



Department of Environmental Protection

Lawton Chiles
Governor

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

Virginia B. Wetherell
Secretary

January 14, 1998

Ms. Theresa Watley
TECO
P.O. Box 111
Tampa, FL 33601-0111

RE: Your attached letters 12/29/97 Gannon Fuel Yard and
12/30/97 Gannon RDF Test Burn

Dear Ms. Watley:

Gannon Fuel Yard

DEP's New Source Review Section in Tallahassee will make a determination as to PSD applicability. If they determine non-applicability, we (the Southwest District) will continue to process and issue the permit. If they determine that PSD is applicable, they will take over the processing at that point.

Gannon RDF Test Burn

The Southwest District will process this authorization.

Future TECO Air Permitting

DEP's Tallahassee office will be the lead processor on future applications, authorizations, etc. Please address these requests, as appropriate, either to the New Source Review Section or the Title V Section. Please continue to send copies to EPCHC and SWD.

Sincerely,

A handwritten signature in cursive script, appearing to read "G. J. Kissel".

G. J. Kissel, P.E.
Air Permitting Supervisor

c: R. Kirby, EPCHC
A. Linero, DEP
S. Sheplak, DEP

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AIR REGULATION

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Mr. Gerald Kissel, P.E.
December 30, 1997
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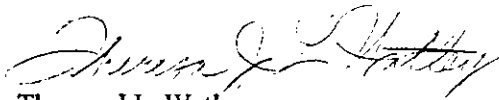
Department of Environmental Protection
SOUTHWEST DISTRICT

require any alteration of any kind to accommodate combustion of the supplemental fuel. In addition, TEC has compiled a listing of emission factors for non-criteria pollutants of concern (to the Department) that may be present in the emissions from the proposed coal/pRDF fuel blend, calculated emission rates for these pollutants of concern from the proposed coal/pRDF blend, conducted dispersion modeling to determine the ambient impact of each pollutant of concern, and compared the modeled ambient impact for each pollutant of concern to the Department's draft guidance on ambient reference concentrations (ARC). This analysis demonstrates that burning the coal/pRDF fuel blend in Unit 4 will not cause an exceedance of any ARC of concern under the "worst case" test burn scenario. Tables summarizing this information and the assumption used in the calculations are presented in Attachments D, E, F, and G.

TEC proposes to conduct the test burn with a blend of pRDF and the typical coal supply for a period of twenty-one (21) days. All testing shall be concluded within sixty (60) days of when pRDF is first introduced in Unit 4. The proposed test burn protocol is provided in Attachment H.

TEC proposes to begin this test burn upon Department approval. Therefore, an expeditious review of this request is appreciated. If you have any questions or comments on this matter, please feel free to contact me at (813) 641-5034.

Sincerely,



Theresa J.L. Watley
Consulting Engineer
Environmental Planning

EPgm\TLW582

Attachments

c/att: Mr. Clair Fancy-FDEP
Mr. Jerry Campbell-EPCHC