

Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

December 1, 1997

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Paul Amundsen, Esquire
Amundsen and Moore
Attorneys at Law
502 East Park Avenue
Tallahassee, Florida 32302-1759

Dear Mr. Amundsen:

We received your letter dated November 18 requesting timely written notice of any requests by TECO to burn fuels other than coal. Any such application will be processed by the Bureau of Air Regulation. We have established a site on our web site which lists application received. You may be interested in reviewing the information on the site from time to time. Our address is www.dep.state.fl.us. Once you see an application of interest, you can request to be copied on correspondence regarding that request. That is easy to do because we can add your name to the list of interested parties in the entry for that specific application in our database. We will also include a note to that effect in the hardcopy file for that permitting action.

We will endeavor to actively notify you soon after we receive any such applications from TECO. However the request is open-ended, does not specify any time limits, and concerns future applications for which there exist no public records. Therefore we cannot ensure that you will always receive notification on a timely basis.

If you have any questions regarding this matter, please call Doug Beason at 850/921-9624. If you wish to learn how to access the information on the website, please call Al Linero at 850/488-1344.

Sincerely,

Howard L. Rhodes, Director
Division of Air Resources
Management

HLR/aal

cc: W. Douglas Beason, Esq.

P 265 659 260

US Postal Service
Receipt for Certified Mail

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Paul Amundsen	
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Amundsen & Moore	
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Tallahassee FL	
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Postmark or Date	12-5-97
TECO	

PS Form 3800, April 1995

your RETURN ADDRESS completed on the reverse side?

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- 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.
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I also wish to receive the following services (for an extra fee):

- Addressee's Address
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Consult postmaster for fee.

3. Article Addressed to:

Paul Amundsen, Esq
Amundsen & Moore
502 E Park Ave.
Tallahassee, FL

32302-1759

4a. Article Number

P 265 659 260

4b. Service Type

- Registered
- Certified
- Express Mail
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7. Date of Delivery

12-8-97

5. Received By: (Print Name)

W. Pinson

6. Signature: (Addressee or Agent)

X W. Pinson

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

Thank you for using Return Receipt Service.

AMUNDSEN & MOORE
ATTORNEYS AT LAW

PAUL H. AMUNDSEN
RICHARD W. MOORE
RICHARD E. TORPY
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502 EAST PARK AVENUE
TALLAHASSEE, FLORIDA 32301
(850) 425-2444
FACSIMILE: (850) 425-2447

PLEASE REPLY TO:
POST OFFICE DRAWER 1759
TALLAHASSEE, FLORIDA 32302-1759

*Clair - suggest a letter
advising we can
not be responsible
for his requests
ck for legal
issues
BREVARD COUNTY OFFICE
200 S. HARBOR CITY BLVD.
SUITE 203
MELBOURNE, FL 32901
(407) 724-6262
FACSIMILE: (407) 727-2006
Thanks
Howard
11/21*

RECEIVED

NOV 19 1997

November 18, 1997
DIVISION OF AIR
RESOURCES MANAGEMENT

Certified - Return Receipt Requested

Howard Rhodes, Director
Division of Air Resources Management
Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Re: Request for Actual Notice Regarding Proposals to Burn other Fuels at TECO's Gannon Station

Dear Mr. Rhodes:

As you know, this office represents Ridge Generating Station, L.P. ("Ridge"). Ridge was a party petitioner in formal administrative proceedings on two air permits sought by Tampa Electric Company ("TECO") to burn tire-derived fuel at TECO's Gannon Plant in Hillsborough County. Last month, TECO withdrew both of those permit applications and consequently the formal proceedings were dismissed.

The purpose of this letter is to request that DEP provide this office with timely, written notice of any similar requests by TECO to burn any fuels other than coal at the Gannon Station and additionally, timely, written notice of DEP's intended action on any such proposals by TECO.

For example, and without limiting the breadth of my request above, projects for which I am asking for actual notice are any TECO request to DEP for authorization of any kind to burn tire-derived fuel, paper pellets, yard waste, wood or wood chips, yard clippings, petroleum coke, and any combinations or blends of these or similar fuels.

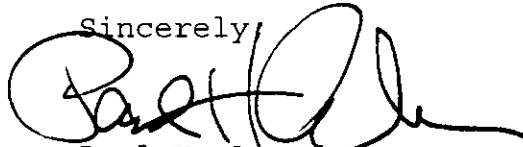
Additionally, actual notice is requested for any proposed changes or alterations or modifications to the fuel yard at the Gannon Station.

Mr. Howard Rhodes
November 18, 1997
Page two

Finally, I would appreciate you advising me immediately if for any reason the DEP will not provide the notice that I am requesting in this letter.

Thank you very much.

Sincerely,

A handwritten signature in black ink, appearing to read "Paul H. Amundsen", written in a cursive style.

Paul H. Amundsen

PHA/mb

cc: W. Douglas Beason, Esquire

like American
with... ..

memo to Gitzler

TIRE BURNING ISSUE

- ◆ The Wheelabrator Ridge Facility is a 50MW electrical generating facility fueled by waste wood and waste tires near Lakeland, Florida.
- ◆ The Facility burns approximately 300,000 tons/year of wood and 45,000 tons/year (4,500,000 tires).
- ◆ During the Pre-Application Meeting with the FDEP in the fall of 1991, the Company was told that, in order to be permitted to burn tires, a spray dryer absorber for SO₂ control and fabric filter would be required. If burning only wood, an electrostatic precipitator would meet permit requirements. Q17
- ◆ The Company made the decision to assume the added capital cost, as well as the additional ongoing operational cost of the S.D.A. and fabric filter because the relative fuel price advantage of tires vs. wood justified the expenditure.
- ◆ In 1995, when the Ridge Facility applied to increase its tire burning capacity from 32,000 tons per year to 45,000 tons per year the Company had to agree to reduce its initial SO₂ limits from 109.4#/hour to 65#/hour in the final permit in order to gain state approval.
- ◆ Tampa Electric is now applying for a permit modification to allow its Gannon Station Unit 3 to burn tires with SO₂ emissions uncontrolled. TECO
Coal and Tires
- ◆ To now have someone with no SO₂ control equipment be allowed to burn tires because they have a lax 1980's SO₂ permit (2.4#/MMBTU at Gannon vs. 0.1#/MMBTU at Ridge) is inconceivable.
- ◆ Since the Ridge Facility started up in 1994, all known significant tire piles have been consumed in central and southern Florida and the disposal is no longer a problem in Florida.

additional

Howard Rhoads

1. Does rule allow a different fuel types to be burned without a new review if conditions?

2. Test burn for TECO; results in Department how.

Just the...

John Zubeal

difference between Tire Sales and production