



CERTIFIED MAIL #P-927 500 697  
RETURN RECEIPT REQUESTED

March 31, 1989

Mr. Arthur J. Wells  
Air Permit Engineer  
Environmental Protection Commission  
of Hillsborough County  
1410 N. 21st Street  
Tampa, FL 33605

Re: F.J. Gannon Station Permit Renewals:

1. Unit 4 Economizer Ash Silo
2. Unit 1-4 Fly Ash Silo
3. Unit 5 & 6 Fly Ash Silo
4. Combustion Turbine

Dear Mr. Wells:

The following is a response to issues raised in the letter of incompleteness dated March 2, 1989, regarding the above referenced permit renewals.

With regard to the applications not being certified by a Florida registered professional engineer, 17-4.050(3), F.A.C., states: "... all applications for a Department permit shall be certified by a professional engineer registered in the State of Florida except ... where professional engineering is not required by Chapter 471, F.S."

Section 471.003(2)(d) states that the following are not required to register under the provisions of Section 471 as a registered engineer:

"Regular full-time employees of a public utility or other entity subject to regulation by the Florida Public Service Commission, Federal Energy Regulatory Commission, or Federal Communications Commission."

The statutes clearly indicate that Tampa Electric Company (TEC) is not required to have a registered professional engineer certify renewal applications. In the past, the Department appears to have recognized these provisions as they have not

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required certification by a registered engineer on previous permit applications from TEC.

With regard to the combustion turbine, 17-2.700(2)(a)3., F.A.C., states "The owner or operator of a source that is subject to any emission limiting standard shall conduct a compliance test that demonstrates compliance with the applicable emission limiting standard prior to obtaining a renewal operation permit." It is TEC's position that the only applicable emission limiting standard for this source is a visible emissions standard. Please find enclosed the four annual opacity compliance tests required under the current operating permit (A029-85099). To TEC's knowledge, there is not a particulate emission limiting standard stated for combustion turbine sources in the regulations; even 40 CFR 60 Subpart GG - Standards of Performance for Stationary Gas Turbines does not specify a mass emissions limiting standard. In addition, TEC is not aware of an established test method capable of testing this type of source for mass emissions. Also, TEC feels that it would be unnecessary to perform such testing, if possible, since the standard of less than 5% opacity (no visible emissions) already assures minimal particulate emissions.

With regard to the pressure drop of the East baghouse of the Units 1-4 Fly Ash Silo, operational records indicate that a pressure drop of greater than five inches of water is not uncommon for normal operations of this device. The manometer in question is routinely checked and is operating properly. Therefore, the upper limit for the pressure drop in the permit renewal should be changed to 8 inches of water.

With regard to the Unit 4 Economizer Ash Silo, this silo has been in an inactive status since mid 1987. Although the silo is not actively used at present, the remaining portion of the economizer ash handling system is still in operation. Therefore, it is necessary to maintain the availability of the economizer ash silo to this system.

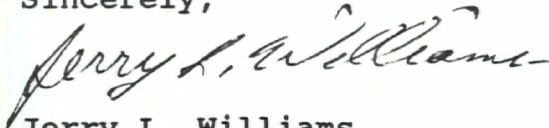
With regard to fugitive emissions in the fly ash loading area, maintenance activities to remove particulate matter from the roads and other paved areas in the vicinity of the loading area are performed regularly by the facility. During the inspection of the facility on February 23, 1989, a specific problem with overloading of a tanker truck was observed by EPCHC staff. This was caused by a problem with the weight setting which indicates when a truck is full. This weight setting has been scaled back to prevent potential overfilling of tanker trucks.

The information provided in this letter should satisfy all the incompleteness concerns regarding the permit renewals in question. Please find enclosed the permit application that were returned with your letter. A revision to the Unit 1-4 Fly Ash

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Silo pressure drop has been made. If you have any further questions, please call.

Sincerely,



Jerry L. Williams  
Director  
Environmental

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Enclosures

cc: J. Harry Kerns, FDER  
George Richardson, FDER