



June 2, 1986

Mr. Bill Thomas
Florida Department of
Environmental Regulation
District Office
7601 Highway 301 North
Tampa, Florida 33610-9544

Re: Tampa Electric Company
Administrative Changes to
Air Permits

Dear Mr. Thomas:

During a recent review of Tampa Electric Company's air permits, administrative inconsistencies were identified that have lead to hardships on us that we feel are not intended by the Department. As shown on the attachment, the inconsistencies involve stack test scheduling, notifications and reporting requirements contained in older air permits. The requested modifications reflect recent changes in Department regulations which depart from previous Department rules or policies.

In order to communicate our concerns and get feedback from the Department, members of my staff met with Mr. Jim Estler of your staff and Mr. Jerry Campbell of the Hillsborough County Environmental Protection Commission on May 29, 1986. Based on this meeting, it is our understanding that neither Mr. Estler nor Mr. Campbell are opposed to modifying the applicable air permits to provide consistency as outlined to them.

Tampa Electric Company respectfully requests that the air permits listed on the attachment be modified to reflect consistent administrative conditions as stated. The requested modification will not change our environmental limits, they only clarify the conditions and time frames for compliance related reports.

We would greatly appreciate an expeditious review of our request for permit modifications, especially as they relate to Units 4, 5 and 6 at Gannon Station which will required compliance testing or excess opacity report submittal in the near future.

D. E. R.

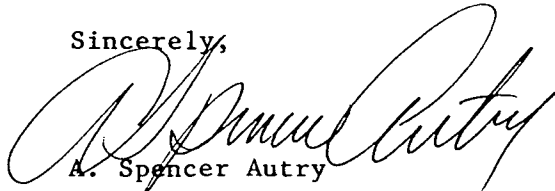
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SOUTH WEST DISTRICT
TAMPA

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Thank you for your cooperation, and, please call me if you have any questions.

Sincerely,



A. Spencer Autry
Manager
Environmental Planning

ASA/jst/004/EE1

Attachment

cc: Jim Estler, FDER
Jerry Campbell, HCEPC

INCONSISTENCIES IN ADMINISTRATIVE PROCEDURES

DER AIR PERMITS
TAMPA ELECTRIC COMPANY (TEC)

The following modifications will provide consistent reporting and administrative requirements for the two major reports required in TEC's air permits:

1. Specify that all annual compliance testing should be done within a 90 day period prior to the specified annual test date. (The regulations require annual test during Fiscal year - October 1 to September 30.)

The permits below either do not address the 90 day test window, or are more stringent than 90 days:

<u>Source</u>	<u>Permit Number</u>	<u>Specific Condition</u>
<u>Hookers Point</u>		
Unit 1	A029-47726	1
Unit 2	A029-47725	1
Unit 3	A029-47724	1
Unit 4	A029-47723	1
Unit 5	A029-47722	1
Unit 6	A029-47721	1
 <u>F.J. Gannon</u>		
Unit 4	A029-80043	4
Unit 5	A029-47728	1
Unit 6	A029-47727	1
Combustion Turbine 1	A029-85099	1
Fly Ash Silo 1	A029-80048	1
Fly Ash Silo 2	A029-80046	1
Economiser Silo	A029-87409	1
 <u>Big Bend</u>		
Unit 1	A029-63296	1
Combustion Turbine 1	A029-85100	1

2. Specify that all compliance test notifications be non-written notifications pursuant to 17-2.700(2)(a)5:

The permits below contain a written notification requirement:

<u>Source</u>	<u>Permit Number</u>	<u>Specific Condition</u>
<u>F.J. Gannon</u>		
Combustion Turbine 1	A029-85099	4
Fly Ash Silo 1	A029-80048	5
Fly Ash Silo 2	A029-80046	3
Economiser Ash Silo	A029-87409	3

Big Bend

Combustion Turbine 1	A029-85100	5
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3. Specify that all compliance test submittals shall be within 45 days as required in 17-2.700(7).

The permits below contain a test submittal date more stringent than 45 days.

<u>Source</u>	<u>Permit Number</u>	<u>Specific Condition</u>
<u>Hookers Point</u>		
Unit 1	A029-47726	1
Unit 2	A029-47725	1
Unit 3	A029-47724	1
Unit 4	A029-47723	1
Unit 5	A029-47722	1
Unit 6	A029-47721	1

F.J. Gannon

Unit 5	A029-47728	1
Unit 6	A029-47727	1

4. Specify that excess emissions refer to 6-minute average opacity.

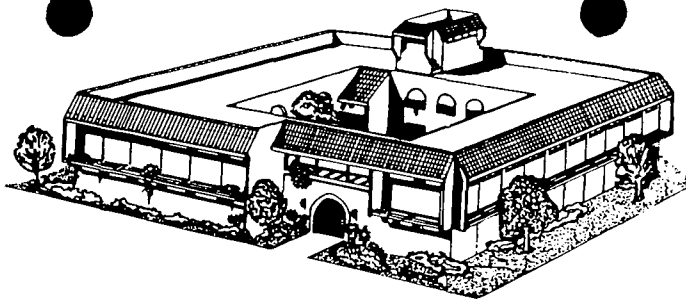
The permits below either do not address the averaging time or specify a 1-minute average:

<u>Source</u>	<u>Permit Number</u>	<u>Specific Condition</u>
<u>F.J. Gannon</u>		
Unit 4	A029-80043	7
<u>Big Bend</u>		
Unit 1	A029-63296	6

HILLSBOROUGH COUNTY
ENVIRONMENTAL PROTECTION

COMMISSION

RODNEY COLSON
RON GLICKMAN
PAM IORIO
RUBIN E. PADGETT
JAN KAMINIS PLATT
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PICKENS C. TALLEY II



ROGER P. STEWART
DIRECTOR

1900 - 9th AVE
TAMPA, FLORIDA 33605

TELEPHONE (813) 272-5960

MEMORANDUM

D. E. R.

Date June 12, 1986

To Jim Estler

From Jerry Campbell *Jc*

Subject: TECO Permit Amendments

[Handwritten signature]
JUN 16 1986

SOUTH WEST DISTRICT
TAMPA

Having reviewed TECO's requests in Spencer Autry's letter of June 2, 1986 to Bill Thomas, I recommend approval of the following amendments:

Gannon Unit 4 (A029-80043)

Change Specific condition #4 to read:

4. This unit shall be stack tested for particulate matter (under both soot blowing and non soot blowing operating conditions), sulfur dioxide and visible emissions at intervals of 12 months from the date of May 30, 1984 or within a ninety (90) day period prior to this date. The Method 9 Test period on this source shall be sixty (60) minutes. Testing procedures shall be consistent with the requirements of Section 17-2.700, F.A.C.

Change specific condition #7 to read:

7. A report shall be submitted to both the Department of Environmental Regulation and the Hillsborough County Environmental Protection Commission within 30 days following each calendar quarter detailing any excess opacity readings recorded during the three month period. For the purpose of this report, excess emission shall be defined as all six minute averages of opacity greater than 20 percent, except as specified in Specific Condition No. 2. The information supplied in this report shall be consistent with the reporting requirements of 40 CFR 51 Appendix P [Section 17-2.710(1), F.A.C.]. This report shall be submitted in duplicate to the Hillsborough County Environmental Protection Commission.

Gannon Unit 5 (A029-47728)

Change specific condition #1 to read:

1. This unit shall be stack tested for particulate matter (under both soot blowing and non soot blowing operating conditions), sulfur dioxide and visible emissions at intervals of 12 months from the date of July 29, 1981 or within a ninety (90) day period prior to this date. The Method 9 Test period on this source shall be sixty (60) minutes. Testing procedures shall be consistent with the requirements of Section 17-2.700, F.A.C. Two copies of the test report shall be submitted to the Air Section of the Hillsborough County Environmental Protection Commission within 45 days of testing.

Gannon Unit #6 (A029-47727)

Change Specific condition #1 to read:

1. This unit shall be stack tested for particulate matter (under both soot blowing and non soot blowing operating conditions), sulfur dioxide and visible emissions at intervals of 12 months from the date of July 29, 1981 or within a ninety (90) day period prior to this date. The Method 9 Test period on this source shall be sixty (60) minutes. Testing procedures shall be consistent with the requirements of Section 17-2.700, F.A.C. Two copies of the test report shall be submitted to the Air Section of the Hillsborough County Environmental Protection Commission within 45 days of testing.

Hookers Point Unit #1 (A029-47726)

Change specific condition #1 to read:

1. This unit shall be stack tested for particulate matter (under both soot blowing and non soot blowing operating conditions), sulfur dioxide and visible emissions at intervals of 12 months from the date of January 27, 1982 or within a ninety (90) day period prior to this date. The Method 9 Test period on this source shall be sixty (60) minutes. Testing procedures shall be consistent with the requirements of Section 17-2.700, F.A.C. Two copies of the test report shall be submitted to the Air Section of the Hillsborough County Environmental Protection Commission within 45 days of testing. A fuel analysis may be submitted in lieu of stack testing for sulfur dioxide.

Hookers Point Unit #2 (A029-47725)

Change specific condition #1 to read:

1. This unit shall be stack tested for particulate matter (under both soot blowing and non soot blowing operating conditions), sulfur dioxide and visible emissions at intervals of 12 months from the date of January 27, 1982 or within a ninety (90) day period prior to this date. The Method 9 Test period on this source shall be sixty (60) minutes. Testing procedures shall be consistent with the requirements of Section 17-2.700, F.A.C. Two copies of the test report shall be submitted to the Air Section of the Hillsborough County Environmental Protection Commission within 45 days of testing. A fuel analysis may be submitted in lieu of stack testing for sulfur dioxide.

Hookers Point Unit #3 (A029-47724)

Change specific condition #1 to read:

1. This unit shall be stack tested for particulate matter (under both soot blowing and non soot blowing operating conditions), sulfur dioxide and visible emissions at intervals of 12 months from the date of January 27, 1982 or within a ninety (90) day period prior to this date. The Method 9 Test period on this source shall be sixty (60) minutes. Testing procedures shall be consistent with the requirements of Section 17-2.700, F.A.C. Two copies of the test report shall be submitted to the Air Section of the Hillsborough County Environmental Protection Commission within 45 days of testing. A fuel analysis may be submitted in lieu of stack testing for sulfur dioxide.

Hookers Point Unit #4 (A029-47723)

Change specific condition #1 to read:

1. This unit shall be stack tested for particulate matter (under both soot blowing and non soot blowing operating conditions), sulfur dioxide and visible emissions at intervals of 12 months from the date of January 27, 1982 or within a ninety (90) day period prior to this date. The Method 9 Test period on this source shall be sixty (60) minutes. Testing procedures shall be consistent with the requirements of Section 17-2.700, F.A.C. Two copies of the test report shall be submitted to the Air Section of the Hillsborough County Environmental Protection Commission within 45 days of testing. A fuel analysis may be submitted in lieu of stack testing for sulfur dioxide.

Hookers Point Unit #5 (A029-47722)

Change specific condition #1 to read:

1. This unit shall be stack tested for particulate matter (under both soot blowing and non soot blowing operating conditions), sulfur dioxide and visible emissions at intervals of 12 months from the date of January 27, 1982 or within a ninety (90) day period prior to this date. The Method 9 Test period on this source shall be sixty (60) minutes. Testing procedures shall be consistent with the requirements of Section 17-2.700, F.A.C. Two copies of the test report shall be submitted to the Air Section of the Hillsborough County Environmental Protection Commission within 45 days of testing. A fuel analysis may be submitted in lieu of stack testing for sulfur dioxide.

Hookers Point Unit #6 (A029-47721)

Change specific condition #1 to read:

1. This unit shall be stack tested for particulate matter (under both soot blowing and non soot blowing operating conditions), sulfur dioxide and visible emissions at intervals of 12 months from the date of January 27, 1982 or within a ninety (90) day period prior to this date. The Method 9 Test period on this source shall be sixty (60) minutes. Testing procedures shall be consistent with the requirements of Section 17-2.700, F.A.C. Two copies of the test report shall be submitted to the Air Section of the Hillsborough County Environmental Protection Commission within 45 days of testing. A fuel analysis may be submitted in lieu of stack testing for sulfur dioxide.

Gannon Combustion Turbine #1 (A029-85099)

Change specific condition #1 to read:

1. Test the emissions for the following pollutant(s) at intervals of 12 months from the date March 15, 1984, or within a ninety (90) day period prior to this date, and submit 2 copies of test data to the Air Section of the Hillsborough County Environmental Protection Commission office within forty five days of such testing [Section 17-2.700 (2), Florida Administrative Code, (F.A.C.)].

- | | |
|---|---|
| <input type="checkbox"/> Particulates | <input type="checkbox"/> Sulfur Oxides |
| <input type="checkbox"/> Fluorides | <input type="checkbox"/> Nitrogen Oxides |
| <input checked="" type="checkbox"/> Opacity | <input type="checkbox"/> Hydrocarbons |
| | <input type="checkbox"/> Total Reduced Sulfur |

*Fuel analysis may be submitted for required sulfur dioxide emission test.

Change specific condition #4 to read:

4. The Hillsborough County Environmental Protection Commission shall be notified 15 days prior to compliance testing.

Gannon Fly Ash Silo #1 - 4 (A029-80048)

Change specific condition #1 to read:

1. Compliance with the opacity standard set forth below shall be demonstrated by conducting 30 minute visible emission tests as units #3, #2 & #1 are converted to coal and begin utilizing this silo. By November 15, 1984, 60 days prior to the expiration of construction permit #AC29-41941, a visible emission test shall be submitted while loading the silo from Units #3 & #4. By January 15, 1986, 60 days prior to the expiration of construction permit AO 29-41942, a visible emission test shall be submitted while loading the silo from Units #2, #3 & #4. By January 15, 1987, 60 days prior to the expiration of construction permit AC29-41943, a visible emission test shall be submitted while loading the silo from Unit #1 and two of the remaining 3 units. Thereafter, visible emissions tests shall be conducted while loading the silo from 3 of the 4 units at 12 month intervals. Tests can be conducted within a ninety (90) day period prior to the dates specified above.

Change specific condition #5 to read:

5. The Hillsborough County Environmental Protection Commission shall be notified 15 days prior to compliance testing.

Gannon Fly Ash Silo #5-6 (A029-80046)

Change specific condition #1 to read:

1. Test the baghouse for visible emissions at intervals of twelve months from the date of November 15, 1983 or within a ninety (90) day period prior to this date. The compliance test shall be conducted using EPA Method #9 (opacity). The Method #9 test interval on this source shall be thirty (30) minutes. Two copies of the test data shall be submitted to the Air Section of the Hillsborough County Environmental Protection Commission within 45 days of testing.

Change specific condition #3 to read:

3. The Hillsborough County Environmental Protection Commission shall be notified 15 days prior to compliance testing.

Gannon Economiser Silo (A029-87409)

Change specific condition #1 to read:

1. Test the baghouse for visible emissions at intervals of twelve months from the date of December 4, 1983 or within a ninety (90) day period prior to this date. The compliance test shall be conducted using EPA Method #9 (opacity). The Method #9 test interval on this source shall be thirty (30) minutes. Two copies of the test data shall be submitted to the Air Section of the Hillsborough County Environmental Protection Commission within 45 days of testing.

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Change specific condition #2 to read:

2. The Hillsborough County Environmental Protection Commission shall be notified 15 days prior to compliance testing.

If you have any questions concerning the contents of this memorandum, please contact me.

JC/ch

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