

State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

INTEROFFICE MEMORANDUM

For Routing To District Offices And/Or To Other Than The Addressee		
To: _____	Loctn.: _____	
To: _____	Loctn.: _____	
To: _____	Loctn.: _____	
From: _____	Date: _____	
Reply Optional []	Reply Required []	Info. Only []
Date Due: _____	Date Due: _____	

TO: W. K. Hennessey

THRU: Dan A. Williams ✓

FROM: William H. Brown *WB*

DATE: August 3, 1981

SUBJECT: TECO Gannon-#1 AC29-41943 *125 MW*

TECO have been requested to convert Gannon #1, 2, 3, 4 to coal. They are to follow the proposed plan as indicated in thier compliance plan which is part of the proviso's set forth in the permit. We concur with HCEPC That this permit be issued with the proviso's set forth in the compliance plan, Technical Evlaution and the proviso's set forth in the permit

Recommend permit be issued

WHB/rkt

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TO: P. David Puchaty
 THRU: Dan A. Williams *DW*
 FROM: William H. Brown, II *W*
 DATE: September 15, 1978
 SUBJECT: TECO - Gannon #1

A029-7136

This unit is a 1257 MMBTU/hr. steam boiler using #6 fuel oil, this fuel oil has 1% sulfur. The emission rate from this unit is 946 lb/hr. SO₂, 44 lb/hr. TSP, allowable 1211 lb/hr. SO₂, 110 lb/hr. TSP. These are in compliance with state regulations.

Please see Griffiths reason for a reduced term permit.

I concur and recommend this permit approved.

WHB/ftb

*to Joe Griffiths agreed
 a five years permits after
 telephone conversation. 9/19/78
 Dan A. Williams*

TO: File

FROM: Robert Soich *RS*

Date: 12/15/93

SUBJECT: Burning of on-spec used oil at TECO Gannon electric generating facility.

As a result of hazardous waste inspections and warning letters WL93-0065HW29SWD and WL93-0066HW29SWD the air section has been informed that burning of on-spec used oil has been, and continues to be an on-going practice at Gannon Station. The existing air operating permits do not mention this activity nor is there correspondence in the permit file. At this time, this does not appear to be in conflict with air regulations.

Originally, the inspectors thought that on-spec used oil was burned in the turbine but, TECO personnel clarified that it was burned in the boilers. Approximately 94,000 gallons of on-spec used oil was burned in 1992. This represents 4.82% of the fuel oil burned at Gannon when compared to fuel oil burned, at the facility, as reported on their 1992 AORs.

The State of Florida promotes the burning of both off-spec and on-spec used oil. Burning of off-spec used oil is subject to all the notification and permitting requirements. The burning of on-spec used oil is subject as follows:

" If your current air pollution operation permit, construction permit, or BACT determination does not specifically prohibit the burning of used oil, then you may responsibly burn (on-specification) used oil without any permit modification until the Department notifies you that your permit needs to be revised." (Victoria J. Tschinkel, used oil as a fuel, 1/5/87 memorandum.)

Upon renewal of Gannon Units 1 thru 6 air operating permits, the permit engineer may want to address the burning of on-spec used oil. Are sampling and analysis requirements needed in the specific conditions of the permit to ensure that used oil specifications are adhered to? It should be noted that from the inspection, it appears that TECO does sample the oil to verify that it meets the definition (specifications) of on-spec used oil.

MEMORANDUM

Permit Amendments for:

AO29-204434 - F.J. Gannon Station No. 1
AO29-172179 - F.J. Gannon Station No. 3
AO29-160269 - F.J. Gannon Station No. 4
AO29-203511 - F.J. Gannon Station No. 5
AO29-203512 - F.J. Gannon Station No. 6

(PATS Processing Nos. 257104, 257106,
257107, 257108 and 257109)

TO: W.C. Thomas, P.E.
District Air Administrator

October 6, 1994

THRU: Gerald J. Kissel, P.E.
District Air Engineer

FROM: John J. Taylor, P.E.
Air Permit Engineer

SUBJECT: *Tampa Electric Company*
F.J. Gannon Station Nos. 1, 3-6

Location: Port Sutton Road, Tampa
County: Hillsborough
Pats 90: December 1, 1994

On September 2, 1994, the Southwest District Office received a request for amendments to the above listed FDEP air pollution operating permits.

This request for amendments was reviewed and approved. The request is for a revision in each permit for a revised testing requirement under sootblowing conditions. This revision will make all the permits consistent with an amendment that was previously made by this Department for AO29-189206 - F.J. Gannon Station No. 2.

The revision includes a statement that..." a test under sootblowing conditions which demonstrates compliance with a non-sootblowing emission limitation will be accepted as proof of compliance with that non-sootblowing emission limitation..."

Recommendation:

I recommend that the permit amendments be issued, and submit them for your review and approval.

(Coordinated with Richard Kirby -EPC)