash may also be conveyed from tanker trucks to Fly Ash Silo No. 2 and from Fly Ash Silo No. 2 to Fly Ash Silo No. 1. . . .

TEC Comment 31:

TEC requests the brief description of the fuel bunkers with Roto-Clones in subsection I be clarified as follows:

> For the operation of F.J. Gannon station Units 1-6 fuel ~~coal~~ bunkers with exhaust fan/cyclone collector (Roto-Clone) controlling dust emissions from each unit's respective bunker, two moving transfer stations via their respective conveyor belts fuel ~~coal~~ through enclosed chutes to each of the six bunkers. Fuel ~~Coal~~ bunkers No. 1-4 and 6 are each equipped with a 9,600 ACFM American Air Filter Company Type D Roto-Clone to abate dust emissions during ventilation. Fuel ~~Coal~~ bunker No. 5 is equipped with a 5,400 ACFM Type D Roto-clone. A number of vent pipes convey air from each bunker to a Roto-Clone during particulate removal. Particulate matter removed by the Roto-Clones is returned to a fuel ~~coal~~ bunker via a hopper and return line. Units No. 1-6 fuel ~~coal~~ bunkers are situated in a west to east fashion. Unit No. 1 fuel ~~coal~~ bunker is located furthest west and Unit No. 6 fuel ~~coal~~ bunker is located furthest east.

TEC Comment 32:

TEC requests Condition I.2 be clarified as follows:

> . . . the maximum allowable particulate matter emission rate from each of the six fuel ~~coal~~ bunkers shall not exceed 0.99 ton/year.

TEC Comment 33:

TEC requests Condition I.3 be clarified as follows:

> Visible emissions from each of the six fuel ~~coal~~ bunkers shall not be equal to or greater than 20% opacity.

TEC Comment 34:

TEC requests that Condition I.4 be deleted to avoid confusion because this requirement is adequately addressed in Subsection K.

TEC Comment 35:

TEC requests Condition I.5 be deleted because each rotoclone emits less than 1 tn/yr and therefore by regulations are exempt from RACT requirements.

TEC Comment 36:

TEC requests Condition J.6 be changed as follows:

> Visible emissions shall not exceed 20 percent opacity, except for one six ~~two~~-minute period per hour during which the opacity shall not exceed 27 ~~40~~ percent.

TEC Comment 37:

TEC notes that Condition J.19.2 contains a requirement c., but does not have an a. nor b. TEC requests the opportunity to review any missing permit conditions prior to permit finalization.

TEC Comment 38:

TEC notes that Condition J.21(a) does not contain a requirement 1. but does contain requirements 2. and 3. TEC requests the opportunity to review any missing permit conditions prior to permit finalization.

TEC Comment 39:

TEC requests that Condition J.22 be modified as follows:

> The permittee shall demonstrate compliance with the liquid fuel sulfur limit by means of a fuel analysis provided by the vendor upon each fuel delivery or by contract specified.

TEC Comment 40:

TEC requests that Condition J.30 be deleted. New No. 2 oil, which is fired only during startup, makes a negligible contribution to emissions from these emissions units. the cost of installing and maintaining new flow monitoring equipment is not justified by the benefit received.

TEC Comment 41:

TEC requests the portion of Condition J.33.e (reporting requirements) requiring the quarterly reporting to EPC be deleted because this requirement is unnecessary.

TEC Comment 42:

TEC requests the following changes to Subsection K. Common Conditions:

-013 Unit No. 1 Fuel ~~Coal~~ Bunker with Roto-Clone
-014 Unit No. 2 Fuel ~~Coal~~ Bunker with Roto-Clone
-015 Unit No. 3 Fuel ~~Coal~~ Bunker with Roto-Clone
-016 Unit No. 4 Fuel ~~Coal~~ Bunker with Roto-Clone
-017 Unit No. 5 Fuel ~~Coal~~ Bunker with Roto-Clone
-018 Unit No. 6 Fuel ~~Coal~~ Bunker with Roto-Clone

TEC Comment 43:

TEC requests Condition K.2. be clarified to include the rotoclones.

TEC Comment 44:

TEC requests Condition K.3. be modified to allow for the testing of two (2) rotoclones annually.

Department of
Environmental Protection

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Lawton Chiles
Governor

Virginia B. Wetherell
Secretary

CERTIFIED MAIL - Return Receipt Requested

November 19, 1996

Mr. John Duff
General Manager
Tampa Electric Company (TEC)
P.O. Box 111
Tampa, Florida 33601-0111

RE: Request for Additional Information Regarding Initial Title V Permit Application
File No. 0570040-002-AV
F. J. Gannon Station, Hillsborough County

Dear Mr. Duff:

Your initial Title V permit application for the F. J. Gannon Station was "timely and complete" for purposes of the initial Title V application submission (see Rule 62-213.420(1)(a)1. and (b)2., F.A.C.).

However, in order to continue processing your permit application, the Department will need the additional information below pursuant to Rule 62-213.420(1)(b)3., F.A.C. and Rule 62-4.070(1), F.A.C. The additional information requested is organized by topic.

Should your response to any of the items below require new calculations, please submit the new calculation, assumptions, reference material and appropriate revised pages of the application form.

Combustion Sources

1. Although your application states that No. 2 fuel oil is used for ignition during start-up for Solid Fuel-Fired Steam Generator Unit Nos. 1 through 3, 5 and 6, the firing of No. 2 fuel oil is not addressed in the current air operation permits for these units. How long has TEC been using No. 2 fuel oil for startup in each unit, and what has been the maximum annual usage of No. 2 fuel oil in each unit? Please submit the Segment (Process/Fuel) Information for No. 2 fuel oil for these emission units as required by DEP Form No. 62-210.900(1) - Instructions (enclosed).

2. On August 16, 1996 and September 17, 1996, inspections conducted by the Environmental Protection Commission of Hillsborough County (EPCHC) indicated

Is your RETURN ADDRESS completed on the reverse side?

SENDER:
- Complete items 1 and/or 2 for additional services.
- Complete items 3, and 4a & b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):
1. ☐ Addressee's Address
2. ☐ Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:
Mr. John Duff
General Manager
Tampa Electric Company (TEC)
P. O. Box 111
Tampa, Florida 33601-0111

4a. Article Number
Z 311 902 880

4b. Service Type
☐ Registered ☐ Insured
☒ Certified ☐ COD
☐ Express Mail ☐ Return Receipt for Merchandise

7. Date of Delivery
11/22/96

5. Signature (Addressee)

8. Addressee's Address (Only if requested and fee is paid)

6. Signature (Agent)
K. Mullen

PS Form 3811, December 1991 ☆U.S. GPO: 1993—352-714 **DOMESTIC RETURN RECEIPT**

Thank you for using Return Receipt Service.

Z 311 902 880

Receipt for Certified Mail
No Insurance Coverage Provided
Do not use for International Mail
(See Reverse)

UNITED STATES POSTAL SERVICE

Sent to Mr. John Duff	
Street and No. P. O. Box 111	
P.O., State and ZIP Code Tampa, Florida 33601-0111	
Postage	$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	$
Postmark or Date	

PS Form 3800, March 1993

fugitive emissions from Solid Fuel-Fired Steam Generator Unit No. 3. Please certify that that the emissions unit is in compliance pursuant to Rule 62-296.320(4)(c), F.A.C. and specific condition number two of air operating permit AO29-255208 or submit a compliance plan pursuant to Rule 62-213.420(3)(j), F.A.C.

Coal Yard and Storage Sources

3. In your application you indicated that there are no emission units subject to Standards of Performance for New Stationary Sources (NSPS). The coal yard appears to be subject to NSPS Subpart Y. Please explain why the coal yard is not subject to NSPS Subpart Y. If it is subject to the subpart, submit a compliance plan pursuant to Rule 62-213.420(3)(j), F.A.C., or indicate in your response that you are in compliance with Subpart Y.

List of Proposed Exempt Activities

4. 40 CFR 63, Subpart T, "National Emission Standards for Hazardous Air Pollutants (NESHAP), applies if you own or operate a solvent cleaning machine that uses a solvent that contains 5 percent or more by weight of any one of any combination of the following halogenated solvents: Carbon tetrachloride, Chloroform, Perchloroethylene, 1,1,1-Trichloroethane, Trichloroethylene, Methylene chloride. a) Are any of the six solvents being used at this facility? b) If yes, what is the amount of solvent (in gallons) used annually at parts-cleaning and degreasing stations? c) Are buckets, pails, and beakers with capacities greater than 7.6 liters (2 gallons) being used?

5. What is being stored in the inorganic storage tanks with storage capacities greater than 550 gallons?

Miscellaneous

6. Since the Gannon Station is located in a "maintenance area" for ozone, does the vehicle refueling operation dispense more than 20,000 gallons/month gasoline? If so, Stage I vapor control applies.

7. The EPCHC has reported to the Department that TEC is currently adding ammonia and sulfur trioxide (SO_3) to flue gases. The SO_3 is being generated from molten sulfur. These processes are not addressed in any of the current air operation permits. How have these additives been addressed in quantifying emissions from these regulated emissions units? We need to better understand the potential for additional emissions from transportation, storage, handling and combustion of these additives.

Responsible Official (R.O.) Certification Statement: Rule 62-213.420, F.A.C., requires that all Title V permit applications must be certified by a responsible official. Due to the nature of the information requested above, your response should be certified by the responsible official. Please compete and submit a new R.O. certification statement page from the new long application form DEP form No. 62-210.900, effective March 21,1996 (enclosed).

Professional Engineer (P.E.) Certification Statement: Rule 62-4.050(3), F.A.C., requires that all applications for a Department permit must be certified by a professional engineer registered in the State of Florida. This requirement also applies to responses to Department requests for additional information of an engineering nature. As a result, your response above should be certified by a professional engineer registered in the State of Florida. Please complete and submit a new P.E. certification statement page from the new long application form, DEP Form No. 62-210.900, effective March 21, 1996 (enclosed).

The Department must receive a response from you within 90 (ninety) days of receipt of this letter, unless you (the applicant) request additional time under Rule 62-213.420(1)(b)6., F.A.C. A copy of your response should be sent to Mr. Richard Kirby at the EPCHC.

For Information Purposes (no response required)

Your Title V application requested that the following products be burned in Solid Fuel-Fired Steam Generator Unit Nos. 1 through 6: petroleum coke/coal blend, tire derived fuel (TDF)/coal blend, and coal/petroleum coke /TDF blend (which includes some paper pellets and yard clippings for Units 1 through 4). Normally, burning of these products results in an increase in emissions and therefore constitutes a modification as defined at Rule 62-210.200, F.A.C. Therefore, any such approval must first be done through preconstruction review (i.e., applying for and receiving an air construction permit). Subsequently, the Title V permit application or permit revision application can be submitted.

Your Title V application also requested alternate testing procedures for the following: a) demonstrating compliance with SO_2 standard for the Solid Fuel-Fired Steam Generators from using DEP Methods 6, 6A, 6B or 6C to using weekly sampling and fuel analysis or continuous emissions monitoring; b) demonstrating compliance with particulate matter for the Combustion Turbine from using EPA Method 9 annually to using EPA Method 9 once every five years; and c) demonstrating compliance with particulate matter for the six coal bunkers from using EPA Methods 1, 2, 3, 4, 5 and 9 annually at 20% to using EPA Methods 1, 2, 3, 4, 5 and 9 once every five years at 5%.

Pursuant to Rule 62-297.620, F.A.C., approval of alternate test procedures is necessary before incorporating them into any air operating permit. Requests for alternate procedures should be addressed to Mr. Mike Harley in the Emissions Monitoring Section at the letterhead address at Mail Station 5510.

If you should have any questions, please call Lennon Anderson or me at (904) 488-1344.

Sincerely,

John C. Brown, Jr., P.E.
Administrator
Title V Section

JCB/la

Enclosures

cc: Janice Taylor, TEC
Thomas W. Davis, P.E., ECT
Richard Kirby, EPCHC
Jerry Kissel, SWD

Florida Department of

Memorandum — Environmental Protection

TO: Iwan Choronenko, Director
Local Program Air Permitting Administrator

FROM: Bruce Mitchell

DATE: August 12, 1996

SUBJECT: Completeness Review of an Application Package for a Title V Operation Permit
F. J. GannonStation: 0570040-002-AV

Enclosed is an application package for a Title V operation permit that is being processed in Tallahassee. Please have someone review the package for completeness and respond in writing by September 9, if you have any comments. Otherwise, no response is required. If there are any questions, please call the project engineer, Lennon Anderson, at 904/488-1344 or SC:278-1344. It is very important to verify the compliance statement regarding the facility. Since we do not have a readily effective means of determining compliance at the time the application was submitted, please advise if you know of any emissions unit(s) that were not in compliance at that time and provide supporting information. Also, do not write on the documents.

If there are any questions regarding this request, please call me or Scott Sheplak at the above number(s).

RBM/bm

Enclosure

Phase II Permit Application

For more information, see instructions and refer to 40 CFR 72.30 and 72.31 and Chapter 62-214, F.A.C.

This submission is: [X] New [ ] Revised

STEP 1
Identify the source by plant name, State, and ORIS code from NADB

Plant Name	State	ORIS Code
F.J. Gannon	FL	646

STEP 2
Enter the boiler ID# from NADB for each affected unit, and indicate whether a repowering plan is being submitted for the unit by entering "yes" or "no" at column c. For new units, enter the requested information in columns d and e

a	b	c	d	e
Boiler ID#	Compliance Plan: Unit Will Hold Allowances in Accordance with 40 CFR 72.9(c)(1)	Compliance Plan: Repowering Plan	New Units: Commence Operation Date	New Units: Monitor Certification Deadline
GB01	Yes	No		
GB02	Yes	No		
GB03	Yes	No		
GB04	Yes	No		
GB05	Yes	No		
GB06	Yes	No		
	Yes			
	Yes			
	Yes			
	Yes			
	Yes			
	Yes			

STEP 3
Check the box if the response in column c of Step 2 is "Yes" for any unit

[ ] For each unit that will be repowered, the Repowering Extension Plan form is included and the Repowering Technology Petition form has been submitted or will be submitted by June 1, 1997.

Plant Name (from Step 1) **BEST AVAILABLE COPY**

STEP 4
Read the standard requirements and certification, enter the name of the designated representative, and sign and date

Standard Requirements

Permit Requirements.

(1) The designated representative of each Acid Rain source and each Acid Rain unit at the source shall:
(i) Submit a complete Acid Rain part application (including a compliance plan) under 40 CFR part 72, Rules 62-214.320 and 330, F.A.C. in accordance with the deadlines specified in Rule 62-214.320, F.A.C.; and
(ii) Submit in a timely manner any supplemental information that the permitting authority determines is necessary in order to review an Acid Rain part application and issue or deny an Acid Rain permit;
(2) The owners and operators of each Acid Rain source and each Acid Rain unit at the source shall:
(i) Operate the unit in compliance with a complete Acid Rain part application or a superseding Acid Rain part issued by the permitting authority; and
(ii) Have an Acid Rain Part.

Monitoring Requirements.

(1) The owners and operators and, to the extent applicable, designated representative of each Acid Rain source and each Acid Rain unit at the source shall comply with the monitoring requirements as provided in 40 CFR part 75, and Rule 62-214.420, F.A.C.
(2) The emissions measurements recorded and reported in accordance with 40 CFR part 75 shall be used to determine compliance by the unit with the Acid Rain emissions limitations and emissions reduction requirements for sulfur dioxide and nitrogen oxides under the Acid Rain Program.
(3) The requirements of 40 CFR part 75 shall not affect the responsibility of the owners and operators to monitor emissions of other pollutants or other emissions characteristics at the unit under other applicable requirements of the Act and other provisions of the operating permit for the source.

Sulfur Dioxide Requirements.

(1) The owners and operators of each source and each Acid Rain unit at the source shall:
(i) Hold allowances, as of the allowance transfer deadline, in the unit's compliance subaccount (after deductions under 40 CFR 73.34(c)) not less than the total annual emissions of sulfur dioxide for the previous calendar year from the unit; and
(ii) Comply with the applicable Acid Rain emissions limitations for sulfur dioxide.
(2) Each ton of sulfur dioxide emitted in excess of the Acid Rain emissions limitations for sulfur dioxide shall constitute a separate violation of the Act.
(3) An Acid Rain unit shall be subject to the requirements under paragraph (1) of the sulfur dioxide requirements as follows:
(i) Starting January 1, 2000, an Acid Rain unit under 40 CFR 72.6(a)(2); or
(ii) Starting on the later of January 1, 2000 or the deadline for monitor certification under 40 CFR part 75, an Acid Rain unit under 40 CFR 72.6(a)(3).
(4) Allowances shall be held in, deducted from, or transferred among Allowance Tracking System accounts in accordance with the Acid Rain Program.
(5) An allowance shall not be deducted in order to comply with the requirements under paragraph (1)(i) of the sulfur dioxide requirements prior to the calendar year for which the allowance was allocated.
(6) An allowance allocated by the Administrator under the Acid Rain Program is a limited authorization to emit sulfur dioxide in accordance with the Acid Rain Program. No provision of the Acid Rain Program, the Acid Rain permit application, the Acid Rain permit, or the written exemption under 40 CFR 72.7 and 72.8 and no provision of law shall be construed to limit the authority of the United States to terminate or limit such authorization.
(7) An allowance allocated by the Administrator under the Acid Rain Program does not constitute a property right.

Nitrogen Oxides Requirements. The owners and operators of the source and each Acid Rain unit at the source shall comply with the applicable Acid Rain emissions limitation for nitrogen oxides.

Excess Emissions Requirements.

(1) The designated representative of an Acid Rain unit that has excess emissions in any calendar year shall submit a proposed offset plan, as required under 40 CFR part 77.
(2) The owners and operators of an Acid Rain unit that has excess emissions in any calendar year shall:
(i) Pay without demand the penalty required, and pay upon demand the interest on that penalty, as required by 40 CFR part 77; and
(ii) Comply with the terms of an approved offset plan, as required by 40 CFR part 77.

Recordkeeping and Reporting Requirements.

(1) Unless otherwise provided, the owners and operators of the source and each Acid Rain unit at the source shall keep on site at the source each of the following documents for a period of 5 years from the date the document is created. This period may be extended for cause, at any time prior to the end of 5 years, in writing by the Administrator or permitting authority:
(i) The certificate of representation for the designated representative for the source and each Acid Rain unit at the source and all documents that demonstrate the truth of the statements in the certificate of representation, in accordance with Rule 62-214.350, F.A.C.; provided that the certificate and documents shall be retained on site at the source beyond such 5-year period until such documents are superseded because of the submission of a new certificate of representation changing the designated representative;
(ii) All emissions monitoring information, in accordance with 40 CFR part 75;
(iii) Copies of all reports, compliance certifications, and other submissions and all records made or required under the Acid Rain Program; and,

Plant Name (from Step 1)

Recordkeeping and Reporting Requirements (cont.)

(iv) Copies of all documents used to complete an Acid Rain part application and any other submission under the Acid Rain Program or to demonstrate compliance with the requirements of the Acid Rain Program.

(2) The designated representative of an Acid Rain source and each Acid Rain unit at the source shall submit the reports and compliance certifications required under the Acid Rain Program, including those under 40 CFR part 72 subpart I and 40 CFR part 75.

Liability.

(1) Any person who knowingly violates any requirement or prohibition of the Acid Rain Program, a complete Acid Rain part application, an Acid Rain part, or a written exemption under 40 CFR 72.7 or 72.8, including any requirement for the payment of any penalty owed to the United States, shall be subject to enforcement pursuant to section 113(c) of the Act.
(2) Any person who knowingly makes a false, material statement in any record, submission, or report under the Acid Rain Program shall be subject to criminal enforcement pursuant to section 113(c) of the Act and 18 U.S.C. 1001.
(3) No permit revision shall excuse any violation of the requirements of the Acid Rain Program that occurs prior to the date that the revision takes effect.
(4) Each Acid Rain source and each Acid Rain unit shall meet the requirements of the Acid Rain Program.
(5) Any provision of the Acid Rain Program that applies to an Acid Rain source (including a provision applicable to the designated representative of an Acid Rain source) shall also apply to the owners and operators of such source and of the Acid Rain units at the source.
(6) Any provision of the Acid Rain Program that applies to an Acid Rain unit (including a provision applicable to the designated representative of an Acid Rain unit) shall also apply to the owners and operators of such unit. Except as provided under 40 CFR 72.44 (Phase II repowering extension plans), and except with regard to the requirements applicable to units with a common stack under 40 CFR part 75 (including 40 CFR 75.16, 75.17, and 75.18), the owners and operators and the designated representative of one Acid Rain unit shall not be liable for any violation by any other Acid Rain unit of which they are not owners or operators or the designated representative and that is located at a source of which they are not owners or operators or the designated representative.
(7) Each violation of a provision of 40 CFR parts 72, 73, 75, 77, and 78 by an Acid Rain source or Acid Rain unit, or by an owner or operator or designated representative of such source or unit, shall be a separate violation of the Act.

Effect on Other Authorities. No provision of the Acid Rain Program, an Acid Rain part application, an Acid Rain part, or a written exemption under 40 CFR 72.7 or 72.8 shall be construed as:

(1) Except as expressly provided in title IV of the Act, exempting or excluding the owners and operators and, to the extent applicable, the designated representative of an Acid Rain source or Acid Rain unit from compliance with any other provision of the Act, including the provisions of title I of the Act relating to applicable National Ambient Air Quality Standards or State Implementation Plans;
(2) Limiting the number of allowances a unit can hold; *provided*, that the number of allowances held by the unit shall not affect the source's obligation to comply with any other provisions of the Act;
(3) Requiring a change of any kind in any State law regulating electric utility rates and charges, affecting any State law regarding such State regulation, or limiting such State regulation, including any prudence review requirements under such State law;
(4) Modifying the Federal Power Act or affecting the authority of the Federal Energy Regulatory Commission under the Federal Power Act; or,
(5) Interfering with or impairing any program for competitive bidding for power supply in a State in which such program is established.

Certification

I am authorized to make this submission on behalf of the owners and operators of the Acid Rain source or Acid Rain units for which the submission is made. I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment.

Name Hugh W. Smith	
Signature Hugh W. Smith	Date 12/19/95

STEP 5 (optional)
Enter the source AIRS and FINDS identification numbers, if known

AIRS	0570040
FINDS	

Florida Department of Environmental Protection

Phase II NO_X Compliance Plan

For more information, see instructions and refer to 40 CFR 76.9

This submission is: [X] New [ ] Revised

STEP 1 Indicate plant name, state, and ORIS code from NADB, if applicable.	Tampa Electric Company F.J. Gannon Station Plant Name	FL State	646 ORIS Code
STEP 2	Identify each affected Group 1 and Group 2 boiler using the boiler ID# from NADB, if applicable. Indicate boiler type: "CB" for cell burner, "CY" for cyclone, "DBW" for dry bottom wall-fired, "T" for tangentially fired, "V" for vertically fired, and "WB" for wet bottom. Indicate the compliance option selected for each unit.		

	ID# GN03 Type CY	ID# GN04 Type CY	ID# GN05 Type WB	ID# GN06 Type WB	ID# Type	ID# Type
(a) Standard annual average emission limitation of 0.50 lb/mmBtu (for Phase I dry bottom wall-fired boilers)	[ ]	[ ]	[ ]	[ ]	[ ]	[ ]
(b) Standard annual average emission limitation of 0.45 lb/mmBtu (for Phase I tangentially fired boilers)	[ ]	[ ]	[ ]	[ ]	[ ]	[ ]
(c) EPA-approved early election plan under 40 CFR 76.8 through 12/31/07 (also indicate above emission limit specified in plan)	[ ]	[ ]	[ ]	[ ]	[ ]	[ ]
(d) Standard annual average emission limitation of 0.46 lb/mmBtu (for Phase II dry bottom wall-fired boilers)	[ ]	[ ]	[ ]	[ ]	[ ]	[ ]
(e) Standard annual average emission limitation of 0.40 lb/mmBtu (for Phase II tangentially fired boilers)	[ ]	[ ]	[ ]	[ ]	[ ]	[ ]
(f) Standard annual average emission limitation of 0.68 lb/mmBtu (for cell burner boilers)	[ ]	[ ]	[ ]	[ ]	[ ]	[ ]
(g) Standard annual average emission limitation of 0.86 lb/mmBtu (for cyclone boilers)	[X]	[X]	[ ]	[ ]	[ ]	[ ]
(h) Standard annual average emission limitation of 0.80 lb/mmBtu (for vertically fired boilers)	[ ]	[ ]	[ ]	[ ]	[ ]	[ ]
(i) Standard annual average emission limitation of 0.84 lb/mmBtu (for wet bottom boilers)	[ ]	[ ]	[X]	[X]	[ ]	[ ]
(j) NO_x Averaging Plan (include NO_x Averaging form)	[ ]	[ ]	[ ]	[ ]	[ ]	[ ]
(k) Common stack pursuant to 40 CFR 75.17(a)(2)(i)(A) (check the standard emission limitation box above for most stringent limitation applicable to any unit utilizing stack)	[ ]	[ ]	[ ]	[ ]	[ ]	[ ]

Plant Name (from Step 1): Tampa Electric Company F.J. Gannon Station

STEP 2, cont'd.

	ID# GN03 Type CY	ID# GN04 Type CY	ID# GN05 Type WB	ID# GN06 Type WB	ID# Type	ID# Type
(l) Common stack pursuant to 40 CFR 75.17(a)(2)(i)(B) with NO_x Averaging (check the NO_x Averaging Plan box and include NO_x Averaging Form)	☐	☐	☐	☐	☐	☐
(m) EPA-approved common stack apportionment method pursuant to 40 CFR 75.17 (a)(2)(i)(C), (a)(2)(iii)(B), or (b)(2)	☐	☐	☐	☐	☐	☐
(n) AEL (include Phase II AEL Demonstration Period, Final AEL Petition, or AEL Renewal form as appropriate)	☐	☐	☐	☐	☐	☐
(o) Petition for AEL demonstration period or final AEL under review by U.S. EPA or demonstration period ongoing	☐	☐	☐	☐	☐	☐
(p) Repowering extension plan approved or under review	☐	☐	☐	☐	☐	☐

STEP 3
Read the standard requirements and certification, enter the name of the designated representative, sign and date.

Standard Requirements

General. This source is subject to the standard requirements in 40 CFR 72.9 (consistent with 40 CFR 76.8(e)(1)(i)). These requirements are listed in this source's Acid Rain Part of its Title V permit.

Special Provisions for Early Election Units

Nitrogen Oxides. A unit that is governed by an approved early election plan shall be subject to an emissions limitation for NO_x as provided under 40 CFR 76.8(a)(2) except as provided under 40 CFR 76.8(e)(3)(iii).

Liability. The owners and operators of a unit governed by an approved early election plan shall be liable for any violation of the plan or 40 CFR 76.8 at that unit. The owners and operators shall be liable, beginning January 1, 2000, for fulfilling the obligations specified in 40 CFR Part 77.

Termination. An approved early election plan shall be in effect only until the earlier of January 1, 2008 or January 1 of the calendar year for which a termination of the plan takes effect. If the designated representative of the unit under an approved early election plan fails to demonstrate compliance with the applicable emissions limitation under 40 CFR 76.5 for any year during the period beginning January 1 of the first year the early election takes effect and ending December 31, 2007, the permitting authority will terminate the plan. The termination will take effect beginning January 1 of the year after the year for which there is a failure to demonstrate compliance, and the designated representative may not submit a new early election plan. The designated representative of the unit under an approved early election plan may terminate the plan any year prior to 2008 but may not submit a new early election plan. In order to terminate the plan, the designated representative must submit a notice under 40 CFR 72.40(d) by January 1 of the year for which the termination is to take effect. If an early election plan is terminated any year prior to 2000, the unit shall meet, beginning January 1, 2000, the applicable emissions limitation for NO_x for Phase II units with Group 1 boilers under 40 CFR 76.7. If an early election plan is terminated on or after 2000, the unit shall meet, beginning on the effective date of the termination, the applicable emissions limitation for NO_x for Phase II units with Group 1 boilers under 40 CFR 76.7.

STEP 3, cont'd.

Certification

I am authorized to make this submission on behalf of the owners and operators of the affected source or affected units for which the submission is made. I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment.

Name Patrick A. Ho	
Signature Patrick A. Ho	Date 12/23/97

CK File

Department of Environmental Protection

Lawton Chiles
Governor

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Virginia B. Wetherell
Secretary

CERTIFIED MAIL - Return Receipt Requested

March 20, 1997

Mr. John Duff
General Manager
Tampa Electric Company (TEC)
P.O. Box 111
Tampa, Florida 33601-0111

RE: Request for Additional Information Regarding Initial Title V Permit Application
File No. 0570040-002-AV
F. J. Gannon Station, Hillsborough County

Dear Mr. Duff:

On February 21, 1997, the Department received your response to our first request for additional information.

In order to continue processing your permit application, the Department will need the additional information below pursuant to Rule 62-213.420(1)(b)3., F.A.C., and Rule 62-4.070(1), F.A.C. The additional information requested is organized by topic. Should your response to any of the items below require new calculations, please submit the new calculation, assumptions, reference material and appropriate revised pages of the application form.

Coal Yard and Storage Sources

1. Standards of Performance for New Stationary Sources (NSPS), 40 C.F.R. 60, Subpart Y, is applicable to coal preparation plants that process more than 200 tons per day and commences construction or modification after October 24, 1974. The Department is aware that the Gannon Station was originally constructed to utilize coal as a primary fuel well before the promulgation of any applicable NSPS. In permit AC 29-61276, the Department approved the modification of the Gannon Coal Yard to accommodate the reconversion of Units 1 through 4 from oil-fired back to coal-fired. According to our records, this approval was done on April 12, 1983. Furthermore, the modification increased the annual coal processed to 2,400,000 (i.e., 6575 ton/day). The coal yard appears to be subject to NSPS, Subpart Y. Please provide documentation that the Gannon Coal Yard is not subject to NSPS, Subpart Y.

P 174 053 111

US Postal Service
Receipt for Certified Mail
No Insurance Coverage Provided.
Do not use for International Mail *(See reverse)*

Sent to John Duff / Tampa Electric Company	
Street & Number P.O. Box 111	
Post Office, State, & ZIP Code Tampa, FL 33601-0111	
Postage	$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	$
Postmark or Date 3-21-97	

PS Form **3800**, April 1995

Is your **RETURN ADDRESS** completed on the reverse side?

SENDER:
- Complete items 1 and/or 2 for additional services.
- Complete items 3, 4a, and 4b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write *"Return Receipt Requested"* on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):
1. ☐ Addressee's Address
2. ☐ Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:
Mr. John Duff
General Manager
Tampa Electric Company
Post Office Box 111
Tampa, Florida 33601-0111

4a. Article Number
P 174 053 111

4b. Service Type
☐ Registered ☒ Certified
☐ Express Mail ☐ Insured
☐ Return Receipt for Merchandise ☐ COD

7. Date of Delivery
MAR 24 1997

5. Received By: *(Print Name)*

8. Addressee's Address *(Only if requested and fee is paid)*

6. Signature: *(Addressee or Agent)*
X

PS Form **3811**, December 1994 Domestic Return Receipt

Thank you for using Return Receipt Service.

List of Proposed Exempt Activities

2. In response to the Department's question 4, TEC stated , "no solvent cleaning machines using the cited solvents are in use at the F.J. Gannon Station." Part (c), apparently, was not answered. Are buckets, pails, and beakers with capacities greater than 7.6 liters (2 gallons) being used? If so, please address appropriately.

Miscellaneous

3. For Unit 6, TEC stated that sulfur trioxide (SO_3) is added to the flue gas prior to the electrostatic precipitator. Please explain how the molten sulfur is generated. If a combustion source is used, please update the application form appropriately.

4. TEC stated in its response to the Department's question 5 that Storage Tank 7 stores a maximum of 4,000 gallons of molten sulfur. Please explain how the sulfur is kept in the liquid phase. a) What is the annual throughput? b) What is the annual sulfur particulate emissions?

Responsible Official (R.O.) Certification Statement: Rule 62-213.420, F.A.C., requires that all Title V permit applications must be certified by a responsible official. Due to the nature of the information requested above, your response should be certified by the responsible official. Please compete and submit a new R.O. certification statement page from the new long application form DEP form No. 62-210.900, effective March 21,1996 (enclosed).

Professional Engineer (P.E.) Certification Statement: Rule 62-4.050(3), F.A.C., requires that all applications for a Department permit must be certified by a professional engineer registered in the State of Florida. This requirement also applies to responses to Department requests for additional information of an engineering nature. As a result, your response above should be certified by a professional engineer registered in the State of Florida. Please complete and submit a new P.E. certification statement page from the new long application form, DEP Form No. 62-210.900, effective March 21, 1996 (enclosed).

The Department must receive a response from you within 90 (ninety) days of receipt of this letter, unless you (the applicant) request additional time under Rule 62-213.420(1)(b)6., F.A.C. **Even though you are entitled to take the full time-frame allowed by rule to respond, it is urged that you provide the requested information as soon as possible in order for us to meet the December 31, 1997 issue date deadline for Acid Rain Sources.** A copy of your response should be sent to Mr. Richard Kirby at the EPCHC.

If you should have any questions, please call Lennon Anderson or Scott Sheplak, P.E. at (904) 488-1344.

Sincerely,

for John C. Brown, Jr., P.E.
Administrator
Title V Section

JCB/sms/la

Enclosures

cc: Janice Taylor, TEC
Thomas W. Davis, P.E., ECT
Richard Kirby, EPCHC
Jerry Kissel, SWD

Owner/Authorized Representative or Responsible Official

1. Name and Title of Owner/Authorized Representative or Responsible Official:

2. Owner/Authorized Representative or Responsible Official Mailing Address:

   Organization/Firm:
   Street Address:
   City: State: Zip Code:

3. Owner/Authorized Representative or Responsible Official Telephone Numbers:
   Telephone: ( ) - Fax: ( ) -

4. Owner/Authorized Representative or Responsible Official Statement:

   I, the undersigned, am the owner or authorized representative of the non-Title V source addressed in this Application for Air Permit or the responsible official, as defined in Rule 62-210.200, F.A.C., of the Title V source addressed in this application, whichever is applicable. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof. I understand that a permit, if granted by the Department, cannot be transferred without authorization from the Department, and I will promptly notify the Department upon sale or legal transfer of any permitted emissions unit.*

   Signature Date

* Attach letter of authorization if not currently on file.

4. Professional Engineer Statement:

I, the undersigned, hereby certify, except as particularly noted herein, that:*

(1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this Application for Air Permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; and

(2) To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application.

If the purpose of this application is to obtain a Title V source air operation permit (check here [ ] if so), I further certify that each emissions unit described in this Application for Air Permit, when properly operated and maintained, will comply with the applicable requirements identified in this application to which the unit is subject, except those emissions units for which a compliance schedule is submitted with this application.

If the purpose of this application is to obtain an air construction permit for one or more proposed new or modified emissions units (check here [ ] if so), I further certify that the engineering features of each such emissions unit described in this application have been designed or examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application.

If the purpose of this application is to obtain an initial air operation permit or operation permit revision for one or more newly constructed or modified emissions units (check here [ ] if so), I further certify that, with the exception of any changes detailed as part of this application, each such emissions unit has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with all provisions contained in such permit.

_____ _____

Signature Date

(seal)

* Attach any exception to certification statement.

Florida Department of
Environmental Protection

Memorandum

TO: Iwan Chorenenko, Director
Air Management Division
Hillsborough County Environmental
Protection Commission

FROM: Bruce Mitchell

DATE: February 28, 1997

SUBJECT: Response to Request for Additional Information Regarding Initial Title V Permit Application
F.J. Gannon Station: 0570040-002-AV

Enclosed is Tampa Electric Company's response to the Department's Request for Additional Information. The following changes and additions were made:

- New Responsible Official
- New Professional Engineer
- Additional Segment (Process/Fuel) Information for Units 1-6

Please update your Title V Application. If there are questions, please contact the project engineer, Lennon Anderson, at 904/488-1344 or SC:278-1344.

RBM/la

Enclosures

cc: Jerry Kissell, SWD

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FEB 21 1997
BUREAU OF
AIR REGULATION

TAMPA ELECTRIC
A TECO ENERGY COMPANY

February 19, 1997

Mr. John C. Brown, Jr., P.E.
Administrator-Title V Section
Florida Department of Environmental Protection
111 South Magnolia Drive
Tallahassee, Florida 32301

Via FedEx
Airbill No. 2561490971

Re: Tampa Electric Company
F. J. Gannon Station
File No. 0570040-002-AV
Response to Request for Additional Information
Regarding Initial Title V Permit Application

Dear Mr. Brown:

Tampa Electric Company (TEC) received the Florida Department of Environmental Protection's (FDEP) request for additional information for our F. J. Gannon Station on November 22, 1996. In response to the referenced request for additional information, please find enclosed four (4) electronic copies of the updated ELSA files and one (1) hard copy of the application. Please be advised that the ELSA files are being submitted in the ELSA Version 1.2.1 to maintain consistency with the original ELSA submittal. The Responsible Official and Professional Engineer certifications are also enclosed using the new long-application form pages.

In addition, the following narrative to your specific information request is being provided to assist in the Title V application review:

FDEP Question 1:

Although your application states that No. 2 fuel oil is used for ignition during start-up for Solid Fuel-Fired Steam Generator Units Nos. 1 through 3, 5, and 6, the firing of No. 2 fuel oil is not addressed in the current air operation permits for these units. How long has TEC been using No. 2 fuel oil for startup in each unit, and what has been the maximum annual usage of No. 2 fuel oil in each unit? Please submit the Segment (Process/Fuel) Information for No. 2 fuel oil for these emission units as required by DEP Form No. 62-210.900(1) - Instructions (Enclosed).

TEC Response:

Because the cited steam generators are solid fuel-fired, each of the units was designed and constructed for ignition using No. 2 fuel oil. This design has not been modified for any unit. No. 2 fuel oil continues to be used for ignition during start-up for the cited steam generators. The application has been updated to include the requested Segment (Process/Fuel) Information form for each cited steam generator.

The No. 2 fuel oil injection guns used for boiler ignition are not equipped with flow meters. In the past, the No. 2 fuel oil usage reported on the F.J. Gannon Station Annual Operating Report has been determined from the facility's overall No. 2 oil usage (excluding the combustion turbine), divided equally among the 6 solid-fuel fired units. TEC will continue this method of reporting the amount of No. 2 fuel oil used for the solid-fuel fired units' startup operation.

FDEP Question 2:

On August 16, 1996, and September 17, 1996, inspections conducted by the Environmental Protection Commission of Hillsborough County (EPCHC) indicated fugitive emissions from Solid Fuel-Fired Steam Generator Unit No. 3. Please certify that the emissions unit is in compliance pursuant to Rule 62-296.320(4)(c), F.A.C. and specific condition number 2 of air operating permit AO 29255208 or submit a compliance plan pursuant to Rule 62-213.420(3)(j), F.A.C.

TEC Response:

Emissions Unit 3 is in compliance pursuant to Rule 62-296.320(4)(c), F.A.C., and Specific Condition 2 of air operating permit AO29-255208. F.J. Gannon Station has an established procedure of reasonable operating practices in place to identify and control unconfined particulate matter emissions from all steam generating units.

TEC personnel routinely inspect the all operating steam generating units. These inspections include detecting and evaluating fugitive emission leaks. Any problems identified are recorded and, if appropriate, a maintenance job request is generated for the next planned outage. Repairs may also be made during an unanticipated outage, time permitting.

It should be noted that during the August 1996 inspection, the Environmental Protection Commission of Hillsborough County (EPC) inspector was advised of this procedure, shown the inspection reports, and informed Gannon Unit 3 was scheduled for outage within the next 10 days. The EPC inspector appeared to be satisfied with TEC's operating practices at that time.

During the September 17, 1996 inspection, Gannon 3 was offline for the above referenced scheduled outage. The fugitive emissions leaks were repaired during the outage.

FDEP Question 3:

In your application you indicate that there are no emission unit subjects to Standards of Performance for New Stationary Sources (NSPS). The coal yard appears to be subject to NSPS Subpart Y. Please explain why the coal yard is not subject to NSPS Subpart Y. If it is subject to the subpart, submit a compliance plan pursuant to Rule 62-213.420(3)(j), F.A.C., or indicate your response that you are in compliance with Subpart Y.

TEC Response:

As you may be aware, the Gannon Station was originally constructed to utilize coal as as a primary fuel well before the promulgation of any standards of performance for new sources. Four of the units were converted to oil-firing and were subsequently converted back to coal. At the time of reconversion to coal, the units were subject to a proposed prohibition order that was issued by United States Department of Energy, Economic Regulatory Administration. The effect of the order would have been to require that the units be reconverted to coal-firing. When the reconversion was proposed, both the Department of Environmental Regulation and the United States Environmental Protection Agency were consulted concerning regulatory requirements. Both agencies approved the reconversion and determined that the Gannon Station was not subject to NSPS. There have been no changes at the facility that would alter this conclusion.

FDEP Question 4:

40 CFR 63, Subpart T, "National Emission Standards for Hazardous Air Pollutants (NESHAP), applies if you own or operate a solvent cleaning machine that uses a solvent that contains 5 percent or more by weight of any one of any combination of the following halogenated solvents: Carbon tetrachloride, Chloroform, Perchloroethylene, 1,1,1-Trichloroethane, Trichlorethylene, Methylene chloride. a) Are any of the six solvents being used at this facility? b) If yes, what is the amount of solvent (in gallons) used annually at parts-cleaning and degreasing stations? c) Are buckets, pails, and beakers with capacities greater than 7.6 liters (2 gallons) being used?

TEC Response:

No solvent cleaning machines using the cited solvents are in use at F.J. Gannon Station.

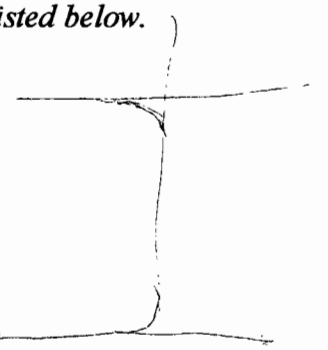
FDEP Question 5:

What is being stored in the inorganic storage tanks with storage capacities greater than 550 gallons?

TEC Response:

Six storage tanks with storage capacities greater than 550 gallons (gal) are in use at F.J. Gannon Station. These tanks, the storage capacity, and the material stored are listed below.

Storage Tank 1 - Sodium hydroxide (NaOH) - 8,073 gal
Storage Tank 2 - Sodium hydroxide (NaOH) - 7,520 gal
Storage Tank 3 - Sulfuric acid (H_2SO_4) - 7,500 gal
Storage Tank 4 - Sulfuric acid (H_2SO_4) - 7,500 gal
Storage Tank 5 - Sulfuric acid (H_2SO_4) - 1,146 gal
Storage Tank 6 - Sodium bisulfite (Na_2SO_3) - 8,500 gal
Storage Tank 7 - Molten sulfur - 4,000 gal



FDEP Question 6:

Since the Gannon Station is located in a "maintenance area" for ozone, does the vehicle refueling operation dispense more than 20,000 gallons/month gasoline? If so, Stage I vapor control applies.

TEC Response:

The F.J. Gannon Station vehicle refueling operation does not dispense more than 20,000 gallons/month gasoline.

FDEP Question 7:

The EPCHC has reported to the Department that TEC is currently adding ammonia and sulfur trioxide (SO_3) to flue gases. The SO_3 is being generated from molten sulfur. These processes are not addressed in any of the current air operation permits. How have these additives been addressed in quantifying emissions from these regulated emission units? We need to better understand the potential for additional emissions from transportation, storage, handling, and combustion of these additives.

TEC Response:

Ammonia is not added to the flue gases at F.J. Gannon Station.

Sulfur trioxide (SO_3) is added to the F.J. Gannon Station Unit 6 flue gas prior to the electrostatic precipitator (ESP). The SO_3 serves as a flue gas conditioner to enhance ESP performance. This SO_3 is emitted from the Unit 6 stack as part of the combustion exhaust stream. The Pollutant Information section (Section E) for Emission Unit 6 does include sulfuric acid mist (SAM). The small amount of flue gas conditioning SAM was included with the fuel-generated SAM for the Title V operating permit application.

SO_3 is generated from molten sulfur and is only released into the Unit 6 flue. SO_3 is not used for any other purpose and is not released to the atmosphere from any other location at F.J. Gannon Station.

Other Updates

A newly signed Responsible Official Certification Statement is included in the update package. Please note that the Responsible Official is now Douglas H. Finke. A newly signed Professional Engineer (P.E.) Certification Statement is also included in the update package. The phone and fax numbers for the Responsible Official (Doug Finke), the plant contact (Cindy Barringer) and the application contact (Janice Taylor) have been updated along with my mailing address in this revised permit application. The Emission Point (Stack/Vent) Information (Section E) sheet for Emission Unit 5 has been amended to correct the actual volumetric flow rate (738,606 acfm).

Please telephone me at (813) 641-5039 if you have any questions or require any clarification.

Sincerely,

Janice K. Taylor
Senior Engineer
Environmental Planning

EP\gm\JKT784

Enclosures

c: Mr. Jerry Kissell, DEP - SW District
Mr. Richard Kirby, EPCHC

TAMPA ELECTRIC

May 22, 2000

Mr. Scott M. Sheplak, P.E.
Florida Department of Environmental Protection
Division of Air Resource Management
111 South Magnolia Drive, Suite 4
Tallahassee, Florida 32301

Via FedEx
Airbill No. 7923 3467 3031

Re: Tampa Electric Company – Phase II NO_x Compliance Plan Revision for Big Bend and Gannon Stations

Dear Mr. Sheplak:

As you are aware, to ensure compliance with Phase II of the Acid Rain program, Tampa Electric Company has elected to employ a System Wide NO_X Averaging Plan. However, in the absence of a final Title V permit for Big Bend and Gannon Stations, there was some question as to whether or not the System Wide NO_X Averaging Plan was valid. Recently, Section 403.0872 of the Florida Statutes was amended by HB 1425 to address this issue. Specifically, Section 13 of HB 1425 reads:

"...This operation permit is the only department operation permit for a major source of air pollution required for such source; provided, at the applicant's request, the department shall issue a separate Acid Rain permit for a major source of air pollution that is an affected source within the meaning of 42 U.S.C s. 7651a(1)...."

Therefore, in accordance with section 403.0872 F.S., TEC formally requests a separate Acid Rain permit that includes the System Wide NO_X Averaging Plan as approved by the Department on January 19, 2000. If you have any questions, please telephone Shannon Todd or me at (813) 641-5125.

Sincerely,

Gregory M. Nelson, P.E.
Designated Representative
Acid Rain Program

EP\gm\SKT165

c: Robert Miller, USEPA
Brian Beals, USEPA
Scott Davis, USEPA Region IV
Jerry Campbell, EPCHC

xc: Clair Kinney
Pat Comer
Cindy Phillips

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TECO
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APR 06 2000
BUREAU OF AIR REGULATION

April 5, 2000

Mr. Scott M. Sheplak, P.E.
Florida Department of Environmental Protection
111 South Magnolia Drive, Suite 4
Tallahassee, Florida 32301

Via FedEx
Airbill No. 7908 2756 9790

Re: Tampa Electric Company
F. J. Gannon Station
Title V Application Amendments
FDEP File No. 0570040-002-AV

Dear Mr. Sheplak:

As you requested, please find enclosed, submitted under my signature as the Responsible Official, a copy of TEC's proposed compliance plan to address the ambient SO_2 issues related to the Title V permitting of this facility. It is my understanding that this proposal will be incorporated into the final Title V permit as a compliance glidepath to bring the facility into compliance with all modeled ambient air quality standards.

With regard to periodic monitoring, TEC proposes the following language for periodic monitoring of particulate matter.

> *Periodic monitoring for particulate matter shall be COMS. For any calendar quarter in which more than five percent of the COMS readings show 20% or greater opacity for any of the Units 1 - 6 (excluding startup, shutdown, and malfunction periods), a steady-state particulate matter stack test shall be performed within the following calendar quarter. Due to the allowed opacity level of 60% for sootblowing and load changing periods for Units 1 - 6, periods of sootblowing and load changing shall also be excluded. The stack test shall comply with all of the testing and reporting requirements contained in the preceding specific conditions. Units are not required to be brought on-line solely for the purpose of performing this special test. If the unit does not operate in the following quarter, the special test may be postponed until the unit is brought back on-line. In such cases, the special test shall be performed within 30 days of the unit being brought back on-line.*

In addition to the above, TEC requests that the following air construction permits be incorporated into the Title V permit application and the relevant conditions contained within them be addressed in the next version of the draft Title V permit.

PROJECT	PERMIT
Gannon Station Fuel Yard	**0570040-006-AC**
Gannon Unit 3 WDF Modification	**0570040-011-AC**
Gannon Crusher House Modification	**0570040-010-AC**

TEC requests the foregoing items, along with the detailed comments on the current draft version of the Title V permit submitted to you on November 10, 1999, be included in a new draft version of the permit.

Please feel free to telephone Jamie Hunter at (813) 641-5033, if you have any questions.

Sincerely,

Karen A. Sheffield

Karen A. Sheffield, P.E.
General Manager
F.J. Gannon Station

EP\gm\JJH918

Enclosure

c/enc: Mr. Clair Fancy, FDEP-Tallahassee
Mr. Jerry Kissel, FDEP-SW District
Mr. Jerry Campbell, EPCHC

PROPOSED SO2 GLIDEPATH TO COVER GANNON THROUGH THE CONVERSION TO BAYSIDE

Background

The current and historical regulatory SO2 limits that cover the operations at Gannon Station are as follows:

2.4 lbs/MMBtu (individual unit on a weekly average basis);
10.6 tons/hour (station-wide cap on a weekly average basis).

During the initial Title V permitting of Gannon Station, the FDEP performed updated ambient air quality dispersion modeling. This new modeling calculated exceedances of the SO2 ambient air quality standard using the existing allowable SO2 limits.

Based on this information Tampa Electric Company (TEC) evaluated possible alternatives to the current operations at Gannon Station to alleviate the modeled SO2 exceedances. These evaluations centered around reducing the sulfur content of the fuel, raising one or more of the existing stacks, or a combination of both. Ultimately, a decision to raise the existing stacks on Units 5 & 6, along with accepting a new limit on SO2 on a 24-hourly average basis of approximately 11.5 tons/hour, was determined to be the best coarse of action. To this end, an air construction permit application for the stack extension project was submitted in October 1998 and discussions of a 24-hour based SO2 limit were held during the ongoing Title V negotiations.

As a result of the Consent Final Judgement entered into by the FDEP and TEC in December 1999, and the Consent Decree entered into by the U.S. Department of Justice (on behalf of EPA) and TEC in February 2000, Gannon Station will be repowered using natural gas fired combustion turbines with oil backup and will cease burning coal by January 1, 2005. The repowered facility will be named Bayside Station to reflect the change in operations. The operations of the Bayside facility will comply with all ambient air quality standards.

Proposed Glidepath

Based on the short life remaining for the existing Gannon Station coal-fired units, the above strategy to extend the stacks to remove the modeled ambient SO2 exceedances is no longer the best strategy. For this short period of time, it is also unreasonable to make any significant modifications to the units, or the fuel contracts, necessary to reduce the SO2 levels needed to show no modeled ambient SO2 exceedances with the existing operations. In light of the foregoing, the following interim SO2 limits are proposed to be included in the final Title V Operating Permit for Gannon Station:

Calendar Year	Station-wide SO2 Limit Tons per hour (24-hour Average)	Basis for Limit
2001	11.5	Equivalent to 1.9 lbs/MMBtu multiplied by the existing station-wide heat input in MMBtu/hour.
2002	10.3	Equivalent to 1.7 lbs/MMBtu multiplied by the existing station-wide heat input in MMBtu/hour.
2003 *	10.3	Equivalent to 1.7 lbs/MMBtu multiplied by the existing station-wide heat input in MMBtu/hour.
2003 **	**	Equivalent to 1.7 lbs/MMBtu multiplied by the existing station-wide heat input, less any Unit(s) shutdown due to repowering, in MMBtu/hour.
2004 **	**	Equivalent to 1.7 lbs/MMBtu multiplied by the existing station-wide heat input, less any Unit(s) shutdown due to repowering, in MMBtu/hour.

Notes: All Gannon coal-fired boilers will be removed from service by December 31, 2004.
Above limits apply only to the collection of boiler emissions and do not include SO2 emissions due to the Bayside Station units.

* Limits applicable to the portion of the year prior to the repowering of any unit(s).

** Limits applicable to the portions of the year following the repowering of any unit(s). The station-wide heat input used in the above equations will be based on the total of the coal-fired boilers remaining after each stage of repowering at the following MMBtu/Hour rates: Boiler No. 1 = 1257; Boiler No.2 = 1257; Boiler No. 3 = 1599; Boiler No. 4 = 1876; Boiler No. 5 = 2284; Boiler No. 6 = 3798.

The above represents a reasonable overall glidepath that will result in ultimate compliance with all modeled ambient air quality standards.

TAMPA ELECTRIC

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MAR 14 2000

BUREAU OF AIR REGULATION

March 13, 2000

Mr. Scott M. Sheplak, P.E.
Florida Department of Environmental Protection
111 South Magnolia Drive, Suite 4
Tallahassee, Florida 32301

Via FedEx
Airbill No. 7923 1218 4589

Re: Tampa Electric Company
F. J. Gannon Station
FDEP File No. 0570040-002-AV
Proposed SO2 Compliance Plan

Dear Mr. Sheplak:

As discussed in our last meeting, please find enclosed TEC's proposed compliance plan to address the ambient SO_2 issues related to the Title V permitting of this facility. This proposal will be incorporated into the final Title V permit as a compliance glidepath to bring the facility into compliance with all modeled ambient air quality standards.

Please feel free to telephone me at (813) 641-5033, if you have any questions.

Sincerely,

Jamie Hunter
Consulting Engineer
Environmental Planning

EP\gm\JJH917

Enclosure

c/enc: Mr. Clair Fancy, FDEP-Tallahassee
Mr. Jerry Kissel, FDEP-SW District
Mr. Jerry Campbell, EPCHC

PROPOSED SO2 GLIDEPATH TO COVER GANNON THROUGH THE CONVERSION TO BAYSIDE

Background

The current and historical regulatory SO2 limits that cover the operations at Gannon Station are as follows:

2.4 lbs/MMBtu (individual unit on a weekly average basis);
10.6 tons/hour (station-wide cap on a weekly average basis).

During the initial Title V permitting of Gannon Station, the FDEP performed updated ambient air quality dispersion modeling. This new modeling calculated exceedances of the SO2 ambient air quality standard using the existing allowable SO2 limits.

Based on this information Tampa Electric Company (TEC) evaluated possible alternatives to the current operations at Gannon Station to alleviate the modeled SO2 excedances. These evaluations centered around reducing the sulfur content of the fuel, raising one or more of the existing stacks, or a combination of both. Ultimately, a decision to raise the existing stacks on Units 5 & 6, along with accepting a new limit on SO2 on a 24-hourly average basis of approximately 11.5 tons/hour, was determined to be the best coarse of action. To this end, an air construction permit application for the stack extension project was submitted in October 1998 and discussions of a 24-hour based SO2 limit were held during the ongoing Title V negotiations.

As a result of the Consent Final Judgement entered into by the FDEP and TEC in December 1999, and the Consent Decree entered into by the U.S. Department of Justice (on behalf of EPA) and TEC in February 2000, Gannon Station will be repowered using natural gas fired combustion turbines with oil backup and will cease burning coal by January 1, 2005. The repowered facility will be named Bayside Station to reflect the change in operations. The operations of the Bayside facility will comply with all ambient air quality standards.

Proposed Glidepath

Based on the short life remaining for the existing Gannon Station coal-fired units, the above strategy to extend the stacks to remove the modeled ambient SO2 exceedances is no longer the best strategy. For this short period of time, it is also unreasonable to make any significant modifications to the units, or the fuel contracts, necessary to reduce the SO2 levels needed to show no modeled ambient SO2 exceedances with the existing operations. In light of the foregoing, the following interim SO2 limits are proposed to be included in the final Title V Operating Permit for Gannon Station:

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2003 **	**	Equivalent to 1.7 lbs/MMBtu multiplied by the existing station-wide heat input, less any Unit(s) shutdown due to repowering, in MMBtu/hour.
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Notes: All Gannon coal-fired boilers will be removed from service by December 31, 2004.
Above limits apply only to the collection of boiler emissions and do not include SO2 emissions due to the Bayside Station units.

* Limits applicable to the portion of the year prior to the repowering of any unit(s).

** Limits applicable to the portions of the year following the repowering of any unit(s). The station-wide heat input used in the above equations will be based on the total of the coal-fired boilers remaining after each stage of repowering at the following MMBtu/Hour rates: Boiler No. 1 = 1257; Boiler No.2 = 1257; Boiler No. 3 = 1599; Boiler No. 4 = 1876; Boiler No. 5 = 2284; Boiler No. 6 = 3798.

The above represents a reasonable overall glidepath that will result in ultimate compliance with all modeled ambient air quality standards.

-file-

INTEROFFICE MEMORANDUM

Sensitivity: COMPANY CONFIDENTIAL

Date: 04-Feb-2000 10:29am
From: Patricia Comer TAL COMER_P
Dept: Office General Counsel
Tel No: 850/488-9730

To: Scott Sheplak TAL (SHEPLAK_S)

Subject: Re: Phase II NOX acid rain

I don't understand the question. Is the question about whether the plan can be retroactive or whether the plan can be used if it hasn't been approved by the permitting authorities (EPA didn't say that the plan could be used if it isn't approved, did they? I thought their issue was why the state had to issue a permit to approve the plan)
Anyway:
Timing and approval:
40 CFR 76.11 (a) says " In lieu of complying with the applicable provisions in s. 76.5, 76.6, or 76.7, any affected units subject to such emissions limitation, under control of the same owner or operator, and having the same designated representative may average their NOx emissions under an averaging plan approved under this section."
40 CFR 76.11(b) says:
(1) The designated representative of a unit meeting the requirements of paragraphs (a)(1), (a)(2) and (a)(8) of this section may submit an averaging plan....at any time up to and including January 1 (or July 1, if the plan is restricted to units located within a single permitting authority's jurisdiction) of the calendar year for which the plan is to become effective.
(3) When an averaging plan.... is not approved, the owner or operator of each unit in the plan shall operate in compliance with the emissions limitation that would apply in the absence of the averaging plan..."

62-210.300 says we can issue a permit with a later effective date, but not with an effective date earlier than the date of final issuance.

So...under federal law, it appears that an Acid Rain plan can be approved during the year it would be in effect. But because we have only one way to approve the terms and conditions of a plan (final issuance of the permit containing the plan) and because we cannot issue retroactive permits, our rules preclude that.

I'm not sure how this would affect TECO in real life. The Acid Rain limits aren't in any Florida permit now (I believe), they exist only in federal regs. But the feds would be unable to enforce the non-averaging-plan limits and we wouldn't be likely to do it either (especially when the currently permitted limits are different)....so the limits would be practically enforceable (to use an EPA term in a different way) only upon issuance of the Title V permit, which would include the averaging plan...

But TECO cannot get one thing they would likely

want...retroactivity of the permit. The permit must become effective on January 1 2001 (or 2002, or 2003.....)and the averaging plan will be effective when the permit is, under state law. The feds can do what they want. I don't expect citizen involvement, but that could be TECO's real problem, here. Not our problem, though. The best solution for everyone is to get the permits issued.

INTEROFFICE MEMORANDUM

Sensitivity: COMPANY CONFIDENTIAL

Date: 03-Feb-2000 02:34pm
From: Scott Sheplak TAL
SHEPLAK_S
Dept: Air Resources Management
Tel No: 850/488-1344

To: Patricia Comer TAL (COMER_P)
To: Clair Fancy TAL (FANCY_C)

Subject: Phase II NOX acid rain

We had a meeting yesterday with TECO on their Title V permits for Big Bend and Gannon.

The revised DRAFT permits issued in September 1999 include the 'straight' NOX emission limits from their originally submitted NOx compliance plan. My understanding is that regardless of whether or not a source has a FINAL Title V permit they must comply with the 'straight' limits beginning January 1, 2000.

TECO submitted a Phase II NOx acid rain averaging plan the end of December 1999. We have reviewed their plan and found it to be complete. In the new plan, TECO wants to establish alternate contemporaneous emission limits for the Big Bend and Gannon plants. You remember that Gulf Power was in a similar situation last year however, they submitted their averaging plan well in advance and the plan was approved in the Title V permit effective January 1, 2000.

At yesterday's meeting I informed TECO that they would not be able to use the new plan until it was approved via the Title V permit. They indicated that there was a deadline to submit NOx averaging plans prior to July 1. Can their new plan be used for CY 2000?

Note, EPA mailed a letter to Clair indicating that a source could operate under a Phase II NOX averaging plan (application) until final approval of the plan. The letter was in response to Gulf Power's situation with a multi-state averaging plan.

-file-

Copy: D. Waters - Gulf
J. Hunter - TECO
11/24 E. Middleswart - NWDist
B. Thomas - SWDist
J. Campbell - HCEPC
P. Comer - OGC
H. Rhodes - DARM

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

NOV 17 1999

RECEIVED
NOV 22 1999
BUREAU OF AIR REGULATION

4APT-ARB

Mr. Clair H. Fancy, P.E.
Chief
Bureau of Air Regulation
Air Resources Management Division
Florida Department of Environmental Protection
Mail Station 5500
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Dear Mr. Fancy:

This letter is to follow up on our recent conversation regarding the approval process for the multi-state Phase II Acid Rain NOx Averaging Plan submitted by participating Southern Company plants to their respective State permitting authorities. Our conversation focused on the status of the proposed averaging plan, should the process of approval through the issuance of permits incorporating the plan not be completed by all the relevant permitting authorities by the Phase II effective date of January 1, 2000.

It is our understanding that the Florida Department of Environmental Protection (FDEP) has set a goal to complete the title V permitting process (i.e., finalize the title V permits) for the Gulf Power plants participating in the Southern Company Phase II NOx Averaging Plan by the end of this year. There remains the possibility, however, due to title V permitting delays that the FDEP may not approve Southern Company's plan and incorporate the plan into final title V permits by the end of this year.

The Acid Rain Division of the Environmental Protection Agency (EPA) considers a compliance plan submitted with an Acid Rain permit application to be part of the Acid Rain permit application (see 40 CFR 72.31(c)). This would include a Phase II NO_x Averaging Plan; however, it would not include a petition for an alternative emission limitation period, a final alternative emission limitation or a renewal of a final alternative emission limitation. Therefore, the permit application shield provided in the Acid Rain regulations extends to a Phase II NOx Averaging Plan that is timely and complete (see 40 CFR 72.32(b)). Further, a complete Phase II NOx Averaging Plan is binding on the owners and operators until issuance or denial of the Acid Rain permit (see 40 CFR 72.32(c)). Under these rule provisions the units included in the Southern Company Phase II NOx Averaging Plan are required to operate in accordance with the terms of the averaging plan until the final approval of the plan (i.e., when all permitting authorities with jurisdiction over the units in the plan have approved the plan) (see 40 CFR 72.40(b)(2)).

If you have any questions or concerns regarding this matter, please contact Jenny Jachim of the EPA Region 4 staff at (404) 562-9126.

Sincerely,

R. Douglas Neeley
Chief
Air & Radiation Technology Branch
Air, Pesticides and Toxics
Management Branch

cc: W. Danny Herrin, Southern Company Services, Inc.
Ronald W. Gore, Alabama Department of Environmental Management
Ronald C. Methier, Environmental Protection Division
James L. Carroll, Jefferson County Department of Health
Dwight Alpern, Acid Rain Division
Robert Miller, Acid Rain Division

Best Available Copy

THE TAMPA TRIBUNE
Published Daily
Tampa, Hillsborough County, Florida

State of Florida }
County of Hillsborough } ss.

Before the undersigned authority personally appeared J. Rosenthal, who on oath says that she is Classified Billing Manager of The Tampa Tribune, a daily newspaper published at Tampa in Hillsborough County, Florida; that the attached copy of advertisement being a

LEGAL NOTICE

in the matter of

PUBLIC NOTICE OF INTENT

was published in said newspaper in the issues of

OCTOBER 11, 1999

Affiant further says that the said The Tampa Tribune is a newspaper published at Tampa in said Hillsborough County, Florida, and that the said newspaper has heretofore been continuously published in said Hillsborough County, Florida, each day and has been entered as second class mail matter at the post office in Tampa, in said Hillsborough County, Florida for a period of one year next preceding the first publication of the attached copy of advertisement; and affiant further says that she has neither paid nor promised any person, this advertisement for publication in the said newspaper.

J Rosenthal

Sworn to and subscribed before me, this 12 day of OCTOBER, A.D. 1999.

Personally Known ____ or Product Identification _____
Type of Identification Produced _____

(SEAL)

Susie Lee Slaton

COMMISSION NUMBER
CC639424
MY COMMISSION EXP.
APRIL 16, 2001
STATE OF FLORIDA

PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

Title V Revised DRAFT Permit No.: 0570040-002-AV F.J. Cannon Station Hillsborough County

The Department of Environmental Protection (permitting authority) gives notice of its intent to issue a Title V air operation permit to Tampa Electric Company for the F.J. Gannon Station located at Port Sutton Road, Tampa, Hillsborough County. This permit incorporates the Phase II NOx standards into the Title IV Acid Rain Part pursuant to Rule 62-214.360(6), Florida Administrative Code (F.A.C.). The applicant's name and address are: Tampa Electric Company, P.O. Box 111, Tampa, Florida 33601-0111.

The permitting authority will issue the Title V PROPOSED Permit, and subsequent Title V FINAL Permit, in accordance with the conditions of the Title V Revised DRAFT Permit unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The permitting authority will accept written comments concerning the proposed Title V Revised DRAFT Permit issuance action for a period of 30 (thirty) days from the date of publication of this Notice. Written comments should be provided to the Department's Bureau of Air Regulation, 2600 Blair Stone Road, Mail Station #5505, Tallahassee, Florida 32399-2400. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in this Title V Revised DRAFT Permit, the permitting authority shall issue another Title V Revised DRAFT Permit and require, if applicable, another Public Notice.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57 of the Florida Statutes (F.S.). The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000 (Telephone: 850/488-9730; Fax: 850/487-4938). Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S., must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of the notice of intent, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the permitting authority for notice of agency action may file a petition within fourteen days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the applicable time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of

Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28.106.205 of the Florida Administrative Code (F.A.C.).

A petition that disputes the material facts on which the permitting authority's action is based must contain the following information:

(a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address and telephone number of the petitioner; name address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how petitioner's substantial rights will be affected by the agency determination;

(c) A statement of how and when the petitioner received notice of the agency action or proposed action;

(d) A statement of all disputed issues of material fact. If there are none, the petition must so state;

(e) A concise statement of the ultimate facts alleged, as well as the rules and statutes which entitle petitioner to relief;

(f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and,

(g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the agency to take with respect to the agency's proposed action.

A petition that does not dispute the material facts upon which the permitting authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the permitting authority's final action may be different from the position taken by it in this notice of intent. Persons whose substantial interests will be affected by any such final decision of the permitting authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation is not available for this proceeding.

In addition to the above, pursuant to 42 United States Code (U.S.C.) Section 7661d(b)(2), any person may petition the Administrator of the EPA within 60 (sixty) days of the expiration of the Administrator's 45 (forty-five) day review period as established at 42 U.S.C Section 7661d(b)(1), to object to issuance of any permit. Any petition shall be based only on objections to the permit that were raised with reasonable specificity during the 30 (thirty) day public comment period provided in this notice, unless the petitioner demonstrates to the Administrator of the EPA that it was impracticable to raise such objections within the comment period or unless the grounds for such objection arose after the comment period. Filing of a petition with the Administrator of the EPA does not stay the effective date of any permit properly issued pursuant to the provisions of Chapter 62-213, F.A.C. Petitions filed with the Administrator of EPA must meet the requirements of 42 U.S.C. Section 7661d(b)(2) and must be filed with the Administrator of the EPA at: U.S. EPA, 401 M Street, S.W., Washington, D.C. 20460.

A complete project file is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

Permitting Authority
Department of Environmental Protection
Bureau of Air Regulation
111 South Magnolia Drive

Department of Environmental Protection

Lawton Chiles
Governor

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Virginia B. Wetherell
Secretary

October 1, 1998

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Gregory M. Nelson, P.E.
Manager - Environmental Planning
Tampa Electric Company
6944 US Highway 41 North
Apollo Beach, Florida 33572-9200

Re: Request for Ambient Sulfur Dioxide Predictions in the Vicinity of F. J. Gannon Station
FDEP File Nos. 0570040-002-AV and 0570040-007-AC

Dear Mr. Nelson:

During our meeting of February 17, 1998 to discuss the Title V draft permits for the F.J. Gannon Station we discussed the likelihood of modeled exceedances of the ambient air quality standards for sulfur dioxide. We requested and believe TEC agreed to provide, more detailed modeling incorporating physical features (such as nearby buildings) capable of affecting the results.

The concern about the potential exceedances has increased because modeling performed for a project at the nearby Cargill Fertilizer Complex indicated modeled exceedances to which the Gannon Station contributes. Additionally the recent Big Bend scrubber and Gannon coalyard pollution control project (PCP) applications indicate that actual emissions at Gannon may increase. While these emissions increases appear to be within the permitted emission limits of the plant, the likelihood of actual (rather than modeled ambient exceedances) is increased.

The information needed is similar to what was submitted for the Big Bend Station in March. Please provide the requested information for the Gannon Station by October 30. If you are unable to provide it, please submit the data on the physical details of the plant in a format compatible with the Building Profile Input program (BPIP) to determine the appropriate downwash parameters for ISCST3. Please include a detailed map for the Gannon Station similar to the one provided for the Big Bend Station showing the location of all of the fenceline receptors used in the air quality impact analysis.

If you should have any questions, please call me or Cleve Holladay (meteorologist) at 850/921-8986.

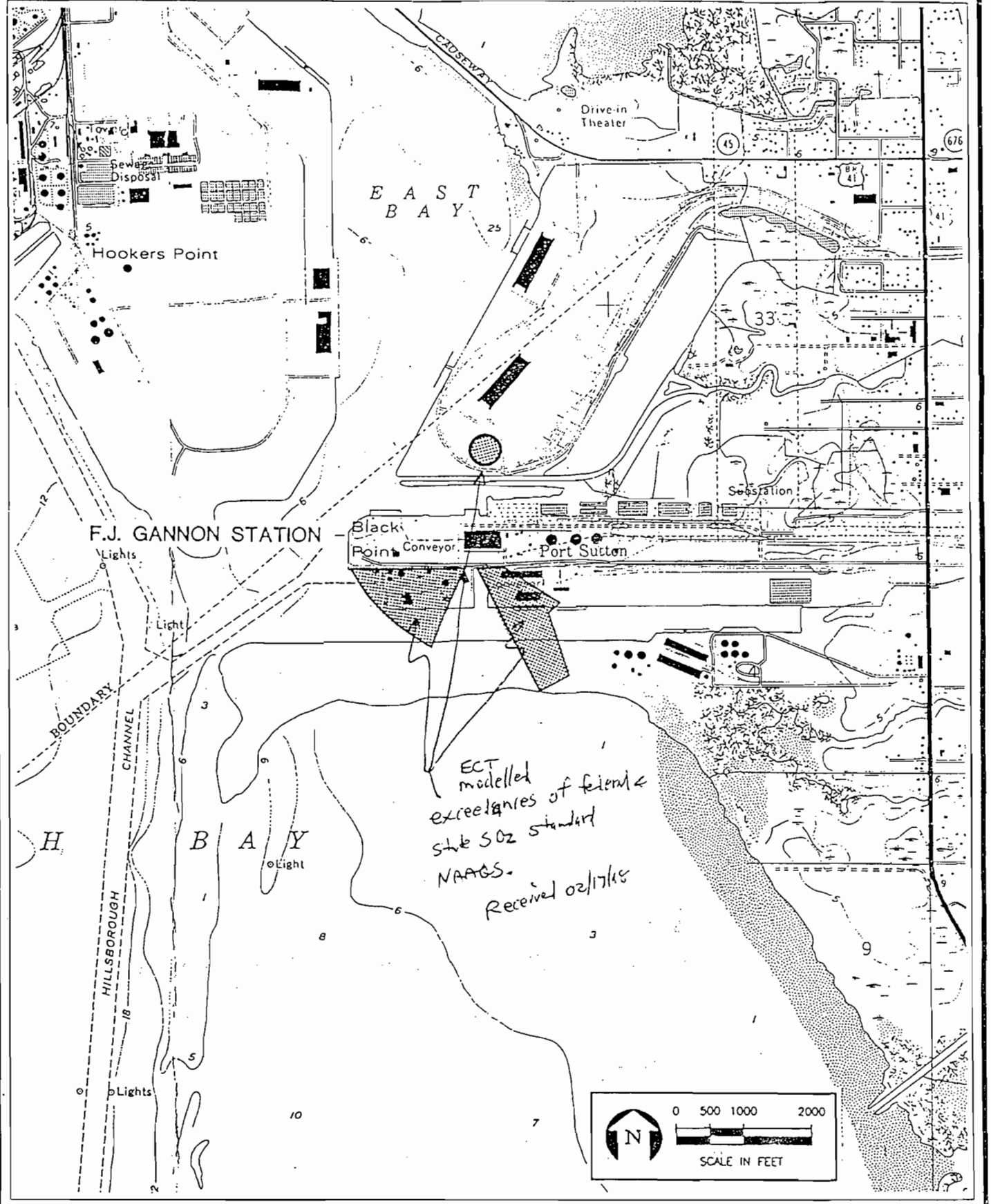
Sincerely,

C. H. Fancy, P.E., Chief
Bureau of Air Regulation

CHF/ch

Enclosure

cc: Doug Neeley, EPA
Iwan Choronenko, HCEPC
Howard Rhodes, DEP
Bill Thomas, DEP SWD



F.J. GANNON STATION IMPACT AREAS

Source: USGS Quad, Tampa, FL, 1981.

TECO
TAMPA ELECTRIC

Department of Environmental Protection

Lawton Chiles
Governor

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Virginia B. Wetherell
Secretary

August 25, 1998

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. David B. Jellerson, P.E.
Environmental Superintendent
Cargill Fertilizer, Inc.
8813 US Highway 41 South
Riverview, Florida 34221

Re: DEP File No. 0570008-025-AC (PSD-FL-250)
3,200 Tons Per day Sulfuric Acid Plant

Dear Mr. Jellerson:

Enclosed is one copy of the Draft Air Construction Permit for the project at the existing Sulfuric Acid Plant No. 7 located at Cargill Fertilizer, US Highway 41 South, in Riverview, Hillsborough County. The Department's Intent to Issue Air Construction Permit and the "PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT" are also included.

The "PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT" must be published in the legal section of a newspaper of general circulation in Hillsborough County. Proof of publication, i.e., newspaper affidavit, must be provided to the Department's Bureau of Air Regulation office within 7 (seven) days of publication. Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permit.

Please note that *modeled* violations were predicted for sulfur dioxide (SO_2) with or without the production increase. According to Rule 62-212.400(5)(d), F.A.C., *"The owner ..... shall demonstrate ... that the increase in emissions .... will not cause or **contribute** to a violation of any ambient air quality standard ....."* The Department has interpreted "contribute" to mean "significantly contribute" with respect to the "Significant Impact Levels" for SO_2 and intends to issue the permit. This interpretation is consistent with EPA Guidance. [Draft NSR Workshop Manual, Page C.52, 1990] Because of the modeled violations, the Department must consider remedial action through the applicable provisions of the state implementation plan. We are reviewing the matter in the course of Title V permitting for large sources in the area and will assess the possible benefits from Title IV, Acid Rain requirements. We recommend that Cargill consider emission reductions at the existing sulfuric acid plants as one other project was already approved at the facility under similar circumstances.

Please submit any written comments you wish to have considered concerning the Department's proposed action to A. A. Linero, P.E., Administrator, New Source Review Section at the above letterhead address. If you have any other questions, please call Mr. Linero at 850/921-9523.

Sincerely,

A A Linero P.E. 8/25

for C. H. Fancy, P.E., Chief,
Bureau of Air Regulation

CHF/aal

Enclosures

ENVIRONMENTAL PROTECTION COMMISSION
HILLSBOROUGH COUNTY

ADMINISTRATIVE OFFICES, LEGAL & WATER MANAGEMENT DIVISION
1900 - 9TH AVENUE
TAMPA, FLORIDA 33605
TELEPHONE (813) 272-5960
FAX (813) 272-5157

AIR MANAGEMENT DIVISION
TELEPHONE (813) 272-5530

WASTE MANAGEMENT DIVISION
TELEPHONE (813) 272-5788

WETLANDS MANAGEMENT DIVISION
TELEPHONE (813) 272-7104

MEMORANDUM

DATE: May 20, 1998

TO: Lennon Anderson

FROM: Alice H. Harman, P.E. AH THRU: RK Richard C. Kirby, IV, P.E.

SUBJECT: TECO Gannon - Follow-up to DEP's Response on Draft Title V

The following information was to be provided concerning comments from TECO. DEP requested EPC to research out a response.

1. Comment #26 (permit modification notifications to EPC): Pursuant to Rule 62-213.412(2), F.A.C., "..Title V source may immediately implement such changes after they....new or revised construction permit...after the source provides to EPC, the Department, each affected state and approved local air program having geographic jurisdiction over the source, a copy of the source's application for operation permit revisions.....", EPC is entitled to receive a copy of all permit modifications. The rule is also paraphrased in Appendix TV-1, Title V Condition No. 39.
2. Comment #29 and #30 (description of fly ash handling): TECO requested additional wording be added for the material handling process flow. The additional wording requested was granted on September 18, 1996 as part of DEP File Processing No.: 0570040-003-AO issued by the SW District. (copy attached) EPC's review memorandum is also attached.

Due to numerous changes, revisions, and deletions of specific conditions, EPC request the opportunity to comment on the revised draft when issued.

Enclosures

AIR MANAGEMENT DIVISION
TELEPHONE (813) 272-5530
WASTE MANAGEMENT DIVISION
TELEPHONE (813) 272-5788
WETLANDS MANAGEMENT DIVISION
TELEPHONE (813) 272-7104

M E M O R A N D U M

DATE: August 21, 1996

TO: George Richardson **THRU:** Jerry Kissel, P.E.

FROM: Leroy Shelton LS **THRU:** RK Richard C. Kirby, IV, P.E.

SUBJECT: **TECO Permit Amendments - Fly Ash Silo No. 1 - AO29-250137**
Fly Ash Silo No. 2 - AO29-250140
(TECO Letter dated July 16, 1996)

1. TECO's letter of July 16, 1996, proposed changes to the existing fly ash silos 1 & 2 permits to allow the fly ash from silo No. 2 to be either gravity fed into closed trucks under silo No. 2, as it is now, or to be gravity fed into the exisiting pugmill under silo No. 1, conditioned with water, and fed into open bed trucks, as currently is the case with the fly ash from silo No. 1. There will be no change to the current emissions limitations.

2. Patrick Shell, EPC, inspected TECO Gannon August 15, 1996. He noted no problems with the proposed amendment concerning the fly ash silos.

3. As per our conversation August 20, 1996, I see no potential adverse impact with the proposed amendment. Based on my engineering judgement, recommend approval of the amendment as proposed on page two of TECO's letter of July 16, 1996.

Environmental Protection

Lawton Chiles
Governor

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

Virginia B. Wetherell
Secretary

NOTICE OF PERMIT AMENDMENT

CERTIFIED MAIL

Mr. Patrick A. Ho, P.E.
Manager, Environmental Planning
Tampa Electric Company
Post Office Box 111
Tampa, FL 33601-0111 /

Dear Mr. Ho:

Re: Permit Amendment
F.J. Gannon Station
Fly Ash Silos No. 1 and 2
DEP File Processing No.: 0570040-003-AO
Current DEP File No.: AO29-250137 & AO29-250140

These permit amendments are at the request of Ms. Laura A. Rector, Engineer, Environmental Planning, Tampa Electric Company. The amendments are as follows:

Permit Number AO29-250137, Silo No. 1

Change description from:

For the operation of F.J. Gannon Station Units 5 and 6 Fly Ash Silo No. 1 (silo No. 1) with baghouse and pugmill. Fly ash that is collected in the hoppers of the electrostatic precipitators of Units 5 and 6 is pneumatically conveyed to a 25 foot diameter, 50 foot high silo. The fly ash in the silo is gravity fed by chute into enclosed tanker trucks or to a pugmill where it is "conditioned" by wetting with water and gravity fed by chute into open bed trucks. The fly ash is then transported to an off-site consumer.

Change description to:

For the operation of F.J. Gannon Station Units 5 and 6 Fly Ash Silo No. 1 (silo No. 1) with baghouse and pugmill. Fly ash that is collected in the hoppers of the electrostatic precipitators of Units 5 and 6 is pneumatically conveyed to a 25 foot diameter, 50 foot high silo. The fly ash in the silo is gravity fed by chute into enclosed tanker trucks or to a pugmill where it is "conditioned" by wetting with water and gravity fed by chute into open bed trucks. In addition, fly ash from F.J. Gannon Station Units 1-4 Fly Ash Silo No. 2 (silo No. 2) may be routed via gravity flow to the pugmill where it is "conditioned" by wetting with water and gravity fed into open bed trucks. The fly ash is then transported to an off-site consumer.

Permit Number AO29-250140, Silo No. 2

Change description from:

For the operation of F.J. Gannon Station Units 1-4 Fly Ash Silo No. 2 (silo No. 2) with baghouse. Fly ash that is collected in the hoppers of the electrostatic precipitators of Units 1-4 is pneumatically conveyed to a 30 foot diameter, 45.5 foot high silo. The fly ash in the silo is gravity fed by tubing into enclosed tanker trucks for transport to an off-site consumer.

Change description to:

For the operation of F.J. Gannon Station Units 1-4 Fly Ash Silo No. 2 (silo No. 2) with baghouse. Fly ash that is collected in the hoppers of the electrostatic precipitators of Units 1-4 is pneumatically conveyed to a 30 foot diameter, 45.5 foot high silo. The fly ash in the silo is gravity fed by tubing into enclosed tanker trucks for transport to an off-site consumer. In addition, fly ash from silo No. 2 may be routed to the pugmill at F.J. Gannon Station Silo No. 1 where it is "conditioned" by wetting with water and gravity fed into open bed trucks. The fly ash is then transported to an off-site consumer.

A person whose substantial interests are affected by this permit amendment may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel, Douglas Building, Mail Station 35, 3900 Commonwealth Blvd., Tallahassee, Florida 32399-3000; within 14 days of receipt of this permit amendment.

Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative proceeding (hearing) under Section 120.57, Florida Statutes.

The petition shall contain the following information;

(a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department's Permit File Number and the county in which the project is proposed;
(b) A statement of how and when each petitioner received notice of the Department's action or proposed action;
(c) A statement of how each petitioner's subsequent interests are affected by the Department's action or proposed action;
(d) A statement of the material facts disputed by petitioner, if any;

(e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action;
(f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action of proposed action; and
(g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the department's action or proposed action.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this permit amendment. Persons whose substantial interests will be affected by any decision of the Department with regard to the permit amendment have a right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of receipt of this permit amendment, in the Office of General Counsel at the above address of the Department. Failure to petition within the allotted time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, Florida Statutes, and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 62-5.207, Florida Administrative Code.

This permit amendment is final and effective on the date filed with the Clerk of the Department unless a petition is filed in accordance with the above paragraphs or unless a request for an extension of time in which to file a petition is filed within the time specified for filing a petition and conforms to Rule 17-103.070, Florida Administrative Code.

Upon timely filling of a petition or a request for an extension of time this permit amendment will not be effective until further Order of the Department. When the Order (Permit Amendment) is final, any party to the Order has the right to seek judicial review of the Order pursuant to Section 120.68, Florida Statutes, by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellant Procedure, with the Clerk of the Department in the Office of General Counsel, Douglas Building, Mail Station 35, 3900 Commonwealth Blvd., Tallahassee, Florida 32399-3000; and by filing a copy of the Notice of Appeal accompanied by the applicable filing fees with the appropriate district Court of Appeal. The Notice of Appeal must be filed within 30 days from the date the Final Order is filed with the Clerk of the Department.

This amendment letter or a copy of this amendment letter must be attached to and becomes a part of air operating permits number AO29-250137 & AO29-250140. If you have any questions, please contact George Richardson in the Air Permitting Section at (813)744-6100, Ext. 105.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION

W.C. Thomas, P.E.
District Air Program
Administrator
Southwest District

cc: Environmental Protection Commission of
Hillsborough County

CERTIFICATE OF SERVICE

The undersigned duly designated Deputy Department Clerk hereby certifies that this Notice of Permit Amendment and all copies were mailed by certified mail before the close of business on 9-18-96 to the listed persons.

FILING AND ACKNOWLEDGEMENT

FILED, on this date, pursuant to Paragraph 120.52(11), Florida Statutes, with the designated Deputy Department Clerk, receipt of which is hereby acknowledged.

Anne Almond
Clerk

9-18-96
Date

TAMPA ELECTRIC

March 19, 1998

Mr. Lenon Anderson
Title V Section
Florida Department of Environmental Protection
Twin Towers Office Building
111 South Magnolia Drive, Suite 4
Tallahassee, Florida 32301

Via FedEx
Airbill No. 800926219607

Re: Tampa Electric Company
F. J. Gannon Station
Draft Title V Air Operation Permit
FDEP File No. 0570040-002-AV

Dear Mr. Anderson:

Please find enclosed TEC's detailed comments regarding the above referenced draft Title V permit. As we discussed, the SO_2 modeling analysis will be submitted under separate cover. In addition, TEC requests that all test windows be ninety (90) days and Gannon Units 1-6 test windows correspond with the Acid Rain RATA testing requirements as follows:

Emission Unit	Annual Date	Frequency
Gannon Unit 1	1st Quarter	Annually
Gannon Unit 2	3rd Quarter	Annually
Gannon Unit 3	4th Quarter	Annually
Gannon Unit 4	2nd Quarter	Annually
Gannon Unit 5	1st Quarter	Annually
Gannon Unit 6	1st Quarter	Annually

Please feel free to telephone me at (813) 641-5039, if you have any questions. Thank you.

Sincerely,

Janice K. Taylor
Senior Engineer
Environmental Planning

EP\gm\JKT830

Enclosure

c/enc: Mr. Scott Sheplak, FDEP-Tallahassee
Mr. Jerry Kissel, FDEP-SW District
Mr. Richard Kirby, EPCHC -
Via FedEx Airbill No. 5060867851

RECEIVED
MAR 20 1998
BUREAU OF
AIR REGULATION

TAMPA ELECTRIC COMPANY
COMMENTS REGARDING THE TITLE V AIR OPERATION PERMIT FOR
F.J. GANNON STATION
FDEP FILE NO. 0570040-002-AV

Table of Contents

TEC Comment 1:

TEC requests the following change to the Table of Contents:

III. Emissions Units and Conditions

...

E. ~~Coal~~ Fuel Yard

Section I. Facility Information.

TEC Comment 2:

TEC requests the following changes to Subsection B. Summary of Emissions Unit ID Nos. and Brief Descriptions:

-008 Fuel ~~Coal~~ Yard. . .
-013 Unit No. 1 Fuel ~~Coal~~ Bunker with Roto-Clone
-014 Unit No. 2 Fuel ~~Coal~~ Bunker with Roto-Clone
-015 Unit No. 3 Fuel ~~Coal~~ Bunker with Roto-Clone
-016 Unit No. 4 Fuel ~~Coal~~ Bunker with Roto-Clone
-017 Unit No. 5 Fuel ~~Coal~~ Bunker with Roto-Clone
-018 Unit No. 6 Fuel ~~Coal~~ Bunker with Roto-Clone

Section II. Facility-wide Conditions.

TEC Comment 3:

Consistent with the previously issued Title V Air Operations Permit for Hookers Point Station, TEC requests the Appendix E-1, List of Exempt Emissions Units and/or Activities, as cited in Condition 5, be modified as follows to include:

13. Storage tanks less with than 550 gallons capacity
14. Inorganic substance storage tanks with 550 gallon or greater capacity and not containing a hazardous air pollutant (HAP)
15. No. 2 fuel oil storage tanks
16. Equipment used for steam cleaning

17. Turbine vapor extractors

TEC Comment 4:

TEC requests Condition 7 be changed as follows:

(a) Attend to accidental spills (solid fuel ~~coal~~ and fly ash) promptly and effectively.

TEC Comment 5:

TEC requests Condition 7(b) be deleted. The specific conditions for each steam generator include required reasonable precautions to minimize particulate matter emissions. Condition 7(b) duplicates these requirements with less specific language that could cause confusion.

TEC also notes that the cited underlying rule for Condition 7(b), 62-296.320(4)(c)(2), F.A.C., applies to unconfined particulate matter emission sources. This rule is not applicable to the steam generators because these emissions units are confined particulate matter emission sources.

Section III. Regulated Emissions Units Conditions

TEC Comment 6:

TEC requests that Emission Unit 3 description be clarified as follows because the heat recovery system is no longer in service:

.... and is of the cyclone firing type~~, equipped with an optional flue gas recirculation (heat recovery) system to maintain steam temperature at low loads~~.

TEC Comment 7:

The subsection A permitting note references these units as Phase I Acid Rain units. These units are regulated under the Phase II Acid Rain rules only.

TEC Comment 8:

TEC requests that all emission units listed in Subsections A, B and C be combined into Subsection A. This consolidation will clarify the specific permit condition requirements for these emission units as well as streamline the permit. TEC believes this approach is appropriate because these units have the same basic method of operations.

TEC Comment 9:

TEC requests Condition A.1 be changed as follows:

The maximum permitted heat input rate on a monthly average basis for each unit is as follows: . . .

TEC Comment 10:

TEC requests Condition A.2 be changed to read as follows to recognize that coal and ignition oil are jointly burned, to allow for the injection of nonhazardous boiler cleaning waste, and to allow on-specification used oil (including oily soil) combustion during normal operations:

(a) Normal operation: The only fuels allowed to be burned are coal and on-specification used oil.

(b) Startup; shutdown; malfunctions: In addition to the fuels allowed to be burned during normal operations, each unit may also burn new No. 2 fuel oil during startup, shutdown and malfunctions. This includes but is not limited to the emission unit, a new cyclone/mill or combustion stabilization.

(c) The injection of nonhazardous boiler chemical cleaning waste is allowed in each unit.

TEC Comment 11:

Consistent with the existing operating permits for F.J. Gannon Station, TEC requests the following statement be added to Condition A.3:

A test under sootblowing conditions which demonstrates compliance with a non-sootblowing limitation will be accepted as proof of compliance with that non-sootblowing limitation.

In addition, TEC requests that only one visible emissions test be done under sootblowing conditions. TEC believes duplicate testing provides no environmental benefit.

TEC Comment 12:

TEC requests Condition A.4 be changed as follows to clarify design fuel consumption rates:

A. Process System Performance Parameters:

1. Source Designator: Units Nos. 1-6
2. Design Fuel Consumption Rate at Maximum Continuous Rating:

Unit	Tons/hr (fuel ~~coal~~)	Fuel Heat Content (Btu/lb)
1	50	12,570
2	51	12,570
3	65	12,300
4	80	11,699

5	93.4	12,227
6	151.4	12,543

All Units:

On-specification used oil - 48 gallons per minute/per boiler; Max 1,000,000 gal/yr per station

. . .

Monthly Recorded or Inspection/Maintenance

~~Inspect insulator compartment heaters/blowers.~~

Units 1-4 Inspect insulator compartment heaters/blowers.

Units 5-6 Inspect penthouse pressurizing fan filters.

TEC Comment 13:

TEC requests Condition B.3 be eliminated because enforcing this condition is neither necessary nor practical. The quantity of SO_2 generated from on-specification used oil combustion is negligible compared to the quantity of SO_2 generated from coal combustion. Segregating and determining the quantity of SO_2 generated from the combustion of each fuel is not possible.

TEC Comment 14:

TEC requests Condition B.6 be changed to Condition A.6 and amended as follows because we believe it will provide clarity and we know of no regulatory requirement mandating recordkeeping completion.:

b. Quantity Limitation: This emissions unit is permitted to burn "on-specification" used oil that is generated by TECO ~~the F.J. Gannon Station~~ in the production and distribution of electricity, not to exceed 1,000,000 gallons during any consecutive 12 month period.

. . .

e. Testing requirements*: The owner or operator shall sample and analyze each batch of used oil to be burned . . .

*Used oil parameters may be characterized by generator knowledge.

f. Record Keeping Requirements: The owner or operator....

(1) The gallons of on-specification used oil generated and burned each month. ~~(This record shall be completed no later than the fifteenth day of the succeeding month.)~~

(2) Consecutive 12-month period. ~~(This record shall be completed no later than the fifteenth day of the succeeding month.)~~

TEC Comment 15:

TEC requests the brief description of the combustion turbine in subsection D be clarified as follows:

This emissions unit is a simple cycle combustion turbine and is designated Combustion Turbine #1 ~~7~~. . . .

TEC Comment 16:

TEC recommends Condition D.7 be changed as follows to promote clarity:

Excess emissions from this ~~these~~ emissions units resulting from . . .

TEC Comment 17:

TEC requests this condition D.9 be changed as follows:

The permittee shall demonstrate compliance with the liquid fuel sulfur limit by means of a fuel analysis ~~provided by the vendor upon each fuel delivery~~ or by contract specifications.

TEC Comment 18

TEC requests Condition D.10 be deleted as unnecessary.

TEC Comment 19:

TEC recommends that Condition D.16 be changed as follows to promote clarity:

Visible Emissions Testing - Annual: By this permit, annual emissions compliance testing for visible emissions is not required ~~for those emissions units~~ while burning ~~c:~~ only liquid fuels for less than 400 hours per year.

TEC Comment 20:

TEC requests Condition D.22 be clarified as follows:

In order to document compliance with the visible emission testing exemption provided in Specific Condition No. D.16 ~~D.5~~, ...

TEC Comment 21:

TEC requests the brief description of the fuel yard in Subsection E be clarified as follows:

-008 F.J. Gannon Station Fuel ~~Coal~~ Yard

For the operation of a fuel ~~bituminous coal~~ yard serving the F.J. Gannon Station boiler units 1 through 6, yard activities including barge (east and west) and railcar unloading of coal, truck/barge unloading of flux ~~limestone or iron ore~~, and transfer and storage

of these materials. ~~The iron ore is shipped, stored, and handled in the same manner as limestone.~~ . . .

Source Designator	Particulate Control Method	Efficiency Rating at Design Capacity	Maximum Design Material Handling Rate (TPH)
Barge to ~~East~~ Grab Bucket	Grab Bucket	-----	1500
~~East~~ Grab Bucket to ~~East~~ Hopper	Side Enclosure	25%	1500
Barge to ~~West~~ Continuous Unloader	Enclosure	40%	1500
~~Barge to West Grab Bucket~~	~~Grab Bucket~~	~~-----~~	~~1500~~
~~West Grab Bucket to to West Hopper~~	~~Side Enclosure~~	~~25%~~	~~1500~~
. . .			
~~West Hopper to Feeder~~	~~-----~~	~~-----~~	~~1500~~
. . .			
Live ~~Limestone~~ Fluxing Stockpile			

TEC Comment 22:

TEC requests Condition E.1 be clarified as follows:

> Permitted Capacity: The maximum permitted process rate is 2.85 million tons/year of coal.

TEC Comment 23:

TEC requests Condition E.4 be deleted because demonstrating compliance with the stated condition is not possible.

TEC Comment 24:

TEC recommends specific Condition E.5., be deleted because the west grab bucket has been retired.

TEC Comment 25:

TEC requests Condition E.8 be clarified as follows:

B. Inspection and Maintenance Procedures:

The fuel ~~coal~~ yard particulate control equipment shall receive regular preventative maintenance as follows: . . .

TEC Comment 26:

TEC requests that Condition E.11 be deleted. All permit modification notifications will be submitted to FDEP, consistent with the Title V Air Operation Permit program.

TEC Comment 27:

TEC requests that Condition E.14 be deleted. This condition is no longer applicable to the fuel yard operations.

TEC Comment 28:

TEC requests that Condition E.15 be deleted. This condition is no longer applicable because the west grab bucket has been retired.

TEC Comment 29:

TEC requests the brief description of the Units 5-6 Fly Ash Silo (No. 1) in Subsection G be clarified as follows:

. . .In addition , fly ash from F.J. Gannon Station Units 1-4 Fly Ash Silo No. 2 (silo No. 2) may be routed via gravity flow to the pugmill where it is "conditioned" by wetting with water and gravity fed into open bed trucks. The fly ash is then transported to an off-site consumer. Fly ash may also be conveyed from tanker trucks to Fly Ash Silo No. 1 and from Fly Ash Silo No. 1 to Fly Ash Silo No. 2. . . .

TEC Comment 30:

TEC requests the brief description of the Units 1-4 Fly Ash Silo (No. 2) in Subsection H be clarified as follows:

. . . In addition, fly ash from silo No. 2 may be routed to the pugmill at F.J. Gannon Station Silo No. 1 where it is "conditioned" by wetting with water and gravity fed into open bed trucks. The fly ash is then transported to an off-site consumer. Fly ash may also be conveyed from tanker trucks to Fly Ash Silo No. 2 and from Fly Ash Silo No. 2 to Fly Ash Silo No. 1. . . .

TEC Comment 31:

TEC requests the brief description of the fuel bunkers with Roto-Clones in subsection I be clarified as follows:

> For the operation of F.J. Gannon station Units 1-6 fuel ~~coal~~ bunkers with exhaust fan/cyclone collector (Roto-Clone) controlling dust emissions from each unit's respective bunker, two moving transfer stations via their respective conveyor belts fuel ~~coal~~ through enclosed chutes to each of the six bunkers. Fuel ~~Coal~~ bunkers No. 1-4 and 6 are each equipped with a 9,600 ACFM American Air Filter Company Type D Roto-Clone to abate dust emissions during ventilation. Fuel ~~Coal~~ bunker No. 5 is equipped with a 5,400 ACFM Type D Roto-clone. A number of vent pipes convey air from each bunker to a Roto-Clone during particulate removal. Particulate matter removed by the Roto-Clones is returned to a fuel ~~coal~~ bunker via a hopper and return line. Units No. 1-6 fuel ~~coal~~ bunkers are situated in a west to east fashion. Unit No. 1 fuel ~~coal~~ bunker is located furthest west and Unit No. 6 fuel ~~coal~~ bunker is located furthest east.

TEC Comment 32:

TEC requests Condition I.2 be clarified as follows:

> . . . the maximum allowable particulate matter emission rate from each of the six fuel ~~coal~~ bunkers shall not exceed 0.99 ton/year.

TEC Comment 33:

TEC requests Condition I.3 be clarified as follows:

> Visible emissions from each of the six fuel ~~coal~~ bunkers shall not be equal to or greater than 20% opacity.

TEC Comment 34:

TEC requests that Condition I.4 be deleted to avoid confusion because this requirement is adequately addressed in Subsection K.

TEC Comment 35:

TEC requests Condition I.5 be deleted because each rotoclone emits less than 1 tn/yr and therefore by regulations are exempt from RACT requirements.

TEC Comment 36:

TEC requests Condition J.6 be changed as follows:

> Visible emissions shall not exceed 20 percent opacity, except for one six ~~two~~-minute period per hour during which the opacity shall not exceed 27 ~~40~~ percent.

TEC Comment 37:

TEC notes that Condition J.19.2 contains a requirement c., but does not have an a. nor b. TEC requests the opportunity to review any missing permit conditions prior to permit finalization.

TEC Comment 38:

TEC notes that Condition J.21(a) does not contain a requirement 1. but does contain requirements 2. and 3. TEC requests the opportunity to review any missing permit conditions prior to permit finalization.

TEC Comment 39:

TEC requests that Condition J.22 be modified as follows:

> The permittee shall demonstrate compliance with the liquid fuel sulfur limit by means of a fuel analysis provided by the vendor upon each fuel delivery or by contract specified.

TEC Comment 40:

TEC requests that Condition J.30 be deleted. New No. 2 oil, which is fired only during startup, makes a negligible contribution to emissions from these emissions units. the cost of installing and maintaining new flow monitoring equipment is not justified by the benefit received.

TEC Comment 41:

TEC requests the portion of Condition J.33.e (reporting requirements) requiring the quarterly reporting to EPC be deleted because this requirement is unnecessary.

TEC Comment 42:

TEC requests the following changes to Subsection K. Common Conditions:

-013 Unit No. 1 Fuel ~~Coal~~ Bunker with Roto-Clone
-014 Unit No. 2 Fuel ~~Coal~~ Bunker with Roto-Clone
-015 Unit No. 3 Fuel ~~Coal~~ Bunker with Roto-Clone
-016 Unit No. 4 Fuel ~~Coal~~ Bunker with Roto-Clone
-017 Unit No. 5 Fuel ~~Coal~~ Bunker with Roto-Clone
-018 Unit No. 6 Fuel ~~Coal~~ Bunker with Roto-Clone

TEC Comment 43:

TEC requests Condition K.2. be clarified to include the rotoclones.

TEC Comment 44:

TEC requests Condition K.3. be modified to allow for the testing of two (2) rotoclones annually.

ENVIRONMENTAL PROTECTION COMMISSION
HILLSBOROUGH COUNTY

ADMINISTRATIVE OFFICES, LEGAL & WATER MANAGEMENT DIVISION
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WETLANDS MANAGEMENT DIVISION
TELEPHONE (813) 272-7104

MEMORANDUM

DATE: March 19, 1998

TO: Lennon Anderson

FROM: RK Richard C. Kirby, P.E. THRU: Jerry Campbell, P.E.

SUBJECT: TECO Gannon Station 0570040-002-AV

This memo is written to summarize the remaining issues which EPC has with the referenced Title V permit. These issues have been discussed with representatives of TECO.

1. The EPC feels strongly that annual limits based on a calendar year are inappropriate. Permit limits should be based, at a maximum, on an annual limit rolled monthly. As back-up for this request, I have attached a copy of page 9 from EPA's guidance dated June 13, 1989, "Limiting Potential to Emit in New Source Permitting." Also:
2. TECO still has not provided information requested regarding their flue gas conditioning system. They should submit a compliance plan to be included in the permit which addresses the issue.
3. We fully support the DEP's requirement for testing during soot blowing and non-soot blowing conditions.
4. Emissions tests should be conducted while boilers are in the automatic mode as opposed to manually controlled to achieve steady state. Attached is a copy of EPA's "A Guideline for Evaluating Compliance Test Results". This document explains under which circumstances testing outside of the 90-110 percent isokinctic range is acceptable.
5. We request that issues provided in our previous comments (copy attached) be addressed by TECO. Perhaps a compliance plan included in the permit is appropriate.

Attachment

cag

1. **Specific Condition(s): A.2., B.2., C.2 (Methods of Operations Fuels):** . Under methods of operation in the draft permit, it states that the No. 2 fuel oil and the coal shall not be cofired. Our previous inspection of the facility along with the information contained in section III.I.6 of the appliction, "Procedures For Start-up and Shut Down", indicates Tampa Electric cofiries No. 2 fuel oil **and** coal during start-up. Based on their current operation, it appears they would be in violation of this condition. Please revise that cofiring may occur during start-up. The rule quote should be Rule 62-210 (274) not Rule 62-210 (272). (See additional comments below concerning used oil.)

2. **Specific Condition(s): A.3., B.4., C.3. (Test Methods and Procedures):** These conditions require the Tampa Electric use EPA reference methods along with fuel analysis to demonstrate compliance with the visible emission and sulfur dioxide emission limits. However, the application (section III Part 9b-1), Tampa Electric has proposed the method of compliance for visible emissions and sulfur dioxide would be fuel sampling or CEM. EPC is in agreement with the use of CEMs but not the option to perform either. The conditions should be modified to require CEM as the method of compliance on a continuous frequency. In order to insure the accuracy of the data, the permit should also require that the CEMs be quality assured in accordance with 40CFR60 Appendix F.

3. **Specific Condition(s): A.4., B.5., C.4. (Monitoring of Operations):** In listing the operation and maintenance parameters for performance and particulate control, the conditions need to specify either maximum or minimum design parameters. For example, the more power delivered to the ESP in the form of higher voltages and currents results in higher removal efficiencies. Therefore, theses parameters need to state minimum design settings. In order to ensure proper operation of the boilers and in order to reduce the boiler tube failure rates, the maximum steam pressure and temperature should be specified. The following clarification needs to be added (additional wording underlined) based on Rule 62-296.700(6)(a), F.A.C.:
    - Maximum Design Operating Pressure
    - Maximum Design Operating Temperature
    - Minimum Design Primary Voltage
    - Minimum Design Primary Current
    - Minimum Design Secondary Voltage
    - Minimum Design Secondary Current
    - Specific Collection Area for ESP

3a. If CEMs are accepted as the method of compliance, the following observations need to be added (underlined) based on Rules 62-213.440(1) and 62-296.700(6)(d):
- Continuously Monitored and Recorded:
    - NOx (lb/MMbtu)
    - SO_2 (lb/MMbtu)

- CO_2 (lb/MMbtu)
- Gas Flow (ACFM)
- Heat Input (MMbtu/hr)

- Daily Recorded and Monitored:
  - Check Hoppers
  - Flue Gas condition system sulfur usage (Unit #6 only)

4. **Specific Condition B.2. (Methods of Operation - Fuels), B.5. (Monitoring of Operation):** Permit AO29-255208 (Unit 4) includes the burning of "on-specification" used oil at a maximum firing of 48 gal/min. What is the reference for the 1,000,000 gal/yr maximum usage? According to the attached memorandum dated 12/15/93, the DEP encourages the burning of "on-specification" used oil. Based on our inspections, Tampa Electric is burning "on-specification" used oil in all of the boilers at the facility. Therefore, the allowable fuels (Specific Conditions A.2., B.2., C.2.) and the conditions for the "on-specification" used oil (Specific Condition B.6) needs to be referenced for all boiler units.

5. **Subsection E (Description):** There appears to be some transfer points missing from the coal yard: D1 to G1, D2 to G2, all points associated with flux handling (tab 14 of application). Please include all transfer/handling units as required under Rule 62-210.300 and Rule 296-700, F.A.C..

6. **Specific Condition E.3. (Visible Emissions**): Rule quote should be "62-296.711(2)(a), F.A.C.".

7. **Specific Condition E.4. (Particulate Matter), Table 1-1**: The PM standard as listed appears to apply to the entire yard while moving 2.85 million tons of coal. Our reading of AC29-152987 sets the 1.43 pounds per hour and 0.51 tons per year limitation to a single piece of equipment, the west coal unloading station. We recommend you delete the Specific Condition altogether, since the equations used to calculate it are highly subjective. The 5% standard under E.3. is verifiable and sufficient to ensure reasonable handling. If you feel compelled to leave it in, then add that it only applies to the west end unloading station.

8. **Specific Condition F.4., G.4., H.4., I.3., I.4., Table 2-1 (pg. 7 of 7): (Test Methods and Procedures):** Either clarify here that the particulate matter test is not required if they accept a 5% visible emission under the exemption Rule 62-297.310(7)(c) or add a note to see Subsection K. Common Conditions for further information. **For Specific Conditions I.3. and I.4.**: If they chose not to accept 5%, then they should be required to test at least one cyclone for PM under Rule 62-296.700(2)(c) to show compliance with the 0.19 pound per hour standard. At a flow rate of 9600 acfm, the 0.19 pounds per hour equates to 0.002 gr/dscf. That is a very tight standard and 20% opacity readings would not provide assurance the roto-clones are meeting the

standard. In fact, we suspect they would have to add baghouses to meet that level of PM standard.

9. **Subsection J. Common Conditions: J.12. (Sulfur Dioxide), Table 2-1 (pg. 1 of 7):** Test Methods and Procedures for sulfur dioxide list methods described in Rule 62-296.405(1)(e)3. If CEMs are accepted for demonstration of compliance, this conditions needs to be adjusted accordingly to include the quality assurance requirements of 40CFR60 Appendix F.

10. **Subsection J. Common Conditions: J.17. (Operating Rate During Testing):** , During normal operating, the boiler conditions are controlled by placing the system in an "automatic" mode, which monitors the demand for power and automatically adjust the fuel and air flow rates accordingly. These fluctuations are usually not large enough to be considered a load change as defined in Rule 62-210.700(3), however they do result in increases in particulate matter emissions. Based upon our inspections and knowledge of Tampa Electric's boiler operations, we have found that during testing, Tampa Electric manually controls the boiler conditions which is not normal operating conditions. We suggest that the condition be revised to include the following language to insure that all testing is conducted under normal conditions based on Rule 62-4.07(3) and 62-297.310(2), F.A.C. As follows, additional wording (underlined): "...at permitted capacity, under normal conditions...allowed by the permit. Each emission unit should be tested with the station master and boiler master in the automatic mode in order to insure the emissions are representative of normal conditions.

11. **Subsection J. Common Conditions: J.24.(Continuous Monitoring Requirements):** Additional wording needs to be included as follows: Tampa Electric Company shall perform quality assurance on the SO_2, Nox, and Opacity monitors in accordance with 40 CFR60 Appendix F.

12. **Subsection J. Common Conditions: J.27.:** Additional wording needs to be included as follows: "... compliance test or quarterly CEM audit is to begin..." per Rule 62-297.310(7)(a)9, F.A.C.

13. **Subsection J. Common Conditions: J.29. (Test Reports):** In order to better correlate the particulate matter emissions with the visible emissions from each boiler, CEM readings shall be submitted for the period during particulate matter testing.

14. **Subsection J. Common Conditions: J.33.(Boiler Cleaning Waste):** Previous permits do not discuss the addition of boiler cleaner waste being injected into the boiler. Is this condition federally enforceable? EPC is uncertain of the impact this waste will have on fuel usage, emissions, etc. What are the combustion by products speciated by type and amount and the method of material introduction into the boiler per Rule 62-210.300(2)(a)1.

15. **Subsection J. Common Conditions: Add (Quarterly Reporting):** An additional condition should be included for the CEM audits that are required under 40CFR60 Appendix F. "Quarterly reports for CEM audits performed in accordance with 40 CFR60 Appendix F shall be submitted within 45 days to the Environmental Protection Commission of Hillsborough County following a calendar quarter.

16. **Subsection J: Common Conditions: Add:** EPC requests that a condition be included in the Title V draft permit for all units that burn liquid fuel as follows:
    - Sulfur dioxide emissions shall be limited to 1.1 pounds per million Btu heat input when liquid fuel is burned. [Rule 1-3.63c., Environmental Protection Commission of Hillsborough County Chapter 1-3, Air Pollution]

17. **Appendix E-1:**
    - **Nos. 6, 8, and 10:** Since Tampa Electric did not provide information regarding the type and amount of paint, blasting abrasives used on site, permit conditions should state that only coal slag be used and limit the amount. Also, Tampa Electric states that unconfined abrasives blasting is an unregulated activity. This is not correct. Pursuant to Rules 62-210 and 62-296, F.A.C, EPC has permitted several grit blasting and painting operations in Hillsborough County.

    - **No. 9:** It is unclear for the application and permit what belt conveyors are requested for exemption. All conveyors in the fuel handling area should be included under Subsection E are subject to Rule 62-296.711, F.A.C. and should not be exempt. Is this supposed to be a belt sander?

    - **No. 12:** If they are conditioning the flue gas of any of the boilers (Unit 6 permitted) with SO^3, the permit will need to address compliance with Rule 62-296.411, F.A.C., for the liquid sulfur handling on the front end. The conditioning is probably a function of the fuel type (pet coke or coal) and the characteristics of the regional coal which they are firing. The permit should require accurate recordkeeping on the amount of sulfur consumed (see Specific Condition C.4. note) and the SO^3 concentration in the condition boiler exhaust. If they are exempt from any standards in Rule 62-296.411 based on storage capacity or usage, there should be a specific condition stating it.

18. **Appendix F: SO_2 Compliance Plan:** If CEMs are accepted as the method of compliance for SO_2, then the compliance plan needs to be revised.

Overall Notes to be included:

1. Tampa Electric has calculated particulate matter emissions (PME) from the fuel yard using the AP-42 drop equation. This is the least conservative method of estimating emissions from coal handling and does not account for PM as captured by a Method 5 sampling train. It arbitrarily excludes all particles greater than 30um and thus

underestimates PM emissions. In order to use these equations correctly, the surface moisture needs to be plugged in. Because of their subjectivity and their common misuse, we are very cautious about any figures derived from the infamous drop equation. The 5% visible emission standard is verifiable and reasonable.

IV. Time Periods For Limiting Production and Operation

As discussed above, a limitation specifically recognized by the regulations as reducing potential to emit is a limitation on production or operation. However, for these limitations to be enforceable as a practical matter, the time over which they extend should be as short term as possible and should generally not exceed one month. This policy was explained in a March 13, 1987 memorandum from John Seitz to Bruce Miller, Region IV. The requirement for a monthly limit prevents the enforcing agency from having to wait for long periods of time to establish a continuing violation before initiating an enforcement action.

EPA recognizes that in some rare situations, it is not reasonable to hold a source to a one month limit. In these cases, a limit spanning a longer time is appropriate if it is a rolling limit. However, the limit should not exceed an annual limit rolled on a monthly basis. EPA cannot now set out all-inclusive categories of sources where a production limit longer than a month will be acceptable because every situation that may arise in the future cannot now be anticipated. However, permits where longer rolling limits are used to restrict production should be issued only to sources with substantial and unpredictable annual variation in production, such as emergency

A GUIDELINE FOR EVALUATING COMPLIANCE TEST RESULTS

(Isokinetic Sampling Rate Criterion)

R. T. Shigehara
Emission Measurement Branch, ESED, OAQPS, EPA

Introduction

The sampling rate used in extracting a particulate matter sample is important because anisokinetic conditions can cause sample concentrations to be positively or negatively biased due to the inertial effects of the particulate matter. Hence, the calculation of percent isokinetic (I) is a useful tool for validating particulate test results. Section 6.12 of the recently revised Method 5[1] states, "If 90 percent $\leq$ I $\leq$ 110 percent, the results are acceptable. If the results are low in comparison to the standard and I is beyond the acceptable range, or, if I is less than 90 percent, the Administrator may opt to accept the results."

This guideline provides a more detailed procedure on how to use percent isokinetic to accept or reject test results when the sampling rate is beyond the acceptable range. The basic approach of the procedure is to account for the inertial effects of particulate matter and to make a maximum adjustment on the measured particulate matter concentration.[2] Then, after comparison with the emission standard, the measured particulate matter concentration is categorized (1) as clearly meeting or exceeding the emission standard or (2) as being in a "gray area" zone. In the former category, the test report is accepted; in the latter, a retest should be done because of anisokinetic sampling conditions.

Procedure

1. Check or calculate the percent isokinetic (I) and the particulate

matter concentration (c_s) according to the procedure outlined in Method 5. Note that c_s must be calculated using the volume of effluent gas actually sampled (in units of dry standard cubic feet, corrected for leakage). Calculate the emission rate (E), i.e. convert c_s to the units of the standard. For the purposes of this guideline, it is assumed that all inputs for calculating E are correct and other specifications of Method 5 are met.

2. Compare E to the standard. Then accept or reject c_s using the criteria outlined below. (A summary is given in Table I):

a. Case 1 - I is between 90 and 110 percent. The concentration c_s must be considered acceptable. A variation of $\pm$ 10 percent from 100 percent isokinetic is permitted by Method 5.

b. Case 2 - I is less than 90 percent.

(1) If E meets the standard, c_s should be accepted, since c_s can either be correct (if all particulate matter are less than about 5 micrometers in diameter) or it can be biased high (if larger than 5 micrometer particulate matter is present) relative to the true concentration; one has the assurance that c_s is yielding an E which is definitely below the standard.

(2) If E is above the standard, multiply c_s by the factor (I/100) and recalculate E. If, on the one hand, this adjusted E is still higher than the standard, the adjusted c_s should be accepted; a maximum adjustment which accounts for the inertial effects of particulate matter has been made and E still exceeds the standard. On the other hand, if the

adjusted E is lower than the standard, a retest should be done.

c. Case 3 - I is greater than 110 percent.

(1) If E exceeds the standard, c_s should be accepted, since c_s can either be equal to the true concentration or biased low relative to it; one has the assurance that E is definintely over the standard.

(2) If E is below the standard, multiply c_s by the factor (I/100) and recalculate E. If, on the one hand, this adjusted E is still lower than the standard, the adjusted c_s should be accepted; a maximum adjustment which accounts for the inertial effects of particulate matter has been made and E still meets the standard. On the other hand, if the adjusted E exceeds the standard, a retest should be done.

Table I. Summary of Procedure

Case	I	Category	Decision
1	90 - 110		Accept
2	< 90	$E \leq$ Em. Std.	Accept
		$c_s(I/100) \rightarrow E_{adj}$ > Em. Std.	Accept
		$c_s(I/100) \rightarrow E_{adj} \leq$ Em. Std.	Retest
3	> 110	E > Em. Std.	Accept
		$c_s(I/100) \rightarrow E_{adj} \leq$ Em. Std.	Accept
		$c_s(I/100) \rightarrow E_{adj}$ > Em. Std.	Retest

Summary

A procedure for accepting or rejecting particulate matter test results based on percent isokinetic has been outlined. It provides a mechanism for accepting all data except where anisokinetic sampling might affect the validity of the test results. This procedure is one of several useful tools for evaluating testing results.

References

1. Method 5 - Determination of Particulate Emissions from Stationary Sources. Federal Register. 42(160):41776-41782, August 18, 1977.

2. Smith, W. S., R. T. Shigehara, and W. F. Todd. A Method for Interpreting Stack Sampling Data. Stack Sampling News. 1(2):8-17, August 1973.

IV. Time Periods For Limiting Production and Operation

As discussed above, a limitation specifically recognized by the regulations as reducing potential to emit is a limitation on production or operation. However, for these limitations to be enforceable as a practical matter, the time over which they extend should be as short term as possible and should generally not exceed one month. This policy was explained in a March 13, 1987 memorandum from John Seitz to Bruce Miller, Region IV. The requirement for a monthly limit prevents the enforcing agency from having to wait for long periods of time to establish a continuing violation before initiating an enforcement action.

EPA recognizes that in some rare situations, it is not reasonable to hold a source to a one month limit. In these cases, a limit spanning a longer time is appropriate if it is a rolling limit. However, the limit should not exceed an annual limit rolled on a monthly basis. EPA cannot now set out all-inclusive categories of sources where a production limit longer than a month will be acceptable because every situation that may arise in the future cannot now be anticipated. However, permits where longer rolling limits are used to restrict production should be issued only to sources with substantial and unpredictable annual variation in production, such as emergency

A GUIDELINE FOR EVALUATING COMPLIANCE TEST RESULTS

(Isokinetic Sampling Rate Criterion)

R. T. Shigehara
Emission Measurement Branch, ESED, OAQPS, EPA

Introduction

The sampling rate used in extracting a particulate matter sample is important because anisokinetic conditions can cause sample concentrations to be positively or negatively biased due to the inertial effects of the particulate matter. Hence, the calculation of percent isokinetic (I) is a useful tool for validating particulate test results. Section 6.12 of the recently revised Method 5[1] states, "If 90 percent $\leq$ I $\leq$ 110 percent, the results are acceptable. If the results are low in comparison to the standard and I is beyond the acceptable range, or, if I is less than 90 percent, the Administrator may opt to accept the results."

This guideline provides a more detailed procedure on how to use percent isokinetic to accept or reject test results when the sampling rate is beyond the acceptable range. The basic approach of the procedure is to account for the inertial effects of particulate matter and to make a maximum adjustment on the measured particulate matter concentration.[2] Then, after comparison with the emission standard, the measured particulate matter concentration is categorized (1) as clearly meeting or exceeding the emission standard or (2) as being in a "gray area" zone. In the former category, the test report is accepted; in the latter, a retest should be done because of anisokinetic sampling conditions.

Procedure

1. Check or calculate the percent isokinetic (I) and the particulate

matter concentration (c_s) according to the procedure outlined in Method 5. Note that c_s must be calculated using the volume of effluent gas actually sampled (in units of dry standard cubic feet, corrected for leakage). Calculate the emission rate (E), i.e. convert c_s to the units of the standard. For the purposes of this guideline, it is assumed that all inputs for calculating E are correct and other specifications of Method 5 are met.

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3	> 110	E > Em. Std.	Accept
		$c_s(I/100) \rightarrow E_{adj} \leq$ Em. Std.	Accept
		$c_s(I/100) \rightarrow E_{adj}$ > Em. Std.	Retest

Summary

A procedure for accepting or rejecting particulate matter test results based on percent isokinetic has been outlined. It provides a mechanism for accepting all data except where anisokinetic sampling might affect the validity of the test results. This procedure is one of several useful tools for evaluating testing results.

References

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2. Smith, W. S., R. T. Shigehara, and W. F. Todd. A Method for Interpreting Stack Sampling Data. Stack Sampling News. 1(2):8-17, August 1973.

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MANATEE COUNTY GOVERNMENT

OFFICE OF THE COUNTY ADMINISTRATOR

"To Serve with Excellence"

November 12, 1999

Sent Via Facsimile 11/12/99

RECEIVED

NOV 17 1999

Rec 11/17

BUREAU OF AIR REGULATION

Mr. Howard L. Rhodes, Director, DARM
Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2400

RE: Initial Title V Air Operation Permit; Tampa Electric Company - Gannon Station

Dear Mr. Rhodes:

On numerous occasions, Manatee County has expressed its concern with the volume of air pollutants emitted by facilities to our north. Modeling shows that we are the downwind recipients of a huge emissions load, consisting primarily of sulfur dioxide (SO2) and nitrogen oxides (NOx) from coal-fired power plants in Hillsborough County.

We are aware of the pending Title V permit for TECO's Gannon Station, and realize that the comment period closes today. The Manatee County Commission would like to go on record as objecting to the liberal emission limits in the draft permit, given the impressive advances in pollution control technology since the Gannon plant was built.

The Commission echoes opinions in the lawsuit EPA recently filed against TECO, and agrees that the company has shown bad faith over the years, skirting Clean Air Act provisions by claiming major plant modifications - which would require re-permitting to New Source Performance Standards - were "routine maintenance", thereby extending the plants' life and increasing generating capacity without reducing emissions to the extent achievable by modern technology. Circumvention of the rules has allowed TECO to release massive amounts of SO2, NOx and particulate matter into the environment.

In light of the foregoing, the Commission asks that DEP reduce the term of the Gannon Title V permit (to become effective 1/1/00) to no more than two years, pending the outcome of the federal lawsuit. The "grandfathered" status of the Big Bend and Gannon plants has allowed TECO to reap handsome profits, to the detriment of the regional environment. It is beyond time for the plants to conform with today's standards.

Sincerely,

Ernie Padgett
County Administrator

1112 Manatee Avenue West • Bradenton, Florida • (941) 748-4501, Ext. 3717 • FAX (941) 745-3790

P.O. Box 1000, Bradenton, Florida 34206-1000

MANATEE COUNTY CITIZENS
AGAINST POLLUTION (MCAP)
P. O. BOX 660
PARRISH, FLORIDA 34219
November 9, 1999

Claire
Howard
11/17
Scott
Cindy

Mr. Howard L. Rhodes, Director
Division of Air Resources Management
Department of Environmental Protection
Mail Station #5505
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

RE: Revised DRAFT Permits Numbered: 0570039-002-AV and 0570040-002-AV

Dear Mr. Rhodes:

It is our contention that the above referenced permits for the operation of the Tampa Electric Company (TECO) Big Bend and Gannon Stations not be approved for the five year period (January 1, 2000 to December 31, 2004).

Since the United States Environmental Protection Agency (USEPA) has filed a Notice of Violation (NOV—EPA-CAA-2000-04-0007) relative to the operation of these plants, it is suggested that they should now continue to operate on a month to month basis until such time as the issues raised in the NOV are resolved.

Anecdotal information, e.g. press releases, indicate that TECO currently intends to litigate this issue. Given this scenario, and should the courts find in favor of the USEPA, then the DEP would have approved the operation of these plants for another five years when in fact they may be operating illegally.

Thank you for your kind consideration of this matter.

Dr. Dan Kumarich
MCAP President

Dan Kumarich

CC: Governor Jeb Bush
David B. Struhs, DEP Secretary

TAMPA ELECTRIC

November 10, 1999

Mr. Scott M. Sheplak, P.E.
Florida Department of Environmental Protection
111 South Magnolia Drive, Suite 4
Tallahassee, Florida 32301

Via Facsimile and FedEx
Airbill No. 7918 0765 0387

RECEIVED
NOV 12 1999
BUREAU OF AIR REGULATION

Re: Tampa Electric Company
F. J. Gannon Station
Comments on the Revised Draft Title V Permit
FDEP File No. 0570040-002-AV

Dear Mr. Sheplak:

Please find enclosed TEC's detailed comments regarding the above referenced Revised Draft Title V Permit

Please feel free to telephone me at (813) 641-5033, if you have any questions.

Sincerely,

Jamie Hunter
Administrator - Air Programs
Environmental Planning

EP\gm\JJH907

Enclosure

c/enc: Mr. Clair Fancy, FDEP-Tallahassee
Mr. Jerry Kissel, FDEP-SW District
Mr. Richard Kirby, EPCHC

TAMPA ELECTRIC COMPANY
COMMENTS REGARDING THE REVISED DRAFT TITLE V
AIR OPERATION PERMIT FOR F.J. GANNON STATION
FDEP FILE NO. 0570040-002-AV

Table of Contents

TEC Comment 1:

TEC requests the following change to the Table of Contents:

III. Emissions Units and Conditions
...
E. ~~Coal~~ Fuel Yard

Section I. Facility Information.

TEC Comment 2:

TEC requests the following changes to Subsection B. Summary of Emissions Unit ID Nos. and Brief Descriptions:

-008 Fuel ~~Coal~~ Yard. . .
-013 Unit No. 1 Fuel ~~Coal~~ Bunker with Roto-Clone
-014 Unit No. 2 Fuel ~~Coal~~ Bunker with Roto-Clone
-015 Unit No. 3 Fuel ~~Coal~~ Bunker with Roto-Clone
-016 Unit No. 4 Fuel ~~Coal~~ Bunker with Roto-Clone
-017 Unit No. 5 Fuel ~~Coal~~ Bunker with Roto-Clone
-018 Unit No. 6 Fuel ~~Coal~~ Bunker with Roto-Clone

TEC Comment 3:

In the listing of "documents on file with the permitting agency", TEC questions the need to list documents changing the Designated Representative. Also, this list should include the letter dated September 30, 1998, withdrawing the Title V DRAFT Permit package.

Section II. Facility-wide Conditions.

TEC Comment 4:

Consistent with the previously issued Title V Air Operations Permit for Hookers Point Station, TEC requests the Appendix I-1, List of Insignificant Emissions Units and/or Activities, as cited in Condition 5, be modified as follows to include:

13. Storage tanks less with than 550 gallons capacity
14. Inorganic substance storage tanks with 550 gallon or greater capacity and not containing a hazardous air pollutant (HAP)
15. No. 2 fuel oil storage tanks
16. Equipment used for steam cleaning
17. Turbine vapor extractors
18. Vehicle Refueling Operations

TEC Comment 5:

TEC requests Condition 7(b) be deleted. The specific conditions for each steam generator include required reasonable precautions to minimize particulate matter emissions. Condition 7(b) duplicates these requirements with less specific language that could cause confusion.

TEC also notes that the cited underlying rule for Condition 7(b), 62-296.320(4)(c)(2), F.A.C., applies to unconfined particulate matter emission sources. This rule is not applicable to the steam generators because these emissions units are confined particulate matter emission sources.

Section III. Regulated Emissions Units Conditions

TEC Comment 6:

TEC requests that Emission Unit 3 description be clarified as follows because the heat recovery system is no longer in service:

> .... and is of the cyclone firing type~~, equipped with an optional flue gas recirculation (heat recovery) system to maintain steam temperature at low loads~~.

TEC Comment 7:

TEC requests that the following sentence be modified as noted in both places it appears in Subsection A.

> New No. 2 fuel oil is used ~~as an ignition fuel~~ during startup, shutdown, and combustion stabilization.

Also, the Subsection A permitting note references these units as Phase I Acid Rain units. These units are regulated under the Phase II Acid Rain rules only.

TEC Comment 8:

TEC requests that all emission units listed in Subsections A, B and C be combined into Subsection A. This consolidation will clarify the specific permit condition requirements for these emission units as well as streamline the permit. TEC believes this approach is appropriate because these units have the same basic method of operations.
Should this comment not be incorporated into the final version of this permit, the following comments noted as applying to Subsection A would also apply, as applicable, to Subsections B and C.

TEC Comment 9:

TEC requests Condition A.1 be changed as follows:

> The maximum ~~operation~~ permitted heat input rates, on a monthly average basis, are as follows: . . .

TEC Comment 10:

TEC requests Condition A.2 be changed to read as follows to recognize that coal and ignition oil are jointly burned, to allow for the injection of nonhazardous boiler cleaning waste, and to allow on-specification used oil (including oily soil) combustion during normal operations:

(a) Normal operation: The only fuels allowed to be burned are coal and on-specification used oil.
(b) Startup; shutdown; malfunctions: In addition to the fuels allowed to be burned during normal operations, each unit may also burn new No. 2 fuel oil during startup, shutdown and malfunctions. This includes but is not limited to the emission unit, a new cyclone/mill or combustion stabilization.
(c) The injection of nonhazardous boiler chemical cleaning waste is allowed in each unit.

TEC Comment 11:

Consistent with the existing operating permits for F.J. Gannon Station, TEC

requests the following statement be added to Condition A.3:

> A test under sootblowing conditions which demonstrates compliance with a non-sootblowing limitation will be accepted as proof of compliance with that non-sootblowing limitation.

In addition, TEC requests that only a visible emissions test under sootblowing conditions be required. TEC believes duplicate testing (sootblowing and non-sootblowing) provides no environmental benefit.

Since compliance with the Sulfur Dioxide limits will be demonstrated through the use of CEM's, TEC requests that the Sulfur Dioxide stack testing requirement be deleted.

Also, TEC requests that the "Annual Date" reference, as well as the note referring to testing "...12 months from the annual date..." be deleted, the following statement be included in the condition:

> During each federal fiscal year (October 1 – September 30) Tampa Electric Company shall have formal compliance tests conducted on each Unit.

TEC Comment 12:

TEC requests Condition A.4 be changed as follows to clarify design fuel consumption rates:

A. Process System Performance Parameters:
1. Source Designator: Units Nos. 1-6
2. Design Fuel Consumption Rate at Maximum Continuous Rating:

Unit	Tons/hr (fuel ~~coal~~)	Fuel Heat Content (Btu/lb)
1	50	12,570
2	51	12,570
3	65	12,300
4	80	11,699
5	93.4	12,227
6	151.4	12,543

All Units:
New No. 2 fuel oil
On-specification used oil - 48 gallons per minute/per boiler; Max 1,000,000 gal/yr per station.

Daily Recorded and Monitored
~~Fuel input~~
...

Monthly Recorded or Inspection/Maintenance
Fuel input
~~Inspect insulator compartment heaters/blowers.~~
Units 1-4 Inspect insulator compartment heaters/blowers.
Units 5-6 Inspect penthouse pressurizing fan filters.

TEC Comment 13:

TEC requests Condition B.3 be eliminated because enforcing this condition is neither necessary nor practical. The quantity of SO_2 generated from on-specification used oil combustion is negligible compared to the quantity of SO_2 generated from coal combustion. Segregating and determining the quantity of SO_2 generated from the combustion of each fuel is not possible.

TEC Comment 14:

TEC requests Condition B.6 be changed to Condition A.6 and amended as follows because we believe it will provide clarity and we know of no regulatory requirement mandating recordkeeping completion.

b. Quantity Limitation: This emissions unit is permitted to burn "on-specification" used oil that is generated by TECO ~~the F.J. Gannon Station~~ in the production and distribution of electricity, not to exceed 1,000,000 gallons during any consecutive 12 month period.

f. Record Keeping Requirements: The owner or operator....
(1) The gallons of on-specification used oil generated and burned each month. ~~(This record shall be completed no later than the fifteenth day of the succeeding month.)~~
(2) The total gallons of on-specification used oil burned in the preceding consecutive 12-month period. ~~(This record shall be completed no later than the fifteenth day of the succeeding month.)~~

TEC Comment 15:

TEC requests the brief description of the combustion turbine in subsection D

be clarified as follows:

> This emissions unit is a simple cycle combustion turbine and is designated Combustion Turbine #1 ~~7~~. . . .

TEC Comment 16:

TEC requests Condition D.1 be changed as follows:

> The maximum ~~operation~~ permitted heat input rate, on a monthly average basis, is as follows: . . .

TEC Comment 17:

TEC recommends Condition D.7 be changed as follows to promote clarity:

> Excess emissions from this ~~these~~ emissions unit~~s~~ resulting from . . .

TEC Comment 18:

TEC requests this condition D.9 be changed as follows:

> The permittee shall demonstrate compliance with the liquid fuel sulfur limit by means of a fuel analysis ~~provided by the vendor upon each fuel delivery~~ or by contract specifications.

TEC Comment 19:

TEC requests Condition D.10 be deleted as unnecessary.

TEC Comment 20:

TEC recommends that Condition D.16 be changed as follows to promote clarity:

> Visible Emissions Testing - Annual: By this permit, annual emissions compliance testing for visible emissions is not required ~~for those emissions units~~ while burning ~~c:.~~ only liquid fuels for less than 400 hours per year.

TEC Comment 21:

TEC requests Condition D.22 be clarified as follows:

> In order to document compliance with the visible emission testing exemption provided in Specific Condition No. D.16 ~~D.5~~, ...

TEC Comment 22:

TEC requests the brief description of the fuel yard in Subsection E be clarified as follows:

> -008 F.J. Gannon Station Fuel ~~Coal~~ Yard
>
> For the operation of a fuel ~~bituminous coal~~ yard serving the F.J. Gannon Station boiler units 1 through 6, yard activities including barge (east and west) and railcar unloading of coal, truck/barge/train unloading of flux ~~limestone or iron ore~~, and transfer and storage of these materials. ~~The iron ore is shipped, stored, and handled in the same manner as limestone.~~ . . .

Material Handling Source Designator	Particulate Control Method	Maximum Design Efficiency Rating at Design Capacity Rate (TPH)
Barge to ~~East~~ Grab 1500 Bucket	Grab Bucket	-----
~~East~~ Grab Bucket to 1500 ~~East~~ Hopper	Side Enclosure	25%
Barge to ~~West~~ 1500 Continuous Unloader	Enclosure	40%
~~Barge to West Grab 1500 Bucket~~	~~Grab Bucket~~	~~-----~~
~~West Grab Bucket to~~	~~Side Enclosure~~	~~25%~~

~~1500~~
~~to West Hopper~~

. . .

~~West Hopper to~~
~~1500~~
~~Feeder~~

. . .

Live ~~Limestone~~ Fluxing
Stockpile

TEC Comment 23:

TEC requests Condition E.1 be clarified as follows:

Permitted Capacity: The maximum permitted process rate is 2.85 million tons/year of coal.

TEC Comment 24:

TEC requests Condition E.4. be deleted because demonstrating compliance with the stated condition is not possible.

TEC Comment 25:

TEC recommends specific Condition E.5. be modified as follows:

A thirty (30) minute visible emissions test shall be performed on the following material transfer operations ~~within 60 days prior to or on December 31~~ during each federal fiscal year:

A. The...
~~B. The west bucket to the west hopper~~
C. The...

TEC Comment 26:

TEC requests E.6. be modified as follows:

Water sprays or chemical wetting agents and stabilizers are

acceptable methods to be used on ~~both live and dead~~ coal storage piles ...

TEC Comment 27:

TEC requests Condition E.8 be clarified as follows:

A. Process Parameters:
1. Operation...
2. Equipment...
3. Wet Dust Suppression:
Manufacture: Martin Marietta and/or Benitec

B. Inspection and Maintenance Procedures:

The fuel ~~coal~~ yard particulate control equipment shall receive regular preventative maintenance as follows: . . .

TEC Comment 28:

TEC requests that Condition E.11 be deleted. All permit modification notifications will be submitted to FDEP, consistent with the Title V Air Operation Permit program.

TEC Comment 29:

TEC requests that Condition E.14 be deleted. This condition is no longer applicable to the fuel yard operations.

TEC Comment 30:

TEC requests that Condition E.15 be deleted. This condition is no longer applicable because the west grab bucket has been retired.

TEC Comment 31:

TEC requests the brief description of the Units 5-6 Fly Ash Silo (No. 1) in Subsection G be clarified as follows:

. . .In addition , fly ash from F.J. Gannon Station Units 1-4 Fly Ash Silo No. 2 (silo No. 2) may be routed via gravity flow to the pugmill where it is "conditioned" by wetting with water and gravity fed into open bed trucks. The fly ash is then transported to an off-site consumer. Fly ash

may also be conveyed from tanker trucks to Fly Ash Silo No. 1 and from Fly Ash Silo No. 1 to Fly Ash Silo No. 2. . . .

TEC Comment 32:

TEC requests that G.4. be modified as follows:

> Each federal fiscal year, test the emissions from the fly ash silo/baghouse and truck loading* ~~annually~~ for particulate matter and visible emissions ~~within 60 days to or on March 22~~.

TEC Comment 33:

Since the testing requirements identified in G.6. only apply to test of the silo/baghouse, TEC requests this condition be modified as follows:

> All fly ash silo/baghouse compliance tests...

TEC Comment 34:

TEC requests the brief description of the Units 1-4 Fly Ash Silo (No. 2) in Subsection H be clarified as follows:

> . . . In addition, fly ash from silo No. 2 may be routed to the pugmill at F.J. Gannon Station Silo No. 1 where it is "conditioned" by wetting with water and gravity fed into open bed trucks. The fly ash is then transported to an off-site consumer. Fly ash may also be conveyed from tanker trucks to Fly Ash Silo No. 2 and from Fly Ash Silo No. 2 to Fly Ash Silo No. 1. . . .

TEC Comment 35:

TEC requests that H.4. be modified as follows:

> Each federal fiscal year, test the emissions from the fly ash silo ~~annually~~ for particulate matter and visible emissions ~~within 60 days to or on March 22~~.

TEC Comment 36:

TEC requests the brief description of the fuel bunkers with Roto-Clones in Subsection I be clarified as follows:

For the operation of F.J. Gannon station Units 1-6 fuel ~~coal~~ bunkers with exhaust fan/cyclone collector (Roto-Clone) controlling dust emissions from each unit's respective bunker, two moving transfer stations via their respective conveyor belts fuel ~~coal~~ through enclosed chutes to each of the six bunkers. Fuel ~~Coal~~ bunkers No. 1-4 and 6 are each equipped with a 9,600 ACFM American Air Filter Company Type D Roto-Clone to abate dust emissions during ventilation. Fuel ~~Coal~~ bunker No. 5 is equipped with a 5,400 ACFM Type D Roto-clone. A number of vent pipes convey air from each bunker to a Roto-Clone during particulate removal. Particulate matter removed by the Roto-Clones is returned to a fuel ~~coal~~ bunker via a hopper and return line. Units No. 1-6 fuel ~~coal~~ bunkers are situated in a west to east fashion. Unit No. 1 fuel ~~coal~~ bunker is located furthest west and Unit No. 6 fuel ~~coal~~ bunker is located furthest east.

TEC Comment 37:

TEC requests Condition I.2 be clarified as follows:

> . . . the maximum allowable particulate matter emission rate from each of the six fuel ~~coal~~ bunkers shall not exceed 0.99 ton/year. Also, the maximum... of the six ~~coal~~ fuel bunkers...

TEC Comment 38:

TEC requests Condition I.3 be clarified as follows:

> Visible emissions from each of the six fuel ~~coal~~ bunkers shall not be equal to or greater than 20% opacity.

TEC Comment 39:

TEC requests that Condition I.4 be deleted to avoid confusion because this requirement is adequately addressed in Subsection K.

TEC Comment 40:

TEC requests Condition I.5 be deleted because each rotoclone emits less than 1 tn/yr and therefore by regulations are exempt from RACT requirements.

TEC Comment 41:

TEC needs additional time and information to determine the validity of the 1.35 pounds of sulfur dioxide per million BTU limit identified in Condition J.4.

TEC Comment 42:

TEC requests Condition J.6 be changed as follows:

> Visible emissions shall not exceed 20 percent opacity, except for one six ~~two~~-minute period per hour during which the opacity shall not exceed 27 ~~40~~ percent.

TEC Comment 43:

TEC requests J.7. be modified as follows:

> ...shall not exceed 60 percent opacity, except for up to 4 six-minute periods, during the 3-hours...

TEC Comment 44:

TEC has concern regarding Conditions J.12.a. through J.12.c. and requests that the use of CEM's for demonstrating compliance be based on the Sulfur Dioxide Compliance Plan submitted to the Department in October 1998.

TEC Comment 45:

TEC requests that Condition J.22 be modified as follows:

> The permittee shall demonstrate compliance with the liquid fuel sulfur limit by means of a fuel analysis provided by the vendor upon each fuel delivery or by contract specified

TEC Comment 46:

The reference to "**Specific Conditions J.2. through J.7.**" should apply to only Specific Conditions J.6. and J.7.

TEC Comment 47:

TEC requests that Condition J.26 be modified as follows:

> ...~~The sulfur variability study will be performed on the facility during the last quarter of each year. The results shall be submitted with the quarterly report for that period.~~

TEC Comment 48:

TEC requests that Condition J.31 be deleted. New No. 2 oil, which is fired only during startup, makes a negligible contribution to emissions from these emissions units. the cost of installing and maintaining new flow monitoring equipment is not justified by the benefit received.

TEC Comment 49:

TEC requests the portion of Condition J.34.e (reporting requirements) requiring the quarterly reporting to EPC be deleted because this requirement is unnecessary.

TEC Comment 50:

TEC requests the following changes to Subsection K. Common Conditions:

-013 Unit No. 1 Fuel ~~Coal~~ Bunker with Roto-Clone
-014 Unit No. 2 Fuel ~~Coal~~ Bunker with Roto-Clone
-015 Unit No. 3 Fuel ~~Coal~~ Bunker with Roto-Clone
-016 Unit No. 4 Fuel ~~Coal~~ Bunker with Roto-Clone
-017 Unit No. 5 Fuel ~~Coal~~ Bunker with Roto-Clone
-018 Unit No. 6 Fuel ~~Coal~~ Bunker with Roto-Clone

TEC Comment 51:

TEC requests Condition K.3. be modified to allow for the testing of two (2) rotoclones annually.

Also, it seems that the information in K.3. may be more clearly addressed in the individual Subsection F through I.

TEC Comment 52:

TEC requests that Condition A.8. in the Acid Rain Permit section be deleted.

If this information is made a part of the permit, then the permit will need the be amended each time the designated representative is changed. This is not necessary.

TEC Comment 53:

TEC requests that the relevant conditions of the following air construction permits be incorporated into this Title V permit.

Gannon Station Fuel Yard, Permit No. 0570040-006-AC
Crusher House Modification, Permit No. 0570040-007-AC
Wood Derived Fuel Modification, Permit No. 0570040-008-AC

Scott
FYI only -

TECO
TAMPA ELECTRIC

RECEIVED
AUG 09 1999
BUREAU OF AIR REGULATION

August 3, 1999

Mr. Clair Fancy
Florida Department of Environmental Protection
2600 Blair Stone Road
Twin Towers Office Building
Tallahassee, Florida 32399-2400

Re: Tampa Electric Company (TEC) - F.J. Gannon Station
Units 5 and 6 Stack Height Increase Construction Permit Application
FDEP File No. 0570040-009-AC

Dear Mr. Fancy:

With respect to the above referenced permit application, Tampa Electric Company is hereby granting a waiver of the 90-day period in which the Department is required to act on a permit pursuant to Section 120.60(1), Florida Statutes. This waiver supplements the waiver submitted on May 11, 1999 and will extend the period for Department action to and including November 19, 1999.

Please let me know if you have any questions. You can contact me at (813) 641-5033.

Sincerely,

J. James Hunter
Administrator - Air Programs
Environmental Planning

EP\gm\SKT109

c: Mr. Al Linero - FDEP
Mr. Cleve Holladay - FDEP
Mr. Jerry Kissel - FDEP SW
Mr. Rick Kirby - EPCHC

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OUTSIDE HILLSBOROUGH COUNTY 1 (888) 223-0800

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

RECEIVED
APR 15 1999
BUREAU OF
AIR REGULATION

4APT-APB

APR 13 1999

Mr. Cleve Holladay
Meteorologist - Bureau of Air Regulation
Florida Department of Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Dear Mr. Holladay:

The March 4, 1999, Tampa Electric Company (TECO) responses to the Region 4 comments of December 8, 1998, have been reviewed. These responses were submitted to the Environmental Protection Agency (EPA) via a fax to Stan Krivo of the Air and Radiation Technology Branch. Region 4's December 1998 comments centered on increasing the existing stack height (i.e., 96 meters (m)) of F. J. Gannon Station Units 5 and 6 to 110 m without a fluid modeling demonstration. The 100 m stack height is apparently needed to avoid pollutant concentrations related to downwash that may adversely impact air quality. The modeling concerning this issue was originally submitted to address title V permit compliance with the sulfur dioxide (SO2) National Ambient Air Quality Standards (NAAQS) for the Tampa Electric Company's F. J. Gannon Station. Region 4 comments pursuant to the review of the March 4, 1999 response follow.

1. TECO states that the Good Engineering Practice (GEP) formula stack height is 133 m; however, TECO is only proposing to raise the stack height for Units 5 and 6 to 82 percent (%) of the GEP formula height, or 110 m. The use of 110 m would require fluid modeling to justify this height as the GEP stack height for setting an emission limit. As previously stated in Region 4's December 8 1998 comments, according to the GEP stack height regulations, there is no restriction or prohibition against, or demonstration required for raising an existing (or replacing) a stack up to 65 m, provided prohibited dispersion techniques are not employed. Raising a stack above the 65 m *de minimis* height requires evidence that the additional height is necessary to avoid downwash-related pollutant concentrations that raise health and welfare concerns. This evidence can be achieved through either of two methods: (1) demonstrate by fluid modeling, using the existing stack and emission rate (before the stack is raised) and adding in the background air quality, that excessive pollutant concentrations will occur, or (2) show by site-specific information that the existing short stack(s) has in fact caused a local nuisance. EPA does not regulate the actual height of a stack and a company is free to build a stack to any height; however, section 123 of the Clean Air Act provides that the EPA Administrator shall regulate that portion of the stack height that is used in calculating emission limitations. Therefore, to use the stack height in regulatory modeling, the new Units 5 and 6 stack height that TECO proposes must be validated in the manner presented above.

2. The TECO letter cites Rule 62-210.550(3) of the Florida State Implementation Plan (SIP) which provides that EPA or the local air program may require the use of fluid modeling or a field study to verify the GEP stack height for the setting an emission limit. It has been the policy of Region 4 and other EPA Regional Offices to adhere to the requirement of developing, by fluid modeling, the GEP stack height that should be used in modeling if a stack is being raised above the *de minimis* stack height of 65 m. Region 4 continues to use this policy and requires the appropriate fluid modeling to be developed to justify the 110 m stack height for TECO Units 5 and 6. Without this policy, the use of a 110 m stack in regulatory modeling to avoid excessive pollutant concentrations would be considered a prohibitive dispersion technique.

3. Additional air dispersion modeling was performed for Units 5 and 6 based on the current sulfur dioxide (SO2) allowable emission limits using the 96 m stack height with and without building downwash to address the 40% excessive concentration criteria. Modeling results for the high-second-high concentration for the 24-hour averaging periods was used. Upon further review of the stack height guidance, the 40% excessive concentration criterion can only be demonstrated through fluid modeling. The submitted Industrial Source Complex (ISC3) model modeling does not meet this requirement.

Region 4 looks forward to working with you to resolve the stack height issue and is willing to provide assistance in developing a fluid modeling protocol for the Gannon Unit 5 and 6 stacks. If this assistance is required, please submit future a response to my attention. If questions arise regarding these comments, please contact Brenda Johnson of my staff at (404) 562-9037.

Sincerely,

Kay Prince for

Linda Anderson-Carnahan
Chief
Air Planning Branch

cc: Stan Krivo, Air and Radiation Technology Branch

CC: File
S. Sheplak, TV

Sheplak, Scott

From: Sheplak, Scott
Sent: Wednesday, April 30, 2003 3:58 PM
To: 'Rob Kalch'
Subject: RE: TEC, Gannon Gt general correspondence

1) Delivered Coal by Truck instead of Railcar. TECO on October 25, 2002, submitted their request for this "insignificant activity". The claim was certified by a P.E. and signed by their R.O. On November 8th we met with TECO, their consultant Tom Davis, P.E., ECT and EPCHC to discuss various permitting issues including this one. There is no change in the coal throughput rate at the station. The emissions units description in Subsection E. will need to be updated. No further action was necessary by the Department.

2) Slag Handling Activities. On July 1, 2002, TECO notified the Department and EPCHC to temporarily store and handle slag at the Gannon Station. Slag is a material with glass like properties. Per the Department's request, TECO submitted calculations certified by a P.E. and signed by their R.O. in order to consider their request as an "insignificant activity". EPCHC commented on their request. During our November 8th meeting we discussed their request; EPCHC had a different professional opinion on the emission factors selected. TECO addressed EPCHC's comments on November 25th. This activity will be added to the permit's Appendix I-1. No further action was necessary by the Department.

-----Original Message-----
From: Rob Kalch [mailto:kalch@epchc.org]
Sent: Tuesday, April 29, 2003 12:09 PM
To: Sheplak, Scott
Subject: Fwd: TEC, Gannon

Mr. Sheplak,

I just wanted to follow up with you on the attached requests.

Sincerely,
Rob Kalch
EPCHC

Sheplak, Scott

From: Robert Kalch [kalch@epchc.org]
Sent: Tuesday, December 31, 2002 12:01 PM
To: Sheplak, Scott
Subject: TEC, Gannon - Coal Delivery By Truck

Mr. Sheplak,

I wanted to touch base with you concerning the proposed coal truck unloading activities at TEC Gannon. I had sent you an email in November.

Basically we (EPC) had estimated the potential emissions of this activity to be 0.16 tpy using the drop equation, 8.6 tpy using Table 11.9-4, AP42 (dated 7/98), and 16.0 tpy using Table 11.9-1, AP42 (dated 7/98). Since we base our evaluation on the worst case emissions, it appeared as though this would not fit in the "insignificant" category.

I wanted to find out if you have you taken any action on this yet? I have not heard anything to date. If you would, please give me a call or contact me by email. I'll be in the office the rest of today and on Thursday.

Sincerely,
Rob Kalch

Sheplak, Scott

From: Robert Kalch [kalch@epchc.org]
Sent: Wednesday, November 27, 2002 9:23 AM
To: Sheplak, Scott
Subject: TEC, Gannon

Mr. Sheplak,

Good morning. I thought I needed to get in touch with you concerning a couple of questions I have.

I was looking at the wood derived fuel request for the TEC, Gannon Station. The last piece of correspondence was a waiver until November 1st. Has the draft been issued? If so, please forward a copy.

The second question concerns the proposed truck unloading activities at the Gannon Station. Have you made a determination yet? EPC staff recently permitted a coal handling facility and used emission factors other than the drop equation. Applying the emission factors to the proposed truck unloading activities at TEC, the PM emissions from the truck unloading activities exceeds the "insignificant" threshold (5 tpy) of Rule 62-213.430(6)(b), F.A.C. If you would like to discuss, please give me a call at your convenience.

Sincerely,
Rob Kalch

11/28 - 12/3 out of office

left message

need to discuss

Sheplak, Scott

From: Robert Kalch [kalch@epchc.org]
Sent: Thursday, October 31, 2002 9:24 AM
To: Sheplak, Scott
Cc: Sterlin Woodard
Subject: RE: Coal Delivery By Trucks, Gannon Station

Mr. Sheplak,

I just wanted to touch base with you concerning the coal delivery by truck request/notification submitted by TEC, dated October 25, 2002. I will be taking a look at this and would like to correspond with the engineer reviewing this at FDEP. Do you know who it will be? I will submit any comments by the end of next week.

Sincerely,
Rob Kalch

-file-

TAMPA ELECTRIC

RECEIVED
FEB 13 2002
BUREAU OF AIR REGULATION

February 12, 2002

Mr. Scott Sheplak, P.E.
Florida Department of
Environmental Protection
111 South Magnolia Drive, Suite 4
Tallahassee, FL 32301

Via FedEx
Airbill No. 7903 0514 2349

Re: Tampa Electric Company
Wood Derived Fuel
F.J. Gannon Station Unit 3
Final Permit No. 0570040-011-AC

Dear Mr. Sheplak:

Final Permit No. 0570040-011-AC was issued to Tampa Electric Company (TEC) on March 7, 2000 authorizing the work to be performed and operating limitations to allow for the firing of a coal and wood- derived fuel (WDF) blend at its F.J. Gannon Station Unit 3 in Tampa, Hillsborough County. WDF can be composed of Paper Pellets, Yard Trash, and Wood/ Wood Chips. Final Permit No. 0570040-011-AC expires on February 28, 2002.

As required by Final Permit No. 0570040-011-AC, performance testing was conducted during April 18 – 28, 2000. The emissions performance testing demonstrated that the F.J. Gannon Station Unit 3 was operating in compliance with permit limits for particulate, sulfuric acid mist, sulfur dioxide (SO_2), nitrogen oxides (NO_x), opacity, volatile organic compounds (VOC's) and visible emissions. A report of the performance testing was submitted to the Department on June 14, 2000.

Operation of the F.J. Gannon Station is currently authorized by Title V Final Permit No. 0570040-002-AV. Final Permit No. 0570040-002-AV was issued with an effective date of January 1, 2001 and expires on December 31, 2004. TEC plans to file a Title V air operations permit revision application to include the terms of 0570040-011-AC during the week of April 29th. Because issuance of a revised Title V permit is expected to take place after February 28, 2002, the expiration date of Final Permit No. 0570040-011-AC TEC requests an extension of the expiration date to July 5, 2002. TEC also has another air construction permit for firing WDF in F.J. Gannon units 1, 2, and 4 under Final Permit No. 0570040-012-AC, which expires on July 5, 2002. This extension will allow the Department and EPA to process the Title V permit revision application for all of F.J. Gannon units 1, 2, 3, and 4 and their addition to the F.J. Gannon Station Title V permit concurrently.

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OUTSIDE HILLSBOROUGH COUNTY 1 (888) 223-0800

If you have any questions please call Dru Latchman or me at (813) 641-5034.

Sincerely,

Laura R. Crouch
Manager- Air Programs
Environmental Affairs

EA/bmr/DNL111

Enclosure

c: Mr. Jerry Campbell, EPCHC
Ms. Alice Harman, EPCHC
Mr. Jerry Kissel - FDEP SW

Attachment B

ECT
Environmental Consulting & Technology, Inc.

October 24, 2002

Ms. Dru Latchman
Tampa Electric Company
6944 U.S. Highway 41 North
Apollo Beach, FL 33572-9200

Re: Tampa Electric Company
F. J. Gannon Station
Delivery of Coal by Truck

Dear Ms. Latchman:

Tampa Electric Company (TEC) plans to submit correspondence to the Florida Department of Environmental Protection (FDEP) notifying the Department of TEC's plans to receive coal by truck at its F.J. Gannon Station. The notification concludes that the limited use of trucks to receive coal qualifies for a permitting exemption pursuant to Rule 62-210.300(3)(b)1., F.A.C. and constitutes an "insignificant activity" with respect to the Chapter 62-213, F.A.C. Title V operation permit program. As requested, a Professional Engineer certification regarding potential emission rates and applicability of Rule 62-210.300(3)(b)., F.A.C. is provided.

TEC plans to receive coal by truck on a limited basis to provide diversity in coal delivery methods. Coal received by truck will be treated with a dust suppressant prior to delivery. Coal dump trucks will enter the plant from Port Sutton Road at the west side of the F.J. Gannon Station and unload at the existing southeast coal storage pile. The coal will then be stored and handled using the existing fuel yard material handling equipment. TEC plans to receive up to 260,000 tons per year of coal by truck as a replacement for coal typically received by barge. Coal truck deliveries may occur for up to five days per week and 26 weeks per year.

There will no increase in the maximum annual coal yard throughput rate. TEC will continue to comply with all fuel yard operating requirements specified in its current F.J. Gannon Station Title V operating permit.

Emissions associated with the coal truck operations will consist of fugitive particulate matter (PM and PM_{10}). Potential PM/PM_{10} emissions were estimated using applicable procedures from EPA's AP-42 document, *Compilation of Air Pollutant Emission Factors, Fifth Edition*. Specifically, potential PM/PM_{10} emissions from coal dump truck unloading were estimated using procedures obtained from AP-42, Section 13.2.4, Aggregate Handling and Storage

3701 Northwest 98th Street
Gainesville, FL 32606

(352) 332-0444

FAX (352) 332-6722

Piles. Potential PM/PM_{10} emissions due to truck traffic on paved plant roadways were estimated using procedures obtained from AP-42, Section 13.2.1, Paved Roads. Details of these potential PM/PM_{10} emission rate estimates are attached.

Coal truck operation potential emission rates, using AP-42 procedures, are estimated to total 0.42 and 0.11 tons per year for PM and PM_{10}, respectively. These estimated emission rates are well below the 5.0 ton per year threshold for a generic emission unit permitting exemption specified in Rule 62-210.300(3)(b)1., F.A.C.

Please contact me at (352) 332-6230, Ext. 351 if there are any questions regarding this certification.

Sincerely,

ENVIRONMENTAL CONSULTING & TECHNOLOGY, INC.

Thomas W. Davis, P.E.
Principal Engineer

Professional Engineer Statement:

I, the undersigned, hereby certify that:

To the best of my knowledge, the emission estimates reported in this certification are true, accurate, and complete based upon reasonable techniques available for estimating emissions.

Signature
Professional Engineer No. 36777

10/24/02
Date

Attachment C

Tampa Electric Company
F.J. Gannon Station
Coal Truck PM/PM_{10} Emission Estimates

Emission Point Description	Emission Point ID	Potential Emission Rates PM (lb/hr)	PM (tpy)	PM_{10} (lb/hr)	PM_{10} (tpy)
Coal Truck Unloading at Southwest Storage Pile	FH-045	0.23	0.12	0.11	0.06
Coal Trucks (Empty)	FH-046a	0.11	0.06	0.02	0.01
Coal Trucks (Full)	FH-046b	0.46	0.24	0.09	0.05
Totals		**0.80**	**0.42**	**0.22**	**0.11**

Source: ECT, 2002.

EMISSION INVENTORY WORKSHEET

Tampa Electric Company - F.J. Gannon Station

FH-045
Coal Trucks

EMISSION SOURCE TYPE

FUGITIVE PM - MATERIAL TRANSFER (DROPS) — Figure:

FACILITY AND SOURCE DESCRIPTION

Emission Source Description:	Fugitive PM - Coal Truck Unloading at Southwest Storage Pile (Drops)
Emission Control Method(s)/ID No.(s):	Moist material
Emission Point ID:	FH-045

EMISSION ESTIMATION EQUATIONS

PM Emission (lb/hr) = 0.74 x 0.0032 x [(Wind Speed/5)$^{1.3}$ / (Material Moisture Content/2)$^{1.4}$] x Material Handled (ton/hr)

PM Emission (ton/yr) = 0.74 x 0.0032 x [(Wind Speed/5)$^{1.3}$ / (Material Moisture Content/2)$^{1.4}$] x Material Handled (ton/yr) x (1 ton/2,000 lb)

Source: Section 13.2.4, AP-42, January 1995.

INPUT DATA AND EMISSIONS CALCULATIONS

Mean Wind Speed: 8.6 mph

Material Moisture Content: 6.5 weight %

Material Transfer Point	Source ID	Material Transfer Rates (ton/hr)	Material Transfer Rates (ton/yr)	Uncontrolled Emission Factor (lb PM/ton)	Control Efficiency (%)	Controlled Emission Factor (lb PM/ton)	Potential Emission Rates (lb/hr)	Potential Emission Rates (ton/yr)
Coal Truck Unloading at Southwest Storage Pile	FH-045	250.0	260,000	0.000920	0.0	0.000920	0.23	0.12
						Totals	0.23	0.12

SOURCES OF INPUT DATA

Parameter	Data Source
Mean Wind Speed, mph	Climate of the States (Tampa, FL), Third Edition, 1985.
Material Moisture Content	TEC, 2002.
Material Transfer Point Identification	TEC, 2002.
Material Transfer Rates	TEC, 2002.

NOTES AND OBSERVATIONS

1. Material transfer rates based on 8 hrs/dy, 5 dys/wk, and 26 wks/yr operation.

DATA CONTROL

Data Collected by:	D. Latchman	Date:	10/02
Evaluated by:	T. Davis	Date:	10/02
Data Entered by:	T. Davis	Date:	10/02

EMISSION INVENTORY WORKSHEET

FH-045
Coal Trucks

Tampa Electric Company - F.J. Gannon Station

EMISSION SOURCE TYPE

FUGITIVE PM_{10} - MATERIAL TRANSFER (DROPS & SCREENING) Figure:

FACILITY AND SOURCE DESCRIPTION

Emission Source Description:	Fugitive PM_{10} - Coal Truck Unloading at Southwest Storage Pile (Drops)
Emission Control Method(s)/ID No.(s):	Moist material
Emission Point ID:	FH-045

EMISSION ESTIMATION EQUATIONS

PM_{10} Emission (lb/hr) = 0.35 x 0.0032 x [(Wind Speed/5)$^{1.3}$ / (Material Moisture Content/2)$^{1.4}$] x Material Handled (ton/hr)

PM_{10} Emission (ton/yr) = 0.35 x 0.0032 x [(Wind Speed/5)$^{1.3}$ / (Material Moisture Content/2)$^{1.4}$] x Material Handled (ton/yr) x (1 ton/2,000 lb)

Source: Section 13.2.4, AP-42, January 1995.

INPUT DATA AND EMISSIONS CALCULATIONS

Mean Wind Speed: 8.6 mph Material Moisture Content: 6.5 weight %

Material Transfer Point	Source ID	Material Transfer Rates (ton/hr)	Material Transfer Rates (ton/yr)	Uncontrolled Emission Factor (lb PM/ton)	Control Efficiency (%)	Controlled Emission Factor (lb PM/ton)	Potential Emission Rates (lb/hr)	Potential Emission Rates (ton/yr)
Coal Truck Unloading at Southwest Storage Pile	FH-045	250.0	250,000	0.000435	0.0	0.000435	0.11	0.057
						Totals	0.11	0.057

SOURCES OF INPUT DATA

Parameter	Data Source
Mean Wind Speed, mph	*Climate of the States* (Tampa, FL), Third Edition, 1985.
Material Moisture Content	TEC, 2002.
Material Transfer Point Identification	TEC, 2002.
Material Transfer Rates	TEC, 2002.

NOTES AND OBSERVATIONS

1. Material transfer rates based on 8 hrs/dy, 5 dys/wk, and 26 wks/yr operation.

DATA CONTROL

Data Collected by:	D. Latchman	Date:	10/02
Evaluated by:	T. Davis	Date:	10/02
Data Entered by:	T. Davis	Date:	10/02

EMISSION INVENTORY WORKSHEET

FH-046
Coal Trucks

Tampa Electric Company - F.J. Gannon Station

EMISSION SOURCE TYPE

FUGITIVE PM - TRUCK TRAFFIC ON PAVED ROADS

FACILITY AND SOURCE DESCRIPTION

Emission Source Description:	Fugitive PM - Coal Truck Traffic on Paved Roads
Emission Control Method(s)/ID No.(s):	Watering, As Necessary
Emission Point ID:	FH-046

EMISSION ESTIMATION EQUATIONS

PM Emission (lb/hr) = 0.082 x [(Silt Loading Factor/2)$^{0.65}$] x (Truck Weight/3)$^{1.5}$ x Vehicle Miles Traveled (VMT)/hr

PM Emission (ton/yr) = 0.082 x [(Silt Loading Factor/2)$^{0.65}$] x (Truck Weight/3)$^{1.5}$ x Vehicle Miles Traveled (VMT)/yr x (1 ton/2,000 lb)

Source: Section 13.2.1, AP-42, October 2002.

INPUT DATA AND EMISSIONS CALCULATIONS

Controlled Silt Loading Factor:	0.97	g/m^2					
Operating Hours:	8	hr/dy	5	dy/wk	26	wk/yr	
Coal Received by Truck:	260,000	ton/yr	Truck Travel Distance (one way):		100	ft	
Hourly Truck Count:	11	trucks/hr	Annual Truck Count:		11,818	trucks/yr	

Truck Traffic Type	Source ID	Vehicle Miles Traveled (VMT/hr)	Vehicle Miles Traveled (VMT/yr)	Vehicle Weight (ton)	Control Efficiency (%)	Potential PM Emission Rates (lb/hr)	Potential PM Emission Rates (ton/yr)
Coal Trucks (Empty)	FH-046a	0.215	224	14.0	90.0	0.11	0.058
Coal Trucks (Full)	FH-046b	0.215	224	36.0	90.0	0.46	0.238
					Totals	0.57	0.296

SOURCES OF INPUT DATA

Parameter	Data Source
Controlled Silt Loading Factor	Based on factor for iron and steel production and overall 90% control efficiency, ECT, 2002.
Vehicle Miles Traveled, VMT	TEC, 2002.
Truck Weights, ton	TEC, 2002.
Control Efficiency	Estimated, ECT 2002.

NOTES AND OBSERVATIONS

DATA CONTROL

Data Collected by:	D. Latchman	**Date:**	10/02
Evaluated by:	T. Davis	**Date:**	10/02
Data Entered by:	T. Davis	**Date:**	10/02

EMISSION INVENTORY WORKSHEET

Tampa Electric Company - F.J. Gannon Station

FH-046
Coal Trucks

EMISSION SOURCE TYPE

FUGITIVE PM_{10} - TRUCK TRAFFIC ON PAVED ROADS

FACILITY AND SOURCE DESCRIPTION

Emission Source Description:	Fugitive PM_{10} - Coal Truck Traffic on Paved Roads
Emission Control Method(s)/ID No.(s):	Watering, As Necessary
Emission Point ID:	FH-046

EMISSION ESTIMATION EQUATIONS

PM_{10} Emission (lb/hr) = 0.016 x [(Silt Loading Factor/2)$^{0.65}$] x (Truck Weight/3)$^{1.5}$ x Vehicle Miles Traveled (VMT)/hr

PM_{10} Emission (ton/yr) = 0.016 x [(Silt Loading Factor/2)$^{0.65}$] x (Truck Weight/3)$^{1.5}$ x Vehicle Miles Traveled (VMT)/yr x (1 ton/2,000 lb)

Source: Section 13.2.1, AP-42, October 2002.

INPUT DATA AND EMISSIONS CALCULATIONS

Controlled Silt Loading Factor:	0.97	g/m^2			
Operating Hours:	8	hr/dy	5	dy/wk	26 wk/yr
Coal Received by Truck:	260,000	ton/yr	Truck Travel Distance (one way):		100 ft
Hourly Truck Count:	11	trucks/hr	Annual Truck Count:	11,818	trucks/yr

Truck Traffic Type	Source ID	Vehicle Miles Traveled (VMT/hr)	Vehicle Miles Traveled (VMT/yr)	Vehicle Weight (ton)	Control Efficiency (%)	Potential PM Emission Rates (lb/hr)	Potential PM Emission Rates (ton/yr)
Coal Trucks (Empty)	FH-046a	0.215	224	14.0	90.0	0.02	0.011
Coal Trucks (Full)	FH-046b	0.215	224	36.0	90.0	0.09	0.047
					Totals	0.11	0.058

SOURCES OF INPUT DATA

Parameter	Data Source
Controlled Silt Loading Factor	Based on factor for iron and steel production and overall 90% control efficiency, ECT, 2002.
Vehicle Miles Traveled, VMT	TEC, 2002.
Truck Weights, ton	TEC, 2002.
Control Efficiency	Estimated, ECT 2002.

NOTES AND OBSERVATIONS

DATA CONTROL

Data Collected by:	D. Latchman	**Date:**	10/02
Evaluated by:	T. Davis	**Date:**	10/02
Data Entered by:	T. Davis	**Date:**	10/02

Department of Environmental Protection

Jeb Bush
Governor

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

David B. Struhs
Secretary

June 7, 2000

Mr. Gregory M. Nelson, P.E.
Designated Representative
Acid Rain Program
Tampa Electric Company
P.O. Box 111
Tampa, FL 33601-0111

Re: Acid Rain Phase II NO_x Compliance Plan Revisions
Big Bend and Gannon Stations; ORIS Codes: 0645 and 0646

Dear Mr. Nelson:

We have received your recent request for the issuance of Acid Rain Permits for the referenced facilities that includes a proposed System Wide NO_x averaging plan for compliance.

Please note that our letter of January 19, 2000 was not an approval of the compliance plan, but only indicated that the Department deemed your application complete. Approval of acid rain compliance plans is made through the permitting process.

We are currently drafting the format of an appropriate "separate" Acid Rain Permit, based on the recent change in the Florida Statutes. Following this effort, we will evaluate the compliance plan for acceptance, and advise you of formal approval if granted. The earliest effective date of the approval of the plan is January 1, 2001.

If you should have any questions, please contact Tom Cascio at 850/921-9526.

Sincerely,

Scott M. Sheplak, P.E.
Administrator
Title V Section

cc: Jenny Jachim, EPA Region 4
Jerry Campbell, EPCHC
Bill Thomas, SWD
Clair Fancy
Cindy Phillips
Pat Comer, Esq.

Administrative Offices,
Legal & Water Management Division
The Roger P. Stewart Environmental Center
1900 - 9th Ave. - Tampa, FL 33605
Ph. (813) 272-5960 - Fax (813) 272-5157

Air Management Fax 272-5605
Waste Management Fax 276-2256
Wetlands Management Fax 272-7144
1410 N. 21st Street - Tampa, FL 33605

Executive Director
Richard D. Garrity, Ph.D.

ENVIRONMENTAL PROTECTION COMMISSION
of Hillsborough County

FAX Transmittal Sheet

DATE: Nov 5, 2002

TO: Scott Sheplak

FAX Phone: _____ **Voice Phone:** _____

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(813) 272-5530 ext. 1258

FROM: Rob Kolch

(Circle applicable section below)

Air Division

-Compliance -Enforcement/Analysis

-Monitoring/Toxics -Permitting

SPECIAL INSTRUCTIONS: Coal Delivery by Truck - TEC

Shelia

TAMPA ELECTRIC

October 25, 2002

Mr. Scott Sheplak, P.E.
Administrator- Title V Section
Florida Department of Environmental Protection
111 South Magnolia Drive, Suite 4
Tallahassee, FL 32301

Via FedEx
Airbill No. 7919 6701 5619

Re: Tampa Electric Company
F.J. Gannon Station
DEP File No. 0570040-002-AV
Coal Delivery by Trucks

Dear Mr. Sheplak:

Tampa Electric Company (TEC) would like to courtesy notify the Florida Department of Environmental Protection (FDEP) that TEC plans to receive coal by truck at its F.J. Gannon Station. TEC believes that the limited use of trucks to receive coal qualifies for a permitting exemption pursuant to Rule 62-210.300(3)(b)1., F.A.C. and constitutes an "insignificant activity" with respect to the Chapter 62-213, F.A.C. Title V operation permit program. Enclosed in Attachment A is the Responsible Official Signature and in Attachment B is the required Professional Engineer certification regarding potential emission rates and applicability of Rule 62-210.300(3)(b)1.,F.A.C.

TEC plans to receive coal by truck on a limited basis to provide diversity in coal delivery methods. Coal received by truck will be treated with a dust suppressant prior to delivery. Coal dump trucks will enter the plant from Port Sutton Road at the west- side of the F.J. Gannon Station and unload at the existing southeast coal storage pile. The coal will then be stored and handled using the existing fuel yard material handling equipment. TEC plans to receive up to 260,000 tons per year of coal by truck as a replacement for coal typically received by barge. Coal truck deliveries may occur for up to five days per week and 26 weeks per year. There will be no increase in the maximum, annual coal yard throughput rate. TEC will continue to comply with all fuel yard operating requirements specified in its current F.J. Gannon Station Title V operating permit.

Emissions associated with the coal truck operations will consist of fugitive particulate matter (PM and PM10). Potential PM/PM10 emissions were estimated total 0.42 and 0.11 tons per year for PM and PM10, respectively. The calculation for these emissions are enclosed in Attachment C. These estimated emission rates are well below the 5.0 ton per year threshold for a generic emission unit permitting exemption specified in Rule 62-210.300(3)(b)1., F.A.C.

TEC appreciates your cooperation in this matter. If it is the FDEP's opinion that permitting is required or if you have any questions, please call Dru Latchman or me at (813) 641-5034.

Sincerely,

Laura R. Crouch
Manager - Air Programs
Environmental Affairs

EA/bmr/DNL136

Enclosure

[redacted]
Mr. Jerry Kissel - FDEP SW

Attachment A

Responsible Official Certification

I have reviewed this permit exemption notification to transport coal to at F.J. Gannon Station by trucks. I hereby certify that these documents are authentic and accurate to the best of my knowledge.

Date: 10/25/02

Signature: Karen Sheffield
General Manager
F.J. Gannon Station

TECO (Gannon)

copy: Tom Rogers AL 11/4 marty Cindy Scott Lennon Jim P 11/5

TAMPA ELECTRIC

Memorandum of Understanding (MOU) Nitrogen Oxide Emissions Rate Reductions

This MOU represents an agreement between the Environmental Protection Commission of Hillsborough County (EPC) and Tampa Electric Company (TEC), that supports TEC's Phase II nitrogen oxide (NOx) reduction activities and EPC's desire to partner with local industry to jointly address local environmental issues.

Whereas the EPC is responsible for protecting the quality of the air and the water for the citizens of this County;

Whereas the air borne emissions of nitrogen oxides may contribute to photochemical smog and ozone, to eutrophication and acidification of surface waters and to degradation of visibility;

Whereas the Tampa Electric Company locally operates ten coal-fired boilers which make up a significant portion of the area's total nitrogen oxide emission inventory;

Whereas the United States EPA has promulgated a nitrogen oxide emission reduction rule requiring tighter limitations for coal-fired boilers as part of their Acid Rain Program;

Whereas seven of the Tampa Electric Company's coal-fired boilers, designated as Gannon Unit 3, Gannon Unit 4, Gannon Unit 5, Gannon Unit 6, Big Bend Unit 1, Big Bend Unit 2, and Big Bend Unit 3 are subject to the EPA's Phase II Nitrogen Oxide Emission Reduction Rule;

Whereas the reductions in this EPA rule are not required until the year 2000 and there are substantial benefits for the area if the Tampa Electric Company were to commit to reduce emissions before the EPA deadline such as fewer precursors available for ozone formation or nitrogen deposition;

Whereas the Tampa Electric Company has already taken the initiative to reduce the nitrogen oxide emissions from some of the individual affected units by more than 20 percent, resulting in an overall reduction of over 10,000 tons from the 1995 levels;

Whereas the EPC believes the combustion modifications and fuel switching proposed by the Tampa Electric Company will address the secondary environmental impacts associated with nitrogen oxide emissions in the Tampa Bay area;

It is therefore agreed that the Tampa Electric Company will voluntarily commit to the EPC to meet the following NOx emission limitations for the Phase II affected units. EPC, in return, will maintain their position that these limits should apply on a federal level. These limitations will be on a system-wide, heat-input weighted, annual average basis, commencing 01/01/98 and extending until such time as one of the signatories voids the MOU as provided below:

Affected Units	Maximum System-wide Annual Average NOx Emission Rate		
	Eff. 01/01/98	Eff. 01/01/99	Eff. 01/01/00
Gannon 3, 4, 5, 6 and Big Bend 1, 2 3	1.03	0.96	0.91

These nitrogen oxide emission rates reflect that the Tampa Electric Company will maintain the reductions achieved in 1996 through 1998; make an additional 5% reduction in 1999; and make another 5% reduction in 2000. Adherence to this commitment will be determined by the Tampa Electric Company's Continuous Emission Monitors (CEMs) as reported to the EPA.

These limitations are in effect for both parties unless, or until the compliance date upon which, an EPA, a regional, a state or a local ruling requires the boilers to meet a more stringent NOx emission rate. At such time, this MOU may be voided by either party by stating their intention in writing.

This MOU shall take effect upon the date of execution by the Executive Director of the EPC; and shall terminate only as discussed above or upon the date of Tampa Electric Company's compliance with an EPA Phase II NOx Reduction Rule equivalent in stringency to this MOU.

For the Tampa Electric Company

Official Signature: _____

Date: 10/29/97

For the Environmental Protection Commission

Executive Director Signature: _____

Date: 10/29/97

8/26 Scott
Leaf to copy them on notices of intent. On any we have already sent send them a copy of intent pack
claim - pls handle claim

LEAF
LEGAL ENVIRONMENTAL ASSISTANCE FOUNDATION

August 13, 1997

Howard Rhodes, Bureau Chief
Bureau of Air Resources
Florida Dept. of Env. Protection
2600 Blairstone Rd, MS 5500
Tallahassee, FL 32399

Re: Title V Permits

Dear Mr. Rhodes:

We understand the Bureau is reviewing applications for operating permits pursuant to DEP's authority to administer the Title V program. We are interested in potential permits for Florida's electric utilities, particularly Florida Power & Light, Florida Power Corp., Gulf Power Co., and Tampa Electric Co.

We would like to be added to any list of interested persons to whom notices of intent to issue or deny permits are sent. We would also like to know what opportunities there are for public comment on proposed permits. In addition, if there is a list of pending permits, we would be grateful for a copy. Thank you for your assistance.

Sincerely,

Gail Kamaras

Gail Kamaras, Director
Energy Advocacy Program

RECEIVED
AUG 15 1997
BUREAU OF
AIR REGULATION

A Public Interest Law Firm

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