TAMPA ELECTRIC

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BUREAU OF AIR REGULATION

June 28, 2002

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. 7918 7311 5485

Re: Tampa Electric Company
F.J. Gannon Station
Unit Nos. 1, 2, 3, & 4 Wood Derived Fuel Title V Modification Application
DEP File No. 0570040-017-AC

Dear Mr.. Sheplak:

Tampa Electric Company (TEC) has received your letter of incompleteness dated May 15, 2002 addressing the Title V permit revision application to allow for the continued operation of Unit Nos. 1-4 on wood-derived fuel (WDF). This correspondence is intended to provide the responses to each question raised by the Department.

FDEP Question 1

On pages 31, 32, 57, 58, 83, 84, 109, and 110 of the permit application, the applicant requested a 100% opacity limit be authorized. Rules 62-296.405(1)(a) and 62-210.700(1) through (3), F.A.C. are cited. Rule 62-296.405(1)(a), F.A.C. does not allow a facility to operate while emitting visible emissions at an opacity of 100% or any other opacity for a duration of 24-minutes per hour. Rules 62-210.700(1) through (3), F.A.C. address excess emissions. Specifically, Rule 62-210.700(3) allows visible emissions above 60 percent opacity for no more than 4, six (6)-minute periods, during a 3-hour period for excess emissions from boiler cleaning and load changes.

You requested authorization to operate up to 60 minutes per hour at an opacity of 100%. Operating at 100% opacity for an hour is not considered to constitute best operational practices or considered to minimize the duration of excess emissions as required by Rule 62-210.700(3), F.A.C.

TECO is allowed to operate in accordance with Rule 62-296.405(1)(a), F.A.C. (visible emissions less than 20% opacity except for one six-minute period per hour during which the opacity shall not exceed 27%). TECO is required to operate in accordance with Rule 62-296.700(1) through (3), F.A.C. by addressing excess emissions as written in the "Rule", and not by the establishment of a 1-hour period during which the boiler(s) may be operated at an opacity of 100%.

TEC Response 1

The visible emissions limitations included in Section III, H. of the application form for each emission unit were intended to address each regulatory limit that could apply to the F.J. Gannon Station fossil fuel fired steam boilers. Although the Department excess emissions regulations do

not specify numerical visible emission limits in several instances, TEC agrees that best operational practices to minimize emissions are required during period of authorized excess emissions. Revised Section III, H. forms have been included in Attachment 1 for your review.

FDEP Question 2

The term "fluxing agent" was used to describe some constituent of the fuels which may be charged into the boilers. Additionally a "non-hazardous boiler chemical cleaning waste" is authorized for injection into the boilers (pages 17, 43, 69, and 95). What are these constituents? Please list the fluxing agents and the non-hazardous boiler chemical cleaning wastes charged into the boilers.

TEC Response 2

The Final Permit No. 0570040-002-AV permits both fluxing agents and non-hazardous boiler chemical cleaning waste to be used at F.J. Gannon Station. Some previously used fluxing agents have been limestone and iron ore. According to Condition A.2., B.2., and C.2., Gannon Units 1-6 are permitted to inject non-hazardous boiler chemical cleaning waste into each unit. If these conditions were used, the non-hazardous boiler chemical cleaning waste, generated on-site, would be injected into each boiler during normal operation as a maintenance procedure, as stated in Condition J.33. Each batch of boiler chemical cleaning waste to be burned would be sampled and analyzed to ensure it is non-hazardous. Some previously used non-hazardous boiler chemical cleaning components are citric acid, hydrochloric acid and ammonia.

FDEP Question 3

Please submit the "Compliance Report" referenced in DEP Form No. 62-210.900(1), block 14. and the corresponding "Compliance Certification" referenced in block 15. for this project. As a guide, see your initial application for Title V permit and statements made in the "INTRODUCTION" for this application.

TEC Response 3

Completed "Compliance Report and Plan" and "Compliance Certification" statements have been included in Attachment 2 as requested.

TEC appreciates the opportunity to provide the additional information contained in this correspondence. If you have any questions, please call Raiza Calderon or me at (813) 641-5261.

Sincerely,

Laura R. Crouch
Manager - Air Programs
Environmental Affairs

EA\bmr\RC133

Enclosure

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

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ATTACHMENT 1

H. VISIBLE EMISSIONS INFORMATION
(Only Regulated Emissions Units Subject to a VE Limitation)

Visible Emissions Limitation: Visible Emissions Limitation 3 of 5

1. Visible Emissions Subtype: *	2. Basis for Allowable Opacity: [✔] Rule [ ] Other
3. Requested Allowable Opacity: Normal Conditions: % Exceptional Conditions: * % Maximum Period of Excess Opacity Allowed: * min/hour	
4. Method of Compliance: **Continuous opacity monitoring system (COMS).**	
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ATTACHMENT 2

COMPLIANCE REPORT, PLAN, AND CERTIFICATION

1. Compliance Report and Plan

Attachment A-1 of the initial Title V permit application identified the requirements that are applicable to the emission units that comprise this Title V source. In addition, performance testing was conducted during April 18 – 28, 2000 as required by Final Permit No. 0570040-011-AC. The emissions performance testing demonstrated that F.J. Gannon Station Unit 3 was operating in compliance with permit limits for particulate, sulfuric acid mist, sulfur dioxide (SO2), nitrogen oxides (NOx), opacity, volatile organic compounds (VOC's) and visible emissions. A report of the performance testing was submitted to the Department on June 14, 2000.

Each emissions unit is in compliance, and will continue to comply, with the respective applicable requirements.

The emission units that comprise this Title V source will comply with future-effective applicable requirements on a timely basis.

2. Proposed Schedule for the Submission of Periodic Compliance Statements Throughout the Permit Term

Periodic compliance statements are proposed to be submitted on an annual basis consistent with FDEP Rule 62-213.440(3)(a)2., F.A.C.

3. Compliance Certification

I, the undersigned, am the responsible official as defined in Chapter 62-210.200(247), F.A.C., of the Title V source for which this report is being submitted. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made and data contained in this report are true, accurate, and complete.

Karen Sheffield — 6/28/02

Karen Sheffield
General Manager – F.J. Gannon Station

Date

SENDER: *COMPLETE THIS SECTION*

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1 Article Addressed to:

Ms. Dru Latchman
Associate Engineer
Environmental Affairs
Tampa Electric Company
PO Box 111
Tampa, FL 33601-0111

COMPLETE THIS SECTION ON DELIVERY

A. Received by *(Please Print Clearly)* MAY

B. Date of Delivery 9 2002

C. Signature

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☐ Agent
☐ Addressee

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type
☒ Certified Mail ☐ Express Mail
☐ Registered ☐ Return Receipt for Merchandise
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? *(Extra Fee)* ☐ Yes

2 7001 0320 0001 3692 8949

PS Form 3811, July 1999 Domestic Return Receipt 102595-00-M-0952

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Division of Air Resources Mgt.
Bureau of Air Regulation, NSR
2600 Blair Stone Rd., MS 5505
Tallahassee, FL 32399-2400

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Laura R. Crouch
Manager - Air Programs
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c/enc: Mr. Jerry Campbell, EPCHC
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1. Visible Emissions Subtype:	2. Basis for Allowable Opacity: [ ] Rule [ ] Other
3. Requested Allowable Opacity: Normal Conditions: % Exceptional Conditions: % Maximum Period of Excess Opacity Allowed: min/hour	
4. Method of Compliance:	
5. Visible Emissions Comment (limit to 200 characters):	

H. VISIBLE EMISSIONS INFORMATION
(Only Regulated Emissions Units Subject to a VE Limitation)

Visible Emissions Limitation: Visible Emissions Limitation 3 of 5

1. Visible Emissions Subtype: *	2. Basis for Allowable Opacity: [✔] Rule [ ] Other
3. Requested Allowable Opacity: Normal Conditions: % Exceptional Conditions: * % Maximum Period of Excess Opacity Allowed: * min/hour	
4. Method of Compliance: **Continuous opacity monitoring system (COMS).**	
5. Visible Emissions Comment (limit to 200 characters): *** Best operational practices to minimize emissions and duration.** **Excess emissions resulting from boiler cleaning and load change.** **Maximum period of visible emissions above 60% opacity allowed is 4, six (6)-minute periods during a 3-hour period.** **Rule 62-210.700(3), F.A.C.**	

Visible Emissions Limitation: Visible Emissions Limitation 4 of 5

1. Visible Emissions Subtype: *	2. Basis for Allowable Opacity: [✔] Rule [ ] Other
3. Requested Allowable Opacity: Normal Conditions: % Exceptional Conditions: * % Maximum Period of Excess Opacity Allowed: * min/hour	
4. Method of Compliance: **Continuous opacity monitoring system (COMS).**	
5. Visible Emissions Comment (limit to 200 characters): *** Best operational practices to minimize emissions and duration.** **Excess opacity allowed for boiler startups and shutdowns.** **Rule 62-210.700(2), F.A.C.**	

H. VISIBLE EMISSIONS INFORMATION
(Only Regulated Emissions Units Subject to a VE Limitation)

Visible Emissions Limitation: Visible Emissions Limitation **5** of **5**

1. Visible Emissions Subtype:	2. Basis for Allowable Opacity:
*	[✔] Rule [ ] Other
3. Requested Allowable Opacity: Normal Conditions: % Exceptional Conditions: * % Maximum Period of Excess Opacity Allowed: * min/hour	
4. Method of Compliance: **Continuous opacity monitoring system (COMS).**	
5. Visible Emissions Comment (limit to 200 characters): *** Best operational practices to minimize emissions and duration.** **Excess opacity allowed for startups, shutdowns, and malfunctions.** **Maximum period of excess emissions allowed is two hours in any 24 hour period.** **Rule 62-210.700(1), F.A.C.**	

Visible Emissions Limitation: Visible Emissions Limitation ____ of ____

1. Visible Emissions Subtype:	2. Basis for Allowable Opacity:
	[ ] Rule [ ] Other
3. Requested Allowable Opacity: Normal Conditions: % Exceptional Conditions: % Maximum Period of Excess Opacity Allowed: min/hour	
4. Method of Compliance:	
5. Visible Emissions Comment (limit to 200 characters):	

ATTACHMENT 2

COMPLIANCE REPORT, PLAN, AND CERTIFICATION

1. Compliance Report and Plan

Attachment A-1 of the initial Title V permit application identified the requirements that are applicable to the emission units that comprise this Title V source. In addition, performance testing was conducted during April 18 – 28, 2000 as required by Final Permit No. 0570040-011-AC. The emissions performance testing demonstrated that F.J. Gannon Station Unit 3 was operating in compliance with permit limits for particulate, sulfuric acid mist, sulfur dioxide (SO2), nitrogen oxides (NOx), opacity, volatile organic compounds (VOC's) and visible emissions. A report of the performance testing was submitted to the Department on June 14, 2000.

Each emissions unit is in compliance, and will continue to comply, with the respective applicable requirements.

The emission units that comprise this Title V source will comply with future-effective applicable requirements on a timely basis.

2. Proposed Schedule for the Submission of Periodic Compliance Statements Throughout the Permit Term

Periodic compliance statements are proposed to be submitted on an annual basis consistent with FDEP Rule 62-213.440(3)(a)2., F.A.C.

3. Compliance Certification

I, the undersigned, am the responsible official as defined in Chapter 62-210.200(247), F.A.C., of the Title V source for which this report is being submitted. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made and data contained in this report are true, accurate, and complete.

Karen Sheffield

6/28/02

Karen Sheffield
General Manager – F.J. Gannon Station

Date