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TAMPA ELECTRIC

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JUL 02 2002

BUREAU OF AIR REGULATION

July 1, 2002

Mr. Clair Fancy  
Chief Bureau of Air Regulation  
Florida Department of Environmental Protection  
111 South Magnolia Drive, Suite 4  
Tallahassee, FL 32301

Via Fed Ex  
Airbill No. 7904 7115 9050

**Re: Tampa Electric Company (TEC)  
F.J. Gannon Station  
Title V Permit No. 0570040-014-AV  
Request for Generic Exemption  
Slag Storage**

Dear Mr. Fancy,

This purpose of this correspondence is to notify the Florida Department of Environmental Protection (DEP) that Tampa Electric Company (TEC) intends to utilize the fuel yard at F. J. Gannon Station (Gannon Station) to temporarily store slag from another electric utility. This slag is used as a material, with glassine properties, for blasting activities.

TEC is submitting the request for a generic exemption to ensure that this is included in Gannon Station's Title V Permit. TEC believes that this qualifies as a generic exemption per the Florida Administrative Code (F.A.C.) 62-210.300(3). TEC believes that this request does not need to be formally submitted until permit renewal per F.A.C. 62-210-300(3). However, in the interest of completeness and open disclosure TEC is informing the DEP with this letter.

The slag will be brought in by barge at infrequent intervals and stored in the fuel yard until needed by Reed Minerals. When the slag is needed, Reed Minerals will bring trucks into the storage area, load the slag and remove it from the site. This activity will occur on an infrequent basis, and it is estimated that the maximum amount of slag handled at the fuel storage area would be no more than 20,000 tons per year. Based on its glassine properties, the slag has minimal dust potential.

Attached is a block diagram with the illustrated transfer points. The slag is loaded into the hopper on the dock with the clamshell and is transferred onto the B conveyor. It is then transferred from the B conveyor to the C conveyor. From the C conveyor it moves to the D-2 conveyor through the T1 structure (transfer structure 1). Finally, it is transferred from the D-2 conveyor to the E2 conveyor through the T2 structure (transfer structure 2). The E2 conveyor stacks the slag material in the North Yard. Once in the North Yard, the slag is the responsibility of Reed minerals. The trucking firm hired by Reed Minerals will load and haul the slag away.

TAMPA ELECTRIC COMPANY  
P. O. BOX 111 TAMPA, FL 33601-0111

(813) 228-4111

AN EQUAL OPPORTUNITY COMPANY  
HTTP://WWW.TAMPAELECTRIC.COM

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HILLSBOROUGH COUNTY (813) 223-0800  
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Mr. Clair Fancy  
July 1, 2002  
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TEC currently has an agreement with Reed Minerals to accept 20,000 tons, annually. TEC has agreed to accept the slag in approximately 5,000-ton allotments per shipment. Currently, TEC has received approximately 5,00 tons of the slag.

Given the properties of the slag and the expected amounts to be handled on-site, the slag handling activity will fall well below the 5.0 tons per year threshold for fugitive emissions of particulate matter. The slag will not emit lead or any hazardous air pollutants. There is no unit-specific requirement for slag handling, and the additional emissions from the activity will not cause the facility to exceed any major source thresholds, even in combination with emissions from all other insignificant emission sources. Therefore, the slag handling activity will qualify for a generic exemption and constitute as an "insignificant activity."

Based on this information, TEC believes that this operation is exempt from permitting per F.A.C. 62-210.300(3) and requests written concurrence from the Department. TEC appreciates the Department's immediate consideration in this matter.

If you have any questions, please feel free to telephone Shelly Castro or me at (813) 641-5033.

Sincerely,



Laura B. Crouch  
Manager - Air Programs  
Environmental Affairs

EA/bmr/SSC125

Enclosures

c/enc: Mr. Jerry Kissel, FDEP SW  
Mr. Scott Sheplak, FDEP  
Ms. Alice Harman, EPCHC

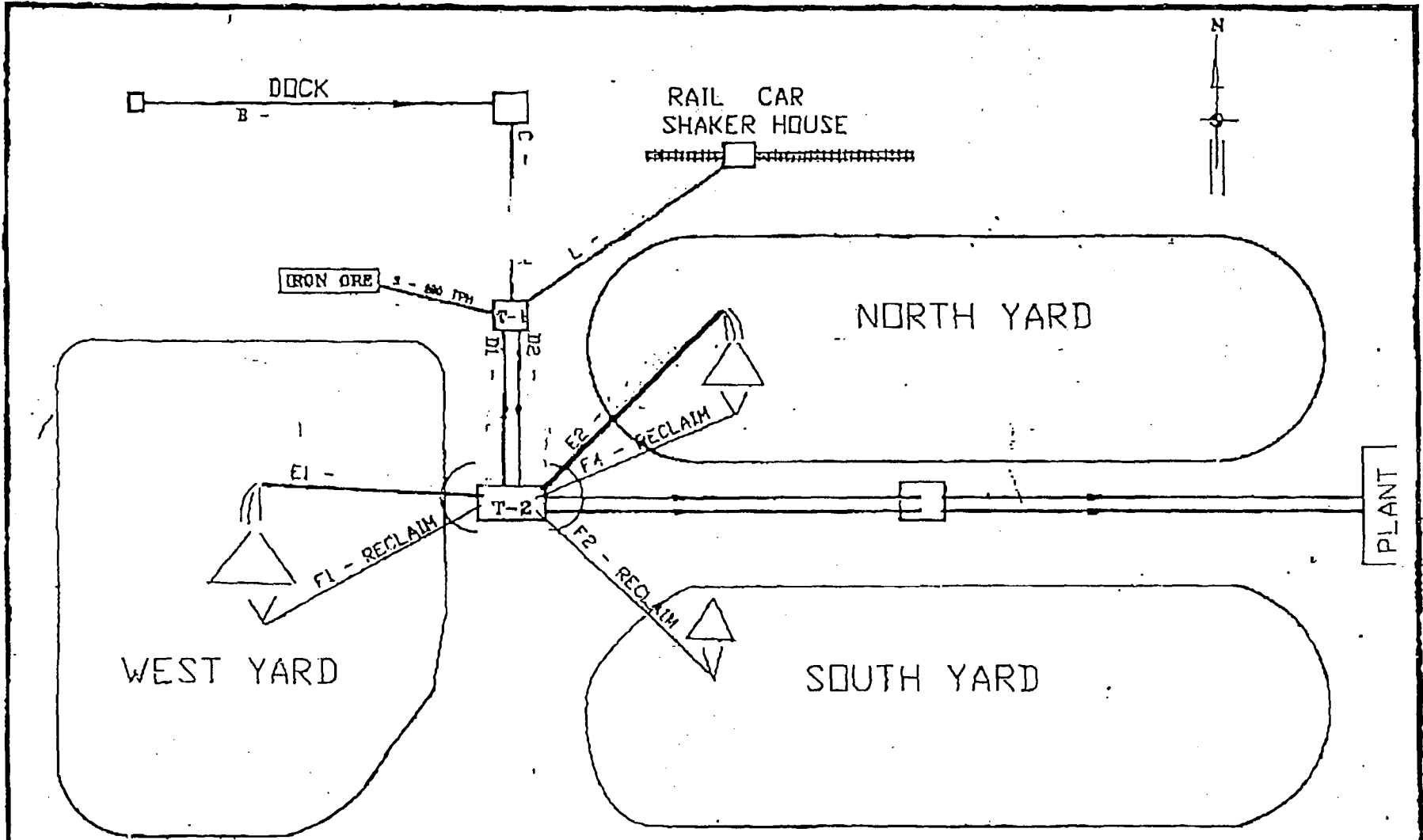
**Attachment A**  
**Responsible Official Certification**

## Responsible Official Certification

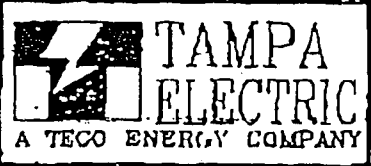
I have reviewed this letter of request for a generic permit exemption to transport and store slag at F.J. Gannon Station. I hereby certify that these documents are authentic and accurate to the best of my knowledge.

Date: 6/28/02

Signature: Karen Sheffield  
General Manager  
F.J. Gannon Station



Maximum Storage Capacities  
 (Adjusted for F-2 Reclaim Installation and Storm Water Containment Project)



**GANNON STATION  
 COAL FIELD PLOT PLAN**

DESIGNED BY HJB	CHECKED BY CH	APPROVED BY
DATE 4/95	SHEET NO. COALFLD6	
FILE NAME	SHEET NO. 1 of 1	



**MATERIAL SAFETY DATA SHEET**

(Complies with 29 CFR 1910.1200)

**SECTION I - GENERAL**

Reed Minerals, HarSCO Corporation  
 P.O. Box 0516  
 Camp Hill, PA 17001-0515  
 Emergency Telephone Number  
 (717) 763-4200

Product Name: RMS  
 CAS Number: 14464-46-1 (Cristobalite)  
 14808-60-7 (Quartz)  
 Particles not otherwise regulated.  
 Common Name: Slag, Coal  
 Date: February, 1998

**SECTION II - INGREDIENTS**

Slag, Coal 100% - 99.0%  
 Cristobalite 0% - 0.3%  
 Quartz 0% - 0.2%

		<u>OSHA PEL</u>	<u>ACGIH TLV</u>
Nuisance Particulate:	Total Particulate	15	10
	Respirable Particulate	5	3
Quartz:	Total Dust	(30 mg/m <sup>3</sup> /% SiO <sub>2</sub> +2)	N/A
	Respirable Dust:	(10 mg/m <sup>3</sup> /% SiO <sub>2</sub> +2)	0.10
Cristobalite:	Total Dust:	(use 1/2 the value calculated from the count or mass formula for quartz)	N/A
	Respirable Dust:	(use 1/2 the value calculated from the count or mass formula for quartz)	0.05

\* Values expressed as mg/m<sup>3</sup>

**SECTION III - PHYSICAL DATA**

Physical Form: Solid (angular granules)  
 Boiling Temperature: N/A  
 Melting Temperature: Greater than 2300°F  
 Vapor Pressure/Density: N/A  
 Evaporation Rate: N/A  
 Specific Gravity: 2.7 g/cc (typical)  
 Water Solubility: Negligible  
 Color: Dark Green/Black  
 Odor: None

#### SECTION IV - FIRE AND EXPLOSION DATA

Product is nonflammable and nonexplosive.

#### SECTION V - REACTIVITY DATA

Product is stable under normal conditions of use, storage, and transportation.

#### SECTION VI - HEALTH HAZARD DATA

RMS aggregate may contain up to 0.3% cristobalite, one of the three major forms of silicon dioxide (crystalline silica). Quartz may be present up to 0.2%, tridymite has not been detected. RMS aggregate, as shipped, do not pose a significant health hazard and should be treated as a nuisance dust. The only significant route of exposure which could pose some level of health hazard is inhalation of respirable particles which may occur during use. As shipped, there are essentially no respirable particles in RMS aggregate. Contact with intact skin is not known to cause health effects. Eye contact may cause irritation but has no known toxic effects.

The International Agency for Research on Cancer (IARC) reviewed the evidence for the carcinogenicity of crystalline silicas in animals. One study utilized intrapleural injection of cristobalite with particles in the respirable range. Malignant lymphomas of the histiocytic type were observed in the treated rats.

Cristobalite and quartz are not identified as carcinogens by OSHA but are identified as probable carcinogens by the International Agency for Research on Cancer (IARC) and reasonably anticipated to be carcinogens by the United States Department of Health and Human Services' National Toxicology Program (NTP).

Respirable quartz tested for carcinogenicity in rats by chronic inhalation and in rats by single or repeated intratracheal instillation, produced a significant increase in the incidences of adenocarcinomas and squamous cell carcinomas of the lung. Based on this study and on those on other forms of crystalline silica, IARC considered the evidence for the carcinogenicity of crystalline silica in experimental animals to be sufficient.

In humans, overexposure to respirable crystalline silica is known to cause silicosis. Silicosis is a chronic disease characterized by the formation of scattered, rounded or stellate silica-containing nodules of scar tissue in the lungs, ranging in size from microscopic to 1.0 cm or more. This can cause symptoms of coughing, dyspnea, wheezing and nonspecific respiratory ailments. Some epidemiology studies have shown a potential connection with lung cancer in those professions with high exposures to respirable silica. Many other studies have failed to find such a connection; however, tobacco smoking and high dust exposure exhibited a synergistic relationship. Pre-existing lung conditions may aggravate the results of exposure to silica dust.

(RM 2/88)

RECEIVED AUG 24 1992

## LABORATORY REPORT

LAB NUMBER: 2418

August 20, 1992

CLIENT: Reed Minerals

## SAMPLE HISTORY:

<u>SAMPLED BY:</u>		<u>DATE SAMPLED:</u>	8-13-92
<u>LOCATION:</u>	West Alton	<u>DATE RECEIVED:</u>	8-14-92
<u>DESCRIPTION:</u>	Raw Coal Slag	<u>DATE COMPLETED:</u>	8-18-92

TESTS REQUIRED: FEDERAL TEST METHOD 1311 - Toxicity  
Characteristic Leaching Procedure

SAMPLE LOCATION: Rail Car

## RESULTS:

ELEMENT TESTED	RESULTS	MAXIMUM ALLOWABLE	ICP DETECTION LIMITS
Arsenic	*BDL	5.0 ppm	0.02
Selenium	0.041 ppm	1.0 ppm	0.01
Chromium	*BDL	5.0 ppm	0.01
Cadmium	*BDL	1.0 ppm	0.003
Lead	*BDL	5.0 ppm	0.05
Barium	*BDL	100.0 ppm	0.002
Mercury	*BDL	0.2 ppm	**0.03
Silver	0.045 ppm	5.0 ppm	0.01

THIS MATERIAL IS NOT CONSIDERED TO BE A HAZARDOUS WASTE ACCORDING TO RCRA REGULATIONS FOR THE LEACHABILITY OF 8 HEAVY METALS.

\* Below Detectable Limits

\*\* The mercury level was below the detection limits of the ICP. Since the detection limits are well below the maximum allowable concentration and there is no reasons (per the submitting agency) to believe that mercury is a contaminant, it is reasonable to assume mercury is not at a level which will classify the product as a hazardous waste.

\*\*\*There are no EPA limits for copper and zinc, local regulations may apply.

TEST PERFORMED BY: Doniss M. Doezema

TEST REVIEWED BY: Gary L. Tinklenberg  
Chemist

WRITTEN REPORT BY: B.A. Doezema

*Barbara A. Doezema*



# REED MINERALS

a harsco company

## MATERIAL SAFETY DATA SHEET

(Complies with 29 CFR 1910.1200)

### SECTION I - GENERAL

Reed Minerals, Harsco Corporation  
 P.O. Box 0515  
 Camp Hill, PA 17001-0515  
 Emergency Telephone Number:  
 (717) 788-4200

Product Name : Black Beauty<sup>®</sup>  
 Alternative :  
 CAS Number : 68478-88-8  
 Particulates not  
 otherwise regulated.  
 Common Name : Blg. Coal  
 Date : April, 1997

### SECTION II - INGREDIENTS

Blg. Coal 89% - 100%

	OSHA -PEL	ACGIH -TLV
Respirable Particulate		
Total Particulate	16	10
Respirable Particulate	5	3
*Values expressed as mg/m <sup>3</sup>		

### SECTION III - PHYSICAL DATA

Physical Form : Solid (angular granules)  
 Boiling Temperature : N/A  
 Melting Temperature : Greater than 2800° F  
 Vapor Pressure/Density : N/A  
 Evaporation Rate : N/A  
 Specific Gravity : 2.7 g/cc (typical)  
 Water Solubility : Negligible  
 Color : Black  
 Odor : None

### SECTION IV - FIRE AND EXPLOSION DATA

Product is nonflammable and nonexplosive

### SECTION V - REACTIVITY DATA

Product is stable under normal conditions of use, storage, and transportation.

Post-It <sup>®</sup> Fax Note	7871	Date	4/23	# of pages	2
To	GILEG Riley	From	Jason		
Co./Dept.		Co.			
Phone #	630-7107	Phone #			
Fax #	Same as 2 yrs	Fax #	AGU		

Post-It <sup>®</sup> brand fax transmittal memo	7871	# of pages	2
To	Bill Cleaton	From	Mike
Co.		Co.	
Dept.		Phone #	
Fax #		Fax #	

**SECTION VI - HEALTH HAZARD DATA**

Low health risk by inhalation. Treat as a nuisance dust. Typical free silica less than 0.1%. This material is not a recognized carcinogen or cocarcinogen. Human toxic response has not been demonstrated for any route of entry. Mechanical irritation may occur to eyes, skin, or respiratory tract. Preexisting health conditions may be aggravated.

Carcinogenicity: NTP - No; IARC Monographs - No; OSHA Regulated - No.

**FIRST AID  
IN CASE OF:**

1. Eye Contact - Immediately flush eyes thoroughly with water or an ophthalmic saline solution.
2. Skin Contact - Wash skin with soap and water if irritation occurs.
3. Inhalation - Remove affected person(s) to fresh air source.
4. Oral Intake - Rinse mouth out with water.

If symptoms persist, contact a physician or other medical personnel.

**SECTION VII - SPILL, LEAK AND DISPOSAL PROCEDURES**

No special procedures required for clean-up. Working with water will reduce airborne dust. Uncontaminated product does not exceed Toxicity Characteristic Leaching Procedure (TCLP) limits and may be disposed of as an inert material in an appropriate solid waste landfill according to applicable Federal, State and Local regulations.

**SECTION VIII - CONTROL MEASURES**

Use appropriate NIOSH certified respiratory protection when exposure limits may be exceeded. Maintain sufficient ventilation to allow visual contact with work surfaces. Appropriate abrasive blaster's protective equipment is required, which may also include gloves, hood with protective lens, safety glasses, and hearing protection.

**SECTION IX - SPECIAL PRECAUTIONS**

Keep product dry and free of all contamination to assure free flow. Use an appropriate safety screen over fill hatch of blasting pot. Respirable dust may be generated during pressure abrasive cleaning operations.

**- NOTE -**

The opinions expressed herein are those of qualified experts within Harsco Corporation. Harsco believes that the information contained herein is current and accurate for the normal and intended use of this product as of the date of this Material Safety Data Sheet. Since the use of this information and of these opinions or the conditions of use of the product are not within the control of Harsco Corporation, it is the user's obligation to determine and observe the conditions of safe use and disposal of the product by their operations.

(RM 487)