



November 29, 1994

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Department of Environmental Protection  
SOUTHWEST DISTRICT

BY \_\_\_\_\_

Mr. Jerry Kessel  
Florida Department of Environmental Protection  
3820 Coconut Palm Boulevard  
Tampa, Florida 33619

Re: Tampa Electric Company  
F.J. Gannon Station  
Air Operating Permits AO29-250137, AO29-250139, and AO29-250140

*AO29-262556*  
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Dear Mr. Kessel:

TEC would like to clarify the methodology for determining the process rate during compliance testing for Gannon Station's Silo # 1 and 2 (Air Operating Permits AO29-250137 and AO29-250140). As you know, there is no gauge to measure the rate of flyash directed into silos. It has been TEC's procedure for compliance testing on the Silos to direct all flyash into the Silo and ensure that the generating units associated with that particular silo are operating within 90% of their capacity. This criteria has been TEC's compliance test procedure which has been accepted by DEP and is currently outlined in specific condition # 7 of the above referenced permits. Pursuant to your discussion with Janice Taylor, it is TEC's understanding that FDEP has no objection to continuing this procedure for these sources.

In addition, TEC requests Air Operating Permit No. AO29-250139 be amended as follows:

Change Specific Condition No. 7 from:

7. Testing of emissions to show compliance shall be conducted within 90-100% of the maximum permitted rate for each of the six coal bunkers of 1600 tons/hour. Determination of the process rate may be done by calculations, which shall be employed on a consistent basis. A compliance test submitted at an operating rate less than 90% of the permitted rate will automatically constitute an amended permit at the lesser rate plus 10%, until the maximum permitted rate, is submitted. Any time the permitted rate of the source is exceeded by more than 10% a compliance test shall be performed within 15 days of initiation of the higher rate and the test results shall be submitted to the Department and the Air Management Division of the Environmental Protection Commission of Hillsborough County within 45 days of testing. Acceptance of the test by the Department will constitute an amended permit

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at the higher rate plus 10%, but in no case shall the maximum permitted rate be exceeded. Failure to submit the process rate and actual operating conditions in the test report may invalidate the test data (Rule 17-4.070(3), F.A.C.).

To:

7. Testing of emissions shall be accomplished at the maximum attainable bunkering rate under typical bunkering operations. The actual coal transfer to bunker rate shall be specified in each test result. Failure to include the actual process or production rate in the results may invalidate the test (Rule 17-4.070(3), F.A.C.).

Since these sources are considered to be minor (less than 1 TPY), TEC feels strongly that requiring the tracking of the bunker rate for each specific rotoclone will be a very burdensome task with no environmental benefit. TEC believes that reasonable assurance of compliance for these sources has been demonstrated to the Department in the past based upon the existing testing procedure and will continue to provide reasonable assurance to the Department for these sources. Therefore, TEC requests that for these minor sources, the existing test procedure remain.

Should you have any questions please call Ms. Janice Taylor at (813) 228-4839 .

Sincerely,



Patrick A. Ho, P.E.  
Manager  
Environmental Planning

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*cc: EPC 12/14 (assigned to J. Richardson)*