

TAMPA ELECTRIC July 7, 2000

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BUREAU OF AIR REGULATION

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 5134 1497

Re: Tampa Electric Company
F. J. Gannon Station
Comments on 3<sup>rd</sup> Draft Title V Permit
FDEP File No. 0570040-002-AV

Dear Mr. Sheplak:

Please find enclosed Tampa Electric Company's (TEC) detailed comment on the 3<sup>rd</sup> draft Title V permit for F.J. Gannon Station. The enclosed mark-up of the publicly noticed permit shows strikethrough for language TEC would like deleted and underline for language that TEC would like added.

In general, the following issues are addressed in the enclosed detailed comments:

- Remaining comments that TEC previously made on the 2<sup>nd</sup> Draft Title V permit that were not sufficiently addressed in this draft.
- Incorporation of the three air construction permits and the SO<sub>2</sub> Compliance Plan into the body of the permit, rather than as attachments to the permit.
- Addition of language to allow for emergency venting of slag tank vents as previously approved by the Department.
- Removing certain language that was added since the 2<sup>nd</sup> draft version of the permit.

## In addition to the enclosed comments, TEC requests the following:

- The allowance to burn used oil in Unit 4 should apply to Units 1 through 6.
- Section III, Subsections A, B, and C should be combined into one subsection, addressing Unit 1 through 6.

(The above items were not included in the enclosed detailed comments for the purpose of clarity)

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The incorporation of the three air construction permits is appropriate at this time since these projects are complete and all required initial compliance tests have been successfully completed.

TEC requests the foregoing items, along with the enclosed detailed comments on the current draft version of the Title V permit be included in the Proposed version of the permit.

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

Sincerely,

Karen A. Sheffield, P.E.

Korena Sheffield

General Manager

F.J. Gannon Station

EP\td\JJH926

Enclosure

c/enc: Mr. Clair Fancy, FDEP-Tallahassee

Mr. Jerry Kissel, FDEP-SW District

Mr. Jerry Campbell, EPCHC

## INTEROFFICE MEMORANDUM

Date: 07-Jul-2000 05:21pm

From: Jamie Hunter

j-jhunter@tecoenergy.com

Dept: Tel No:

To: See Below

Subject: Gannon Title V Comments - July 7

Attached is the FINAL cover letter and TEC's FINAL comments on the 3rd draft of the Title V permit. The final original hard copy has been sent FedEx today, Friday, July 7th.

The changes from the copy I sent you yesterday are as follows:

Section III C.4.C. - The words "pressurizing fan filters" were replaced with "blower and tub heaters". This correctly identifies the equipment referenced.

Section III E. "Brief Description" Section - language was modified from "(East and West)" to "(clamshell and continuous)" to more clearly describe to two unloaders.

Section III. E.5. revised A. - language was modified from "The west bucket to the west hopper" to "The clamshell to the hopper". This, as does the above comment, clarifies the description of the unloaders.

Section III. revised E.9.A.3. - "Benetech" was mis-spelled. This was corrected.

Section III. G.5.B.1. and H.5.B.1. - The word "manometer" was inadvertently stricken in these section. This has been corrected.

Section III. J.34.d.(1) and (2) - The language "(This record shall be completed no later than the fifteenth day of the succeeding month.)" in these two sections should have been stricken, as it was in the other section of the permit. This has been corrected.

### NO OTHER CHANGES WERE MADE.

Please let me know if you have any questions.

Jamie Hunter 813.641.5033

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FROM:

Gina Morales (813)641-5036

Tampa Electric Company 6944 U.S. Highway 41 North

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