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BUREAU OF AIR REGULATION

June 27, 2003

Mr. Scott Sheplak, P.E.
Administrator- Title V Section
Florida Department of Environmental Protection
111 South Magnolia Drive, Suite 4
Tallahassee, FL 32301

Via FedEx
Airbill No. 7922 7702 8021

Re: **Tampa Electric Company**
F.J. Gannon Station
DEP File No. 0570040-002-AV
Water injection

Dear Mr. Sheplak:

Per our telephone conversation on June 26, 2003, Tampa Electric Company (TEC) is providing courtesy notification to the Florida Department of Environmental Protection (FDEP) regarding our plan to inject water from the recycle water ponds into F.J. Gannon Station Unit 4 and 6 boilers. TEC believes that the injection of water into the boilers qualifies for a permitting exemption pursuant to Rule 62-210.300(3)(b)1., Florida Administrative Code (F.A.C.) and constitutes an "insignificant activity" with respect to the Chapter 62-213, F.A.C. Title V Operating Permit Program. Enclosed in Attachment A is the Responsible Official Signature and in Attachment B is the required Professional Engineer certification regarding potential emission rates and applicability of Rule 62-210.300(3)(b)1., F.A.C.

TEC plans to inject water into the boiler to lower high pond levels. This activity will have the added benefit of assisting in de-slugging the boilers for better combustion and low combustion temperatures, which in turn will reduce Nitrogen Oxides (NO_x) emissions. TEC will continue to comply with all Unit 4 and 6 operating requirements specified in its current F.J. Gannon Station Title V operating permit.

Emissions associated with the water injection operations will consist of particulate matter (PM and PM10). Potential PM/PM10 emissions are estimated total 4.9 tons per year. The calculation for these emissions is enclosed in Attachment C. These estimated emission rates are well below the 5.0 ton per year threshold for a generic emission unit permitting exemption specified in Rule 62-210.300(3)(b)1., F.A.C.

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TEC appreciates your cooperation in this matter. Per conversation with you, TEC is submitting this letter, but will be proceeding with the water injection upon submittal of this letter due to the impending rainy weather conditions. If it is the FDEP's opinion that permitting is required or if you have any questions, please call Dru Latchman or me at (813) 641-5358.

Sincerely,

Dru Latchman
DL

Laura R. Crouch
Manager - Air Programs
Environmental Affairs

EA/bmr/DNLI

Enclosure


c/enc: Mr. Sterlin Woodard, EPCHC
Mr. Jerry Kissel - FDEP SW

Attachment A

Responsible Official Certification

I have reviewed this letter of request for authorization to re-inject water into F.J. Gannon Station boilers. I hereby certify that these documents are authentic and accurate to the best of my knowledge.

Date: 6/26/03

Signature: 
Wade A. Maye
General Manager
F.J. Gannon Station

Attachment B

ATTACHMENT I

TAMPA ELECTRIC COMPANY
GANNON GENERATING STATION
BOILER INJECTION OF POND WATER

Professional Engineer Certification

Professional Engineer Statement:

I, the undersigned, hereby certify, except as particularly noted herein, that:*

(1) To the best of my knowledge, there is reasonable assurance that the injection of pond water in Units 4 and 6 at the F.J. Gannon Generating Station qualifies as an insignificant activity eligible for a generic emissions unit permit exemption pursuant to Rule 62-210.300(3)(b), F.A.C.; and

(2) To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of air pollutants not regulated for an emissions unit, based solely upon the materials, information and calculations provided with this certification.

Signature

Date

(seal)

* Certification is applicable to the classification of pond water injection in Units 4 and 6 at the F.J. Gannon Generating Station as an insignificant activity eligible for a generic emissions unit permit exemption pursuant to Rule 62-210.300(3)(b), F.A.C.

Attachment C

Attachment I
Tampa Electric Company
F.J. Gannon Generating Station
Pond Water Boiler Injection Emission Estimates

Data:

| | | |
|--|-------|-------------------------------------|
| Unit 6 Pond Water Injection Rate: | 120 | gal/min |
| Unit 4 Pond Water Injection Rate: | 40 | gal/min |
| Unit 6 Injection Annual Operation: | 1,492 | hr/yr |
| Unit 4 Injection Annual Operation: | 1,492 | hr/yr |
| Pond Water Density: | 8.345 | lb/gal |
| Pond Water Total Suspended Solids (TSS): | 22 | ppmw (maximum) |
| Pond Water Total Dissolved Solids (TDS): | 4,800 | ppmw (maximum) |
| Unit 6 EPS PM Removal Efficiency: | 98.05 | % (From Title V permit application) |
| Unit 4 EPS PM Removal Efficiency: | 99.05 | % (From Title V permit application) |

Emission Rate Calculations:

| | | |
|--|------------|-------------------|
| Unit 6 Annual Pond Water Injection Rate: | 10,744,467 | gal/yr |
| | 89,662,576 | lb/yr |
| Unit 4 Annual Pond Water Injection Rate: | 3,581,489 | gal/yr |
| | 29,887,525 | lb/yr |
| Unit 6 Pond Water PM ESP Inlet Loading: | 432,353 | lb/yr (TSS + TDS) |
| Unit 4 Pond Water PM ESP Inlet Loading: | 144,118 | lb/yr (TSS + TDS) |
| Unit 6 Pond Water PM ESP Outlet Loading: | 8,430.9 | lb/yr |
| | 4.2 | ton/yr |
| Unit 4 Pond Water PM ESP Outlet Loading: | 1,369.1 | lb/yr |
| | 0.7 | ton/yr |
| Total PM Increase | 4.9 | ton/yr |