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July 1, 1998

Mr. A.A. Linero, P.E., Administrator
New Source Review Section
Florida Department of Environmental Protection
Bureau of Air Regulation
111 South Magnolia Drive, Suite 4
Tallahassee, Florida 32301

Via FedEx
Airbill No. 805858541119

**Re: Tampa Electric Company (TEC) - F. J. Gannon Station
Fuel Yard Crusher Modification Construction Permit Application
Response to Agency Comments
FDEP File No. 0570040-007-AC**

Dear Mr. Linero:

Thank you and Ms. Heron for taking the time on Tuesday afternoon to discuss TEC's concerns regarding your June 26, 1998 correspondence. As we discussed, it appears that the bulk of the Department's concerns stem from a basic misunderstanding of our crusher modification. Namely, **TEC is not requesting an increase in the coal feed rate at Gannon Station in conjunction with this Crusher Modification or in conjunction with the Fuel Yard Throughput Modification.**

The original June 1997 Fuel Yard Modification Construction Permit Application was intended to "serve as notification that two of the existing four fuel crushers will be replaced . . . [but will not be] subject to any New Source Performance Standards. . ." TEC's intent was to replace the crushers in-kind in order to re-establish consistent fine grind capability without suffering a loss in crushing rate. However, TEC's assertion that the replacement of these crushers was not subject to NSPS was challenged by the Department and TEC subsequently removed the crushers from the fuel yard modification.

Over time, TEC re-evaluated our continuing need to re-establish fine grind capability at Gannon Station; and determined that it was more cost effective to add two new crushers instead of replacing the existing crushers. This option would also provide us with more operational flexibility in the event that any of the crushers came off-line for maintenance.

Mr. A.A. Linero
July 1, 1998
Page 2 of 2

As such, the May 1998 Crusher Modification Construction Permit Application speaks to the addition of two fine grind crushers rated at 600 tph. The new crushers will be installed upstream of the existing 400 tph crusher pairs. The existing crushers will serve as back-up/overflow for the new crushers. Please note, however, that the crusher additions will in no way increase the coal feed rate to the boilers because the belt speeds before and after the crusher house are not changing from the currently rated 800 tph each. Furthermore, these belt speeds are not requested to increase as part of the pending Fuel Yard Throughput Modification. The new crushers will only allow us to maintain our current feed rate while re-establishing consistent fine grind capability.

We expect that these clarifications will enable you to resume processing TEC's application. However, we would be pleased to meet with you and/or Ms. Heron to discuss this issue in more detail. I also suggest that we step through the Process Flow Diagram (Document II.E.3) together. If you have any additional questions or comments, feel free to contact me at (813) 641-5034. Thank you for your assistance on this project.

Sincerely,



Theresa J.L. Watley
Consulting Engineer
Environmental Planning

EP\gm\TJLW601

c: Mr. Clair Fancy - FDEP
Mr. Jerry Kissel - FDEP SW
Mr. Richard Kirby - EPCHC

cc: T. Heron, BAR

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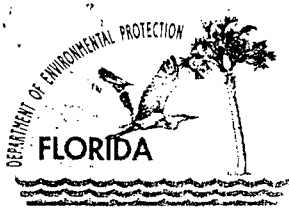
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PS Form 3800, April 1995



Department of Environmental Protection

Lawton Chiles
Governor

Virginia B. Wetherell
Secretary

June 26, 1998

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Charles R. Black
Vice-President Energy Supply
Tampa Electric Company
702 North Franklin Avenue
Tampa, Florida 33602

Re: DEP File No. 0570040-007-AC
Fuel Yard Crusher Modification

Dear Mr. Black:

The Department has reviewed Tampa Electric Company's (TEC) application that was received on May 28, 1998. This application is for a modification of the permit for the fuel yard operation (as currently is allowed under FDEP AO 29-216480). Based on our review of this application and discussions with the HCEPC (see letter attached), we have the following understanding and additional information requirements:

TEC has been operating the coal yard with a federally enforceable limit of 2.85 million tons of coal per year since May 21, 1987.

The May 28, 1998 construction permit application for the two new 600 tons per hour (each) crushers and the June 1997 construction permit application for an increase in the coal yard throughput from 2.85 to 4.0 million tons per year (later reduced to 3.77 and subsequently to 3.30 million tons per year), are not independent projects.

Prior to the submittal of the May 1998 application, TEC explained to the Department that the existing two (2) crushers could not adequately accommodate the proposed coal throughput. It is the Department's understanding that the increase in coal yard throughput from 1600 tons per hour to 2800 tons per hour is necessary because TEC has switched to a lower heat content coal (~1996), thus requiring an increase in coal yard throughput in order to maintain the facility's original heat input.

The June 1997 application discussed passing 4.0 million tons of coal per year through the coal yard (later reduced to 3.77 and subsequently to 3.30 million tons per year) using crushers 1 and 2 only, each operating at 800 tons per hour. The existing crushers, as described in this application, were to be replaced with new crushers operating at the same rate, which would not result in a modification to the crusher house.

The purpose of the two new crushers is to accommodate the planned coal yard throughput increase from 2.85 to 3.77 million tons per year (reduced to 3.30 million tons per year by correspondence received on June 15, 1998).

"Protect, Conserve and Manage Florida's Environment and Natural Resources"

Mr. Charles R. Black
Page 2 of 2
June 26, 1998

The May 1998 application discussed passing through the coal yard 2.85 million tons of coal (allowable throughput) using four crushers without providing any information why it is necessary to add the two new crushers (each operating at 600 tons per hour) to the existing crusher house and extend conveyor belts to accommodate the new crushers.

This modification would result in an increase in the facility throughput and actual particulate emissions (PM/PM₁₀).

Future actual PM₁₀ emissions in the application are based on the permitted throughput limit of 2.85 million tons of coal per year.

We believe that the calculations should be based on the planned throughput of 3.77 millions tons of coal (or the latest submittal of 3.30 millions tons of coal) instead of the permitted 2.85 million tons of coal. Potential PM/PM₁₀ emissions from the entire coal yard/crusher project should be considered because the crusher project is not independent from the coal yard project. Please revise and submit your calculations reflecting the real nature of this project as explained above. Please include a response to the items raised in the attached memo from HCEPC.

We will resume processing this application after receipt of the requested information. Your project staff and consultants can contact me or Mrs. Teresa Heron at 850/488-0114, if they have any questions regarding this matter.

Sincerely,



A. A. Linero, P.E. Administrator
New Source Review Section

AAL/th

Attachment

cc: Brian Beals, EPA
John Bunyak, NPS
Bill Thomas, SWD
Gregory M. Nelson, TEC
Theresa J.L. Watley, TEC
Richard Kirby, HPCHC
Lennon Anderson, DEP

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DOTTIE BERGER
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JIM NORMAN
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EXECUTIVE DIRECTOR
ROGER P. STEWART



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FAX (813) 272-5137

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TELEPHONE (813) 272-7104

ENVIRONMENTAL PROTECTION COMMISSION
OF HILLSBOROUGH COUNTY

FAX TRANSMITTAL SHEET

DATE: 6/25/98

TO: Teresa Heron

FAX PHONE: Speed VOICE PHONE: _____

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EPC FAX TRANSMISSION LINE: (813) 272-5605
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FROM: Rick Kirby
(CIRCLE APPLICABLE SECTION BELOW)

AIR DIVISION

-ENFORCEMENT

-ENGINEERING

-SUPPORT OPERATIONS

SPECIAL INSTRUCTIONS: TECO Bannan Coal Crushers
I will inspect later today & send you a copy
of notes
Rick

COMMISSION

DOTTIE BERGER
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CHRIS HART
JIM NORMAN
JAN PLATT
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ED TURANCHIK

EXECUTIVE DIRECTOR

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TELEPHONE (813) 272-7104

MEMORANDUM

DATE: June 25, 1998
TO: Teresa Heron, P.E.
FROM: Richard C. Kirby, IV, P.E. THRU: Jerry Campbell, P.E.
SUBJECT: Tampa Electric Company, Gannon Station Addition of 2 Coal Crushers

I have reviewed the application package submitted by TECO dated May 27, 1998. This application is made for the addition of 2 fine grind coal crushers to be rated at 600 TPH each. I request the following issues be included in the review process.

1. In the introduction section of this package it is stated that this application is not to be considered as part of the pending construction permit application for an increase in annual coal throughput limits. Since additional coal throughput and additional coal handling equipment are being sought simultaneously, it seems inappropriate to separate the two. Clearly, if PSD is triggered by the increased throughput, the new crushers should have BACT level controls and there should be a single authorization for the whole project.
2. Table A-2 gives excess emissions rule (62-210.700, F.A.C.) as being applicable to this facility. It should be noted that this State rule does not allow exceedances of federal requirements, such as NSPS subpart Y.
3. In the material submitted it is stated that calculations are for PM10. It appears that the K factor (0.0011) used in the equation is for PM2.5.
4. No calculations were provided for coal crushing. This should be provided. The drop equation is not adequate for this activity.
5. Total PM emissions is a PSD pollutant as well as PM10. TECO should provide projected emissions for both.
6. The TECO PSD analysis is done from current actuals to future expected actual emissions. Based on our understanding of the WEPCO decision, this is appropriate for steam generating units, but not for other units at a power generating facility.

Thank you for the opportunity to provide comments.





TAMPA ELECTRIC

May 27, 1998

Mr. A.A. Linero, P.E., Administrator
New Source Review Section
Florida Department of Environmental Protection
Bureau of Air Regulation
111 South Magnolia Drive, Suite 4
Tallahassee, Florida 32301

Via Hand Delivery

RECEIVED
MAY 28 1998
BUREAU OF
AIR REGULATION

**Re: Tampa Electric Company (TEC)
F. J. Gannon Operating Permit No. AO29 -216480
Fuel Yard Crusher Modification Construction Permit Application**

Dear Mr. Linero:

0570040-007-AC

Please find enclosed three (3) signed and sealed copies of TEC's permit application to amend the above referenced operating permit. A check for \$250.00 to the Florida Department of Environmental Protection is also enclosed.

The fourth signed and sealed copy is being submitted to the Environmental Protection Commission of Hillsborough County (EPC). Also enclosed in the EPC's package is a check for \$960.00

TEC would be pleased to meet with you or your staff at your convenience to discuss this request in detail. If you have any additional questions or comments, feel free to contact me at (813) 641-5034. Thank you for your assistance on this project.

Sincerely,

Theresa J.L. Watley
Consulting Engineer
Environmental Planning

EP\gm\TJLW593

Enclosures

c/enc: Mr. Clair Fancy - FDEP
Mr. Jerry Kissel - FDEP SW
Mr. Richard Kirby - EPCHC

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

(813) 228-4111

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May 21, 19 98

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040-031
203 Apollo Beach Boulevard
Apollo Beach, Florida 33572

FOR Gannon Fuel Yard Permit Mod.
T. Watley

Nancy E. Foley



P 265 659 418

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PS Form 3800 April 1995

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*Charles R. Black
Tampa Electric Co.
702 N. Franklin Ave
Tampa, FL
33602*

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P 265 659 418

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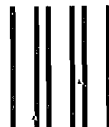
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BUREAU OF
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Department of Environmental Protection
Division of Air Resources Management
Bureau of Air Regulation, NSRS
2600 Blair Stone Road, MS 5505
Tallahassee, Florida 32399-2400



STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
NOTICE OF PERMIT

In the Matter of an
Application for Permit Modification by:

Mr. Charles R. Black, Vice President Energy Supply
Tampa Electric Company
702 North Franklin Avenue
Tampa, Florida 33602

DEP File No. 0570040-007-AC
Coal Yard Modification (Crusher House)
Hillsborough County

Enclosed is the Final Permit Number 0570040-007-AC for an air construction permit to modify the Crusher House at the F. J. Gannon Power Plant Coal Yard by adding two new additional 600 TPH crushers. The F. J. Gannon Power Plant facility is located at Port Sutton Road, Tampa, Hillsborough County. This permit is issued pursuant to Chapter 403, Florida Statutes.

Any party to this order (permit) has the right to seek judicial review of the permit pursuant to Section 120.68, F.S., by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the Department in the Legal Office; and by filing a copy of the Notice of Appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The Notice of Appeal must be filed within 30 (thirty) days from the date this Notice is filed with the Clerk of the Department.

Executed in Tallahassee, Florida.



C. H. Fancy, P.E., Chief
Bureau of Air Regulation

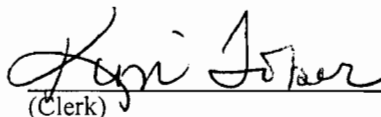
CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this NOTICE OF FINAL PERMIT (including the FINAL permit) was sent by certified mail (*) and copies were mailed by U.S. Mail before the close of business on 2-5-99 to the person(s) listed:

Mr. Charles R. Black, *
Ms. Theresa J. L. Watley, TEC
Mr. Bill Thomas, SWD
Mr. Gregory M. Nelson, PE
Mr. Jerry Campbell, EPCHC

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to §120.52, Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.

 2-5-99
(Clerk) (Date)

FINAL DETERMINATION

Tampa Electric Company (TEC)
F.J. Gannon Power Station, Hillsborough County
Crusher House Modification
DEP File No: 0570261-007-AC

An Intent to Issue an air construction permit, authorizing the modification of the Crusher House at the F.J. Gannon Power Plant Coal Yard was distributed on September 4, 1998. This facility is located at Port Sutton Road in Tampa, Hillsborough County, Florida.

The Public Notice of Intent to Issue Air Construction Permit was published in The Tampa Tribune on Wednesday September 23, 1998. A Petition for a Formal Administrative Hearing was received by the Department on September 25 from the Environmental Protection Commission of Hillsborough County (EPC). Following receipt of a Notice of Voluntary Dismissal from EPCHC on January 29, the Division of Administrative Hearings issued an Order Closing The File on February 1.

Additional verbal comments were provided by EPC. The main comment is that the Reasonable Available Control Technology emissions standard of 5 percent opacity should be established as the governing rule for visible emissions. The Department considered EPC's comments and concurs that the 5% opacity limit is the allowable RACT standard for these units. The draft permit already has this 5% opacity standard as a specific condition for these units.

TEC provided comments in writing. These were to clarify wording in Sections 4, 5 and 6.2 of the Technical Evaluation and Preliminary Determination and to revise certain Specific Conditions in the draft permit.

The Department evaluated TEC requests and acknowledges their comments regarding the technical evaluation and the draft permit. The Department will revise the draft permit to:

- Clarify the designations of the crushers as "crusher pairs," each pair rated at 800 tons per hour.
- Delete the term "dead" and "alive" from descriptions of coal piles since this distinction no longer exists at the facility.
- Revise the net increase of PM/PM₁₀ to the original proposed limit of 0.14 tons per year (TPY). The Department acknowledges that the net change of PM/PM₁₀ emissions is 0.14 TPY. Specific Condition 4 of Section I of the draft permit is revised to reflect the appropriate total PM/PM₁₀ value proposed of 0.50 TPY considering the 0.14 TPY net change.

The 30 minute VE test requested in Section 5.1 of the draft permit is not acceptable during the initial performance tests pursuant to 40CFR60.8 and 60.11, which require EPA Method 9 and three 60 minute observations. For subsequent demonstrations, a 30 minute VE test is acceptable.

The final action of the Department will be to issue the permit with the changes noted above.



Jeb Bush
Governor

Department of Environmental Protection

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

David B. Struhs
Secretary

PERMITTEE:

Tampa Electric Company (TEC)
F.J. Gannon Station
702 North Franklin Avenue
Tampa, Florida 33602

File No.	0570040-007-AC
Project	Crusher House Modification
SIC No.	4911
ARMS No.	Coal Yard Emissions Unit 008
Expires:	December 31, 1999

Authorized Representative:
Charles R. Black
Vice President Energy Supply

PROJECT AND LOCATION:

Construction permit for the installation of two additional 600 tph (each) fine grind crushers at the Crusher House. The existing 800 tph crusher pairs will serve as back-up/overflow for the new crushers. The new crushers will be installed upstream of the existing crusher pairs. The Crusher House is located at the facility's Coal Yard which is designated in the ARMS system as Emissions Unit (E.U.) 008. This E.U. is located at the F.J. Gannon Power Plant, Port Sutton Rd, Tampa, Hillsborough County. UTM coordinates are: Zone 17; 360.00 km E; 3087.50 km N.

STATEMENT OF BASIS:

This construction permit is issued under the provisions of Chapter 403 of the Florida Statutes (F.S.), and Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297 of the Florida Administrative Code (F.A.C.). The above named permittee is authorized to modify the facility in accordance with the conditions of this permit and as described in the application, approved drawings, plans, and other documents on file with the Department of Environmental Protection (Department).

Attached appendix made a part of this permit:

Appendix GC

Construction Permit General Conditions

Howard L. Rhodes, Director
Division of Air Resources Management

AIR CONSTRUCTION PERMIT 0570040-007-AC

SECTION I. FACILITY INFORMATION

1.0 FACILITY DESCRIPTION

This facility, F.J. Gannon Station, consists of six steam boilers (Units 1 through 6); six steam turbines; one simple-cycle combustion turbine; a once-through cooling water system; solid fuels, fluxing material, fly ash, slag, and fuel storage/handling facilities; fuel storage tanks; and ancillary support equipment. The nominal output is 1,317 megawatts (MW). The facility utilizes coal as its primary fuel for Units 1-6. The combustion turbine is allowed to burn new No. 2 fuel oil, with a maximum sulfur content of 0.5% by weight.

Based on the initial Title V permit application received June 14, 1996, this facility is a major source of hazardous air pollutants (HAPs).

2.0 PROJECT DESCRIPTION

This project modification is for the construction/modification of the coal yard's crusher house serving the Gannon Station's boilers 1 through 6.

Two new fine grind crushers (Crushers 3A and 3B) will be installed in the existing crusher house. Crusher 3A will receive coal from belt G1 and Crusher 3B will receive coal from belt G2. Any portion of the coal directed to Crusher 3A may instead be routed to existing Crusher 1 via a G1 belt extension. Likewise, any portion of coal directed to Crusher 3B may instead be routed to existing Crusher 2 via a G2 belt extension.

Belts H1 and H2 will be extended to accommodate the new crushers. These new Crushers 3A and 3B will each be rated at 600 tons per hour and will feed to belts H1 and H2, respectively. The existing Crushers pairs (1A1B and 2A2B) are each rated at 800 tons per hour and will continue to feed to belts H1 and H2, respectively.

The existing crushers will serve as back-up/overflow for the new crushers. The new crushers addition will not increase the coal feed rate to the boilers because the belt speeds before and after the crusher house are not changing from the currently rated 800 tph. The new crushers will allow TEC to maintain its current feed rate while re-establishing consistent fine grind capability. The coal throughput will remain at the permitted rate of 2.85 million tons coal per year.

This project modification comprises the emissions points FH032 through FH 035a:

The estimated total PM/PM₁₀ emissions as a result of this crusher house modification would not exceed 1 TPY.

3.0 REGULATORY CLASSIFICATION

The facility, F.J. Gannon Station Power Plant, is classified as a Major or Title V Source of air pollution because emissions of at least one regulated air pollutant, such as particulate matter (PM/PM₁₀), sulfur dioxide (SO₂), nitrogen oxides (NO_x), carbon monoxide (CO), or volatile organic compounds (VOC) exceeds 100 tons per year (TPY).

This facility is within an industry included in the list of the 28 Major Facility Categories per Table 62-212.400-1, F.A.C. Because emissions are greater than 100 TPY for at least one criteria pollutant, the facility is also a Major Facility with respect to Rule 62-212.400, Prevention of Significant Deterioration (PSD).

This facility is located in an area (Hillsborough County) designated "unclassifiable" for SO₂, "maintenance" for Ozone (O₃), particulate matter (PM), and lead (Pb), and "attainment" for all the other criteria pollutants (Rule 62-204.360, F.A.C.).

This facility (6 steam boilers) is also subject to the provisions of Title IV, Acid Rain, Clean Air Act as amended in 1990.

AIR CONSTRUCTION PERMIT 0570040-007-AC

SECTION I. FACILITY INFORMATION

4.0 EMISSIONS UNIT(S)

Emissions Unit

This permit addresses the following emissions points within the following emissions unit :

EMISSIONS UNIT NO.	SYSTEM	DESCRIPTION*
ARMS E. U. No. 008 Coal Yard	Fuel Handling and Storage System	Fugitive Emissions Points FH 032 through FH 035a

Crusher House Modification :

<u>Source Designator</u>	<u>PM Control Method</u>	<u>Efficiency Rating</u>	<u>Design Capacity</u>	<u>Emission Point</u>	<u>Emission Rate (TPY)</u>
Conveyor G1 to Crusher 3A	Enclosure & Dust Suppressants	90%	800 TPH	FH032	0.09
Crusher 3A to Conveyor G1	Enclosure & Dust Suppressants	90%	800 TPH	FH032a	0.04
Conveyor G1 to Crushers 1A1B	Enclosure & Dust Suppressants	90%	800 TPH	FH032b	0.04
Conveyor G2 to Crusher 3B	Enclosure & Dust Suppressants	90%	800 TPH	FH033	0.09
Crusher 3B to Conveyor G2	Enclosure & Dust Suppressants	90%	800 TPH	FH033a	0.04
Conveyor G2 to Crushers 2A2B	Enclosure & Dust Suppressants	90%	800 TPH	FH033b	0.04
Crushers 1A1B to Conveyor H1	Enclosure & Dust Suppressants	90%	800 TPH	FH034	0.04
Crusher 3A to Conveyor H1	Enclosure & Dust Suppressants	90%	600 TPH	FH034a	0.04
Crushers 2A2B to Conveyor H2	Enclosure & Dust Suppressants	90%	800 TPH	FH035	0.04
Crusher 3B to Conveyor H2	Enclosure & Dust Suppressants	90%	600 TPH	FH035a	0.04
Total PM/PM ₁₀ Emissions					0.50

The Coal Yard facility (ARMS Emissions Unit 008) , is regulated under Rule 62-296.700, F.A.C., Reasonably Available Control Technology (RACT) Particulate Matter and Rule 62-296.711, F.A.C., Materials Handling, Sizing, Screening, Crushing and Grinding Operations.

5.0 PERMIT SCHEDULE

- 09/23/98 Notice of Intent published in the Tampa Tribune
- 08/31/98 Distributed Intent to Issue Permit
- 08/03/98 Application deemed complete
- 05/28/98 Received Application

AIR CONSTRUCTION PERMIT 0570040-007-AC

SECTION I. FACILITY INFORMATION

6.0 RELEVANT DOCUMENTS:

The documents listed below are the basis of the permit. They are specifically related to this permitting action, but not all are incorporated into this permit. These documents are on file with the Department.

- Application received on May 28, 1998
- Department's letters dated June 26 and July 31, 1998
- Hillsborough County Environmental Protection Commission's memo dated June 25, 1998
- TEC's letters dated July 1 and August 3, 1998
- Department's Intent to Issue and Public Notice Package dated August 31, 1998
- Petition for Formal Hearing received at the DEP Office of General Counsel on September 25, 1998
- Notice of Voluntary Dismissal sent by Hillsborough County EPC to DOAH on January 29, 1999
- DOAH Order Closing The File dated February 1, 1999

7.0 PERMITTING HISTORY:

<u>E.U. ID No</u>	<u>Description</u>	<u>Permit No.</u>	<u>Issue Date</u>	<u>Expiration Date</u>
008	Coal Yard	AO29-216480	4/23/93	9/12/97
		AC29-114676	5/19/87	9/30/87
		AC29-152987	12/6/88	6/1/89
		AC29-61276	4/12/83	12/31/84

AC29-61276: Coal Handling Modification at the Gannon Coal Yard

A modification of the Coal Yard to allow an increase of the throughput rate from 1,270,000 tons per year to 2.40 million tons per year was approved in 1983. This modification reconverted Boilers 1-4 from oil burning back to coal because of the increasing of price of crude oil at that time. This permit was issued in 1983.

AC29-114676: Coal Handling Modification at the Gannon Coal Yard - Revision of Permit AC29-61276.

The modification of the permit revised the coal throughput from 2.40 to 2.85 million tons per year. This revision was approved in 1987.

AC29-152987: Replacement of the existing west grab bucket-hopper coal unloading system with a 1,500 TPH new coal unloader. This permit was issued in 1988. This emission point is part of the ARMS Emission Unit 008 Coal Yard.

AO29-216480: This operation permit covers the entire Coal Yard operation.

AIR CONSTRUCTION PERMIT 0570040-007-AC

SECTION II. EMISSION UNIT(S) GENERAL REQUIREMENTS

1.0 ADMINISTRATIVE

- 1.1 Applicable Regulations: Unless otherwise indicated, the construction and operation of these emission units shall be in accordance with the capacities and specifications stated in the application. The permittee is subject to all applicable provisions of Chapter 403, F.S. and Florida Administrative Code Chapters 62-4, 62-103, 62-204, 62-210, 62-212, 62-213, 62-296, and 62-297, and the Code of Federal Regulations Section 40, Part 60. Specifically, this project is subject to applicable requirements of the New Source Performance Standards (NSPS) for Coal Processing Plants, Subpart Y, identified by the Code of Federal Regulations and incorporated by reference in the Florida Administrative Code regulation 62-204.800. Issuance of this permit does not relieve the facility owner or operator from compliance with any applicable federal, state, or local permitting requirements or regulations. [Rule 62-210.300, and 62-204.800, F.A.C.]
- 1.2 Regulating Agencies: All documents related to applications for permits to construct, operate or modify an emissions unit should be submitted to the Bureau of Air Regulation (BAR), Florida Department of Environmental Protection (FDEP), at 2600 Blainstone Road, Tallahassee, Florida 32399-2400 and phone number (850)488-1344. All documents related to reports, tests, and notifications should be submitted to the DEP Southwest District office (DEPSW), 3804 Coconut Palm Drive, Tampa, Florida 33619 and phone number 813/744-6100 and the Hillsborough County Environmental Protection Commission (HCEPC), 1410 North 21 Street, Tampa, Florida 33605, and phone number 813/272-5530.
- 1.3 Modification: The permittee shall give prior written notification to the Department and the HCEPC when there is any modification to this facility. This notice shall be submitted sufficiently in advance of any critical date involved to allow sufficient time for review, discussion, and revision of plans, if necessary. Such notice shall include, but not be limited to, information describing the precise nature of the change; modifications to any emission control system; production capacity of the facility before and after the change; and the anticipated completion date of the change. [Chapters 62-210 and 62-212 F.A.C.]
- The changes may include, but are not limited to, the following, and may also require prior authorization before implementation:
- A. Alteration or replacement of any equipment* or parameter listed in the description.
 - B. Installation or addition of any equipment* which is a source of air pollution.
 - C. Any changes in the method of operation, raw materials, products or fuels.
- * Not applicable to normal maintenance and repairs, and vehicles used for transporting material.
[Rule 62-4.070(3), F.A.C., Rule 62-210.300, F.A.C.]
- 1.4 General Conditions: The owner and operator is subject to and shall be aware of and operate under the attached General Permit Conditions G.1 through G.15 listed in *Appendix GC* of this permit. General Permit Conditions are binding and enforceable pursuant to Chapter 403 of the Florida Statutes. [Rule 62-4.160, F.A.C.]
- 1.5 Terminology: The terms used in this permit have specific meanings as defined in the corresponding chapter of the Florida Administrative Code.
- 1.6 Forms and Application Procedures: The permittee shall use the applicable forms listed in Rule 62-210.900, F.A.C., when appropriate and follow the application procedures in Chapter 62-4, F.A.C. [Rule 62-210.900, F.A.C.]
- 1.7 Expiration: This air construction permit shall expire on October 1, 1999. [Rule 62-210.300(1), F.A.C.]

AIR CONSTRUCTION PERMIT 0570040-007-AC

SECTION II. EMISSION UNIT(S) GENERAL REQUIREMENTS

The permittee may, for good cause, request that this construction permit be extended. Such a request shall be submitted to the Bureau of Air Regulation prior to 60 days before the expiration of the permit. However, the permittee shall promptly notify the HCEPC and the DEP SWD offices of any delays in completion of the project which would affect the startup day by more than 90 days. [Rule 62-4.080, F.A.C.]

- 1.8 Application for Title V Permit: A revision of the Title V operating permit application pursuant to Chapter 62-213, F.A.C., shall be submitted to the DEPs Bureau of Air Regulation and a copy to the HCEPC and DEP's SW District offices in Tampa. [Chapter 62-213, F.A.C.]
- 1.9 New or Additional Conditions: Pursuant to Rule 62-4.080, F.A.C., for good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time. [Rule 62-4.080, F.A.C.]

2.0 EMISSION LIMITING STANDARDS

- 2.1 RACT Visible Emissions Standard: [Rule 62-296-700, F.A.C.] Unless otherwise specified, no person shall cause, let, permit, suffer or allow to be discharged into the atmosphere any air pollutants from these emissions units, the opacity of which is equal to:

- Visible emissions from PM unconfined particulate matter sources shall not exceed 5% opacity.
- Water sprays or chemical wetting agents and stabilizers are acceptable methods to be used on coal storage piles as necessary to maintain an opacity of less than or equal to 5%. Other appropriate methods may be applied to maintain this opacity, after they are approved by the Department.
[AC 29-114676]

2.2 Unconfined Emissions of Particulate Matter [Rule 62-296.320(4)(c), F.A.C.]

- (a) The owner or operators shall not cause, let, permit, suffer or allow the emissions of unconfined particulate matter from any source whatsoever, including, but not limited to, vehicular movement, transportation of materials, construction, alteration, demolition or wrecking, or industrially related activities such as loading, unloading, storing or handling, without taking reasonable precautions to prevent such emission.
- (b) Reasonable precautions include but are not limited to the following:
- Paving and maintenance of roads, parking areas and yards.
 - Application of water or chemicals to control emissions from such activities as demolition of buildings, grading roads, construction, and land clearing.
 - Application of asphalt, water, oil, chemicals or other dust suppressants to unpaved roads, yards, open stock piles and similar activities.
 - Removal of particulate matter from roads and other paved areas under the control of the owner or operator of the facility to prevent reentrainment, and from buildings or work areas to prevent particulate from becoming airborne.
 - Landscaping or planting of vegetation.
 - Use of hoods, fans, filters, and similar equipment to contain, capture and/or vent particulate matter.
 - Confining abrasive blasting where possible.

AIR CONSTRUCTION PERMIT 0570040-007-AC

SECTION II. EMISSION UNIT(S) GENERAL REQUIREMENTS

- Enclosure or covering of conveyor systems.
- (c) Emission Control Methods for the Crusher House are enclosures and dust suppressants.

NOTE: Facilities that cause frequent, valid complaints may be required by the Permitting Authority to take these or other reasonable precautions. In determining what constitutes reasonable precautions for a particular source, the Department shall consider the cost of the control technique or work practice, the environmental impacts of the technique or practice, and the degree of reduction of emissions expected from a particular technique or practice.

2.3 General Pollutant Emission Limiting Standards: [Rule 62-296.320 (1), F.A.C.]

- (b) No person shall cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor.

NOTE: An objectionable odor is defined as any odor present in the outdoor atmosphere which by itself or in combination with other odors, is or may be harmful or injurious to human health or welfare, which unreasonably interferes with the comfortable use and enjoyment of life or property, or which creates a nuisance. [F.A.C. 62-210.200(198)]

3.0 OPERATION AND MAINTENANCE

3.1 The Operation and Maintenance Plan for Particulate Control

A. Process Parameters:

1. Operation schedule: 8760 hours per year
2. Equipment Data:
 - Conveyor Hoods: corrugated Aluminum
 - Transfer Point Enclosures: Carbon Steel
3. Wet Dust Suppression:
 - Manufacturer: Martin Marietta

B. Inspection and Maintenance Procedures:

The coal yard particulate control equipment receive regular preventative maintenance as follows:

Conveyor Enclosures:

1. Daily random visual inspections of conveyor hoods.
2. Daily random visual inspection of the transfer points chute work

Dust Suppression System:

1. Quarterly inspection of system for water leaks.
2. Quarterly inspection of spray nozzles.

The pumps, tanks, etc., that make-up the dust suppression system undergo normal maintenance including lubrication, flushing, and draining.
[Rule 62-296.700, F.A.C. and Application submitted May 28, 1998]

AIR CONSTRUCTION PERMIT 0570040-007-AC

SECTION II. EMISSION UNIT(S) GENERAL REQUIREMENTS

- 3.2 Plant Operation - Problems: If temporarily unable to comply with any of the conditions of the permit due to breakdown of equipment or destruction by hazard of fire, wind or by other cause, the owner or operator shall notify the HPCEC and Southwest District office in Tampa as soon as possible, but at least within (1) working day, excluding weekends and holidays. The notification shall include: pertinent information as to the cause of the problem; the steps being taken to correct the problem and prevent future recurrence; and where applicable, the owner's intent toward reconstruction of destroyed facilities. Such notification does not release the permittee from any liability for failure to comply with the conditions of this permit and the regulations. [Rule 62-4.130, F.A.C.]
- 3.3 Circumvention: The owner or operator shall not circumvent any air pollution control equipment or allow the emission of air pollutants without this equipment operating properly. [Rules 62-210.650, F.A.C.]
- 3.4 Excess Emissions Requirements [Rule 62-210.700, F.A.C.]
- (a) Excess emissions resulting from start-up, shutdown or malfunction of these emissions units shall be permitted providing (1) best operational practices to minimize emissions are adhered to and (2) the duration of excess emissions shall be minimized, but in no case exceed two hours in any 24 hour period unless specifically authorized by the Southwest District office for longer duration. [Rule 62-210.700(1), F.A.C.]
 - (b) Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during start-up, shutdown, or malfunction shall be prohibited. [Rule 62-210.700(4), F.A.C.]
 - (c) In case of excess emissions resulting from malfunctions, the owner or operator shall notify the Air Control Section of the DEPSW District and the HCEPC offices within one (1) working day of: the nature, extent, and duration of the excess emissions; the cause of the problem; and the corrective actions being taken to prevent recurrence. [Rule 62-210.700(6), F.A.C.]

4.0 MONITORING OF OPERATIONS

4.1 Determination of Process Variables:

- (a) The permittee shall install, operate, and maintain equipment and/or instruments necessary to determine process variables, such as process weight input or heat input, when such data is needed in conjunction with emissions data to determine the compliance of the emissions unit with applicable emission limiting standards. [Rule 62-297.310 (5), F.A.C.]
- (b) Equipment and/or instruments used to directly or indirectly determine such process variables, including devices such as belt scales, weight hoppers, flow meters, and tank scales, shall be calibrated and adjusted to indicate the true value of the parameter being measured with sufficient accuracy to allow the applicable process variable to be determined within 10% of its true value. [Rule 62-297.310(5), F.A.C.]

5.0 TEST AND COMPLIANCE REQUIREMENTS

- 5.1 Test Performance: Within 60 days after achieving the maximum production rate at which this facility will be operated, but not later than 180 days after initial startup up and annually thereafter, the owner or operator shall conduct performance test(s) for Visible Emissions (Opacity) pursuant to 40 CFR 60.8, Performance Tests, Rule 62-296.310 F.A.C., 40 CFR 60, Appendix A. Subsequent opacity compliance tests shall be conducted for a

AIR CONSTRUCTION PERMIT 0570040-007-AC

SECTION II. EMISSION UNIT(S) GENERAL REQUIREMENTS

duration of 30 minutes in accordance with Rule 62-297.310(4)2., F.A.C. [Rule 62-204.800, F.A.C and Rule 62-297.310, F.A.C.]

- 5.2 Test Procedures and Test Reports shall meet all applicable requirements of the Florida Administrative Code Chapter 62-297. [Rule 62-297.310, F.A.C.]
- 5.3 Test Notification: The owner or operator shall notify the HCEPC and the DEPSW District offices in Tampa in writing at least (30) days [initial] and (15) days [annual] prior to conducting each scheduled compliance test. The notification shall include the test date, the expected test time, the facility contact person for the test, and the person or company conducting the test. The (15) day notification requirement may be waived at the discretion of the Department. Likewise, if circumstances prevent testing during the test window specified for the emission unit, the owner or operator may request an alternate test date before the expiration of this window. [Rule 62-297.310 and 40 CFR 60.8, F.A.C.]
- 5.4 Special Compliance Tests: When the Department, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in Rule 62-204, 62-210, 62-212, 62-296 and 62-297, F.A.C. or in a permit issued pursuant to those rules is being violated, it may require the owner or operator of the facility to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions units and to provide a report on the results of said tests to the Southwest District office in Tampa. [Rule 62-297.310, F.A.C.]
- 5.5 Compliance Testing: All compliance testing shall be conducted during normal operation and at the maximum material (including limestone or iron ore where applicable) transfer rate attainable during the test period. Actual material handling rates will be determined using the totalizer readings obtained from scales located on C, L, and H conveyors. The readings from these scales will be recorded at the start and finish of the visible emissions test. The difference between the value recorded divided by the test duration will be the value used to represent the material handling rate. Alternatively, values from the circular chart recorders located in the coal field control room will be used in the event a problem with a scale totalizer arises. The test result shall indicate if iron ore has been included in the corresponding material transfer rate. Failure to include the actual process or production rate in the results may invalidate the test. [Rule 62-4.070(3), F.A.C. and AO29-216480]
- 5.6 Exceptions and Approval of Alternate Procedures and Requirements: An Alternate Sampling Procedure (ASP) may be requested from the Bureau of Monitoring and Mobile Sources of the Florida Department of Environmental Protection in accordance with the procedures specified in Rule 62-297.620, F.A.C.
- 6.0 **REPORTS AND RECORDS**
- 6.1 Duration: All reports and records required by this permit shall be kept for at least (5) years from the date the information was recorded. [62-4.160(14)(b), F.A.C.]
- 6.2 Operation and Maintenance. Records of inspections, maintenance, and performance parameters shall be made available to the HCEPC and the SW DEP offices upon request. [Rules 62-213.440(1)(b)2.b. and 62-296.700(6)(e), F.A.C.]

AIR CONSTRUCTION PERMIT 0570040-007-AC

SECTION II. EMISSION UNIT(S) GENERAL REQUIREMENTS

6.2 Emission Compliance Stack Test Reports:

- (a) A *test report* indicating the results of the required compliance tests shall be filed with the HPCEC and the Southwest District offices in Tampa as soon as practical, but no later than 45 days after the last sampling run is completed. [Rule 62-297.310, F.A.C.]
- (b) The *test report* shall provide sufficient detail on the tested emission unit and the procedures used to allow the Department and the HCEPC to determine if the test was properly conducted and if the test results were properly computed. At a minimum, the test report shall provide the applicable information listed in **Rule 62-297.310(8), F.A.C.**

6.3 Excess Emissions Report: If excess emissions occur, the owner or operator shall notify the Air Section of the HPCEC and the Southwest District offices within (1) working day of: the nature, extent, and duration of the excess emissions; the cause of the excess emissions; and the actions taken to correct the problem. In addition, the Department may request a written summary report of the incident. Pursuant to the New Source Performance Standards, excess emissions shall also be reported in accordance with 40 CFR 60.7. [Rules 62-4.130 and 62-210.700(6), F.A.C.]

6.4 Annual Operating Report for Air Pollutant Emitting Facility: Before March 1st of each year, the owner or operator shall submit to the Department this required report [DEP Form No. 62-210.900(5)], which summarizes operations for the previous calendar year. [Rule 62-210.370(3), F.A.C.]

7.0 OTHER REQUIREMENTS

7.1 This permit (addition of the two 600 tph new crushers) does not supersede or change any applicable requirement or previous construction/operation permits for the ARMS Emission Unit No. 008 Coal Yard (as a whole).

AIR CONSTRUCTION PERMIT 0570040-007-AC

SECTION III. EMISSION UNIT(S) SPECIFIC CONDITIONS

1.0 ESSENTIAL POTENTIAL TO EMIT (PTE) PARAMETERS

- 1.1 Permitted Capacity. The maximum permitted process rate for the coal yard shall not exceed 2.85 million tons/year.
[Rules 62-4.160(2), and 62-210.200 (PTE), F.A.C. and AC29-114676]

2.0 OPERATING REQUIREMENTS

- 2.1 Hours of Operation. The crusher house is allowed to operate continuously, i.e., 8,760 hours/year.
[Rules 62-4.160(2) and 62-210.200, F.A.C., P.T.E.]

3.0 EMISSION LIMITATIONS AND STANDARDS

- 3.1 Visible Emissions. Visible emissions generated by fugitive or unconfined particulate matter from the coal yard's crusher house shall not exceed 5% opacity.
[Rule 62-296.711(2)(a), F.A.C. AC29-61276 and AC29-114676]

4.0 TEST METHODS AND PROCEDURES

- 4.1 Test Methods: The test method for visible emissions shall be determined using EPA Method 9, adopted and incorporated by reference in Rule 62-204.800, F.A.C., and referenced in Chapter 62-297, F.A.C.
[Rules 62-204.800, 62-297.310(7)(a)4., and 62-297.400, F.A.C.]

5.0 MONITORING OF OPERATIONS

- 5.1 Operation and Maintenance Plan (O&MP): The crusher house shall comply with the O&MP for the Coal Yard Particulate Control as specified in Section II. Condition 3.1.
[Rule 62-296.700, F.A.C, Applicant request on application submitted on May 28,1998]

6.0 NSPS REQUIREMENTS

- 6.1 The new crushers shall comply with all applicable requirements of 40CFR60, Subpart A, General Provisions. In addition, the new crushers shall comply with 40CFR60, NSPS for Coal Preparation Plants, Subpart Y.
[Rule 62-204.800 F.A.C., 40CFR60, Subpart Y]

7.0 REASONABLE ASSURANCES

- 7.1 All controls associated with the transfer points (i.e., the enclosures and dust suppression) shall be maintained to the extent that the capture efficiencies credited will be achieved. Reasonable precautions to prevent unconfined emissions of particulate matter shall be in accordance with Rule 62-296.320(7).F.A.C
[Rule 62-4.070(3), and Rule 62-296.320(7) F.A.C.]

APPENDIX GC
GENERAL PERMIT CONDITIONS [RULE 62-4.160, F.A.C.]

- G.1 The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.
- G.2 This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings or exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.
- G.3 As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey and vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit is not a waiver or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.
- G.4 This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.
- G.5 This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.
- G.6 The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.
- G.7 The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:
- (a) Have access to and copy and records that must be kept under the conditions of the permit;
 - (b) Inspect the facility, equipment, practices, or operations regulated or required under this permit, and,
 - (c) Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.
- Reasonable time may depend on the nature of the concern being investigated.
- G.8 If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:
- (a) A description of and cause of non-compliance; and
 - (b) The period of noncompliance, including dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

APPENDIX GC
GENERAL PERMIT CONDITIONS [RULE 62-4.160, F.A.C.]

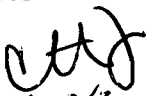
The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

- G.9 In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by Sections 403.73 and 403.111, Florida Statutes. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.
- G.10 The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.
- G.11 This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 62-4.120 and 62-730.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.
- G.12 This permit or a copy thereof shall be kept at the work site of the permitted activity.
- G.13 This permit also constitutes:
- (a) Determination of Best Available Control Technology ();
 - (b) Determination of Prevention of Significant Deterioration (); and
 - (c) Compliance with New Source Performance Standards (X).
- G.14 The permittee shall comply with the following:
- (a) Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
 - (b) The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application or this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.
 - (c) Records of monitoring information shall include:
 - 1. The date, exact place, and time of sampling or measurements;
 - 2. The person responsible for performing the sampling or measurements;
 - 3. The dates analyses were performed;
 - 4. The person responsible for performing the analyses;
 - 5. The analytical techniques or methods used; and
 - 6. The results of such analyses.
- G.15 When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

Memorandum

Florida Department of
Environmental Protection

TO: Howard Rhodes

THRU: Clair Fancy 
Al Linero *adj 2/3*

FROM: Teresa Heron *T.H.*

DATE: February 3, 1999

SUBJECT: Tampa Electric Company - F. J. Gannon Station
Application to Construct/Modify the Solid Fuel Handling and Storage
System DEP File No. 0570040-007-AC

Attached is the permit to modify the existing solid fuel handling and storage system at the Tampa Electric Company (TEC) Gannon Station.

This change will allow TEC, to add two new 600 tph crushers to be located upstream of the existing crusher pairs. The existing crushers will serve as back-up/overflow for the new crushers. The addition of the two new crushers will not increase the existing permitted coal feed rate to the boilers since the currently permitted belt speed rate of 800 tph for each belt, before and after the crusher house, will not be changed. An insignificant increase of less than one (1) ton per year in actual emissions is expected from this emission unit.

The project will help control high flyash "loss on ignition" caused by use of high moisture, low Btu coal that TEC is using to control nitrogen oxides emissions. This will be accomplished by producing a finer grind.

The project is a pollution control project as defined in 40 CFR 52.21(b)(32) because it is "an activity or project to accommodate fuel switchingfor the purpose of controlling emissions." Initially Hillsborough County filed a petition but voluntarily withdrew it in exchange for additional permit conditions on the related coal project.

I recommend your approval and signature.

TH/kt

Z 031 392 014

US Postal Service
Receipt for Certified Mail

No Insurance Coverage Provided.
 Do not use for International Mail (See reverse)

Sent to <i>James Hunter</i>	
Street & Number <i>1700</i>	
Post Office, State, & ZIP Code <i>Tampa FL</i>	
Postage	\$
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Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	<i>10-6-99</i>
<i>0570040-007-AC</i>	

PS Form 3800, April 1995

Is your RETURN ADDRESS completed on the reverse side?

SENDER: ■ Complete items 1 and/or 2 for additional services. ■ Complete items 3, 4a, and 4b. ■ Print your name and address on the reverse of this form so that we can return this card to you. ■ Attach this form to the front of the mailpiece, or on the back if space does not permit. ■ Write "Return Receipt Requested" on the mailpiece below the article number. ■ The Return Receipt will show to whom the article was delivered and the date delivered.		I also wish to receive the following services (for an extra fee): 1. <input type="checkbox"/> Addressee's Address 2. <input type="checkbox"/> Restricted Delivery Consult postmaster for fee.	
3. Article Addressed to: <i>Mr. James Hunter</i> <i>Air Programs - Env. Plan.</i> <i>Tampa Electric Co</i> <i>PO Box 111</i> <i>Tampa, FL</i> <i>33601-0111</i>		4a. Article Number <i>2031 392 014</i>	
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Department of Environmental Protection
Division of Air Resources Management
Bureau of Air Regulation, NSRS
2600 Blair Stone Road, MS 5505
Tallahassee, Florida 32399-2400

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OCT 11 1999

BUREAU OF AIR REGULATION



DEPARTMENT OF ENVIRONMENTAL PROTECTION
NOTICE OF ADMINISTRATIVE PERMIT CORRECTION

In the Matter of an Application for Administrative Permit Correction:

Mr. James Hunter
Air Programs – Environmental Planning
Tampa Electric Company
Post Office Box 111
Tampa, Florida 33601-0111

DEP File No.: 0570040-007-AC
Gannon Station - Crushers

The Department has determined that minor corrections to information contained in Permit Number 0570040-007-AC is required. This correction is related to a typographical error and is minor in nature and does not alter, modify or revise any permit requirement. This Administrative Permit Correction is processed as project number 0570040-007-AC, pursuant to Rule 62-210.360, F.A.C. The correction is:

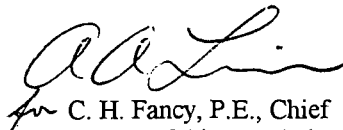
Specific Condition 1.7 in Section II shall read:

Expiration: This air construction permit shall expire on ~~October 1, 1999~~ December 31, 1999. [Rule 62-210.300(1), F.A.C.]

This permit correction corrects and is a part of Permit Number 0570040-007-AC. This permit correction is issued pursuant to Chapter 403, Florida Statutes.

Any party to this order (permit correction) has the right to seek judicial review of it under section 120.68 of the Florida Statutes, by filing a notice of appeal under rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel, Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000, and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The notice must be filed within thirty days after this order is filed with the clerk of the Department.

Executed in Tallahassee, Florida.

 P.E.
C. H. Fancy, P.E., Chief
Bureau of Air Regulation


CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Notice of Administrative Permit Correction was sent by certified mail (*) and copies were mailed by U.S. Mail before the close of business on 10-6-99 to the person(s) listed:

Mr. James Hunter, TECO *
Ms. Theresa Whatley, TECO*
Mr. Gregory M. Nelson, PE
Mr. Bill Thomas, SWD
Mr. Jerry Campbell, EPCHC

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to §120.52, Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.


(Clerk)

10-6-99
(Date)



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OCT 01 1999

BUREAU OF AIR REGULATION

September 30, 1999

Ms. Teresa Heron
Florida Department of Environmental Protection
Twin Towers Office Building
111 South Magnolia Drive, Suite 4
Tallahassee, Florida 32301

Via Facsimile and FedEx
Airbill No. 7910 0202 7404

**Re: Tampa Electric Company
Gannon Station - Crushers
Construction Permit #0570040-007-AC
Administrative Permit Correction Request**

Dear Ms. Heron:

Tampa Electric Company (TEC) requests an administrative permit correction to the above referenced permit as stated below:

SECTION II. EMISSION UNIT(S) GENERAL REQUIREMENTS

1.0 ADMINISTRATIVE

FROM:

1.7 Expiration: This air construction permit shall expire on October 1, 1999. [Rule 62-210.300(1), F.A.C.]

TO:

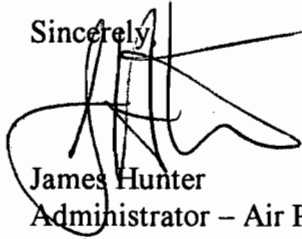
1.7 Expiration: This air construction permit shall expire on December 31, 1999. [Rule 62-210.300(1), F.A.C.]

The expiration date is correctly stated on the first page of the permit. The expiration date reference noted above was inadvertently carried over from an earlier draft version of the permit.

Ms. Teresa Heron
September 30, 1999
Page 2 of 2

If you have any questions, please call Jamie Woodlee or me at (813) 641-5060.

Sincerely,

A handwritten signature in black ink, appearing to read 'James Hunter', written over the word 'Sincerely,'.

James Hunter
Administrator – Air Programs
Environmental Planning

EP\gm\JTW874

c: Rick Kirby, EPCHC
Clair Fancy, FDEP
Al Linero, FDEP
Scott Sheplak, FDEP

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

ENVIRONMENTAL PROTECTION
COMMISSION OF HILLSBOROUGH
COUNTY, FLORIDA,

Petitioner,

vs.

OGC CASE NO. 98-2635
DOAH CASE NO. 98-4594

TAMPA ELECTRIC COMPANY and
STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION,

Respondents.

ORDER CLOSING FILE

On September 25, 1998, the Florida Department of Environmental Protection (Department) received a petition for administrative hearing from Petitioner, Environmental Protection Commission of Hillsborough County, Florida. The petition challenged the Department's Intent to Issue Air Construction Amendment to Permit No. 0570040-007-AC to Tampa Electric Company, to modify the Crusher House at the F.J. Gannon Power Plant Coal Yard, in Hillsborough County.

On February 1, 1999, after receiving a Notice of Voluntary Dismissal, the assigned administrative law judge issued an order closing the file of the Division of Administrative Hearings and relinquishing jurisdiction back to the Department. See Exhibit 1. There being no further matters to consider,

IT IS ORDERED:

The petition having been withdrawn, the Department's Division of Air Resources Management is directed to issue Permit No. 0570040-007-AC as based on the stipulation

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AIR REGULATION

settlement between Tampa Electric Company and Environmental Protection Commission of Hillsborough County, Florida.

Any party to this order has the right to seek judicial review of the order under section 120.68 of the Florida Statutes by the filing of a notice of appeal under rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department in the Office of General Counsel, 3900 Commonwealth Boulevard, Mail Station 35, Tallahassee, Florida 32399-3000, and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate district court of appeal. The notice of appeal must be filed within 30 days from the date this order is filed with the clerk of the Department.

DONE AND ORDERED this 5th day of February, 1999, in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION


F. PERRY ODOM
General Counsel

Douglas Building
3900 Commonwealth Boulevard
Mail Station 35
Tallahassee, Florida 32399-3000
Telephone: (850) 488-9314

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to S.120.52 Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.


CLERK

DATE 2/5/99

CERTIFICATE OF SERVICE

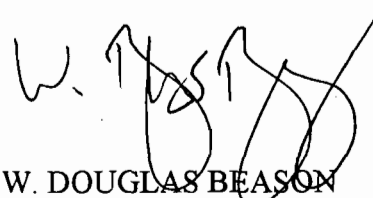
I CERTIFY that a true copy of the foregoing was mailed to:

Vernon R. Wagner, Esq.
Patrick B. Courtney, Esq.
Environmental Protection Commission
of Hillsborough County
1900 Ninth Avenue
Tampa, Florida 33605

Lawrence N. Curtin, Esq.
Post Office Drawer 810
Tallahassee, Florida 32302-0180

on this 8th day of February, 1999.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION



W. DOUGLAS BEASON
Assistant General Counsel

3900 Commonwealth Boulevard
Mail Station 35
Tallahassee, Florida 32399-3000
Telephone: (850) 488-9314

STATE OF FLORIDA
DIVISION OF ADMINISTRATIVE HEARINGS

ENVIRONMENTAL PROTECTION)
COMMISSION OF HILLSBOROUGH)
COUNTY, FLORIDA,)
)
Petitioner,)
)
vs.)
)
TAMPA ELECTRIC COMPANY and)
DEPARTMENT OF ENVIRONMENTAL)
PROTECTION,)
)
Respondents.)

Case No. 98-4594

ORDER CLOSING THE FILE

Based on a Notice of Voluntary Dismissal, and without objection, it is

ORDERED that:

1. This case is DISMISSED. The file of the Division of Administrative Hearings is CLOSED.
2. The hearing scheduled for February 17, 1999, is cancelled.

DONE AND ORDERED this 1 day of February, 1999, in Tallahassee, Leon County, Florida.



WILLIAM F. QUATTLEBAUM
Administrative Law Judge
Division of Administrative Hearings
The DeSoto Building
1230 Apalachee Parkway
Tallahassee, Florida 32399-3060
(850) 488-9675 SUNCOM 278-9675
Fax Filing (850) 921-6847
www.doah.state.fl.us

Law Offices

HOLLAND & KNIGHT LLP

**315 South Calhoun Street
P.O. Drawer 810 (ZIP 32302-0810)
Tallahassee, Florida 32301**

**850-224-7000
FAX 850-224-8832**

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Miami	West Palm Beach

FACSIMILE

TO:

Al Linero
NAME

DEP
COMPANY/FIRM

CITY

STATE

922-6979
FAX NUMBER

488-1344
TELEPHONE NUMBER

FROM:

Lawrence N. Curtin
NAME

425-5678
TELEPHONE NUMBER

3

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Order Closing the File, DOAH Case No. 98-4594

FOR THE RECORD:

DATE: **February 2, 1999**

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FAKED BY: AMOUNT:

FILE #: **9977-2033** CLIENT NAME: **TECO/EPC v.**

CONFIRMED: YES NO NAME: TIME:

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STATE OF FLORIDA
DIVISION OF ADMINISTRATIVE HEARINGS

ENVIRONMENTAL PROTECTION)
 COMMISSION OF HILLSBOROUGH)
 COUNTY, FLORIDA,)
)
 Petitioner,)
)
 vs.)
)
 TAMPA ELECTRIC COMPANY and)
 DEPARTMENT OF ENVIRONMENTAL)
 PROTECTION,)
)
 Respondents.)

Case No. 98-4594


ORDER CLOSING THE FILE

Based on a Notice of Voluntary Dismissal, and without objection, it is

ORDERED that:

1. This case is DISMISSED. The file of the Division of Administrative Hearings is CLOSED.
2. The hearing scheduled for February 17, 1999, is cancelled.

DONE AND ORDERED this 1 day of February, 1999, in Tallahassee, Leon County, Florida.


 WILLIAM F. QUATTLEBAUM
 Administrative Law Judge
 Division of Administrative Hearings
 The DeSoto Building
 1230 Apalachee Parkway
 Tallahassee, Florida 32399-3060
 (850) 488-9675 SUNCOM 278-9675
 Fax Filing (850) 921-6847
 www.doah.state.fl.us

Filed with the Clerk of the
Division of Administrative Hearings
this 1 day of February, 1999.

COPIES FURNISHED:

Lawrence N. Curtin, Attorney
Susan L. Stephens, Attorney
Holland & Knight, LLP
Post Office Drawer 810
Tallahassee, Florida 32302-0810
Tampa Electric Company

W. Douglas Beason, Attorney
Department of Environmental Protection
Mail Station 35
3900 Commonwealth Boulevard
Tallahassee, Florida 32399-3000

Vernon R. Wagner, Chief Counsel
Patrick B. Courtney, Esquire
1900 9th Avenue
Tampa, Florida 33605-3820
Environmental Protection Commission
of Hillsborough County, Florida

Kathy Carter, Agency Clerk
Office of the General Counsel
Department of Environmental Protection
Mail Station 35
3900 Commonwealth Boulevard
Tallahassee, Florida 32399-3000

Teresa
TECO Gannon
Petitions

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

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SEP 25 1998

IN RE:
AN APPLICATION FOR PERMIT BY:

TAMPA ELECTRIC COMPANY,
F. J. GANNON STATION,
HILLSBOROUGH COUNTY, FLORIDA.

DEP
DRAFT PERMIT NUMBER:
0570040-007-AC

Department of Environmental Protection
Office of General Counsel

PETITION FOR FORMAL ADMINISTRATIVE HEARING

Petitioner, ENVIRONMENTAL PROTECTION COMMISSION OF HILLSBOROUGH COUNTY, FLORIDA (EPC), through its undersigned counsel, hereby files this petition for administrative proceeding pursuant to Chapter 120.569 and 120.57 Florida Statutes, in the matter of TAMPA ELECTRIC COMPANY, F. J. GANNON STATION, CONSTRUCTION/MODIFICATION PERMIT NO. 0570040-007-AC, in Hillsborough County, Florida. More specifically, EPC objects to the STATE OF FLORIDA, DEPARTMENT OF ENVIRONMENTAL PROTECTION's (the "Department") draft conditions included in and subject of their Notice of Intent to Issue Air Construction Permit. In support of this petition, EPC states the following:

BACKGROUND

1. EPC is an environmental regulatory agency with jurisdiction in Hillsborough County, Florida pursuant to 84-446, Laws of Florida, as amended. EPC's address and telephone number are: 1900 Ninth Ave. Tampa, Florida 33605, (813) 272-5960.

2. The Department's address and telephone number are: 3900 Commonwealth Blvd., Mail Station #35, Tallahassee, Florida, 32399-3000; Office of General Counsel-(850) 488-9314.

3. The project, subject of this petition, is the proposed TAMPA ELECTRIC COMPANY (hereinafter "TECO") Air Construction Permit for their F.J. Gannon facility, permit number 0570040-007AC.

4. On June 30, 1997, TECO applied for an increase in the coal throughput at the F.J. Gannon Facility. In that application (0570040-006AC), TECO referenced the replacement of two (2) coal crushers at the facility, but did not make application for a permit for that replacement. TECO's original position was that the replacement of the coal crushers did not require a permit. TECO received notification of permit requirements, pursuant to 40 CFR 60 subpart Y, on July 25, 1997. As of the date of this filing, Petitioner has not received notice of intent to issue a permit as to 0570040-006AC. On May 28, 1998, TECO applied to the permitting authority for an Air Construction Permit for the F.J. Gannon Station and associated facilities located in Hillsborough County, Florida. That proposed project (0570040-007AC), the construction of two additional coal crushers, is subject to preconstruction review under the provisions of Chapter 403 Florida Statutes, Chapters 62-212 and 62-4, Florida Administrative Code (FAC) and 40 CFR 60, and Chapter 1-3, Rules of the Environmental Protection Commission of Hillsborough County, pursuant to 84-446, Laws of Florida.

5. The Department's current draft permit conditions will allow the subject TECO facility to conduct activities in violation of Department rules. The activities allowed by the draft permit consist of construction of two additional coal crushers. TECO has failed to provide any assurance that the proposed project meets the requirements of Prevention of Significant Deterioration (PSD) and Best Achievable Control Technology (BACT). The activities associated with the subject Air Construction Permit would have the potential to significantly impact the air quality within Hillsborough County by allowing a potential increase in the emissions of sulfur dioxide of over 7000 tons per 12 consecutive months. Hillsborough County is designated an "Air Quality Maintenance Area" by EPA for pollutant particulate matter. The County has already experienced actual sulfur dioxide (SO₂) emissions which exceed state ambient air standards, and modeled concentrations exceed federal ambient air standards.

6. Petitioner received notice of the Department's Intent to Issue Air Construction Permit, by copy on September 8, 1998 and properly filed its timely request for an extension of time to file this Petition.

STATEMENT OF SUBSTANTIAL INTERESTS

7. EPC's substantial interests will be affected by the proposed permit, in that, the facility is located within Hillsborough County and residents of Hillsborough County own property adjacent to and in the vicinity of the facility. Furthermore, residents of Hillsborough County live near and use the subject area for recreational purposes. The proposed activity will have the effect of impairing, polluting, or otherwise injuring the air, water and other natural resources of the county and the state all in violation of the Department's rules. The Department's failure to obtain reasonable assurance that their rules will be met and its decision to issue the permit with the proposed conditions substantially affects Hillsborough County, its citizens and natural resources.

DISPUTED ISSUES OF MATERIAL FACT

8. Material facts specifically disputed by EPC (apparently relied upon by the Department in its intent to issue the subject permit with proposed conditions) include the following:

A) Separation of Projects: Whether the addition of two (2) coal crushers, allowed by this permitting action (057004-007AC), and the increase in coal yard throughput, proposed by permitting action 0570040-006-AC, should be reviewed as separate projects or considered together as one project since both projects are inextricably intertwined.

B) Designation as Pollution Control Project (PCP): Whether the additional coal crushers when considered in conjunction with the coal yard throughput increase, qualify as a PCP (as defined in 40 CFR 52.21(b)(32)).

C) Prevention of Significant Deterioration (PSD) Applicability: Whether the addition of the coal crushers, when considered in conjunction with the coal yard throughput increase is subject to PSD and Best Available Control Technology (BACT) as defined in 40 CFR 52.21(b)(12) and Rule 62-212, FAC.

D) Visible Emission Standard: Whether Rule 62-296.320 is the applicable regulation pertaining to the pollutant opacity, or Rule 62-296.700, as adopted in Rule 1-3, Rules of EPC.

FACTS WARRANTING MODIFICATION OF PROPOSED AGENCY ACTION

9. The facts warranting modification of agency action are as follows:

A) Separation of Projects: Application was initially made with the 2 projects combined. TECO has stated that both modifications are necessary due to switching from low moisture to high moisture coal. Both modifications should be reviewed as one project and subjected to the requirements of PSD and BACT since they would not qualify for consideration under the Pollution Control Project (PCP) exemption, 40 CFR 52.21(b)(2)(iii)(h).

B) Designation as a Pollution Control Project (PCP): In order to qualify under the PCP exemption, the project must not be less environmentally beneficial, or the effective increase will cause or contribute to a violation of a national air quality standard. Hillsborough County has experienced measured ground level exceedances of sulfur dioxide (SO₂). Modeling performed by FDEP engineers has shown exceedances of ground level SO₂ for both federal and state ambient air standards. The proposed projects could lead to an increase in actual modeled emission of over 7,000 tons of sulfur dioxide per 12 consecutive months.

C) Prevention of Significant Deterioration (PSD): Since the project does not qualify as a PCP, as explained in B above, it then should fall under Rule 62-212.400(2)(d)(4)(a)(ii), FAC. As such, TECO should provide assurance that all requirements of PSD and BACT are met.

D) Visible Emission Standard: TECO has requested and the Department intends to issue a permit which allows use of Chapter 62-296.320 as the applicable regulation pertaining to Visible Emission Standards. Chapter 1-3, Rules of the Environmental Protection Commission of Hillsborough County, establishes Chapter 62-296.700, F.A.C., Particulate Matter RACT, as applicable to air pollution sources within Hillsborough County. State authority to implement this rule is established in Chapter 84-446, Laws of Florida.

10. As to those points raised in Paragraphs 8 and 9 above, nothing provided to EPC in the TECO's application supports the conclusion drawn by the Department that reasonable assurance has been provided that TECO's activities will comply with applicable regulations.

LAWS ENTITLING PETITIONER TO RELIEF

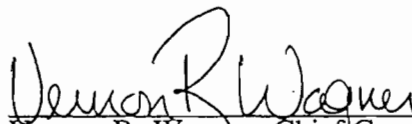
11. Rule 62-212.400(2)(d)4.a.(ii) requires BACT for each modification which results in a significant net emissions increase.

12. Chapter 1-3 Rules of the Environmental Protection Commission of Hillsborough County, and Rule 62-296.700 provide regulatory requirements for 5% opacity from particulate matter emission sources.

REQUEST FOR RELIEF

Wherefore, EPC requests that it be granted a formal hearing on this matter and the Department conclude that:

- A) TECO has not provided reasonable assurance that the departments regulations will be complied with.
- B) The coal crushers and coal yard throughput increase modifications are one project.
- C) The coal yard throughput increase and coal crushers do not qualify, together or separately, as a pollution control project.
- D) The department require TECO to demonstrate that BACT has been provided for this project.
- E) The Particulate Matter RACT emissions standard of 5% opacity be established as the governing rule for visible emissions.



Vernon R. Wagner, Chief Counsel

Florida Bar # 0826261

Patrick B. Courtney, Esquire

Florida Bar # 063533

**ENVIRONMENTAL PROTECTION
COMMISSION**

of Hillsborough County

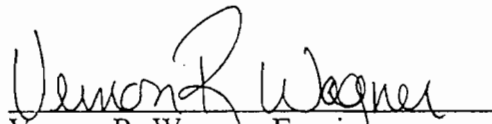
1900 Ninth Avenue

Tampa, Florida 33605

(813) 272-5960

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Petition for Formal Administrative Hearing has been sent via Federal Express Overnight Delivery to Office of General Counsel, Florida Department of Environmental Protection, 3900 Commonwealth Blvd., Mail Station #35, Tallahassee, Florida, 32399-3000; and by first class to Karen Sheffield, P.E., General Manager, Tampa Electric Company, P.O. Box 111, Tampa, Florida 33601-0111, and to Lawrence N. Curtin, Esq., Holland and Knight, P.O. Drawer 810, Tallahassee, Florida, 32302-0810, this 24th day of September, 1998.


Vernon R. Wagner, Esquire

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

RECEIVED
NOV 20 1998
RC

IN RE:
AN APPLICATION FOR PERMIT BY:

TAMPA ELECTRIC COMPANY,
F. J. GANNON STATION,
HILLSBOROUGH COUNTY, FLORIDA.

DEP
DRAFT PERMIT NUMBER:
0570040-006-AC

Dept. of Environmental Protection
Office of General Counsel

PETITION FOR FORMAL ADMINISTRATIVE HEARING

Petitioner, ENVIRONMENTAL PROTECTION COMMISSION OF HILLSBOROUGH COUNTY, FLORIDA (EPC), through its undersigned counsel, hereby files this petition for administrative proceeding pursuant to Chapter 120.569 and 120.57 Florida Statutes, in the matter of TAMPA ELECTRIC COMPANY, F. J. GANNON STATION, CONSTRUCTION/MODIFICATION PERMIT NO. 0570040-006-AC, in Hillsborough County, Florida. More specifically, EPC objects to the STATE OF FLORIDA, DEPARTMENT OF ENVIRONMENTAL PROTECTION's (the "Department") draft conditions included in and subject of their Notice of Intent to Issue Air Construction Permit. In support of this petition, EPC states the following:

BACKGROUND

1. EPC is an environmental regulatory agency with jurisdiction in Hillsborough County, Florida pursuant to 84-446, Laws of Florida, as amended. EPC's address and telephone number are: 1900 Ninth Ave. Tampa, Florida 33605, (813) 272-5960.

2. The Department's address and telephone number is: 3900 Commonwealth Blvd., Mail Station #35, Tallahassee, Florida, 32399-3000; Office of General Counsel-(850) 488-9314.

3. The project, subject of this petition, is the proposed TAMPA ELECTRIC COMPANY (hereinafter "TECO") Air Construction Permit for their F.J. Gannon Station Facility, permit number 0570040-006-AC.

4. On June 30, 1997, TECO applied for an increase in the coal throughput at the F.J. Gannon Station Facility in Hillsborough County, Florida. In that application (0570040-006AC), TECO referenced the replacement of two (2) coal crushers at the facility, but did not make application for a permit for that replacement. TECO subsequently claimed Pollution Control Project (PCP) status for the project. The claim is based on projected nitrogen oxide (NOx) removal achieved by use of Powder River Basin (PRB) Coal. An associated emissions increase of over 7000 tons per year of SO₂ was also requested by TECO as part of the project. On May 28, 1998, TECO applied to the permitting authority for an Air Construction Permit for the additional coal crushers at the Gannon Station. That proposed project (0570040-007AC) is the subject of EPC Petition for Formal Administrative Hearing, pending before DOAH Administrative Law Judge, William F. Quattlebaum as case number 98-4594, presently set for hearing February 17 and 18, 1999.

5. The Department's current draft permit conditions will allow the subject TECO facility to conduct activities in violation of Department rules. The activities allowed by the draft permit consist of (1) increase in coal throughput, and (2) addition of equipment to allow handling of alternate fuels in the coal yard. TECO has failed to provide reasonable assurance that the proposed project meets the requirements of a Pollution Control Project (PCP). The activities associated with the subject Air Construction Permit would have the potential to significantly impact the air quality within Hillsborough County by allowing a potential increase in the emissions of sulfur dioxide of over 7000 tons and particulate matter 10 (PM10) of over 90 tons for any 12 consecutive month period. Hillsborough County is designated an "Air Quality Maintenance Area" by the State for the pollutant particulate matter, and is unclassified for the pollutant sulfur dioxide. The County has already experienced actual sulfur dioxide (SO₂) emissions which exceeded state ambient air standards, and TECO's own Title V permit application based on the existing State Implementation Plan showed modeled concentrations of sulfur dioxide which exceed state and federal ambient air standards.

6. The Department's draft permit grants the project PCP status which exempts it from being subject to PSD and BACT requirements. By allowing an increase of greater than 7000 tons of sulfur dioxide emission per 12 consecutive months, the draft permit does not meet the regulatory criteria for a PCP.

7. Petitioner received notice of the Department's Intent to Issue Air Construction Permit, by copy on November 6, 1998.

STATEMENT OF SUBSTANTIAL INTERESTS

8. EPC's substantial interests will be affected by the proposed permit, in that, the facility is located within Hillsborough County and residents of Hillsborough County own property adjacent to and in the vicinity of the facility. Furthermore, residents of Hillsborough County live near and use the subject area for recreational purposes. The proposed activity will have the effect of impairing, polluting, or otherwise injuring the air, water and other natural resources of the county and the state all in violation of the Department's rules. The Department's failure to obtain reasonable assurance that their rules will be met and its decision to issue the permit with the proposed conditions substantially affects Hillsborough County, its citizens and natural resources.

DISPUTED ISSUES OF MATERIAL FACT

9. Material facts specifically disputed by EPC (apparently relied upon by the Department in its intent to issue the subject permit with proposed conditions) include the following:

A) Separation of Projects: Whether the addition of two (2) coal crushers, proposed to be allowed by permitting action 057004-007-AC, and the increase in coal yard throughput, proposed by this permitting action (0570040-006-AC), should be reviewed as separate projects or considered together as one project since both projects are inextricably intertwined.

B) Designation as Pollution Control Project (PCP): Whether the coal throughput increase and associated addition of 2 coal crushers qualify as a PCP (as defined in 40 CFR 52.21(b)(32)).

C) Prevention of Significant Deterioration (PSD) Applicability: Whether the coal yard throughput increase and associated coal crushers addition is subject to PSD and Best Available Control Technology (BACT) as defined in 40 CFR 52.21(b)(12) and Rule 62-212, FAC.

D) Baseline Emissions: Whether the appropriate time and actual emissions were selected to establish the validity of this project as a PCP.

E) Particulate Matter: Whether appropriate emission factors were used to determine potential and actual emissions of particulate matter 10 (PM10) from coal handling and whether it is appropriate to issue the permit without limits for particulate matter emissions.

FACTS WARRANTING MODIFICATION OF PROPOSED AGENCY ACTION

10. The facts warranting modification of agency action are as follows:

A) Separation of Projects: Application was initially made with the 2 projects combined. TECO has stated that both modifications are necessary due to switching from low moisture to high moisture coal. Both modifications should be reviewed as one project and subjected to the requirements of PSD and BACT since they would not qualify for consideration under the Pollution Control Project (PCP) exemption, 40 CFR 52.21(b)(2)(iii)(h).

B) Designation as a Pollution Control Project (PCP): In order to qualify under the PCP exemption, the project must not be less environmentally beneficial, and the effective increase must not cause or contribute to a violation of a national air quality standard. Hillsborough County has experienced measured ground level exceedances of sulfur dioxide (SO₂). Modeling performed by FDEP engineers has shown exceedances of ground level SO₂ for both federal and state ambient air standards. Hillsborough County is designated by the State as a maintenance area for the pollutant particulate matter. The proposed projects could lead to an increase in actual emissions of over 7,000 tons of sulfur dioxide and over 90 tons of PM10 in any 12 consecutive month period. Also, the draft permit does not contain emission limits for PM10, SO₂ and NOx required to establish the projects' eligibility to be considered a PCP.

C) Prevention of Significant Deterioration (PSD): Since the project does not qualify as a PCP, as explained in B above, it then should fall under Rule 62-212.400(2)(d)(4)(a)(ii), FAC. As such, TECO should provide assurance that all requirements of PSD and BACT are met.

D) Baseline Emissions & Particulate Matter: There is no connection between a baseline timeframe in which emissions of NOx will be reduced and net emissions of PM10 and SO2 are quantified and limited.

11. As to those points raised in Paragraphs 9 and 10 above, nothing provided to EPC in the TECO's application supports the conclusion drawn by the Department that reasonable assurance has been provided that TECO's activities will comply with applicable regulations.

LAWS ENTITLING PETITIONER TO RELIEF

12. Rule 62-212.400(2)(d)4.a.(ii) requires BACT for each modification which results in a significant net emissions increase.

REQUEST FOR RELIEF

Wherefore, EPC requests that it be granted a formal hearing on this matter and the Department conclude that:

- A) TECO has not provided reasonable assurance that the departments regulations will be complied with.
- B) The coal crushers and coal yard throughput increase modifications are one project.
- C) The coal yard throughput increase and coal crushers do not qualify, together or separately, as a pollution control project.
- D) The department require TECO to demonstrate that BACT has been provided for this project.



Vernon R. Wagner, Chief Counsel

Florida Bar # 0826261

Patrick B. Courtney, Esquire

Florida Bar # 063533

**ENVIRONMENTAL PROTECTION
COMMISSION**

of Hillsborough County

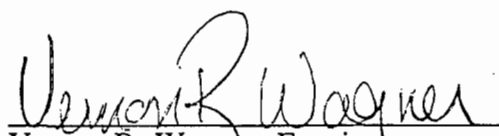
1900 Ninth Avenue

Tampa, Florida 33605

(813) 272-5960

CERTIFICATE OF SERVICE

I **HEREBY CERTIFY** that a true and correct copy of the foregoing Petition for Formal Administrative Hearing has been sent via Federal Express Overnight Delivery to Office of General Counsel, Florida Department of Environmental Protection, 3900 Commonwealth Blvd., Mail Station #35, Tallahassee, Florida, 32399-3000; and by first class to Karen Sheffield, P.E., General Manager, Tampa Electric Company, P.O. Box 111, Tampa, Florida 33601-0111, and to Lawrence N. Curtin, Esq., Holland and Knight, P.O. Drawer 810, Tallahassee, Florida, 32302-0810, this 19th day of November, 1998.


Vernon R. Wagner, Esquire

COMMISSION

- DOTTIE BERGER
- JOE CHILLURA
- CHRIS HART
- JIM NORMAN
- JAN PLATT
- THOMAS SCOTT
- ED TURANCHIK

EXECUTIVE DIRECTOR

ROGER P. STEWART



ADMINISTRATIVE OFFICES, LEGAL & WATER MANAGEMENT DIVISION
 1900 - 9TH AVENUE
 TAMPA, FLORIDA 33605
 TELEPHONE (813) 272-5960
 FAX (813) 272-5157

AIR MANAGEMENT DIVISION
 TELEPHONE (813) 272-5530

WASTE MANAGEMENT DIVISION
 TELEPHONE (813) 272-5788

WETLANDS MANAGEMENT DIVISION
 TELEPHONE (813) 272-7104

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JAN 29 1999

BUREAU OF AIR REGULATION

TO: Al Liner

FAX Phone: 850-922-6979

Voice Phone: _____

TOTAL NUMBER OF PAGES INCLUDING THIS COVER PAGE: 3

EPC FAX Transmission Line: (813) 272-5157 For retransmission or any FAX problems, call: (813) 272-5960

FROM: PATRICK COURTNEY

(circle applicable phone number and organization below)

(813) 272-5960	(813) 272-5530	(813) 272-5788	(813) 272-5960	(813) 272-7104
Executive Director	Air Division	Waste Management	Water Division	Ecosystems Management
Legal Counsel	• Special Programs	• UST Clean-Up	• Enforcement	• Environmental Engineering
Finance & Administration	• Air Engineering	• Solid/hazardous Waste	• Water Engineering	• Environmental Assessment
• Accounting & Budgeting		• UST Compliance	• Monitoring & Analysis	• Compliance & Enforcement
• Data Processing/MIS				

SPECIAL INSTRUCTIONS:

Notice of Voluntary Dismissal - Coal Crusher Permit

STATE OF FLORIDA
DIVISION OF ADMINISTRATIVE HEARINGS

ENVIRONMENTAL PROTECTION COMMISSION
of Hillsborough County,

P.O. # 88-112
Petitioner

vs. *Environmental Protection Commission*

DOAH Case No. 98-4594

OGC Case No. 98-2575

TAMPA ELECTRIC CO. & DEP,
Respondents.

NOTICE OF VOLUNTARY DISMISSAL

Comes now Environmental Protection Commission of Hillsborough County, Petitioner in the above-styled case, and files this its Notice of Voluntary Dismissal, and states as follows:

Pursuant to the attached Stipulation of Settlement and its related exhibits numbered 1-3, Petitioner hereby voluntarily withdraws and dismisses its Petition for Administrative Hearing filed in the above-styled case.

P.O. # 88-112
Environmental Protection Commission

Patrick B. Courtney
Patrick B. Courtney, Esq.
Florida Bar No. 063533
Environmental Protection Commission
of Hillsborough County
1900 Ninth Avenue
Tampa, FL 33605
(813)272-5960
Counsel for Petitioner

P.O. # 88-112
Environmental Protection Commission

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been furnished by facsimile and U.S. Mail to the Division of Administrative Hearings, The Desoto Building, 1230 Apalachee Parkway, Tallahassee, FL 32399-3060, (850)921-6847; Lawrence Curtin, Holland and Knight, 315 S, Calhoun St., P.O.Box 810, Tallahassee, FL 32302-0810; and W. Douglas Beason, Office of General Counsel, Department of Environmental Protection, 3900 Commonwealth Blvd., MS-35, Tallahassee, FL 32399-3000; this 29th day of January, 1999.

Patrick B. Courtney
Patrick B. Courtney

[Faint handwritten notes]

[Faint handwritten notes]



Department of Environmental Protection

Lawton Chiles
Governor
CERTIFIED MAIL

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Virginia B. Wetherell
Secretary

September 30, 1998

Ms. Karen A. Sheffield, P.E.
General Manager
Tampa Electric Company
P.O. Box 111
Tampa, FL 33601-0111

Re: DRAFT Title V Permit No.: 0570040-002-AV
F. J. Gannon Station

Dear Ms. Sheffield:

The permitting authority issued an intent to issue a DRAFT Title V air operation permit on August 26, 1997 for the F. J. Gannon Station located at Port Sutton Road, Tampa, Hillsborough County.

Based on recent modeling analyses performed by the department, the modeled sulfur dioxide emissions from the F. J. Gannon Station alone exceed the United States Environmental Protection Agency's and state of Florida's 3-hour ambient air quality standard for sulfur dioxide and the state of Florida's 24-hour ambient air quality standard for sulfur dioxide. The department hereby withdraws the "INTENT TO ISSUE TITLE V AIR OPERATION PERMIT" and the DRAFT Title V air operation permit dated August 26, 1997. The DRAFT permit was open due to the extension of time requested by the applicant, Tampa Electric Company, and the Hillsborough County Environmental Protection Commission. The Department will issue a new DRAFT Title V air operation permit as soon as possible.

If you have any other questions, please contact Mr. Scott M. Sheplak, P.E., at 850/921-9532.

Sincerely,

C. H. Fancy, P.E.
Chief
Bureau of Air Regulation

CHF/ss

cc: Thomas W. Davis, P.E., ECT	Larry Curtain, Holland and Knight
Gregory M. Nelson, DR	Douglas Reason, Esq.
Theresa J.L. Watley, TEC	Jerry Kissel, SWD
Pat Comer, Esq.	Al Linero, DEP
Bill Thomas, SWD	Cleveland Holladay, DEP
Richard Kirby, EPCHC	Scott Sheplak, DEP
Thomas W. Reese, Esq.	Lennon Anderson, DEP

"Protect, Conserve and Manage Florida's Environment and Natural Resources"



TAMPA ELECTRIC

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SEP 30 1998

BUREAU OF AIR REGULATION

September 29, 1998

Ms. Teresa Heron
New Source Review Section
Florida Department of Environmental Protection
Bureau of Air Regulation
111 South Magnolia Drive, Suite 4
Tallahassee, Florida 32301

Via Federal Express
Airbill No. 805858542424

**Re: Tampa Electric Company (TEC) - F. J. Gannon Station
Fuel Yard Crusher Modification Construction Permit
Proof of Publication of the Intent to Issue
FDEP File No. 0570040-007-AC**

Dear Ms. Heron:

Pursuant to Rule 62-110.106(5), F.A.C., enclosed is the proof of publication of the Notice of Intent to Issue the Tampa Electric Company F.J. Gannon Station Fuel Yard Crusher Modification Construction Permit. This notice was published in the legal section of the Tampa Tribune on Wednesday, September 23, 1998.

Thank you for your attention to this matter. If you have any concerns or questions feel free to contact me at (813) 641-5034.

Sincerely,

Theresa J.L. Watley
Consulting Engineer
Environmental Planning

EP\gm\TJLW614

Enclosure

cc: J. Heron, BAR

c/enc: Mr. Clair Fancy-FDEP
Mr. Jerry Kissel-FDEP SW
Mr. Richard Kirby-EPCHC

THE TAMPA TRIBUNE
Published Daily
Tampa, Hillsborough County, Florida

State of Florida }
 County of Hillsborough } ss.

Before the undersigned authority personally appeared J. Rosenthal, who on oath says that she is Classified Billing Manager of The Tampa Tribune, a daily newspaper published at Tampa in Hillsborough County, Florida; that the attached copy of advertisement being a

LEGAL NOTICE

in the matter of _____

PUBLIC NOTICE OF INTENT

was published in said newspaper in the issues of _____

SEPTEMBER 23, 1998

Affiant further says that the said The Tampa Tribune is a newspaper published at Tampa in said Hillsborough County, Florida, and that the said newspaper has heretofore been continuously published in said Hillsborough County, Florida, each day and has been entered as second class mail matter at the post office in Tampa, in said Hillsborough County, Florida for a period of one year next preceding the first publication of the attached copy of advertisement; and affiant further says that she has neither paid nor promised any person, this advertisement for publication in the said newspaper.

J. Rosenthal

 23

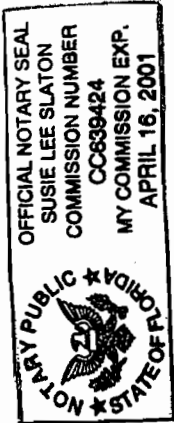
Sworn to and subscribed before me, this _____ day

of _____ SEPTEMBER, A.D. 1998

Personally Known _____ or Product Identification _____
 Type of Identification Produced _____

(SEAL)

Susie Lee Slaton



PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT
 STATE OF FLORIDA
 DEPARTMENT OF ENVIRONMENTAL PROTECTION
 DEP File No. 0570040-007AC
 Tampa Electric Company
 F.J. Gannon Power Plant
 Coal Yard Crusher
 House Modification
 Hillsborough County

The Department of Environmental Protection (Department) gives notice of its intent to issue an air construction permit to Tampa Electric Company. The permit is to modify the Crusher House at the F.J. Gannon Power Plant Coal Yard located at Port Sutton Road, Tampa, Hillsborough County. A Best Available Control Technology (BACT) determination was not required pursuant to Rules 62 212.400, F.A.C. and 40 CFR 52.21. The applicant's name and address are Tampa Electric Company (TEC), 702 North Franklin Avenue, Tampa, Florida 33602.

This modification will allow the addition of two new 600 tons per hour (TPH) crushers to be located upstream of the existing 400 TPH crusher pairs. The existing crushers will serve as back-up/overflow for the new crushers. The main purpose of the new crushers is to provide a finer grind to minimize carryover of partially combusted coal to the flyash collection system. The problem, known as 'high flyash loss on ignition,' was exacerbated by a switch to low heat, high moisture coal used to reduce nitrogen oxides emissions. The addition of the two new crushers will not increase the coal feed rate to the boilers since the currently permitted belt speed rate of 800 TPH each, before and after the crusher house, will not be changed. An insignificant increase of less than one (1) ton per year in actual emissions is expected from this modification.

The Department will issue the final permit with the attached conditions unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The Department will accept written comments concerning the proposed permit issuance action for a period of 30 (thirty) days from the date of publication of 'Public Notice of Intent to Issue Air Construction Permit.' Written comments should be provided to the Department's Bureau of Air Regulation at 2600 Blair Stone Road, Mail Station #5505, Tallahassee, FL 32399-2400. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in the proposed agency action, the Department shall revise the proposed permit and require, if applicable, another Public Notice.

The Department will issue the permit with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to Sections 120.569 and 120.57 F.S., before the deadline for filing a petition. The procedures for petitioning for a hearing are set forth below. Mediation is not available in this proceeding.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under Sections 120.569 and 120.57 of the Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee,

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SEP 30 1998

**BUREAU OF
AIR REGULATION**

Leao

0570040-007-AC

Florida, 32399-3000. Petitions filed by the permit applicant or any of the parties listed below must be filed within fourteen days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3) of the Florida Statutes must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of this notice of intent, whichever occurs first. Under Section 120.60(3), however, any person who asked the Department for notice of agency action may file a petition within fourteen days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57 F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205 of the Florida Administrative Code.

A petition that disputes the material facts on which the Department's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner, the name, address, and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of how and when petitioner received notice of the agency action or proposed action; (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate; (e) A concise statement of the ultimate facts alleged, as well as the rules and statutes which entitle the petitioner to relief; and (f) A demand for relief.

A petition that does not dispute the material facts upon which the Department's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Department's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any such final decision of the Department on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

A complete project file is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

Department of Environmental Protection
Bureau of Air Regulation

111 S. Magnolia Drive, Suite 4
Tallahassee, Florida 32301
Telephone: 850/488-0114
Fax: 850/922-6979

Department of Environmental Protection

Southwest District Office
3804 Coconut Palm Drive
Tampa, Florida 33619-8218
Telephone: 813/744-6100
Fax: 813/744-6084

Hillsborough County
Environmental Protection Commission
1410 North 21 Street
Tampa, Florida 33605
Telephone: 813/272-5530
Fax: 813/272-5605

The complete project file includes the Draft Permit, the application, and the information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the New Resource Review Section at 111 South Magnolia Drive, Suite 4, Tallahassee, Florida 32301, or call 850/488-0114, for additional information.

4061 9/23/98

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

RECEIVED

SEP 25 1998

IN RE:
AN APPLICATION FOR PERMIT BY:

TAMPA ELECTRIC COMPANY,
F. J. GANNON STATION,
HILLSBOROUGH COUNTY, FLORIDA.

DEP
DRAFT PERMIT NUMBER:
0570040-007-AC

Dept. of Environmental Protection
Office of General Counsel

PETITION FOR FORMAL ADMINISTRATIVE HEARING

Petitioner, ENVIRONMENTAL PROTECTION COMMISSION OF HILLSBOROUGH COUNTY, FLORIDA (EPC), through its undersigned counsel, hereby files this petition for administrative proceeding pursuant to Chapter 120.569 and 120.57 Florida Statutes, in the matter of TAMPA ELECTRIC COMPANY, F. J. GANNON STATION, CONSTRUCTION/MODIFICATION PERMIT NO. 0570040-007-AC, in Hillsborough County, Florida. More specifically, EPC objects to the STATE OF FLORIDA, DEPARTMENT OF ENVIRONMENTAL PROTECTION's (the "Department") draft conditions included in and subject of their Notice of Intent to Issue Air Construction Permit. In support of this petition, EPC states the following:

BACKGROUND

1. EPC is an environmental regulatory agency with jurisdiction in Hillsborough County, Florida pursuant to 84-446, Laws of Florida, as amended. EPC's address and telephone number are: 1900 Ninth Ave. Tampa, Florida 33605, (813) 272-5960.

2. The Department's address and telephone number are: 3900 Commonwealth Blvd., Mail Station #35, Tallahassee, Florida, 32399-3000; Office of General Counsel-(850) 488-9314.

3. The project, subject of this petition, is the proposed TAMPA ELECTRIC COMPANY (hereinafter "TECO") Air Construction Permit for their F.J. Gannon facility, permit number 0570040-007AC.

4. On June 30, 1997, TECO applied for an increase in the coal throughput at the F.J. Gannon Facility. In that application (0570040-006AC), TECO referenced the replacement of two (2) coal crushers at the facility, but did not make application for a permit for that replacement. TECO's original position was that the replacement of the coal crushers did not require a permit. TECO received notification of permit requirements, pursuant to 40 CFR 60 subpart Y, on July 25, 1997. As of the date of this filing, Petitioner has not received notice of intent to issue a permit as to 0570040-006AC. On May 28, 1998, TECO applied to the permitting authority for an Air Construction Permit for the F.J. Gannon Station and associated facilities located in Hillsborough County, Florida. That proposed project (0570040-007AC), the construction of two additional coal crushers, is subject to preconstruction review under the provisions of Chapter 403 Florida Statutes, Chapters 62-212 and 62-4, Florida Administrative Code (FAC) and 40 CFR 60, and Chapter 1-3, Rules of the Environmental Protection Commission of Hillsborough County, pursuant to 84-446, Laws of Florida.

5. The Department's current draft permit conditions will allow the subject TECO facility to conduct activities in violation of Department rules. The activities allowed by the draft permit consist of construction of two additional coal crushers. TECO has failed to provide any assurance that the proposed project meets the requirements of Prevention of Significant Deterioration (PSD) and Best Achievable Control Technology (BACT). The activities associated with the subject Air Construction Permit would have the potential to significantly impact the air quality within Hillsborough County by allowing a potential increase in the emissions of sulfur dioxide of over 7000 tons per 12 consecutive months. Hillsborough County is designated an "Air Quality Maintenance Area" by EPA for pollutant particulate matter. The County has already experienced actual sulfur dioxide (SO₂) emissions which exceed state ambient air standards, and modeled concentrations exceed federal ambient air standards.

6. Petitioner received notice of the Department's Intent to Issue Air Construction Permit, by copy on September 8, 1998 and properly filed its timely request for an extension of time to file this Petition.

STATEMENT OF SUBSTANTIAL INTERESTS

7. EPC's substantial interests will be affected by the proposed permit, in that, the facility is located within Hillsborough County and residents of Hillsborough County own property adjacent to and in the vicinity of the facility. Furthermore, residents of Hillsborough County live near and use the subject area for recreational purposes. The proposed activity will have the effect of impairing, polluting, or otherwise injuring the air, water and other natural resources of the county and the state all in violation of the Department's rules. The Department's failure to obtain reasonable assurance that their rules will be met and its decision to issue the permit with the proposed conditions substantially affects Hillsborough County, its citizens and natural resources.

DISPUTED ISSUES OF MATERIAL FACT

8. Material facts specifically disputed by EPC (apparently relied upon by the Department in its intent to issue the subject permit with proposed conditions) include the following:

A) Separation of Projects: Whether the addition of two (2) coal crushers, allowed by this permitting action (057004-007AC), and the increase in coal yard throughput, proposed by permitting action 0570040-006-AC, should be reviewed as separate projects or considered together as one project since both projects are inextricably intertwined.

B) Designation as Pollution Control Project (PCP): Whether the additional coal crushers when considered in conjunction with the coal yard throughput increase, qualify as a PCP (as defined in 40 CFR 52.21(b)(32)).

C) Prevention of Significant Deterioration (PSD) Applicability: Whether the addition of the coal crushers, when considered in conjunction with the coal yard throughput increase is subject to PSD and Best Available Control Technology (BACT) as defined in 40 CFR 52.21(b)(12) and Rule 62-212, FAC.

D) Visible Emission Standard: Whether Rule 62-296.320 is the applicable regulation pertaining to the pollutant opacity, or Rule 62-296.700, as adopted in Rule 1-3, Rules of EPC.

FACTS WARRANTING MODIFICATION OF PROPOSED AGENCY ACTION

9. The facts warranting modification of agency action are as follows:

A) Separation of Projects: Application was initially made with the 2 projects combined. TECO has stated that both modifications are necessary due to switching from low moisture to high moisture coal. Both modifications should be reviewed as one project and subjected to the requirements of PSD and BACT since they would not qualify for consideration under the Pollution Control Project (PCP) exemption, 40 CFR 52.21(b)(2)(iii)(h).

B) Designation as a Pollution Control Project (PCP): In order to qualify under the PCP exemption, the project must not be less environmentally beneficial, or the effective increase will cause or contribute to a violation of a national air quality standard. Hillsborough County has experienced measured ground level exceedances of sulfur dioxide (SO₂). Modeling performed by FDEP engineers has shown exceedances of ground level SO₂ for both federal and state ambient air standards. The proposed projects could lead to an increase in actual modeled emission of over 7,000 tons of sulfur dioxide per 12 consecutive months.

C) Prevention of Significant Deterioration (PSD): Since the project does not qualify as a PCP, as explained in B above, it then should fall under Rule 62-212.400(2)(d)(4)(a)(ii), FAC. As such, TECO should provide assurance that all requirements of PSD and BACT are met.

D) Visible Emission Standard: TECO has requested and the Department intends to issue a permit which allows use of Chapter 62-296.320 as the applicable regulation pertaining to Visible Emission Standards. Chapter 1-3, Rules of the Environmental Protection Commission of Hillsborough County, establishes Chapter 62-296.700, F.A.C., Particulate Matter RACT, as applicable to air pollution sources within Hillsborough County. State authority to implement this rule is established in Chapter 84-446, Laws of Florida.

10. As to those points raised in Paragraphs 8 and 9 above, nothing provided to EPC in the TECO's application supports the conclusion drawn by the Department that reasonable assurance has been provided that TECO's activities will comply with applicable regulations.

LAWS ENTITLING PETITIONER TO RELIEF

11. Rule 62-212.400(2)(d)4.a.(ii) requires BACT for each modification which results in a significant net emissions increase.

12. Chapter 1-3 Rules of the Environmental Protection Commission of Hillsborough County, and Rule 62-296.700 provide regulatory requirements for 5% opacity from particulate matter emission sources.

REQUEST FOR RELIEF

Wherefore, EPC requests that it be granted a formal hearing on this matter and the Department conclude that:

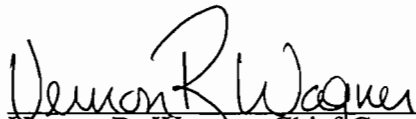
- A) TECO has not provided reasonable assurance that the departments regulations will be complied with.

- B) The coal crushers and coal yard throughput increase modifications are one project.

- C) The coal yard throughput increase and coal crushers do not qualify, together or separately, as a pollution control project.

- D) The department require TECO to demonstrate that BACT has been provided for this project.

- E) The Particulate Matter RACT emissions standard of 5% opacity be established as the governing rule for visible emissions.



Vernon R. Wagner, Chief Counsel

Florida Bar # 0826261

Patrick B. Courtney, Esquire

Florida Bar # 063533

**ENVIRONMENTAL PROTECTION
COMMISSION**

of Hillsborough County

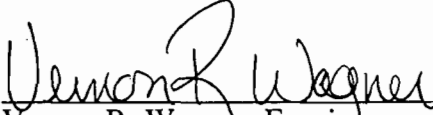
1900 Ninth Avenue

Tampa, Florida 33605

(813) 272-5960

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Petition for Formal Administrative Hearing has been sent via Federal Express Overnight Delivery to Office of General Counsel, Florida Department of Environmental Protection, 3900 Commonwealth Blvd., Mail Station #35, Tallahassee, Florida, 32399-3000; and by first class to Karen Sheffield, P.E., General Manager, Tampa Electric Company, P.O. Box 111, Tampa, Florida 33601-0111, and to Lawrence N. Curtin, Esq., Holland and Knight, P.O. Drawer 810, Tallahassee, Florida, 32302-0810, this 24th day of September, 1998.


Vernon R. Wagner, Esquire



TAMPA ELECTRIC

September 24, 1998

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SEP 28 1998

BUREAU OF
AIR REGULATION

Ms. Teresa Heron
New Source Review Section
Florida Department of Environmental Protection
Bureau of Air Regulation
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Certified Mail No. P 148 152 735
Return Receipt Requested

**Re: Tampa Electric Company (TEC) - F. J. Gannon Station
Fuel Yard Crusher Modification Construction Permit
Comments on the Proposed Construction Permit
FDEP File No. 0570040-007-AC**

Dear Ms. Heron:

Thank you for drafting the Fuel Yard Crusher Construction Permit with such technical soundness. It is apparent that the information presented to you in our application was thoroughly digested and incorporated into this permit. Based on our review of the draft permit we offer only a few minor comments

1. The references to existing Crushers 1 and 2 throughout the *Public Notice, Technical Evaluation and draft Permit* are inconsistent. TEC wishes to ensure that the Department has a clear understanding of the crusher configurations. Crushers 1A1B are two crushers each rated at 400 tons per hour (TPH). Thus, the Crusher 1 pair is rated at 800 TPH. Similarly, Crushers 2A2B are two crushers each rated at 400 TPH; so that the Crusher 2 pair is rated at 800 TPH. TEC suggests that the term crusher pairs, (e.g., Crushers 1A1B or Crushers 2A2B), rated at 800 TPH, be used throughout the documentation to avoid confusion.
2. On pages TE-4 (Section 4.) and TE-5 (Section 5.), the reference to the coal throughput increase project should be stricken. TEC understands that once this Crusher Modification Permit is issued, the crusher modifications must be incorporated into the Fuel Yard Throughput Modification Permit Application. Furthermore, TEC understands that any regulatory determination imposed upon the processing of the fuel yard permit would also be applicable to the crusher house because the crusher house is an emission source in Emission Unit No. 008. Hence, the reference to the pending Fuel Yard Permit Application is unnecessarily included.
3. On page TE-7 (Section 6.2) it is incorrect to add TEC's future potential PM emissions to our future potential PM₁₀ emissions since PM₁₀ is a subset of PM. As such, the total PM/PM₁₀ emissions should be 0.14 TPY.
4. On page 6 of 11 (Section 2.1) the reference to "live and dead" coal storage piles should be stricken because this distinction no longer exists at F.J. Gannon Station.

Ms. Teresa Heron
September 24, 1998
Page 2 of 2

5. On page 8 of 11 (Section 5.1), TEC requests that a 30 minute VE test be specified, to be conducted at one hammermill crusher material transfer location.

Thank you again for your cooperation with this project. Feel free to contact me at (813) 641-5034 if you have any additional questions or concerns.

Sincerely,



Theresa J.L. Watley
Consulting Engineer
Environmental Planning

EP\gm\TJLW613

c: Mr. Clair Fancy - FDEP
Mr. Jerry Kissel - FDEP SW
Mr. Richard Kirby - EPCHC

P 265 659 413

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PS Form 3800, April 1995

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Mr. Charles R. Black
Vice President Energy S.
Tampa Electric Corp
702 N. Franklin Ave
Tampa, FL 33602

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P 265 659 413

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Department of Environmental Protection

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Governor

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Virginia B. Wetherell
Secretary

August 31, 1998

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Charles R. Black
Vice President Energy Supply
Tampa Electric Corporation
702 North Franklin Avenue
Tampa, Florida

Dear Mr. Black:

RE: Tampa Electric Company - F.J. Gannon Power Plant - Hillsborough County
DEP Permit File No. 0570040-007AC Solid Fuel Handling and Storage System
(Crusher House) Modification

Enclosed is one copy of the Draft Air Construction Permit Amendment for the modification of the Crusher House at the Solid Fuel Handling and Storage System of this facility. This emission unit is located at the TEC facility (F.J. Gannon Power Plant) in Port Sutton Road, Hillsborough County. The Department's Intent to Issue Air Construction Permit Amendment and the "PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT AMENDMENT" are also included.

The "PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT" must be published in the legal section of a newspaper of general circulation in Hillsborough County. Proof of publication, i.e., newspaper affidavit, must be provided to the Department's Bureau of Air Regulation office within 7 (seven) days of publication. Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permit.

Please submit any written comments you wish to have considered concerning the Department's proposed action to A. A. Linero, P.E., Administrator, New Source Review Section at the above letterhead address. If you have any other questions, please call Ms. Teresa Heron at 850/921-9529.

Sincerely,

C. H. Fancy, P.E., Chief,
Bureau of Air Regulation

CHF/aal

Enclosures

PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

DEP File No. 0570040-007AC
Tampa Electric Company- F.J. Gannon Power Plant
Coal Yard Crusher House Modification
Hillsborough County

The Department of Environmental Protection (Department) gives notice of its intent to issue an air construction permit to Tampa Electric Company. The permit is to modify the Crusher House at the F.J. Gannon Power Plant Coal Yard located at Port Sutton Road, Tampa, Hillsborough County. A Best Available Control Technology (BACT) determination was not required pursuant to Rules 62-212.400, F.A.C. and 40 CFR 52.21. The applicant's name and address are Tampa Electric Company (TEC), 702 North Franklin Avenue, Tampa, Florida 33602.

This modification will allow the addition of two new 600 tons per hour (TPH) crushers to be located upstream of the existing 400 TPH crusher pairs. The existing crushers will serve as back-up/overflow for the new crushers. The main purpose of the new crushers is to provide a finer grind to minimize carryover of partially combusted coal to the flyash collection system. The problem, known as "high flyash loss on ignition," was exacerbated by a switch to low heat, high moisture coal used to reduce nitrogen oxides emissions. The addition of the two new crushers will not increase the coal feed rate to the boilers since the currently permitted belt speed rate of 800 TPH each, before and after the crusher house, will not be changed. An insignificant increase of less than one (1) ton per year in actual emissions is expected from this modification.

The Department will issue the final permit with the attached conditions unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The Department will accept written comments concerning the proposed permit issuance action for a period of 30 (thirty) days from the date of publication of "Public Notice of Intent to Issue Air Construction Permit." Written comments should be provided to the Department's Bureau of Air Regulation at 2600 Blair Stone Road, Mail Station #5505, Tallahassee, FL 32399-2400. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in the proposed agency action, the Department shall revise the proposed permit and require, if applicable, another Public Notice.

The Department will issue the permit with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to Sections 120.569 and 120.57 F.S., before the deadline for filing a petition. The procedures for petitioning for a hearing are set forth below. Mediation is not available in this proceeding.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under Sections 120.569 and 120.57 of the Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station # 35, Tallahassee, Florida, 32399-3000. Petitions filed by the permit applicant or any of the parties listed below must be filed within fourteen days of receipt of this notice of intent. Petitions filed by any

persons other than those entitled to written notice under Section 120.60(3) of the Florida Statutes must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of this notice of intent, whichever occurs first. Under Section 120.60(3), however, any person who asked the Department for notice of agency action may file a petition within fourteen days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57 F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205 of the Florida Administrative Code.

A petition that disputes the material facts on which the Department's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner, the name, address, and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of how and when petitioner received notice of the agency action or proposed action; (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate; (e) A concise statement of the ultimate facts alleged, as well as the rules and statutes which entitle the petitioner to relief; and (f) A demand for relief.

A petition that does not dispute the material facts upon which the Department's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Department's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any such final decision of the Department on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

A complete project file is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

Department of Environmental Protection	Department of Environmental Protection	Hillsborough County Environmental Protection Commission
Bureau of Air Regulation	Southwest District Office	1410 North 21 Street
111 S. Magnolia Drive, Suite 4	3804 Coconut Palm Drive	Tampa, Florida 33605
Tallahassee, Florida 32301	Tampa, Florida 33619-8218	Telephone: 813/272-5530
Telephone: 850/488-0114	Telephone: 813/744-6100	Fax: 813/272-5605
Fax: 850/922-6979	Fax: 813/744-6084	

The complete project file includes the Draft Permit, the application, and the information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the New Resource Review Section at 111 South Magnolia Drive, Suite 4, Tallahassee, Florida 32301, or call 850/488-0114, for additional information.

In the Matter of an
Application for Permit by:

Mr. Charles R. Black, Vice-President Energy Supply
Tampa Electric Company
702 North Franklin Avenue
Tampa, Florida 33602

DEP Previous File No. A029-216480
DRAFT Permit No.: 0570040-007AC
Coal Yard Modification (Crusher House)
Hillsborough County

INTENT TO ISSUE AIR CONSTRUCTION PERMIT

The Department of Environmental Protection (Department) gives notice of its intent to issue an air construction permit (copy of DRAFT Permit attached) for the proposed project, detailed in the application specified above for the reasons stated below.

The applicant, Tampa Electric Company (TEC), applied on May 28, 1998 to the Department for an air construction permit to modify the Crusher House at the F.J. Gannon Power Plant Coal Yard (Emission Unit 008) by adding two new additional 600 TPH crushers. The F.J. Gannon Power Plant facility is located at Port Sutton Road, Tampa, Hillsborough County.

The Department has permitting jurisdiction under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, and 62-212. The above actions are not exempt from permitting procedures. The Department has determined that an air construction permit is required to conduct the work.

The Department intends to issue this air construction permit based on the belief that reasonable assurances have been provided to indicate that operation of these emission units will not adversely impact air quality, and the emission units will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297, F.A.C.

Pursuant to Section 403.815, F.S., and Rule 62-110.106(7)(a)1., F.A.C., you (the applicant) are required to publish at your own expense the enclosed "Public Notice of Intent to Issue Air Construction Permit." The notice shall be published one time only in the legal advertisement section of a newspaper of general circulation in the area affected. For the purpose of these rules, "publication in a newspaper of general circulation in the area affected" means publication in a newspaper meeting the requirements of Sections 50.011 and 50.031, F.S., in the county where the activity is to take place. Where there is more than one newspaper of general circulation in the county, the newspaper used must be one with significant circulation in the area that may be affected by the permit. If you are uncertain that a newspaper meets these requirements, please contact the Department at the address or telephone number listed below. The applicant shall provide proof of publication to the Department's Bureau of Air Regulation, at 2600 Blair Stone Road, Mail Station #5505, Tallahassee, Florida 32399-2400 (Telephone: 850/488-0114; Fax 850/922-6979). The Department suggests that you publish the notice within thirty days of receipt of this letter. You must provide proof of publication within seven days of publication, pursuant to Rule 62-110.106(5), F.A.C. No permitting action for which published notice is required shall be granted until proof of publication of notice is made by furnishing a uniform affidavit in substantially the form prescribed in section 50.051, F.S. to the office of the Department issuing the permit or other authorization. Failure to publish the notice and provide proof of publication may result in the denial of the permit pursuant to Rules 62-110.106(9) & (11), F.A.C.

The Department will issue the final permit with the attached conditions unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The Department will accept written comments concerning the proposed permit issuance action for a period of 30 (thirty) days from the date of publication of "Public Notice of Intent to Issue Air Construction Permit." Written comments should be provided to the Department's Bureau of Air Regulation at 2600 Blair Stone Road, Mail Station #5505, Tallahassee, FL 32399-2400. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in the proposed agency action, the Department shall revise the proposed permit and require, if applicable, another Public Notice.

The Department will issue the permit with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to sections 120.569 and 120.57 F.S., before the deadline for filing a petition. The procedures for petitioning for a hearing are set forth below.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under sections 120.569 and 120.57 of the Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station # 35, Tallahassee, Florida, 32399-3000. Petitions filed by the permit applicant or any of the parties listed below must be filed within fourteen days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under section 120.60(3) of the Florida Statutes must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of this notice of intent, whichever occurs first. Under section 120.60(3), however, any person who asked the Department for notice of agency action may file a petition within fourteen days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under sections 120.569 and 120.57 F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with rule 28-106.205 of the Florida Administrative Code.

A petition that disputes the material facts on which the Department's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner, the name, address, and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of how and when petitioner received notice of the agency action or proposed action; (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate; (e) A concise statement of the ultimate facts alleged, as well as the rules and statutes which entitle the petitioner to relief; and (f) A demand for relief.

A petition that does not dispute the material facts upon which the Department's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by rule 28-106.301

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Department's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any such final decision of the Department on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above. Mediation is not available in this proceeding.

In addition to the above, a person subject to regulation has a right to apply for a variance from or waiver of the requirements of particular rules, on certain conditions, under Section 120.542 F.S. The relief provided by this state statute applies only to state rules, not statutes, and not to any federal regulatory requirements. Applying for a variance or waiver does not substitute or extend the time for filing a petition for an administrative hearing or exercising any other right that a person may have in relation to the action proposed in this notice of intent.

The application for a variance or waiver is made by filing a petition with the Office of General Counsel of the Department, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. The petition must specify the following information: (a) The name, address, and telephone number of the petitioner; (b) The name, address, and telephone number of the attorney or qualified representative of the petitioner, if any; (c) Each rule or portion of a rule from which a variance or waiver is requested; (d) The citation to the statute underlying (implemented by) the rule identified in (c) above; (e) The type of action requested; (f) The specific facts that would justify a variance or waiver for the petitioner; (g) The reason why the variance or waiver would serve the purposes of

TECHNICAL EVALUATION
AND
PRELIMINARY DETERMINATION

Tampa Electric Company

F. J. Gannon Station
Crusher House Modification
Coal Yard ARMS Emissions Unit No. 008
Tampa, Hillsborough County

DEP File No. 0570040-007AC

Department of Environmental Protection
Division of Air Resources Management
Bureau of Air Regulation

August 31, 1998

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

1. APPLICATION INFORMATION

1.1 Applicant Name and Address

Tampa Electric Company (TEC)
F. J. Gannon Station - Steam Electric Generating Facility
Port Sutton Road
Tampa, Hillsborough County, Florida 33619

Authorized Representative: Charles R. Black, Vice President Energy Supply

1.2 Reviewing and Process Schedule

05-28-98: Date of Receipt of Application
06-26-98: DEP Incompleteness Letter
07-01-98 Received TEC Partial response to Incompleteness Letter
08-03-98: Received TEC Response to Incompleteness Letter
08-31-98: Intent Issued

2. FACILITY INFORMATION

2.1 Facility Location

The F. J. Gannon Station Power Plant is located at Port Sutton Road Drive in Tampa, Hillsborough County. This site is approximately 75 kilometers from the Chassahowitzka National Wilderness Area, a Class I PSD Area. The UTM coordinates of this facility are Zone 17; 360 km E; 3087.50 km N.

2.2 Standard Industrial Classification Codes (SIC)

Industry Group No.	49	Electric, Gas, and Sanitary Services
Industry No.	4911	Electric Services

2.3 Facility Category

This facility generates 1,317 megawatts electric power from: 6 electric steam generators one simple cycle combustion turbine and 6 steam combustion turbines.

The facility is classified as a Major or Title V Source of air pollution because emissions of at least one regulated air pollutant, such as particulate matter (PM/PM₁₀), sulfur dioxide (SO₂), nitrogen oxides (NO_x), carbon monoxide (CO), or volatile organic compounds (VOC) exceeds 100 TPY.

This facility is within an industry included in the list of the 28 Major Facility Categories per Table 62-212.400-1, F.A.C. Because emissions are greater than 100 TPY for at least one criteria pollutant, the facility is also a major facility with respect to Rule 62-212.400, Prevention of Significant Deterioration (PSD). Per Table 62-212.400-2, the proposed modification (crushers addition) at this facility does not result in emissions increases above the PSD level of 25/15 TPY of PM/PM₁₀.

This facility (6 steam boilers) is also subject to the provisions of Title IV, Acid Rain, Clean Air Act as amended in 1990.

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

3. PROJECT DESCRIPTION

Two new fine grind crushers (Crushers 3A and 3B) will be installed in the existing crusher house. Crusher 3A will receive coal from Belt G1 and Crusher 3 B will receive coal from Belt G2. Any portion of the coal directed to Crusher 3A may instead be routed to existing Crusher 1 via a G1 belt extension. Likewise, any portion of coal directed to Crusher 3B may instead be routed to existing Crusher 2 via a G2 belt extension.

Belts H1 and H2 will be extended to accommodate the new crushers. These new Crushers 3A and 3B will each be rated at 600 tons per hour (TPH) and will feed to belts H1 and H2, respectively. The existing Crushers 1 and 2 are each rated at 800 TPH and will continue to feed to Belts H1 and H2, respectively.

The existing crushers will serve as back-up/overflow for the new crushers. The new crushers will not increase the coal feed rate to the boilers because the belt speeds before and after the crusher house are not changing from the currently rated 800 TPH. The current crushers or a like-kind replacement could supply the boilers with more coal than required for full-time operation. The new crushers will allow TEC to maintain its current feed rate while re-establishing consistent fine grind capability. Fine grinding capability is required to promote more complete burnout and avoid high carryover of partially burned fuel to the flyash collection system. The potential for high "loss on ignition (LOI)" in the flyash is a consequence of using low heat, high moisture fuel to reduce nitrogen oxides. High LOI lowers boiler efficiency and makes the flyash less salable.

This project modification comprises the emissions points FH032 through FH035a. Refer to Figure II.E.3.1 [Application submitted on May 28, 1998]. The estimated total PM/PM₁₀ emissions as a result of this crusher house modification would not exceed 1 TPY.

3.1. Emissions Unit

This permit addresses the following emissions unit:

EMISSIONS UNIT NO.	SYSTEM	DESCRIPTION*
ARMS E. U No. 008 Coal Yard	Fuel Handling and Storage System	Fugitive Emissions Points FH 032 through FH 035a

Crusher House Modification :

<u>Source Designator</u>	<u>PM Control Method</u>	<u>Efficiency Rating</u>	<u>Design Capacity</u>	<u>Emission Point</u>
Conveyor G1 to Crusher 3A	Enclosure & Dust Suppressants	90%	800 TPH	FH032
Crusher 3A to Conveyor G1	Enclosure & Dust Suppressants	90%	800 TPH	FH032a
Conveyor G1 to Crusher 1A1B	Enclosure & Dust Suppressants	90%	800 TPH	FH032b
Conveyor G2 to Crusher 3B	Enclosure & Dust Suppressants	90%	800 TPH	FH033
Crusher 3B to Conveyor G2	Enclosure & Dust Suppressants	90%	800 TPH	FH033a
Conveyor G2 to Crusher 2A2B	Enclosure & Dust Suppressants	90%	800 TPH	FH033b
Crusher 1A1B to Conveyor H1	Enclosure & Dust Suppressants	90%	800 TPH	FH034
Crusher 3A to Conveyor H1	Enclosure & Dust Suppressants	90%	600 TPH	FH034a
Crusher 2A2B to Conveyor H2	Enclosure & Dust Suppressants	90%	800 TPH	FH035
Crusher 3B to Conveyor H2	Enclosure & Dust Suppressants	90%	600 TPH	FH035a

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

4. COAL YARD PROCESS DESCRIPTION

Fugitive emissions sources located at F. J. Gannon Station consist of activities associated with the storage and handling of fuel, flux, and flyash. All fuel and flux handling and storage emissions points are addressed as one emissions unit identified as Coal Yard ARMS Emission Unit 008. Yard activities include barge (East and West) and railcar unloading of coal, truck unloading of limestone or iron ore, and transfer and storage of these materials. The iron ore is shipped, stored and handled in the same manner as limestone. Particulate control media and other yard activity parameters are listed in the coal yard operation/construction permits.

Total estimated particulate matter emissions from the entire Coal Yard are 181 tons per year (1985 file information). The maximum process rate throughput for the Coal Yard is 2.85 million tons per year. At this time, a permit is under review to convert this value to its heat equivalent due to use of low Btu, high moisture coal to reduce nitrogen oxides emissions.

ARMS Emission Unit 008, F. J Gannon Coal Yard consists of the following emissions points:

Barge to East Clamshell	FH-001
Barge to West Clamshell	FH-002
Barge to Continuous Unloader	FH-003
East Clamshell to East Hopper	FH-004
West Clamshell to West Hopper	FH-005
Continuous Unloader to Conveyor A	FH-006
Conveyor A to Continuous Feeder	FH-007
East Hopper to Conveyor B	FH-008
West Hopper to Conveyor B	FH-009
Conveyor B to Conveyor C	FH-011
Conveyor C to Conveyor D1/D2 (fluxing agent to storage)	FH-012
Railcar to Hopper	FH-013
Hopper to Conveyor L	FH-014
Conveyor L to Conveyor D1/D2 (fluxing agent to storage)	FH-015
Conveyor D1 to Conveyor M1	FH-016
Conveyor D2 to Conveyor M2	FH-017
Conveyor M1 to Conveyor E1	FH-018
Conveyor M2 to Conveyor E2	FH-019
Conveyor E1 to Storage Pile	FH-020
Conveyor E2 to Storage Pile	FH-021
North Storage Pile	FH-022
East Portion of South Storage Pile	FH-023a
West Portion of South Storage Pile	FH-023b
Underground Reclaim System to Conveyor F1	FH-024
Underground Reclaim System to Conveyor F4	FH-025
Underground Reclaim System to Conveyor F3	FH-026
Underground Reclaim System to Conveyor F2	FH-027
Conveyor F1 to Conveyor G1/G2	FH-028
Conveyor F4 to Conveyor G1/G2	FH-029
Conveyor F3 to Conveyor G1/G2	FH-030
Conveyor F2 to Conveyor G1/G2	FH-031
Conveyor G1 to Hammermill Crusher 3A*	FH-032
Hammermill Crusher 3A to Conveyor G1*	FH-032a

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

Conveyor G1 to Hammermill Crusher 1A1B*	FH-032b
Conveyor G2 to Hammermill Crusher 3B*	FH-033
Hammermill Crusher 3B to Conveyor G2*	FH-033a
Conveyor G2 to Hammermill Crusher 2A2B*	FH-033b
Hammermill Crusher 1A1B to Conveyor H1*	FH-034
Hammermill Crusher 3A to Conveyor H2*	FH-034a
Hammermill Crusher 2A2B to Conveyor H2*	FH-035
Hammermill Crusher 3B to Conveyor H2*	FH-035a
Conveyor D1 to Conveyor G1/G2 (Storage Bypass)	FH-042

* This equipment may also be used to transfer flux. [Source: Application submitted on May 28, 1998]

The fly ash handling and storage fugitive emission points are identified as ARMS Emissions Units No. 009, 010 and 011. These emissions units include fugitives emissions points FA-002 (ARMS E.U. 011), FA-004 & FA-005 (ARMS E.U 010), and FA-007.(ARMS E.U. 009).

5. RULE APPLICABILITY

This project will be reviewed under Rule 62-212.300 F.A.C., General. Preconstruction Review Requirements. This proposed crusher house modification project, is not subject to review under Rule 62-212.400., F.A.C., Prevention of Significant Deterioration (PSD), because the potential emission increases for PM/PM₁₀ (~1TPY), do not exceed the significant emission rates given in Chapter 62-212, Table 62-212.400-2, F.A.C.

Pursuant to Rule 62-212.400(2)(e)3., F.A.C., Contemporaneous Emissions Changes, this project is contemporaneous with the coal throughput increase project that is currently being evaluated by the SWDEP office. TEC originally submitted the crusher modification with the proposed coal throughput increase. TEC subsequently separated the projects due to the more pressing need to install the new crushers while the throughput increase project was considered as a pollution control project (PCP) under Rule 62-212.400(2)(f), F.A.C. If the coalyard throughput project is a PCP, then the crusher project is also a PCP because its purpose is to accommodate switching to a high moisture, low heat blend to reduce nitrogen oxides emissions.

If the Department makes a final determination that the coal throughput increase project is not a PCP, rather but a major modification subject to PSD review for PM/PM₁₀ (or any other affected PSD pollutant), then the crusher modification project will be reviewed as part of the overall major modification. If this occurs, a Best Available Control Technology (BACT) would be required for the crusher house project modification since there is a net increase (~1 TPY) of PM/PM₁₀ emissions. [Rules 62-212.400, 62.204.800(2)1., F.A.C., 40CFR51.166(j) and 40CFR52.21(j) Control Technology Review]

This crusher house modification project is subject to PM RACT requirements of 5% opacity and 0.03 gr/dscf (vent or stack) because it is a source of unconfined particulate matter emissions located in the Hillsborough County particulate matter air quality maintenance area and also because it is part of the Coal Yard facility (ARMS Emission Unit 008) with estimated PM emissions of 181 TPY. [RACT Rule 62-296.711(2)(a), F.A.C., Materials Handling, Sizing, Screening, Crushing and Grinding Operations].

This crusher house modification project is subject to all applicable requirements of the 40CFR60, New Source Performance Standard (NSPS) Subpart Y for Coal Preparation Plants.

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

This facility is located in an area (Hillsborough County) designated “unclassifiable” for SO₂, “maintenance” for Ozone (O₃), particulate matter (PM), and lead (Pb), and “attainment” for all the other criteria pollutants [Rule 62-204.360, F.A.C.].

This facility, F. J. Gannon Station, shall comply with all applicable provisions of the Florida Administrative Code (including applicable portions of the Code of Federal Regulations incorporated therein) and, specifically, the following Chapters and Rules:

5.1 State Regulations

Chapter 62-4	Permits.
Rule 62-204.220	Ambient Air Quality Protection
Rule 62-204.240	Ambient Air Quality Standards
Rule 62-204.260	Prevention of Significant Deterioration Increments
Rule 62-204.800	Federal Regulations Adopted by Reference
Rule 62-210.300	Permits Required
Rule 62-210.350	Public Notice and Comments
Rule 62-210.370	Reports
Rule 62-210.550	Stack Height Policy
Rule 62-210.650	Circumvention
Rule 62-210.700	Excess Emissions
Rule 62-210.900	Forms and Instructions
Rule 62-212.300	General Preconstruction Review Requirements
Rule 62-212.400	Prevention of Significant Deterioration
Rule 62-212.500	New Source Review for Nonattainment Areas
Chapter 62-213	Operation Permits for Major Sources of Air Pollution
Chapter 62-214	Requirements For Sources Subject To The Federal Acid Rain Program
Rule 62-296.320	General Pollutant Emission Limiting Standards
Rule 62-296.700	RACT Particulate Matter
Rule 62-296.702	Fossil Fuel Steam Generators
Rule 62-296.711	Materials Handling, Sizing, Screening, Crushing and Grinding Operations
Rule 62-297.310	General Test Requirements
Rule 62-297.401	Compliance Test Methods
Rule 62-297.520	EPA Continuous Monitor Performance Specifications

5.2 Federal Rules

40 CFR 60	NSPS Subparts D, Da, Db, Dc and Subparts Y
40 CFR 61	National Emission Standards for Hazardous Emissions Sources
40 CFR 72	Acid Rain Permits (applicable sections)
40 CFR 73	Allowances (applicable sections)
40 CFR 75	Monitoring (applicable sections including applicable appendices)
40 CFR 76	Acid Rain Nitrogen Oxides Emission Reduction Program
40 CFR 77	Acid Rain Program-Excess Emissions (future applicable requirements)
40 CFR 78	Appeal Procedures for Acid Rain Program
40 CFR 82	Protection of Stratospheric Ozone

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

6. SOURCE IMPACT ANALYSIS

6.1 Emission Limitations

The proposed crusher house modification project will emit not more than 1 TPY of particulate matter (PM/PM₁₀) as a result of the addition of the two 600 TPH new crushers. The applicant's proposed emissions for this project are summarized below:

6.2 Emission Summary

SUMMARY OF TOTAL PM/PM ₁₀ EMISSION CHANGES (TONS PER YEAR)				
Emission Point Description	Emission Point ID	Actual	Future Potential	Change
Conveyor G1 to Crusher 3A	FH-032	0.12	0.12	0.00
Crusher 3A to Conveyor G1	FH032a	0.00	0.06	0.06
Conveyor G1 to Crusher 1	FH-032b	0.00	0.06	0.06
Conveyor G2 to Crusher 3B	FH-033	0.12	0.12	0.00
Crusher 3B to Conveyor G2	FH-033a	0.00	0.06	0.06
Conveyor G2 to Crusher 2	FH-033b	0.00	0.06	0.06
Conveyor 1 to Conveyor H1	FH-034	0.12	0.06	-0.06
Crusher 3A to Conveyor H1	FH-034a	0.00	0.06	0.06
Crushers 2 to Conveyor H2	FH-035	0.12	0.06	-0.06
Crushers 3B to Conveyor H2	FH-035a	0.00	0.06	0.06
Total PM/PM₁₀ Emissions		0.48	0.72	0.24

Notes:

1. Actual emissions based on average of 1996 and 1997 actual fuel throughput equally divided among transfer points.
2. Future potential emissions based on permitted throughput limit equally divided among transfer points.
3. See Application and additional information submitted on May 28 and August 3, 1998 for emissions calculation details.

6.3 Control Technology

As reported by the applicant, unconfined particulate matter emissions that may result from operations at this facility include vehicular traffic on paved and unpaved road, wind-blown dust from yard areas, periodic abrasive blasting.

The proposed techniques to prevent unconfined particulate matter emissions on an as needed basis are:

- Chemical or water application to: unpaved roads and unpaved yard areas
- Paving and maintenance of roads, parking areas and yards areas
- Landscaping or planting of vegetation
- Confining abrasive blasting where necessary

6.4 Air Quality Analysis

The Department has reasonable assurance that the proposed project, as described in the application and subject to the conditions of approval proposed herein, will not cause or significantly contribute to a violation of any ambient air quality standard or PSD increment.

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

7. CONCLUSION

Based on the foregoing technical evaluation of the application and additional information submitted by the applicant, the Department has made a preliminary determination that the proposed project will comply with all applicable state and federal air pollution regulations.

A. A. Linero, P.E.

Teresa Heron, Review Engineer

Cleve Holladay, Meteorologist

PERMITTEE:

Tampa Electric Company (TEC)
F.J. Gannon Station
702 North Franklin Avenue
Tampa, Florida 33602

File No.	0570040-007-AC
Project	Crusher House Modification
SIC No.	4911
ARMS No.	Coal Yard Emissions Unit 008
Expires:	October 1, 1999

Authorized Representative:
Charles R. Black
Vice-President Energy Supply

PROJECT AND LOCATION:

Construction permit for the installation of two additional 600 tph (each) fine grind crushers at the Crusher House. The existing 800 tph crusher pairs will serve as back-up/overflow for the new crushers. The new crushers will be installed upstream of the existing crusher pairs. The Crusher House is located at the facility's Coal Yard which is designated in the ARMS system as Emissions Unit (E.U.) 008. This E.U. is located at the F.J. Gannon Power Plant, Port Sutton Rd, Tampa, Hillsborough County. UTM coordinates are: Zone 17; 360.00 km E; 3087.50 km N.

STATEMENT OF BASIS:

This construction permit is issued under the provisions of Chapter 403 of the Florida Statutes (F.S.), and Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297 of the Florida Administrative Code (F.A.C.). The above named permittee is authorized to modify the facility in accordance with the conditions of this permit and as described in the application, approved drawings, plans, and other documents on file with the Department of Environmental Protection (Department).

Attached appendix made a part of this permit:

Appendix GC

Construction Permit General Conditions

Howard L. Rhodes, Director
Division of Air Resources
Management

AIR CONSTRUCTION PERMIT 0570040-007-AC

SECTION I. FACILITY INFORMATION

1.0 FACILITY DESCRIPTION

This facility, F.J. Gannon Station, consists of six steam boilers (Units 1 through 6); six steam turbines; one simple-cycle combustion turbine; a once-through cooling water system; solid fuels, fluxing material, fly ash, slag, and fuel storage/handling facilities; fuel storage tanks; and ancillary support equipment. The nominal output is 1,317 megawatts (MW). The facility utilizes coal as its primary fuel for Units 1-6. The combustion turbine is allowed to burn new No. 2 fuel oil, with a maximum sulfur content of 0.5% by weight.

Based on the initial Title V permit application received June 14, 1996, this facility is a major source of hazardous air pollutants (HAPs).

2.0 PROJECT DESCRIPTION

This project modification is for the construction/modification of the coal yard's crusher house serving the Gannon Station's boilers 1 through 6.

Two new fine grind crushers (Crushers 3A and 3B) will be installed in the existing crusher house. Crusher 3A will receive coal from belt G1 and Crusher 3B will receive coal from belt G2. Any portion of the coal directed to Crusher 3A may instead be routed to existing Crusher 1 via a G1 belt extension. Likewise, any portion of coal directed to Crusher 3B may instead be routed to existing Crusher 2 via a G2 belt extension.

Belts H1 and H2 will be extended to accommodate the new crushers. These new Crushers 3A and 3B will each be rated at 600 tons per hour and will feed to belts H1 and H2, respectively. The existing Crushers 1 and 2 are each rated at 800 tons per hour and will continue to feed to belts H1 and H2, respectively.

The existing crushers will serve as back-up/overflow for the new crushers. The new crushers addition will not increase the coal feed rate to the boilers because the belt speeds before and after the crusher house are not changing from the currently rated 800 tph. The new crushers will allow TEC to maintain its current feed rate while re-establishing consistent fine grind capability. The coal throughput will remain at the permitted rate of 2.85 million tons coal per year.

This project modification comprises the emissions points FH032 through FH 035a:

The estimated total PM/PM10 emissions as a result of this crusher house modification would not exceed 1 TPY.

3.0 REGULATORY CLASSIFICATION

The facility, F.J. Gannon Station Power Plant, is classified as a Major or Title V Source of air pollution because emissions of at least one regulated air pollutant, such as particulate matter (PM/PM₁₀), sulfur dioxide (SO₂), nitrogen oxides (NO_x), carbon monoxide (CO), or volatile organic compounds (VOC) exceeds 100 tons per year (TPY).

This facility is within an industry included in the list of the 28 Major Facility Categories per Table 62-212.400-1, F.A.C. Because emissions are greater than 100 TPY for at least one criteria pollutant, the facility is also a Major Facility with respect to Rule 62-212.400, Prevention of Significant Deterioration (PSD).

This facility is located in an area (Hillsborough County) designated "unclassifiable" for SO₂, "maintenance" for Ozone (O₃), particulate matter (PM), and lead (Pb), and "attainment" for all the other criteria pollutants (Rule 62-204.360, F.A.C.).

This facility (6 steam boilers) is also subject to the provisions of Title IV, Acid Rain, Clean Air Act as amended in 1990.

AIR CONSTRUCTION PERMIT 0570040-007-AC

SECTION I. FACILITY INFORMATION

4.0 EMISSIONS UNIT(S)

Emissions Unit

This permit addresses the following emissions points within the following emissions unit :

EMISSIONS UNIT NO.	SYSTEM	DESCRIPTION*
ARMS E. U No. 008 Coal Yard	Fuel Handling and Storage System	Fugitive Emissions Points FH 032 through FH 035a

Crusher House Modification :

<u>Source Designator</u>	<u>PM Control Method</u>	<u>Efficiency Rating</u>	<u>Design Capacity</u>	<u>Emission Point</u>	<u>Emission Rate (TPY)</u>
Conveyor G1 to Crusher 3A	Enclosure & Dust Suppressants	90%	800 TPH	FH032	0.12
Crusher 3A to Conveyor G1	Enclosure & Dust Suppressants	90%	800 TPH	FH032a	0.06
Conveyor G1 to Crusher 1A1B	Enclosure & Dust Suppressants	90%	800 TPH	FH032b	0.06
Conveyor G2 to Crusher 3B	Enclosure & Dust Suppressants	90%	800 TPH	FH033	0.12
Crusher 3B to Conveyor G2	Enclosure & Dust Suppressants	90%	800 TPH	FH033a	0.06
Conveyor G2 to Crusher 2A2B	Enclosure & Dust Suppressants	90%	800 TPH	FH033b	0.06
Crusher 1A1B to Conveyor H1	Enclosure & Dust Suppressants	90%	800 TPH	FH034	0.06
Crusher 3A to Conveyor H1	Enclosure & Dust Suppressants	90%	600 TPH	FH034a	0.06
Crusher 2A2B to Conveyor H2	Enclosure & Dust Suppressants	90%	800 TPH	FH035	0.06
Crusher 3B to Conveyor H2	Enclosure & Dust Suppressants	90%	600 TPH	FH035a	0.06
Total PM/PM ₁₀ Emissions					0.72

The Coal Yard facility (ARMS Emissions Unit 008) , is regulated under Rule 62-296.700, F.A.C., Reasonably Available Control Technology (RACT) Particulate Matter and Rule 62-296.711, F.A.C., Materials Handling, Sizing, Screening, Crushing and Grinding Operations.

5.0 PERMIT SCHEDULE

- xx/xx/xx Notice of Intent published [in newspaper]
- 08/31/98 Distributed Intent to Issue Permit
- 08/03/98 Application deemed complete
- 05/28/98 Received Application

AIR CONSTRUCTION PERMIT 0570040-007-AC

SECTION I. FACILITY INFORMATION

6.0 RELEVANT DOCUMENTS:

The documents listed below are the basis of the permit. They are specifically related to this permitting action, but not all are incorporated into this permit. These documents are on file with the Department.

- Application received on May 28, 1998
- Department's letters dated June 26 and July 31, 1998
- Hillsborough County Environmental Protection Commission's memo dated June 25, 1998
- TEC's letters dated July 1 and August 3, 1998.
- Department's Intent to Issue and Public Notice Package dated August 31, 1998.

7.0 PERMITTING HISTORY:

E.U.

<u>ID No</u>	<u>Description</u>	<u>Permit No.</u>	<u>Issue Date</u>	<u>Expiration Date</u>
-008	Coal Yard	AO29-216480	4/23/93	9/12/97
		AC29-114676	5/19/87	9/30/87
		AC29-152987	12/6/88	6/1/89
		AC29-61276	4/12/83	12/31/84

AC29-61276: Coal Handling Modification at the Gannon Coal Yard

A modification of the Coal Yard to allow an increase of the throughput rate from 1,270,000 tons per year to 2.40 million tons per year was approved in 1983. This modification reconverted Boilers 1-4 from oil burning back to coal because of the increasing price of crude oil at that time. This permit was issued in 1983.

AC29-114676: Coal Handling Modification at the Gannon Coal Yard - Revision of Permit AC29-61276.

The modification of the permit revised the coal throughput from 2.40 to 2.85 million tons per year. This revision was approved in 1987.

AC29-152987: Replacement of the existing west grab bucket-hopper coal unloading system with a 1,500 TPH new coal unloader. This permit was issued in 1988. This emission point is part of the ARMS Emission Unit 008 Coal Yard.

AO29-216480: This operation permit covers the entire Coal Yard operation.

AIR CONSTRUCTION PERMIT 0570040-007-AC

SECTION II. EMISSION UNIT(S) GENERAL REQUIREMENTS

1.0 ADMINISTRATIVE

- 1.1 Applicable Regulations: Unless otherwise indicated, the construction and operation of these emission units shall be in accordance with the capacities and specifications stated in the application. The permittee is subject to all applicable provisions of Chapter 403, F.S. and Florida Administrative Code Chapters 62-4, 62-103, 62-204, 62-210, 62-212, 62-213, 62-296, 62-297, and the Code of Federal Regulations Section 40, Part 60. Specifically, this project is subject to applicable requirements of the New Source Performance Standards (NSPS) for Coal Processing Plants, Subpart Y, identified by the Code of Federal Regulations and incorporated by reference in the Florida Administrative Code regulation 62-204.800. Issuance of this permit does not relieve the facility owner or operator from compliance with any applicable federal, state, or local permitting requirements or regulations. [Rule 62-210.300, and 62-204.800, F.A.C.]
- 1.2 Regulating Agencies: All documents related to applications for permits to construct, operate or modify an emissions unit should be submitted to the Bureau of Air Regulation (BAR), Florida Department of Environmental Protection (FDEP), at 2600 Blairstone Road, Tallahassee, Florida 32399-2400 and phone number (850)488-1344. All documents related to reports, tests, and notifications should be submitted to the DEP Southwest District office (DEPSW), 3804 Coconut Palm Drive, Tampa, Florida 33619 and phone number 813/744-6100 and the Hillsborough County Environmental Protection Commission (HCEPC), 1410 North 21 Street, Tampa, Florida 33605, and phone number 813/272-5530.
- 1.3 Modification: The permittee shall give prior written notification to the Department and the HCEPC when there is any modification to this facility. This notice shall be submitted sufficiently in advance of any critical date involved to allow sufficient time for review, discussion, and revision of plans, if necessary. Such notice shall include, but not be limited to, information describing the precise nature of the change; modifications to any emission control system; production capacity of the facility before and after the change; and the anticipated completion date of the change. [Chapters 62-210 and 62-212 F.A.C.]
- The changes may include, but are not limited to, the following, and may also require prior authorization before implementation:
- A. Alteration or replacement of any equipment* or parameter listed in the description.
 - B. Installation or addition of any equipment* which is a source of air pollution.
 - C. Any changes in the method of operation, raw materials, products or fuels.
- * Not applicable to normal maintenance and repairs, and vehicles used for transporting material.
[Rule 62-4.070(3), F.A.C., Rule 62-210.300, F.A.C.]
- 1.4 General Conditions: The owner and operator is subject to and shall be aware of and operate under the attached General Permit Conditions G.1 through G.15 listed in *Appendix GC* of this permit. General Permit Conditions are binding and enforceable pursuant to Chapter 403 of the Florida Statutes. [Rule 62-4.160, F.A.C.]
- 1.5 Terminology: The terms used in this permit have specific meanings as defined in the corresponding chapter of the Florida Administrative Code.
- 1.6 Forms and Application Procedures: The permittee shall use the applicable forms listed in Rule 62-210.900, F.A.C., when appropriate and follow the application procedures in Chapter 62-4, F.A.C. [Rule 62-210.900, F.A.C.]
- 1.7 Expiration: This air construction permit shall expire on October 1, 1999. [Rule 62-210.300(1), F.A.C.]

AIR CONSTRUCTION PERMIT 0570040-007-AC

SECTION II. EMISSION UNIT(S) GENERAL REQUIREMENTS

The permittee may, for good cause, request that this construction permit be extended. Such a request shall be submitted to the Bureau of Air Regulation prior to 60 days before the expiration of the permit. However, the permittee shall promptly notify the HCEPC and the DEP SWD offices of any delays in completion of the project which would affect the startup day by more than 90 days. [Rule 62-4.080, F.A.C.]

- 1.8 Application for Title V Permit: A revision of the Title V operating permit application pursuant to Chapter 62-213, F.A.C., shall be submitted to the DEPs Bureau of Air Regulation and a copy to the DEP's SW District office in Tampa. [Chapter 62-213, F.A.C.]
- 1.9 New or Additional Conditions: Pursuant to Rule 62-4.080, F.A.C., for good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time. [Rule 62-4.080, F.A.C.]

2.0 EMISSION LIMITING STANDARDS

2.1 General Visible Emissions Standard: [Rule 62-296-320 (4)(b), F.A.C.] Unless otherwise specified by rule or permit, no person shall cause, let, permit, suffer or allow to be discharged into the atmosphere any air pollutants from new or existing emissions units, the opacity of which is equal to:

- Visible emissions from PM unconfined particulate matter sources shall not exceed 5% opacity.
- Water sprays or chemical wetting agents and stabilizers are acceptable methods to be used on both live and dead coal storage piles as necessary to maintain an opacity of less than or equal to 5%. Other appropriate methods may be applied to maintain this opacity, after they are approved by the Department. [AC 29-114676]

2.2 Unconfined Emissions of Particulate Matter [Rule 62-296.320(4)(c), F.A.C.]

- (a) The owner or operators shall not cause, let, permit, suffer or allow the emissions of unconfined particulate matter from any source whatsoever, including, but not limited to, vehicular movement, transportation of materials, construction, alteration, demolition or wrecking, or industrially related activities such as loading, unloading, storing or handling, without taking reasonable precautions to prevent such emission.
- (b) Reasonable precautions include but are not limited to the following:
- Paving and maintenance of roads, parking areas and yards.
 - Application of water or chemicals to control emissions from such activities as demolition of buildings, grading roads, construction, and land clearing.
 - Application of asphalt, water, oil, chemicals or other dust suppressants to unpaved roads, yards, open stock piles and similar activities.
 - Removal of particulate matter from roads and other paved areas under the control of the owner or operator of the facility to prevent reentrainment, and from buildings or work areas to prevent particulate from becoming airborne.
 - Landscaping or planting of vegetation.
 - Use of hoods, fans, filters, and similar equipment to contain, capture and/or vent particulate matter.
 - Confining abrasive blasting where possible.

AIR CONSTRUCTION PERMIT 0570040-007-AC

SECTION II. EMISSION UNIT(S) GENERAL REQUIREMENTS

- Enclosure or covering of conveyor systems.
- (c) Emission Control Methods for the Crusher House are enclosures and dust suppressants.

NOTE: Facilities that cause frequent, valid complaints may be required by the Permitting Authority to take these or other reasonable precautions. In determining what constitutes reasonable precautions for a particular source, the Department shall consider the cost of the control technique or work practice, the environmental impacts of the technique or practice, and the degree of reduction of emissions expected from a particular technique or practice.

2.3 General Pollutant Emission Limiting Standards: [Rule 62-296.320 (1), F.A.C.]

- (b) No person shall cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor.

NOTE: An objectionable odor is defined as any odor present in the outdoor atmosphere which by itself or in combination with other odors, is or may be harmful or injurious to human health or welfare, which unreasonably interferes with the comfortable use and enjoyment of life or property, or which creates a nuisance. [F.A.C. 62-210.200(198)]

3.0 OPERATION AND MAINTENANCE

3.1 The Operation and Maintenance Plan for Particulate Control

A. Process Parameters:

1. Operation schedule: 8760 hours per year
2. Equipment Data:
 - Conveyor Hoods: corrugated Aluminum
 - Transfer Point Enclosures: Carbon Steel
3. Wet Dust Suppression:
 - Manufacturer: Martin Marietta

B. Inspection and Maintenance Procedures:

The coal yard particulate control equipment receive regular preventative maintenance as follows:

Conveyor Enclosures:

1. Daily random visual inspections of conveyor hoods.
2. Daily random visual inspection of the transfer points chute work

Dust Suppression System:

1. Quarterly inspection of system for water leaks.
2. Quarterly inspection of spray nozzles.

The pumps, tanks, etc., that make-up the dust suppression system undergo normal maintenance including lubrication, flushing, and draining.

[Rule 62-296.700, F.A.C. and Application submitted May 28, 1998]

AIR CONSTRUCTION PERMIT 0570040-007-AC

SECTION II. EMISSION UNIT(S) GENERAL REQUIREMENTS

- 3.2 Plant Operation - Problems: If temporarily unable to comply with any of the conditions of the permit due to breakdown of equipment or destruction by hazard of fire, wind or by other cause, the owner or operator shall notify the HPCEC and Southwest District office in Tampa as soon as possible, but at least within (1) working day, excluding weekends and holidays. The notification shall include: pertinent information as to the cause of the problem; the steps being taken to correct the problem and prevent future recurrence; and where applicable, the owner's intent toward reconstruction of destroyed facilities. Such notification does not release the permittee from any liability for failure to comply with the conditions of this permit and the regulations. [Rule 62-4.130, F.A.C.]
- 3.3 Circumvention: The owner or operator shall not circumvent any air pollution control equipment or allow the emission of air pollutants without this equipment operating properly. [Rules 62-210.650, F.A.C.]
- 3.4 Excess Emissions Requirements [Rule 62-210.700, F.A.C.]
- (a) Excess emissions resulting from start-up, shutdown or malfunction of these emissions units shall be permitted providing (1) best operational practices to minimize emissions are adhered to and (2) the duration of excess emissions shall be minimized, but in no case exceed two hours in any 24 hour period unless specifically authorized by the Southwest District office for longer duration. [Rule 62-210.700(1), F.A.C.]
 - (b) Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during start-up, shutdown, or malfunction shall be prohibited. [Rule 62-210.700(4), F.A.C.]
 - (c) In case of excess emissions resulting from malfunctions, the owner or operator shall notify the Air Control Section of the DEPSW District and the HCEPC offices within one (1) working day of: the nature, extent, and duration of the excess emissions; the cause of the problem; and the corrective actions being taken to prevent recurrence. [Rule 62-210.700(6), F.A.C.]
- 4.0 **MONITORING OF OPERATIONS**
- 4.1 Determination of Process Variables:
- (a) The permittee shall install, operate, and maintain equipment and/or instruments necessary to determine process variables, such as process weight input or heat input, when such data is needed in conjunction with emissions data to determine the compliance of the emissions unit with applicable emission limiting standards. [Rule 62-297.310 (5), F.A.C.]
 - (b) Equipment and/or instruments used to directly or indirectly determine such process variables, including devices such as belt scales, weight hoppers, flow meters, and tank scales, shall be calibrated and adjusted to indicate the true value of the parameter being measured with sufficient accuracy to allow the applicable process variable to be determined within 10% of its true value. [Rule 62-297.310(5), F.A.C.]
- 5.0 **TEST AND COMPLIANCE REQUIREMENTS**
- 5.1 Test Performance: Within 60 days after achieving the maximum production rate at which this facility will be operated, but not later than 180 days after initial startup up and annually thereafter, the owner or operator shall conduct performance test(s) for VE pursuant to 40 CFR 60.8, Performance Tests, Rule 62-296.310 F.A.C., 40 CFR 60, Appendix A. [Rule 62-204.800, F.A.C and Rule 62-297.310, F.A.C.]

AIR CONSTRUCTION PERMIT 0570040-007-AC

SECTION II. EMISSION UNIT(S) GENERAL REQUIREMENTS

- 5.2 Test Procedures and Test Reports shall meet all applicable requirements of the Florida Administrative Code Chapter 62-297. [Rule 62-297.310, F.A.C.]
- 5.3 Test Notification: The owner or operator shall notify the HCEPC and the DEPSW District offices in Tampa in writing at least (30) days [initial] and (15) days [annual] prior to conducting each scheduled compliance test. The notification shall include the test date, the expected test time, the facility contact person for the test, and the person or company conducting the test. The (30) or (15) day notification requirement may be waived at the discretion of the Department. Likewise, if circumstances prevent testing during the test window specified for the emission unit, the owner or operator may request an alternate test date before the expiration of this window. [Rule 62-297.310 and 40 CFR 60.8, F.A.C.]
- 5.4 Special Compliance Tests: When the Department, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in Rule 62-204, 62-210, 62-212, 62-296 and 62-297, F.A.C. or in a permit issued pursuant to those rules is being violated, it may require the owner or operator of the facility to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions units and to provide a report on the results of said tests to the Southwest District office in Tampa. [Rule 62-297.310, F.A.C.]
- 5.5 Compliance Testing: All compliance testing shall be conducted during normal operation and at the maximum material (including limestone or iron ore where applicable) transfer rate attainable during the test period. Actual material handling rates will be determined using the totalizer readings obtained from scales located on C, L, and H conveyors. The readings from these scales will be recorded at the start and finish of the visible emissions test. The difference between the value recorded divided by the test duration will be the value used to represent the material handling rate. Alternatively, values from the circular chart recorders located in the coal field control room will be used in the event a problem with a scale totalizer arises. The test result shall indicate if iron ore has been included in the corresponding material transfer rate. Failure to include the actual process or production rate in the results may invalidate the test. [Rule 62-4.070(3), F.A.C. and AO29-216480]
- 5.6 Exceptions and Approval of Alternate Procedures and Requirements: An Alternate Sampling Procedure (ASP) may be requested from the Bureau of Monitoring and Mobile Sources of the Florida Department of Environmental Protection in accordance with the procedures specified in Rule 62-297.620, F.A.C.
- 6.0 **REPORTS AND RECORDS**
- 6.1 Duration: All reports and records required by this permit shall be kept for at least (5) years from the date the information was recorded. [62-4.160(14)(b), F.A.C.]
- 6.2 Operation and Maintenance. Records of inspections, maintenance, and performance parameters shall be made available to the HCEPC and the SW DEP offices upon request. [Rules 62-213.440(1)(b)2.b. and 62-296.700(6)(e), F.A.C.]
- 6.2 Emission Compliance Stack Test Reports:
- (a) A *test report* indicating the results of the required compliance tests shall be filed with the HPCEC and the Southwest District offices in Tampa as soon as practical, but no later than 45 days after the last sampling run is completed. [Rule 62-297.310, F.A.C.]

AIR CONSTRUCTION PERMIT 0570040-007-AC

SECTION II. EMISSION UNIT(S) GENERAL REQUIREMENTS

(b) The *test report* shall provide sufficient detail on the tested emission unit and the procedures used to allow the Department and the HCEPC to determine if the test was properly conducted and if the test results were properly computed. At a minimum, the test report shall provide the applicable information listed in **Rule 62-297.310(8), F.A.C.**

6.3 **Excess Emissions Report:** If excess emissions occur, the owner or operator shall notify the Air Section of the HPCEC and the Southwest District offices within (1) working day of: the nature, extent, and duration of the excess emissions; the cause of the excess emissions; and the actions taken to correct the problem. In addition, the Department may request a written summary report of the incident. Pursuant to the New Source Performance Standards, excess emissions shall also be reported in accordance with 40 CFR 60.7. [**Rules 62-4.130 and 62-210.700(6), F.A.C.**]

6.4 **Annual Operating Report for Air Pollutant Emitting Facility:** Before March 1st of each year, the owner or operator shall submit to the Department this required report [DEP Form No. 62-210.900(5)], which summarizes operations for the previous calendar year. [**Rule 62-210.370(3), F.A.C.**]

7.0 OTHER REQUIREMENTS

7.1 This permit (addition of the two 600 tph new crushers) does not supersede or change any applicable requirement or previous construction/operation permits for the ARMS Emission Unit No. 008 Coal Yard (as a whole).

DRAFT

AIR CONSTRUCTION PERMIT 0570040-007-AC

SECTION III. EMISSION UNIT(S) SPECIFIC CONDITIONS

1.0 ESSENTIAL POTENTIAL TO EMIT (PTE) PARAMETERS

- 1.1 Permitted Capacity. The maximum permitted process rate for the coal yard shall not exceed 2.85 million tons/year.
[Rules 62-4.160(2), and 62-210.200 (PTE), F.A.C. and AC29-114676]

2.0 OPERATING REQUIREMENTS

- 2.1 Hours of Operation. The crusher house is allowed to operate continuously, i.e., 8,760 hours/year.
[Rules 62-4.160(2) and 62-210.200, F.A.C., P.T.E.]

3.0 EMISSION LIMITATIONS AND STANDARDS

- 3.1 Visible Emissions. Visible emissions generated by fugitive or unconfined particulate matter from the coal yard's crusher house shall not exceed 5% opacity.
[Rule 62-296.711(2)(a), F.A.C. AC29-61276 and AC29-114676]

4.0 TEST METHODS AND PROCEDURES

- 4.1 Test Methods: The test method for visible emissions shall be determined using EPA Method 9, adopted and incorporated by reference in Rule 62-204.800, F.A.C., and referenced in Chapter 62-297, F.A.C.
[Rules 62-204.800, 62-297.310(7)(a)4., and 62-297.400, F.A.C.]

5.0 MONITORING OF OPERATIONS

- 5.1 Operation and Maintenance Plan (O&MP): The crusher house shall comply with the O&MP for the Coal Yard Particulate Control as specified in Section II, Condition 3.1.
[Rule 62-296.700, F.A.C, Applicant request on application submitted on May 28,1998]

6.0 NSPS REQUIREMENTS

- 6.1 The new crushers shall comply with all applicable requirements of 40CFR60, Subpart A, General Provisions. In addition, the new crushers shall comply with 40CFR60, NSPS for Coal Preparation Plants, Subpart Y.
[Rule 62-204.800 F.A.C., 40CFR60, Subpart Y]

7.0 REASONABLE ASSURANCES

- 7.1 All controls associated with the transfer points (i.e., the enclosures and dust suppression) shall be maintained to the extent that the capture efficiencies credited will be achieved. Reasonable precautions to prevent unconfined emissions of particulate matter shall be in accordance with Rule 62-296.320(7).F.A.C
[Rule 62-4.070(3), and Rule 62-296.320(7) F.A.C.]

APPENDIX GC
GENERAL PERMIT CONDITIONS [F.A.C. 62-4.160]

- G.1 The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.
- G.2 This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings or exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.
- G.3 As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey and vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit is not a waiver or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.
- G.4 This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.
- G.5 This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.
- G.6 The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.
- G.7 The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:
- a) Have access to and copy and records that must be kept under the conditions of the permit;
 - b) Inspect the facility, equipment, practices, or operations regulated or required under this permit, and,
 - c) Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

- G.8 If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:
- a) A description of and cause of non-compliance; and
 - b) The period of noncompliance, including dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

APPENDIX GC
GENERAL PERMIT CONDITIONS [F.A.C. 62-4.160]

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

- G.9 In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by Sections 403.73 and 403.111, Florida Statutes. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.
- G.10 The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.
- G.11 This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 62-4.120 and 62-730.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.
- G.12 This permit or a copy thereof shall be kept at the work site of the permitted activity.
- G.13 This permit also constitutes:
- a) Determination of Best Available Control Technology ()
 - b) Determination of Prevention of Significant Deterioration (); and
 - c) Compliance with New Source Performance Standards ().
- G.14 The permittee shall comply with the following:
- a) Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
 - b) The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application or this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.
 - c) Records of monitoring information shall include:
 - 1. The date, exact place, and time of sampling or measurements;
 - 2. The person responsible for performing the sampling or measurements;
 - 3. The dates analyses were performed;
 - 4. The person responsible for performing the analyses;
 - 5. The analytical techniques or methods used; and
 - 6. The results of such analyses.
- G.15 When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.



August 25, 1998

Ms. Teresa Heron
 New Source Review Section
 Florida Department of Environmental Protection
 Bureau of Air Regulation
 2600 Blair Stone Road
 Tallahassee, Florida 32399-2400

Via Facsimile and
 U.S. Mail

RECEIVED
 AUG 28 1998
 BUREAU OF
 AIR REGULATION

**Re: Tampa Electric Company (TEC) - F. J. Gannon Station
 Fuel Yard Crusher Modification Construction Permit Comments
 FDEP File No. 0570040-007-AC**

Dear Ms. Heron:

Thank you for your expedient review of our permit application. Based on our review of the draft permit we offer the following:

1. The processing rate through Emission Points FH-032a and FH-033a is 800 tons per hour, each. The revised Emission Inventory Worksheets are attached. These corrections do not affect the total annual emissions of PM₁₀/PM.
2. The crusher house modification is not subject to 40 Code of Federal Regulation (CFR) Part 60, New Source Performance Standard (NSPS) for Nonmetallic Processing Plants, Subpart OOO. Fluxing material, including limestone, makes up no more than 2 percent of the material processed through the crushers. Under Subpart OOO, nonmetallic mineral means "any of the following minerals or any mixture of which the majority is any of the following minerals. . . limestone". Because limestone does not make up the majority of the material mixture being processed, Subpart OOO is not applicable.

Ms. Teresa Heron

August 25, 1998

Page 2 of 2

Thank you for your cooperation with this project. Feel free to contact me at (813) 641-5034 if you have any additional questions or concerns.

Sincerely,

A handwritten signature in cursive script that reads "Theresa J.L. Watley/gm". The signature is written in black ink and is positioned above the typed name and title.

Theresa J.L. Watley
Consulting Engineer
Environmental Planning

EPgmTJLW610

Enclosure

c/enc: Mr. Clair Fancy - FDEP
Mr. Jerry Kissel - FDEP SW
Mr. Richard Kirby - EPCHC

FUTURE POTENTIAL EMISSION INVENTORY WORKSHEET

Tampa Electric Company - F.J. Gannon Station

FH-032a

EMISSION SOURCE TYPE

MATERIAL TRANSFER - FUGITIVE EMISSION SOURCES

Figure:

FACILITY AND SOURCE DESCRIPTION

Emission Source Description: Fuel Handling - Hammermill Crusher 3A to Conveyor G1

Emission Control Method(s)/ID No(s): Enclosure with Dust Suppressant

Emission Point ID: FH-032a

Transfer Point ID(s):

EMISSION ESTIMATION EQUATIONS

$$\text{Emission(lb/hr)} = 0.0032 \times \text{material transferred(tons/hr)} \times [(\text{average wind speed(mph)} / 5)^{E1.3} / (\text{moisture content(pct)} / 2)^{E1.4}] \times [100 - \text{control(pct)} / 100]$$

$$\text{Emission(tpy)} = 0.0032 \times \text{material transferred(tpy)} \times [(\text{average wind speed(mph)} / 5)^{E1.3} / (\text{moisture content(pct)} / 2)^{E1.4}] \times [100 - \text{control(pct)} / 100] \times (1/2000)$$

Source: Section 13.2.4 - Aggregate Handling and Storage Piles, AP-42, Fifth Edition, January 1995.

INPUT DATA AND EMISSIONS CALCULATIONS

Mean Wind Speed (mph)	Potential Quantity Transferred		Material Moisture Content (pct)	Control Efficiency (pct)	Potential Total PM Emission Rates	
	(tons/hr)	(tons/yr)			(lb/hr)	(tpy)
8.6	800	712,500	6.5	90.0	0.10	0.04

SOURCES OF INPUT DATA

Parameter	Data Source
Mean Wind Speed	Tampa, FL, Climate of the State, Third Edition, 1985.
Potential Quantity Transferred	TEC, 1998.
Material Moisture Content	Average fuel moisture content, TEC, 1994.
Control Efficiency	Table 3.2.17-2, Workbook on Estimation of Emissions and Dispersion Modeling of Fugitive Particulate Sources, UARG, September 1981.

NOTES AND OBSERVATIONS

Future potential Total PM emissions based on 2,850,000 tons per year of coal delivered.

Future potential coal reclaiming was assumed to be equally divided between conveyors G1 and G2, or 1,425,000 tons per conveyor.

Future potential coal reclaiming from conveyors G1 and G2 was also assumed to be equally divided between Crushers 3A and 1, or Crushers 3B and 2; or 712,500 tons per crusher series.

DATA CONTROL

Data Collected by:	T.J.L. Watley	Date:	08/25/98
Evaluated by:	T.J.L. Watley	Date:	08/25/98
Data Entered by:	T.J.L. Watley	Date:	08/25/98
Reviewed by:	A. Trbovich	Date:	08/25/98

FUTURE POTENTIAL EMISSION INVENTORY WORKSHEET

Tampa Electric Company - F.J. Gannon Station

FH-033a

EMISSION SOURCE TYPE

MATERIAL TRANSFER - FUGITIVE EMISSION SOURCES

Figure:

FACILITY AND SOURCE DESCRIPTION

Emission Source Description: Fuel Handling - Hammermill Crusher 3B to Conveyor G2

Emission Control Method(s)/ID No(s): Enclosure with Dust Suppressant

Emission Point ID: FH-033a Transfer Point ID(s):

EMISSION ESTIMATION EQUATIONS

$$\text{Emission(lb/hr)} = 0.0032 \times \text{material transferred(tons/hr)} \times \left[\frac{\text{average wind speed(mph)}}{5} \right]^{E1.3} \left[\frac{\text{moisture content(pct)}}{2} \right]^{E1.4} \times \left[\frac{100 - \text{control(pct)}}{100} \right]$$

$$\text{Emission(tpy)} = 0.0032 \times \text{material transferred(tpy)} \times \left[\frac{\text{average wind speed(mph)}}{5} \right]^{E1.3} \left[\frac{\text{moisture content(pct)}}{2} \right]^{E1.4} \times \left[\frac{100 - \text{control(pct)}}{100} \right] \times (1/2000)$$

Source: Section 13.2.4 - Aggregate Handling and Storage Piles, AP-42, Fifth Edition, January 1995.

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Mean Wind Speed (mph)	Potential Quantity Transferred		Material Moisture Content (pct)	Control Efficiency (pct)	Potential Total PM Emission Rates	
	(tons/hr)	(tons/yr)			(lb/hr)	(tpy)
8.6	800	712,500	6.5	90.0	0.10	0.04

SOURCES OF INPUT DATA

Parameter	Data Source
Mean Wind Speed	Tampa, FL, Climate of the State, Third Edition, 1985.
Potential Quantity Transferred	TEC, 1998.
Material Moisture Content	Average fuel moisture content, TEC, 1994.
Control Efficiency	Table 3.2.17-2, Workbook on Estimation of Emissions and Dispersion Modeling of Fugitive Particulate Sources, UARG, September 1981.

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Reviewed by:	A. Trbovich	Date:	08/25/98

FUTURE ACTUAL EMISSION INVENTORY WORKSHEET

Tampa Electric Company - F.J. Gannon Station

FH-032a

EMISSION SOURCE TYPE

MATERIAL TRANSFER - FUGITIVE EMISSION SOURCES

Figure:

FACILITY AND SOURCE DESCRIPTION

Emission Source Description: Fuel Handling - Hammermill Crusher 3A to Conveyor G1

Emission Control Method(s)/ID No(s): Enclosure with Dust Suppressant

Emission Point ID: FH-032a

Transfer Point ID(s):

EMISSION ESTIMATION EQUATIONS

$$\text{Emission(lb/hr)} = 0.0011 \times \text{material transferred(tons/hr)} \times [(\text{average wind speed(mph)} / 5)\text{E1.3} / (\text{moisture content(pct)} / 2)\text{E1.4}] \times [100 - \text{control(pct)} / 100]$$

$$\text{Emission(tpy)} = 0.0011 \times \text{material transferred(tpy)} \times [(\text{average wind speed(mph)} / 5)\text{E1.3} / (\text{moisture content(pct)} / 2)\text{E1.4}] \times [100 - \text{control(pct)} / 100] \times (1/2)$$

Source: Section 13.2.4 - Aggregate Handling and Storage Piles, AP-42, Fifth Edition, January 1995.

INPUT DATA AND EMISSIONS CALCULATIONS

Mean Wind Speed (mph)	Actual Quantity Transferred		Material Moisture Content (pct)	Control Efficiency (pct)	Actual PM10 Emission Rates	
	(tons/hr)	(tons/yr)			(lb/hr)	(tpy)
8.6	800	712,500	6.5	90.0	0.03	0.02

SOURCES OF INPUT DATA

Parameter	Data Source
Mean Wind Speed	Tampa, FL, Climate of the State, Third Edition, 1985.
Actual Quantity Transferred	TEC, 1998.
Material Moisture Content	Average fuel moisture content, TEC, 1994.
Control Efficiency	Table 3.2.17-2, Workbook on Estimation of Emissions and Dispersion Modeling of Fugitive Particulate Sources, UARG, September 1981.

NOTES AND OBSERVATIONS

Future actual PM10 emissions based on 2,850,000 tpy of coal used.

Future actual coal reclaiming was assumed to be equally divided between conveyors G1 and G2, or 1,425,000 tons per conveyor.

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FUTURE ACTUAL EMISSION INVENTORY WORKSHEET

Tampa Electric Company - F.J. Gannon Station

FH-033a

EMISSION SOURCE TYPE

MATERIAL TRANSFER - FUGITIVE EMISSION SOURCES

Figure:

FACILITY AND SOURCE DESCRIPTION

Emission Source Description: Fuel Handling - Hammermill Crusher 3B to Conveyor G2

Emission Control Method(s)/ID No(s): Enclosure with Dust Suppressant

Emission Point ID: FH-033a Transfer Point ID(s):

EMISSION ESTIMATION EQUATIONS

$$\text{Emission(lb/hr)} = 0.0011 \times \text{material transferred(tons/hr)} \times [(\text{average wind speed(mph)} / 5)E1.3 / (\text{moisture content(pct)} / 2)E1.4] \times [100 - \text{control(pct)} / 100]$$

$$\text{Emission(tpy)} = 0.0011 \times \text{material transferred(tpy)} \times [(\text{average wind speed(mph)} / 5)E1.3 / (\text{moisture content(pct)} / 2)E1.4] \times [100 - \text{control(pct)} / 100] \times (1/2000)$$

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	(tons/hr)	(tons/yr)			(lb/hr)	(tpy)
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Department of Environmental Protection

Lawton Chiles
Governor

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Virginia B. Wetherell
Secretary

August 11, 1998

Mr. Doug Neely, Chief
Air, Radiation Technology Branch
Preconstruction/HAP Section
U.S. EPA - Region IV
61 Forsyth Street
Atlanta, Georgia 30303

Re: Tampa Electric Company (TEC) F.J. Gannon Station
File No. 0570040-007-AC

Dear Mr. Neely:

Enclosed is a copy of responses by Tampa Electric Company (TEC) to questions regarding their application to increase coalyard throughput at the F.J. Gannon Power Plant. The increase is requested to offset the lower heating value of coals used for the purposes of meeting corporate-wide Title IV Acid Rain requirements. We previously sent you the application and additional information. Note that TEC believes their project constitutes a Pollution Control Project.

If you have any questions, please contact me at (850)921-9523.

Sincerely,

A. A. Linero, P.E.
Administrator
New Source Review Section

AAL/kt

Enclosures

F.J. GANNON STATION
FUEL YARD MODIFICATION
CONSTRUCTION PERMIT APPLICATION



JUNE 1997

RECEIVED

AUG 06 1998

**BUREAU OF
AIR REGULATION**

**ADDENDUM
AUGUST 1998**

①

**FUEL YARD MODIFICATION CONSTRUCTION PERMIT
APPLICATION**

RESPONSE TO AGENCY COMMENTS

**Tampa Electric Company (TEC) - F. J. Gannon Station
Fuel Yard Modification Construction Permit Application
Response to Agency Request for Additional Information**

EPCHC Comment No. 1:

The submittal does not address emissions from the coal yard itself. As previously outlined by EPC, we do not agree with the applicants methodology, particularly the bulldozing and crushing of coal. Emission factors from AP-42, Chapter 11.9, "Western Surface Coal Mining" are appropriate.

TEC Response No. 1:

EPC has once again stated that the agency disagrees with TEC's methodology, but offers no technical support for their preference to use the factors in AP-42, Chapter 11.9, Western Surface Coal Mining. In our permit application addendum of September 24, 1997, TEC fully addressed the technical basis for selecting the coal yard emission factors used in the fuel yard modification construction permit application. This same issue was addressed again in our permit application addendum of December 29, 1997. Please refer to those two addenda for a complete technical discussion of this issue.

EPCHC Comment No. 2:

The package includes emission estimates for PM/PM₁₀. Only one value is give for this factor. PM₁₀ and total particulate matter are PSD regulated air pollutants (Table 212.400-2, F.A.C.) The applicant must provide emissions estimates for both from the entire facility.

TEC Response No. 2:

The June 8, 1998, permit application addendum included an analysis of total particulate matter (PM) and respirable particulate matter (PM₁₀) emissions from the steam generating units. This analysis was based on past actual PM emissions. For the PM₁₀ emission analysis, PM₁₀ emissions were conservatively assumed to be equal to PM emissions. On this basis, the analyses for PM and PM₁₀ are identical, as indicated on the heading of Table 4 of the June 8, 1998 permit application addendum.

PM and PM₁₀ emission estimates for the fuel yard have been provided in the initial permit application and the September 24, 1997, permit application addendum. Please refer to those two documents for the coal yard PM and PM₁₀ emission estimates.

EPCHC Comment No. 3:

The applicant submitted values for increases in SO₂, NO_x, and PM/PM₁₀. Several other PSD pollutants emitted from coal burning were not evaluated. The applicant should provide analysis for CO, fluorides, lead, and mercury.

TEC Response No. 3:

TEC did not submit values for increases in nitrogen oxides (NO_x) and PM/PM₁₀ emissions. The information submitted in the June 8, 1998, permit application addendum demonstrates a 15,099 or a 10,347 ton per year (tpy) decrease in NO_x emissions as compared to 1995/96 and 1996/97, respectively. The information also demonstrates a 277 or a 338 tpy decrease in both PM and PM₁₀ emissions as compared to 1995/96 and 1996/97, respectively.

Sulfur dioxide (SO₂) emissions from F.J. Gannon Station are expected to increase. However, the associated installation of the flue gas desulfurization (FGD) system on Big Bend Station Units 1 and 2 will result in a TEC system-wide decrease in SO₂ emission of 47,506 or 63,172 tpy. Please refer to the attached Table 5A. (This table numbering is consistent with the June 8, 1998, permit application addendum.)

The requested evaluations for carbon monoxide, fluorides, lead, and mercury emissions have not been completed because fuel specific data are not available and because emissions of these pollutants are not expected to either increase or decrease as a result of this Pollution Control Project (PCP).

EPCHC Comment No. 4

The EPC did not receive copies of calculations used to derive the emission estimates given. These should be provided along with all input parameters

TEC Response No. 4:

Due to the fundamental nature of the computations in Tables 2-6 of our June 8, 1998 permit application addendum, TEC did not compile supplemental calculation sheets. However, TEC offers the following general commentary:

- In Table 1, the fuel quality data used in Tables 2-5 are presented.
- In Table 2, the averages from 1995 and 1996 actual data are calculated; the average coal heat content is used to calculate the projected total heat input at the 2.85 tpy maximum; then the throughput of lower heat content coal needed to sustain this calculated total heat input is calculated.
- In Tables 3, NO_x emission rates (based on our conservative projections of unit NO_x reduction capabilities) are used to calculate projected annual emissions from the calculated projected total heat input. Projected emissions are then compared to past actual average emissions.
- In Table 4, Coal Ash Contents from Table 1 and our ESP Control Efficiencies are used to calculate projected annual emissions from the calculated projected total heat input. Projected emissions are then compared to past actual average emissions.
- In Table 5, SO₂ emission rates from Table 1 are used to calculate projected annual emissions from the calculated projected total heat input. Projected emissions are then compared to past actual average emissions.

EPCHC Comment No. 5:

As stated in previous EPC comments regarding this application, the Gannon Station's coal usage and power output have been steadily increasing over several years. From 1994 through 1996 Gannon Station's coal use has increased approximately 23% with a corresponding heat input rate increase of 18%. Coal usage is rapidly approaching the current permitted throughput limit of the yard.

In this submittal, TECO's own numbers show that in the years they are considering baseline (1995/1996) the actual coal usage has risen to within 7% of the current limit. Given the admitted net significant increase and the fact that the coal yard limit has been reached, we do not believe this project qualifies as a pollution prevention project (PCP) as described in 40 CFR 52.21.

TEC Response No. 5:

TEC disagrees with the conclusions drawn from EPC's assessment of our historical operations at Gannon Station. Our records indicate that while coal consumption has increased 23% during 1994 - 1996, Station energy production has only increased 6%, which is consistent with TEC's load growth of approximately 3% per year during this time period. Furthermore, coal heat content has decreased 14%. Therefore, the majority of the increase in coal throughput is directly attributable to a decrease in coal heat content.

However, the criteria of a PCP as defined in 40 CFR 52, does not include the assessment of the facility's past operating practices. Rather, as provided in our December 29, 1997 and June 8, 1998 permit application addenda, TEC's request to increase coal throughput at F.J. Gannon Station in order to accommodate the use of lower heat content fuels, is exempt from PSD applicability as a PCP because, as defined in 40 CFR 52.21, a PCP is

Any activity or project undertaken at an existing electric steam generating unit for purposes of reducing emissions from such unit. Such activities and projects are limited to . . . an activity or project to accommodate switching to a fuel which is less polluting than the fuel in use prior to the activity or project, including, but not limited to natural gas or coal reburning, or the co-firing of natural gas and other fuel for the purpose of controlling emissions...

Table 5A Tampa Electric Company System - PCP SO2 Emission Comparison - Phase II Compliance Plan

Station / Unit	Future Projected SO2 Emissions					Past Actual SO2 Emissions			SO2 Emission Change (tpy)
	Coal Usage (tons)	Coal Heat Content (Btu/lb)	Total Heat Input (Btu)	Emission Rate (lb/MMBtu)	Annual Emissions* (tpy)	1995 (tpy)	1996 (tpy)	Average (tpy)	
Big Bend 1	N.A.	N.A.	N.A.	N.A.	3,733	33,565	36,738	35,152	(31,419)
Big Bend 2	N.A.	N.A.	N.A.	N.A.	3,856	34,295	34,941	34,618	(30,762)
Big Bend 3	N.A.	N.A.	N.A.	N.A.	18,214	14,543	12,355	13,449	4,765
Big Bend 4	N.A.	N.A.	N.A.	N.A.	5,033	2,620	5,087	3,854	1,180
Gannon 1	325,465	9,100	5.92E+12	1.9	5,627	4,021	5,480	4,751	877
Gannon 2	315,718	9,100	5.75E+12	1.9	5,459	3,918	5,058	4,488	971
Gannon 3	409,695	9,225	7.56E+12	1.6	6,047	5,925	6,400	6,163	(115)
Gannon 4	680,226	9,225	1.26E+13	1.6	10,040	9,955	9,849	9,902	138
Gannon 5	596,167	12,100	1.44E+13	2.0	14,427	10,374	12,968	11,671	2,756
Gannon 6	977,374	12,100	2.37E+13	2.0	23,652	18,797	20,301	19,549	4,103
Total or Average	3,304,646	10,570	6.99E+13	N/A	96,089	138,013	149,177	143,595	(47,506)

Gannon Station SO2 Rate 1.9
Based on Title IV Annual Average

* For Big Bend, annual emissions based on FGD Phase II SO2 Compliance Plan.

Past Actual SO2 Emissions			SO2 Emission Change (tpy)
1996 (tpy)	1997 (tpy)	Average (tpy)	
36,738	37,315	37,027	(33,294)
34,941	44,876	39,909	(36,053)
12,355	14,459	13,407	4,807
5,087	5,844	5,466	(433)
5,480	5,344	5,412	215
5,058	7,771	6,415	(956)
6,400	9,772	8,086	(2,039)
9,849	10,383	10,116	(76)
12,968	10,753	11,861	2,567
20,301	22,829	21,565	2,087
149,177	169,346	159,262	(63,172)

**FUEL YARD MODIFICATION CONSTRUCTION PERMIT
APPLICATION**

SIGNATURE PAGES

**AUTHORIZED REPRESENTATIVE FORM,
AUTHORIZATION AND P.E. CERTIFICATION**

Owner/Authorized Representative or Responsible Official

1. Name and Title of Owner/Authorized Representative or Responsible Official :

Name : Gregory M. Nelson
Title : Manager, Environmental Planning

2. Owner or Authorized Representative or Responsible Official Mailing Address :

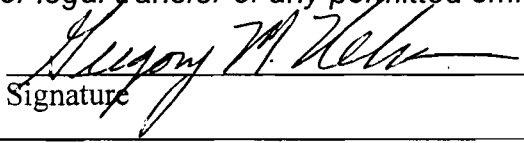
Organization/Firm : Tampa Electric Company
Street Address : 6944 U.S. Highway 41 North
City : Apollo Beach
State : FL Zip Code : 33572-9200

3. Owner/Authorized Representative or Responsible Official Telephone Numbers :

Telephone : (813)641-5016 Fax : (813)641-5081

4. Owner/Authorized Representative or Responsible Official Statement :

I, the undersigned, am the owner or authorized representative of the non-Title V source addressed in this Application for Air Permit or the responsible official, as defined in Rule 62-210.200, F.A.C., of the Title V source addressed in this application, whichever is applicable. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof. I understand that a permit, if granted by the Department, cannot be transferred without authorization from the Department, and I will promptly notify the Department upon sale or legal transfer of any permitted emissions units.*


Signature

8/5/98
Date

* Attach letter of authorization if not currently on file.

I. Part 2 - 1

DEP Form No. 62-210.900(1) - Form
Effective : 3-21-96



TO WHOM IT MAY CONCERN:

Please be advised that Gregory M. Nelson, P.E., Manager, Environmental Planning, is the authorized representative of Tampa Electric Company concerning matters with which this permit application deals.

Very truly yours,



Charles R. Black
Vice President
Energy Supply

CRB\gm\ADMIN\AUTH.LTR

Application Processing Fee

Check one:

Attached - Amount: \$ 250.00

Not Applicable.

Construction/Modification Information

1. Description of Proposed Project or Alterations: 1. Increase fuel yard throughput from 2,850,000 tpy to 3,304,646 tpy. 2. Standardize all barge and rail unloading belt speeds to 2,300 tph. 3. Add equipment to handle alternate fuel at 362,025 tpy and 400 tph.
2. Projected or Actual Date of Commencement of Construction: 01-Sep-1997
3. Projected Date of Completion of Construction: 31-Aug-1998

Professional Engineer Certification

1. Professional Engineer Name: Thomas W. Davis Registration Number: 36777
2. Professional Engineer Mailing Address: Organization/Firm: Environmental Consulting & Technology, Inc. Street Address: 3701 NW 98 th Street City: Gainesville State: FL Zip Code: 32606
3. Professional Engineer Telephone Numbers: Telephone: (352) 332-0444 Fax: (352) 332-6722

4. 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 air pollutant emissions unit(s) and the air pollution control equipment described in this Application for Air Permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; 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 hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application.

If the purpose of this application is to obtain a Title V source air operation permit (check here [] if so), I further certify that each emissions unit described in this Application for Air Permit, when properly operated and maintained, will comply with the applicable requirements identified in this application to which the unit is subject, except those emissions units for which a compliance schedule is submitted with this application.

If the purpose of this application is to obtain an air construction permit for one or more proposed new or modified emissions units (check here [X] if so), I further certify that the engineering features of each such emissions unit described in this application have been designed or examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application.

If the purpose of this application is to obtain an initial air operation permit or operation permit revision for one or more newly constructed or modified emissions units (check here [] if so), I further certify that, with the exception of any changes detailed as part of this application, each such emissions unit has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with all provisions contained in such permit.

Thomas W. Owens

Signature

8/4/98

Date

(seal)

* Attach any exception to certification statement.



TAMPA ELECTRIC

RECEIVED

AUG 06 1998

BUREAU OF AIR REGULATION

August 6, 1998

Mr. A.A. Linero, P.E., Administrator
New Source Review Section
Florida Department of Environmental Protection
Bureau of Air Regulation
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Via Hand Delivery

**Re: Tampa Electric Company (TEC) - F. J. Gannon Station
Fuel Yard Modification Construction Permit Application
Response to Agency Request for Additional Information
FDEP File No. 0570040-007-AC**

Dear Mr. Linero:

Please find enclosed three (3) signed and sealed copies of TEC's response to the July 7, 1998 request for additional information (received from the Southwest District) regarding the above referenced construction permit application. A fourth signed and sealed copy is being submitted to the Environmental Protection Commission of Hillsborough County (EPCHC). In addition, please note that the Authorized Representative for this construction permit application has been changed to Gregory M. Nelson.

As previously communicated to the Department, TEC's requested fuel yard permit modification to increase annual coal throughput at F.J. Gannon Station is critical to our nitrogen oxides (NO_x) reduction strategy for compliance with the Clean Air Act Amendments of 1990 (CAAA). Accordingly, TEC demonstrated in our June 8, 1998 submittal that our NO_x reduction project meets the regulatory requirements of a Pollution Control Project (PCP), and hence is exempt from PSD.

To-date, the Department appears to be struggling to understand TEC's perspective regarding our NO_x Reduction Pollution Control Project. But, in the same vein, the Department has overwhelmingly applauded our Sulfur Dioxide (SO₂) Reduction Pollution Control Project that will reduce SO₂ emissions for the entire TEC system with the installation of a wet FGD Scrubber at Big Bend Station Units 1 and 2. The dual nature of these projects is what we seek to explain in this final submittal.

As you know, CAAA compliance is generally achieved on a system-wide, pollutant-interdependent basis. To this end, TEC's FGD permit application and SO₂ Compliance Plan includes significantly reducing SO₂ emissions at Big Bend via the FGD scrubber, while using fuels

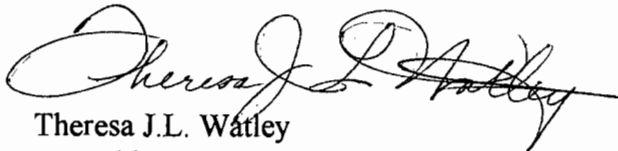
Mr. A.A. Linero, P.E., Administrator
August 6, 1998
Page 2 of 2

with slightly higher actual sulfur content at F.J. Gannon. Through this plan, a net reduction of SO₂ is accomplished for the TEC system. Similarly, TEC's NO_x reduction strategy incorporates the SO₂ Compliance Plan fuels and describes the per unit reductions needed to meet the system-annual-average NO_x emission limit.

Typically, a source must demonstrate a PSD exemption by showing no significant emission increases at the source (or facility), not the system. However, in the case of TEC's NO_x Reduction PCP, this demonstration cannot be made for the source/facility because of the interdependence of TEC's SO₂ and NO_x PCPs for system-wide CAAA compliance. For this reason, TEC has urged the Department "to consider TEC's system-wide emission reductions in their evaluation of our requested fuel yard coal throughput increase". As shown in the enclosures, TEC projects a system-wide 47,000 ton per year SO₂ emission decrease after implementation of our Phase II CAAA PCPs. As such, TEC requests that the Department authorize our coal yard throughput increase without further delay.

At this time, TEC has exhausted all resources to provide the Department with all available information pertaining to this construction permit application. We, therefore, expect that this additional information will enable you to resume and complete processing TEC's Fuel Yard Modification Construction Permit Application. Furthermore, in accordance with Rule 62-4.055, F.A.C., we respectfully request, that the Department consider this application to be complete with this submittal and that you issue an intent to permit this project within 30 days. If you still have any questions or comments, feel free to contact me at (813) 641-5034. Thank you again for your continued cooperation with this project.

Sincerely,



Theresa J.L. Watley
Consulting Engineer
Environmental Planning

EP\gm\TJLW607

c/enc: Mr. Clair Fancy - FDEP
Mr. Jerry Kissel - FDEP SW
Mr. Richard Kirby - EPCHC

F.J. GANNON STATION
FUEL YARD MODIFICATION
CONSTRUCTION PERMIT APPLICATION



JUNE 1997

RECEIVED

AUG 06 1998

**BUREAU OF
AIR REGULATION**

**ADDENDUM
AUGUST 1998**

②

**FUEL YARD MODIFICATION CONSTRUCTION PERMIT
APPLICATION**

RESPONSE TO AGENCY COMMENTS

**Tampa Electric Company (TEC) - F. J. Gannon Station
Fuel Yard Modification Construction Permit Application
Response to Agency Request for Additional Information**

EPCHC Comment No. 1:

The submittal does not address emissions from the coal yard itself. As previously outlined by EPC, we do not agree with the applicants methodology, particularly the bulldozing and crushing of coal. Emission factors from AP-42, Chapter 11.9, "Western Surface Coal Mining" are appropriate.

TEC Response No. 1:

EPC has once again stated that the agency disagrees with TEC's methodology, but offers no technical support for their preference to use the factors in AP-42, Chapter 11.9, Western Surface Coal Mining. In our permit application addendum of September 24, 1997, TEC fully addressed the technical basis for selecting the coal yard emission factors used in the fuel yard modification construction permit application. This same issue was addressed again in our permit application addendum of December 29, 1997. Please refer to those two addenda for a complete technical discussion of this issue.

EPCHC Comment No. 2:

The package includes emission estimates for PM/PM₁₀. Only one value is give for this factor. PM₁₀ and total particulate matter are PSD regulated air pollutants (Table 212.400-2, F.A.C.) The applicant must provide emissions estimates for both from the entire facility.

TEC Response No. 2:

The June 8, 1998, permit application addendum included an analysis of total particulate matter (PM) and respirable particulate matter (PM₁₀) emissions from the steam generating units. This analysis was based on past actual PM emissions. For the PM₁₀ emission analysis, PM₁₀ emissions were conservatively assumed to be equal to PM emissions. On this basis, the analyses for PM and PM₁₀ are identical, as indicated on the heading of Table 4 of the June 8, 1998 permit application addendum.

PM and PM₁₀ emission estimates for the fuel yard have been provided in the initial permit application and the September 24, 1997, permit application addendum. Please refer to those two documents for the coal yard PM and PM₁₀ emission estimates.

EPCHC Comment No. 3:

The applicant submitted values for increases in SO₂, NO_x, and PM/PM₁₀. Several other PSD pollutants emitted from coal burning were not evaluated. The applicant should provide analysis for CO, fluorides, lead, and mercury.

TEC Response No. 3:

TEC did not submit values for increases in nitrogen oxides (NO_x) and PM/PM₁₀ emissions. The information submitted in the June 8, 1998, permit application addendum demonstrates a 15,099 or a 10,347 ton per year (tpy) decrease in NO_x emissions as compared to 1995/96 and 1996/97, respectively. The information also demonstrates a 277 or a 338 tpy decrease in both PM and PM₁₀ emissions as compared to 1995/96 and 1996/97, respectively.

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**FUEL YARD MODIFICATION CONSTRUCTION PERMIT
APPLICATION**

SIGNATURE PAGES

**AUTHORIZED REPRESENTATIVE FORM,
AUTHORIZATION AND P.E. CERTIFICATION**

Owner/Authorized Representative or Responsible Official

1. Name and Title of Owner/Authorized Representative or Responsible Official :

Name : Gregory M. Nelson
Title : Manager, Environmental Planning

2. Owner or Authorized Representative or Responsible Official Mailing Address :

Organization/Firm : Tampa Electric Company
Street Address : 6944 U.S. Highway 41 North
City : Apollo Beach
State : FL Zip Code : 33572-9200

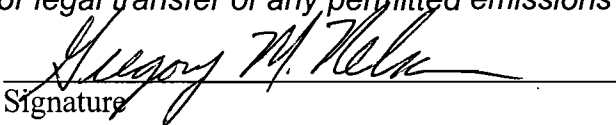
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Telephone : (813)641-5016 Fax : (813)641-5081

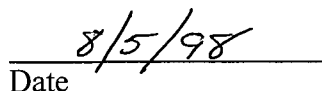
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Signature



Date



* Attach letter of authorization if not currently on file.

I. Part 2 - 1

DEP Form No. 62-210.900(1) - Form

Effective : 3-21-96



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Charles R. Black
Vice President
Energy Supply

CRB\gm\ADMIN\AUTHLLTR

Application Processing Fee

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1. Professional Engineer Name: Thomas W. Davis Registration Number: 36777
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3. Professional Engineer Telephone Numbers: Telephone: (352) 332-0444 Fax: (352) 332-6722

4. Professional Engineer Statement:

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

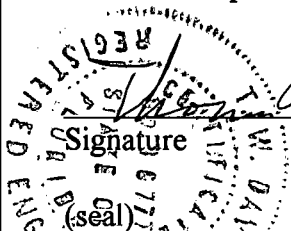
(1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this Application for Air Permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; 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 hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application.

If the purpose of this application is to obtain a Title V source air operation permit (check here [] if so), I further certify that each emissions unit described in this Application for Air Permit, when properly operated and maintained, will comply with the applicable requirements identified in this application to which the unit is subject, except those emissions units for which a compliance schedule is submitted with this application.

If the purpose of this application is to obtain an air construction permit for one or more proposed new or modified emissions units (check here [X] if so), I further certify that the engineering features of each such emissions unit described in this application have been designed or examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application.

If the purpose of this application is to obtain an initial air operation permit or operation permit revision for one or more newly constructed or modified emissions units (check here [] if so), I further certify that, with the exception of any changes detailed as part of this application, each such emissions unit has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with all provisions contained in such permit.



M. Davis

Signature

8/4/98

Date

* Attach any exception to certification statement.



TAMPA ELECTRIC
July 31, 1998

RECEIVED

AUG 03 1998

BUREAU OF
AIR REGULATION

Mr. A.A. Linero, P.E., Administrator
New Source Review Section
Florida Department of Environmental Protection
Bureau of Air Regulation
111 South Magnolia Drive, Suite 4
Tallahassee, Florida 32301

Via FedEx
Airbill No. 805858540400

Re: Tampa Electric Company (TEC) - F. J. Gannon Station
Fuel Yard Crusher Modification Construction Permit Application
Response to Agency Comments
FDEP File No. 0570040-007-AC

Dear Mr. Linero:

Please find enclosed three (3) signed and sealed copies of TEC's response to agency comments regarding the above referenced construction permit application. A fourth signed and sealed copy is being submitted to the Environmental Protection Commission of Hillsborough County (EPCHC).

This correspondence and attachments are submitted in response to your June 26, 1998 comments, and as a supplement to TEC's July 1, 1998 response to agency comments. In this submittal, TEC specifically addresses the comments raised by the Environmental Protection Commission of Hillsborough County (EPCHC). In addition, please note that the Authorized Representative for this construction permit application has been changed to Gregory M. Nelson.

We expect that these additional responses will enable you to resume processing TEC's Crusher Modification Permit Application. However, if you still have any questions or comments, feel free to contact me at (813) 641-5034. Thank you for your cooperation with this project.

Sincerely,

Theresa J.L. Watley
Consulting Engineer
Environmental Planning

EP\gm\TJLW604

Enclosures

c/enc: Mr. Clair Fancy - FDEP
Mr. Jerry Kissel - FDEP SW
Mr. Richard Kirby - EPCHC

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

(813) 228-4111

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HILLSBOROUGH COUNTY (813) 223-0800
OUTSIDE HILLSBOROUGH COUNTY 1 (888) 223-0800

RECEIVED

AUG 03 1998

**BUREAU OF
AIR REGULATION**

F.J. GANNON STATION

**FUEL YARD CRUSHER MODIFICATION
CONSTRUCTION PERMIT APPLICATION**



TAMPA ELECTRIC

MAY 1998

**ADDENDUM
JULY 1998**

**FUELYARD CRUSHER
CONSTRUCTION PERMIT APPLICATION
RESPONSE TO AGENCY COMMENTS**

**Tampa Electric Company (TEC) - F.J. Gannon Station
Fuel Yard Crusher Modification Construction Permit Application
Response To Agency Comments**

EPCHC Comment No. 1:

In the introduction section of this package it is stated that this application is not to be considered as part of the pending construction permit application for an increase in annual coal throughput limits. Since additional coal throughput and additional coal handling equipment are being sought simultaneously, it seems inappropriate to separate the two. Clearly, if PSD is triggered by the increased throughput, the new crushers should have BACT level controls and there should be a single authorization for the whole project.

TEC Response No. 1:

The crusher modification is not a means to increase the coal feed rate at F.J. Gannon Station. The purpose of installing the two new 600 ton per hour (tph) crushers is only to allow TEC to maintain our current feed rate while re-establishing consistent fine grind capability. This condition is unachievable with our existing crushers. As such, the existing crushers will serve as back-up/overflow for the new crushers in the event any of the crushers are taken off-line for maintenance, etc.

The purpose of the independent permitting effort to increase coal throughput is only to accommodate TEC's use of lower BTU fuels without compromising our ability to provide needed power generation. Furthermore, as a pollution control project that significantly reduces emissions of nitrogen oxides, the coal yard throughput project is exempt from PSD requirements.

Therefore, TEC maintains our assertion that these two projects are independent permitting efforts.

EPCHC Comment No. 2:

Table A-2 gives excess emissions rule (62-210.700, F.A.C.) as being applicable to this facility. It should be noted that this State rule does not allow exceedances of federal requirements, such as NSPS subpart Y.

TEC Response No. 2:

TEC concurs that Rule 62-210.700, F.A.C. allows for exceedances of applicable state emission requirements, but that this rule does not allow for exceedances of the applicable federal emission limits included in NSPS Subpart Y.

EPCHC Comment No. 3: In the material submitted it is stated that calculations are for PM₁₀. It appears that the K factor (0.0011) used in the equation is for PM_{2.5}.

TEC Response No. 3:

The PM₁₀ emissions were calculated correctly using the aerodynamic particulate size multiplier (k-factor) for PM₁₀. Per Compilation of Air Pollutant Emission Factors, Volume I: Stationary Point and Area Sources (AP-42), Section 13.2.4.2, the appropriate k-factor for PM₁₀ is 0.35. When combined with the emission algorithm constant of 0.0032, the result is the 0.0011 value cited in the emission estimation spreadsheets provided in Appendix B of the construction permit application.

EPCHC Comment No. 4:

No calculations were provided for coal crushing. This should be provided. The drop equation is not adequate for this activity.

TEC Response No. 4:

No particulate matter will be emitted from the crushing operation because the crushers are completely enclosed. Particulate matter will be emitted from the transfer of coal into and out of the crushers. The appropriate algorithm to use to estimate these emissions is the "drop equation" from AP-42, Section 13.2.4.2.

EPCHC Comment No. 5:

Total PM emissions is a PSD pollutant as well as PM 10. TECO should provide projected emissions for both.

TEC Response No. 5:

The requested total suspended particulate matter (TSP) worksheets are attached and should be inserted into the permit application as Appendix B.3 and Appendix B.4. A TSP emission summary is also attached and should be inserted into the permit application as Document II.E.6.1.a

EPCHC Comment No. 6:

The TECO PSD analysis is done from current actuals to future expected emissions. Based on our understanding of the WEPCO decision, this is appropriate for steam generating units, but not for other units at a power generating facility.

TEC Response No. 6:

The PSD analysis is not based on future expected actual emissions. The current actual PM emissions are based on 1996 and 1997 actual coal yard throughput data. The future potential emissions are based on the annual throughput limit contained in the current coal yard permit. This limit is 2.85 million tons per year.

**FUELYARD CRUSHER
CONSTRUCTION PERMIT APPLICATION**

SIGNATURE PAGES

**AUTHORIZED REPRESENTATIVE FORM,
AUTHORIZATION AND P.E. CERTIFICATION**

Owner/Authorized Representative or Responsible Official

1. Name and Title of Owner/Authorized Representative or Responsible Official :

Name : Gregory M. Nelson
Title : Manager, Environmental Planning

2. Owner or Authorized Representative or Responsible Official Mailing Address :

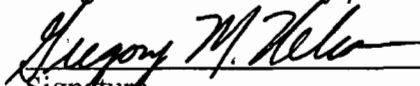
Organization/Firm : Tampa Electric Company
Street Address : 6944 U.S. Highway 41 North
City : Apollo Beach
State : FL Zip Code : 33572-9200

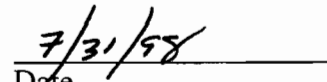
3. Owner/Authorized Representative or Responsible Official Telephone Numbers :

Telephone : (813)641-5016 Fax : (813)641-5081

4. Owner/Authorized Representative or Responsible Official Statement :

I, the undersigned, am the owner or authorized representative of the non-Title V source addressed in this Application for Air Permit or the responsible official, as defined in Rule 62-210.200, F.A.C., of the Title V source addressed in this application, whichever is applicable. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof. I understand that a permit, if granted by the Department, cannot be transferred without authorization from the Department, and I will promptly notify the Department upon sale or legal transfer of any permitted emissions units.*


Signature


Date

* Attach letter of authorization if not currently on file.

I. Part 2 - 1

DEP Form No. 62-210.900(1) - Form
Effective : 3-21-96



TO WHOM IT MAY CONCERN:

Please be advised that Gregory M. Nelson, P.E., Manager, Environmental Planning, is the authorized representative of Tampa Electric Company concerning matters with which this permit application deals.

Very truly yours,

Charles R. Black
Vice President
Energy Supply

CRB\gm\ADMIN\AUTHLLTR

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

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CUSTOMER SERVICE:
HILLSBOROUGH COUNTY (813) 223-0800
OUTSIDE HILLSBOROUGH COUNTY 1 (888) 223-0800

Application Processing Fee

Check one :

[X] Attached - Amount : \$250.00 [] Not Applicable.

Construction/Modification Information

1. Description of Proposed Project or Alterations :	
1. Install two additional fine grind crushers rated at 600 tph each.	
2. Projected or Actual Date of Commencement of Construction :	01-Nov-1998
3. Projected Date of Completion of Construction :	01-May-1999

Professional Engineer Certification

1. Professional Engineer Name : Gregory M. Nelson Registration Number : 44078	
2. Professional Engineer Mailing Address :	
Organization/Firm : Tampa Electric Company Street Address : 6944 U.S. Highway 41 North City : Apollo Beach State : FL Zip Code : 33572-9200	
3. Professional Engineer Telephone Numbers :	
Telephone : (813)641-5016	Fax : (813)641-5081

4. Professional Engineer Statement :

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

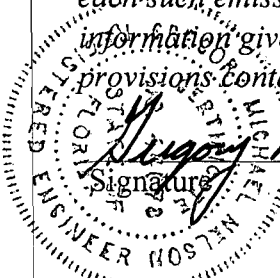
(1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollutant control equipment described in this Application for Air Permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; 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 hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application.

If the purpose of this application is to obtain a Title V source air operation permit (check here [] if so), I further certify that each emissions unit described in this Application for Air Permit, when properly operated and maintained, will comply with the applicable requirements identified in this application to which the unit is subject, except those emissions units for which a compliance schedule is submitted with this application.

If the purpose of this application is to obtain an air construction permit for one or more proposed new or modified emissions units (check here [] if so), I further certify that the engineering features of each such emissions unit described in this application have been designed or examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application.

If the purpose of this application is to obtain an initial air operation permit or operation permit revision for one or more newly constructed or modified emissions units (check here [] if so), I further certify that, with the exception of any changes detailed as part of this application, each such emissions has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with all provisions contained in such permit.



Michael M. Nelson
Signature

7/31/98
Date

* Attach any exception to certification statement.

I. Part 6 - 1

DOCUMENT II.E.6.1.a

SUMMARY OF TOTAL PM EMISSION CHANGES

DOC.II.E.6.1.a - SUMMARY OF TOTAL PM EMISSION CHANGES

Emission Point Description	Total PM Emission			
	Emission Point ID	Actual (tpy)	Future Potential (tpy)	Change (tpy)
Conveyor G1 to Crusher 3A	FH-032	0.09	0.09	0.00
Crusher 3A to Conveyor G1	FH-032a	0.00	0.04	0.04
Conveyor G1 to Crusher 1	FH-032b	0.00	0.04	0.04
Conveyor G2 to Crusher 3B	FH-033	0.09	0.09	0.00
Crusher 3B to Conveyor G2	FH-033a	0.00	0.04	0.04
Conveyor G2 to Crusher 2	FH-033b	0.00	0.04	0.04
Crusher 1 to Conveyor H1	FH-034	0.09	0.04	-0.05
Crusher 3A to Conveyor H1	FH-034a	0.00	0.04	0.04
Crushers 2 to Conveyor H2	FH-035	0.09	0.04	-0.05
Crushers 3B to Conveyor H2	FH-035a	0.00	0.04	0.04
Total PM Emission Summary		0.36	0.50	0.14

Notes:

1. Actual emissions based on average of 1996 and 1997 actual fuel throughput equally divided among transfer points.
2. Future potential emissions based on permitted throughput limit equally divided among transfer points.
3. See Appendix B for emission calculation detail.

APPENDIX B.3

**FUTURE POTENTIAL TOTAL PM
EMISSION CALCULATION SPREADSHEETS**

FUTURE POTENTIAL EMISSION INVENTORY WORKSHEET

Tampa Electric Company - F.J. Gannon Station

FH-032

EMISSION SOURCE TYPE

MATERIAL TRANSFER - FUGITIVE EMISSION SOURCES

Figure:

FACILITY AND SOURCE DESCRIPTION

Emission Source Description: Fuel Handling - Conveyor G1 to Hammermill Crusher 3A

Emission Control Method(s)/ID No(s): Enclosure with Dust Suppressant

Emission Point ID: FH-032

Transfer Point ID(s):

EMISSION ESTIMATION EQUATIONS

$$\text{Emission(lb/hr)} = 0.0032 \times \text{material transferred(tons/hr)} \times [(\text{average wind speed(mph)} / 5)^{E1.3} / (\text{moisture content(pct)} / 2)^{E1.4}] \times [100 - \text{control(pct)} / 100]$$

$$\text{Emission(tpy)} = 0.0032 \times \text{material transferred(tpy)} \times [(\text{average wind speed(mph)} / 5)^{E1.3} / (\text{moisture content(pct)} / 2)^{E1.4}] \times [100 - \text{control(pct)} / 100] \times (1/2000)$$

Source: Section 13.2.4 - Aggregate Handling and Storage Piles, AP-42, Fifth Edition, January 1995.

INPUT DATA AND EMISSIONS CALCULATIONS

Mean Wind Speed (mph)	Potential Quantity Transferred		Material Moisture Content (pct)	Control Efficiency (pct)	Potential Total PM Emission Rates	
	(tons/hr)	(tons/yr)			(lb/hr)	(tpy)
8.6	800	1,425,000	6.5	90.0	0.10	0.09

SOURCES OF INPUT DATA

Parameter	Data Source
Mean Wind Speed	Tampa, FL, Climate of the State, Third Edition, 1985.
Potential Quantity Transferred	TEC, 1998.
Material Moisture Content	Average fuel moisture content, TEC, 1994.
Control Efficiency	Table 3.2.17-2, Workbook on Estimation of Emissions and Dispersion Modeling of Fugitive Particulate Sources, UARG, September 1981.

NOTES AND OBSERVATIONS

Future potential Total PM emissions based on 2,850,000 tons per year of coal delivered.

Future potential coal reclaiming was assumed to be equally divided between conveyors G1 and G2, or 1,425,000 tons per conveyor.

Future potential coal reclaiming from conveyors G1 and G2 was also assumed to be equally divided between Crushers 3A and 1, or Crushers 3B and 2; or 712,500 tons per crusher series.

DATA CONTROL

Data Collected by:	T.J.L. Watley	Date:	07/29/98
Evaluated by:	T.J.L. Watley	Date:	07/29/98
Data Entered by:	T.J.L. Watley	Date:	07/29/98
Reviewed by:	A. Trbovich	Date:	07/29/98

FUTURE POTENTIAL EMISSION INVENTORY WORKSHEET

Tampa Electric Company - F.J. Gannon Station

FH-032a

EMISSION SOURCE TYPE

MATERIAL TRANSFER - FUGITIVE EMISSION SOURCES

Figure:

FACILITY AND SOURCE DESCRIPTION

Emission Source Description: Fuel Handling - Hammermill Crusher 3A to Conveyor G1

Emission Control Method(s)/ID No(s): Enclosure with Dust Suppressant

Emission Point ID: FH-032a Transfer Point ID(s):

EMISSION ESTIMATION EQUATIONS

$$\text{Emission(lb/hr)} = 0.0032 \times \text{material transferred(tons/hr)} \times [(\text{average wind speed(mph)} / 5)E1.3 / (\text{moisture content(pct)} / 2)E1.4] \times [100 - \text{control(pct)} / 100]$$

$$\text{Emission(tpy)} = 0.0032 \times \text{material transferred(tpy)} \times [(\text{average wind speed(mph)} / 5)E1.3 / (\text{moisture content(pct)} / 2)E1.4] \times [100 - \text{control(pct)} / 100] \times (1/2000)$$

Source: Section 13.2.4 - Aggregate Handling and Storage Piles, AP-42, Fifth Edition, January 1995.

INPUT DATA AND EMISSIONS CALCULATIONS

Mean Wind Speed (mph)	Potential Quantity Transferred		Material Moisture Content (pct)	Control Efficiency (pct)	Potential Total PM Emission Rates	
	(tons/hr)	(tons/yr)			(lb/hr)	(tpy)
8.6	600	712,500	6.5	90.0	0.07	0.04

SOURCES OF INPUT DATA

Parameter	Data Source
Mean Wind Speed	Tampa, FL, Climate of the State, Third Edition, 1985.
Potential Quantity Transferred	TEC, 1998.
Material Moisture Content	Average fuel moisture content, TEC, 1994.
Control Efficiency	Table 3.2.17-2, Workbook on Estimation of Emissions and Dispersion Modeling of Fugitive Particulate Sources, UARG, September 1981.

NOTES AND OBSERVATIONS

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Future potential coal reclaiming was assumed to be equally divided between conveyors G1 and G2, or 1,425,000 tons per conveyor.

Future potential coal reclaiming from conveyors G1 and G2 was also assumed to be equally divided between Crushers 3A and 1, or Crushers 3B and 2; or 712,500 tons per crusher series.

DATA CONTROL

Data Collected by:	T.J.L. Watley	Date:	07/29/98
Evaluated by:	T.J.L. Watley	Date:	07/29/98
Data Entered by:	T.J.L. Watley	Date:	07/29/98
Reviewed by:	A. Trbovich	Date:	07/29/98

FUTURE POTENTIAL EMISSION INVENTORY WORKSHEET

Tampa Electric Company - F.J. Gannon Station

FH-032b

EMISSION SOURCE TYPE

MATERIAL TRANSFER - FUGITIVE EMISSION SOURCES

Figure:

FACILITY AND SOURCE DESCRIPTION

Emission Source Description: Fuel Handling - Conveyor G1 to Hammermill Crusher 1

Emission Control Method(s)/ID No(s): Enclosure with Dust Suppressant

Emission Point ID: FH-032b Transfer Point ID(s):

EMISSION ESTIMATION EQUATIONS

$$\text{Emission(lb/hr)} = 0.0032 \times \text{material transferred(tons/hr)} \times [(\text{average wind speed(mph)} / 5)^{E1.3} / (\text{moisture content(pct)} / 2)^{E1.4}] \times [100 - \text{control(pct)} / 100]$$

$$\text{Emission(tpy)} = 0.0032 \times \text{material transferred(tpy)} \times [(\text{average wind speed(mph)} / 5)^{E1.3} / (\text{moisture content(pct)} / 2)^{E1.4}] \times [100 - \text{control(pct)} / 100] \times (1/2000)$$

Source: Section 13.2.4 - Aggregate Handling and Storage Piles, AP-42, Fifth Edition, January 1995.

INPUT DATA AND EMISSIONS CALCULATIONS

Mean Wind Speed (mph)	Potential Quantity Transferred		Material Moisture Content (pct)	Control Efficiency (pct)	Potential Total PM Emission Rates	
	(tons/hr)	(tons/yr)			(lb/hr)	(tpy)
8.6	800	712,500	6.5	90.0	0.10	0.04

SOURCES OF INPUT DATA

Parameter	Data Source
Mean Wind Speed	Tampa, FL, Climate of the State, Third Edition, 1985.
Potential Quantity Transferred	TEC, 1998.
Material Moisture Content	Average fuel moisture content, TEC, 1994.
Control Efficiency	Table 3.2.17-2, Workbook on Estimation of Emissions and Dispersion Modeling of Fugitive Particulate Sources, UARG, September 1981.

NOTES AND OBSERVATIONS

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Future potential coal reclaiming from conveyors G1 and G2 was also assumed to be equally divided between Crushers 3A and 1, or Crushers 3B and 2; or 712,500 tons per crusher series.

DATA CONTROL

Data Collected by:	T.J.L. Watley	Date:	07/29/98
Evaluated by:	T.J.L. Watley	Date:	07/29/98
Data Entered by:	T.J.L. Watley	Date:	07/29/98
Reviewed by:	A. Trbovich	Date:	07/29/98

FUTURE POTENTIAL EMISSION INVENTORY WORKSHEET

Tampa Electric Company - F.J. Gannon Station

FH-033

EMISSION SOURCE TYPE

MATERIAL TRANSFER - FUGITIVE EMISSION SOURCES

Figure:

FACILITY AND SOURCE DESCRIPTION

Emission Source Description: Fuel Handling - Conveyor G2 to Hammermill Crusher 3B

Emission Control Method(s)/ID No(s) : Enclosure with Dust Suppressant

Emission Point ID: FH-033

Transfer Point ID(s):

EMISSION ESTIMATION EQUATIONS

$$\text{Emission(lb/hr)} = 0.0032 \times \text{material transferred(tons/hr)} \times [(\text{average wind speed(mph)} / 5)^{E1.3} / (\text{moisture content(pct)} / 2)^{E1.4}] \times [100 - \text{control(pct)} / 100]$$

$$\text{Emission(tpy)} = 0.0032 \times \text{material transferred(tpy)} \times [(\text{average wind speed(mph)} / 5)^{E1.3} / (\text{moisture content(pct)} / 2)^{E1.4}] \times [100 - \text{control(pct)} / 100] \times (1/2000)$$

Source: Section 13.2.4 - Aggregate Handling and Storage Piles, AP-42, Fifth Edition, January 1995.

INPUT DATA AND EMISSIONS CALCULATIONS

Mean Wind Speed (mph)	Potential Quantity Transferred		Material Moisture Content (pct)	Control Efficiency (pct)	Potential Total PM Emission Rates	
	(tons/hr)	(tons/yr)			(lb/hr)	(tpy)
8.6	800	1,425,000	6.5	90.0	0.10	0.09

SOURCES OF INPUT DATA

Parameter	Data Source
Mean Wind Speed	Tampa, FL, Climate of the State, Third Edition, 1985.
Potential Quantity Transferred	TEC, 1998.
Material Moisture Content	Average fuel moisture content, TEC, 1994.
Control Efficiency	Table 3.2.17-2, Workbook on Estimation of Emissions and Dispersion Modeling of Fugitive Particulate Sources, UARG, September 1981.

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Data Collected by:	T.J.L. Watley	Date:	07/29/98
Evaluated by:	T.J.L. Watley	Date:	07/29/98
Data Entered by:	T.J.L. Watley	Date:	07/29/98
Reviewed by:	A. Trbovich	Date:	07/29/98

FUTURE POTENTIAL EMISSION INVENTORY WORKSHEET

Tampa Electric Company - F.J. Gannon Station

FH-033a

EMISSION SOURCE TYPE

MATERIAL TRANSFER - FUGITIVE EMISSION SOURCES

Figure:

FACILITY AND SOURCE DESCRIPTION

Emission Source Description: Fuel Handling - Hammermill Crusher 3B to Conveyor G2

Emission Control Method(s)/ID No(s): Enclosure with Dust Suppressant

Emission Point ID: FH-033a Transfer Point ID(s):

EMISSION ESTIMATION EQUATIONS

$$\text{Emission(lb/hr)} = 0.0032 \times \text{material transferred(tons/hr)} \times [(\text{average wind speed(mph)} / 5)^{E1.3} / (\text{moisture content(pct)} / 2)^{E1.4}] \times [100 - \text{control(pct)} / 100]$$

$$\text{Emission(tpy)} = 0.0032 \times \text{material transferred(tpy)} \times [(\text{average wind speed(mph)} / 5)^{E1.3} / (\text{moisture content(pct)} / 2)^{E1.4}] \times [100 - \text{control(pct)} / 100] \times (1/2000)$$

Source: Section 13.2.4 - Aggregate Handling and Storage Piles, AP-42, Fifth Edition, January 1995.

INPUT DATA AND EMISSIONS CALCULATIONS

Mean Wind Speed (mph)	Potential Quantity Transferred		Material Moisture Content (pct)	Control Efficiency (pct)	Potential Total PM Emission Rates	
	(tons/hr)	(tons/yr)			(lb/hr)	(tpy)
8.6	600	712,500	6.5	90.0	0.07	0.04

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- Future potential coal reclaiming from conveyors G1 and G2 was also assumed to be equally divided between Crushers 3A and 1, or Crushers 3B and 2; or 712,500 tons per crusher series.

DATA CONTROL

Data Collected by:	T.J.L. Watley	Date:	07/29/98
Evaluated by:	T.J.L. Watley	Date:	07/29/98
Data Entered by:	T.J.L. Watley	Date:	07/29/98
Reviewed by:	A. Trbovich	Date:	07/29/98

FUTURE POTENTIAL EMISSION INVENTORY WORKSHEET

Tampa Electric Company - F.J. Gannon Station

FH-033b

EMISSION SOURCE TYPE

MATERIAL TRANSFER - FUGITIVE EMISSION SOURCES

Figure:

FACILITY AND SOURCE DESCRIPTION

Emission Source Description: Fuel Handling - Conveyor G2 to Hammermill Crusher 2

Emission Control Method(s)/ID No(s): Enclosure with Dust Suppressant

Emission Point ID: FH-033b Transfer Point ID(s):

EMISSION ESTIMATION EQUATIONS

$$\text{Emission (lb/hr)} = 0.0032 \times \text{material transferred (tons/hr)} \times [(\text{average wind speed (mph)} / 5)E1.3 / (\text{moisture content (pct)} / 2)E1.4] \times [100 - \text{control (pct)} / 100]$$

$$\text{Emission (tpy)} = 0.0032 \times \text{material transferred (tpy)} \times [(\text{average wind speed (mph)} / 5)E1.3 / (\text{moisture content (pct)} / 2)E1.4] \times [100 - \text{control (pct)} / 100] \times (1/2000)$$

Source: Section 13.2.4 - Aggregate Handling and Storage Piles, AP-42, Fifth Edition, January 1995.

INPUT DATA AND EMISSIONS CALCULATIONS

Mean Wind Speed (mph)	Potential Quantity Transferred		Material Moisture Content (pct)	Control Efficiency (pct)	Potential Total PM Emission Rates	
	(tons/hr)	(tons/yr)			(lb/hr)	(tpy)
8.6	800	712,500	6.5	90.0	0.10	0.04

SOURCES OF INPUT DATA

Parameter	Data Source
Mean Wind Speed	Tampa, FL, Climate of the State, Third Edition, 1985.
Potential Quantity Transferred	TEC, 1998.
Material Moisture Content	Average fuel moisture content, TEC, 1994.
Control Efficiency	Table 3.2.17-2, Workbook on Estimation of Emissions and Dispersion Modeling of Fugitive Particulate Sources, UARG, September 1981.

NOTES AND OBSERVATIONS

Future potential Total PM emissions based on 2,850,000 tons per year of coal delivered.

Future potential coal reclaiming was assumed to be equally divided between conveyors G1 and G2, or 1,425,000 tons per conveyor.

Future potential coal reclaiming from conveyors G1 and G2 was also assumed to be equally divided between Crushers 3A and 1, or Crushers 3B and 2; or 712,500 tons per crusher series.

DATA CONTROL

Data Collected by:	T.J.L. Watley	Date:	07/29/98
Evaluated by:	T.J.L. Watley	Date:	07/29/98
Data Entered by:	T.J.L. Watley	Date:	07/29/98
Reviewed by:	A. Trbovich	Date:	07/29/98

FUTURE POTENTIAL EMISSION INVENTORY WORKSHEET

Tampa Electric Company - F.J. Gannon Station

FH-034

EMISSION SOURCE TYPE

MATERIAL TRANSFER - FUGITIVE EMISSION SOURCES

Figure:

FACILITY AND SOURCE DESCRIPTION

Emission Source Description: Fuel Handling - Hammermill Crusher 1 to Conveyor H1

Emission Control Method(s)/ID No(s) .: Enclosure with Dust Suppressant

Emission Point ID: FH-034

Transfer Point ID(s):

EMISSION ESTIMATION EQUATIONS

$$\text{Emission(lb/hr)} = 0.0032 \times \text{material transferred(tons/hr)} \times [(\text{average wind speed(mph)} / 5)E^{1.3} / (\text{moisture content(pct)} / 2)E^{1.4}] \times [100 - \text{control(pct)} / 100]$$

$$\text{Emission(tpy)} = 0.0032 \times \text{material transferred(tpy)} \times [(\text{average wind speed(mph)} / 5)E^{1.3} / (\text{moisture content(pct)} / 2)E^{1.4}] \times [100 - \text{control(pct)} / 100] \times (1/2000)$$

Source: Section 13.2.4 - Aggregate Handling and Storage Piles, AP-42, Fifth Edition, January 1995.

INPUT DATA AND EMISSIONS CALCULATIONS

Mean Wind Speed (mph)	Potential Quantity Transferred		Material Moisture Content (pct)	Control Efficiency (pct)	Potential Total PM Emission Rates	
	(tons/hr)	(tons/yr)			(lb/hr)	(tpy)
8.6	800	712,500	6.5	90.0	0.10	0.04

SOURCES OF INPUT DATA

Parameter	Data Source
Mean Wind Speed	Tampa, FL, Climate of the State, Third Edition, 1985.
Potential Quantity Transferred	TEC, 1998.
Material Moisture Content	Average fuel moisture content, TEC, 1994.
Control Efficiency	Table 3.2.17-2, Workbook on Estimation of Emissions and Dispersion Modeling of Fugitive Particulate Sources, UARG, September 1981.

NOTES AND OBSERVATIONS

Future potential Total PM emissions based on 2,850,000 tons per year of coal delivered.

Future potential coal reclaiming was assumed to be equally divided between conveyors G1 and G2, or 1,425,000 tons per conveyor.

Future potential coal reclaiming from conveyors G1 and G2 was also assumed to be equally divided between Crushers 3A and 1, or Crushers 3B and 2; or 712,500 tons per crusher series.

DATA CONTROL

Data Collected by:	T.J.L. Watley	Date:	07/29/98
Evaluated by:	T.J.L. Watley	Date:	07/29/98
Data Entered by:	T.J.L. Watley	Date:	07/29/98
Reviewed by:	A. Trbovich	Date:	07/29/98

FUTURE POTENTIAL EMISSION INVENTORY WORKSHEET

Tampa Electric Company - F.J. Gannon Station

FH-034a

EMISSION SOURCE TYPE

MATERIAL TRANSFER - FUGITIVE EMISSION SOURCES

Figure:

FACILITY AND SOURCE DESCRIPTION

Emission Source Description: Fuel Handling - Hammermill Crusher 3A to Conveyor H1

Emission Control Method(s)/ID No(s): Enclosure with Dust Suppressant

Emission Point ID: FH-034a Transfer Point ID(s):

EMISSION ESTIMATION EQUATIONS

$$\text{Emission(lb/hr)} = 0.0032 \times \text{material transferred(tons/hr)} \times \left[\frac{\text{average wind speed(mph)}}{5} \right]^{E1.3} / \left[\frac{\text{moisture content(pct)}}{2} \right]^{E1.4} \times [100 - \text{control(pct)} / 100]$$

$$\text{Emission(tpy)} = 0.0032 \times \text{material transferred(tpy)} \times \left[\frac{\text{average wind speed(mph)}}{5} \right]^{E1.3} / \left[\frac{\text{moisture content(pct)}}{2} \right]^{E1.4} \times [100 - \text{control(pct)} / 100] \times (1/2000)$$

Source: Section 13.2.4 - Aggregate Handling and Storage Piles, AP-42, Fifth Edition, January 1995.

INPUT DATA AND EMISSIONS CALCULATIONS

Mean Wind Speed (mph)	Potential Quantity Transferred		Material Moisture Content (pct)	Control Efficiency (pct)	Potential Total PM Emission Rates	
	(tons/hr)	(tons/yr)			(lb/hr)	(tpy)
8.6	600	712,500	6.5	90.0	0.07	0.04

SOURCES OF INPUT DATA

Parameter	Data Source
Mean Wind Speed	Tampa, FL, Climate of the State, Third Edition, 1985.
Potential Quantity Transferred	TEC, 1998.
Material Moisture Content	Average fuel moisture content, TEC, 1994.
Control Efficiency	Table 3.2.17-2, Workbook on Estimation of Emissions and Dispersion Modeling of Fugitive Particulate Sources, UARG, September 1981.

NOTES AND OBSERVATIONS

Future potential Total PM emissions based on 2,850,000 tons per year of coal delivered.

Future potential coal reclaiming was assumed to be equally divided between conveyors G1 and G2, or 1,425,000 tons per conveyor.

Future potential coal reclaiming from conveyors G1 and G2 was also assumed to be equally divided between Crushers 3A and 1, or Crushers 3B and 2; or 712,500 tons per crusher series.

DATA CONTROL

Data Collected by:	T.J.L. Watley	Date:	07/29/98
Evaluated by:	T.J.L. Watley	Date:	07/29/98
Data Entered by:	T.J.L. Watley	Date:	07/29/98
Reviewed by:	A. Trbovich	Date:	07/29/98

FUTURE POTENTIAL EMISSION INVENTORY WORKSHEET

Tampa Electric Company - F.J. Gannon Station

FH-035

EMISSION SOURCE TYPE

MATERIAL TRANSFER - FUGITIVE EMISSION SOURCES

Figure:

FACILITY AND SOURCE DESCRIPTION

Emission Source Description: Fuel Handling - Hammermill Crusher 2 to Conveyor H2

Emission Control Method(s)/ID No(s): Enclosure with Dust Suppressant

Emission Point ID: FH-035

Transfer Point ID(s):

EMISSION ESTIMATION EQUATIONS

$$\text{Emission(lb/hr)} = 0.0032 \times \text{material transferred(tons/hr)} \times [(\text{average wind speed(mph)} / 5)^{E1.3} / (\text{moisture content(pct)} / 2)^{E1.4}] \times [100 - \text{control(pct)} / 100]$$

$$\text{Emission(tpy)} = 0.0032 \times \text{material transferred(tpy)} \times [(\text{average wind speed(mph)} / 5)^{E1.3} / (\text{moisture content(pct)} / 2)^{E1.4}] \times [100 - \text{control(pct)} / 100] \times (1/2000)$$

Source: Section 13.2.4 - Aggregate Handling and Storage Piles, AP-42, Fifth Edition, January 1995.

INPUT DATA AND EMISSIONS CALCULATIONS

Mean Wind Speed (mph)	Potential Quantity Transferred		Material Moisture Content (pct)	Control Efficiency (pct)	Potential Total PM Emission Rates	
	(tons/hr)	(tons/yr)			(lb/hr)	(tpy)
8.6	800	712,500	6.5	90.0	0.10	0.04

SOURCES OF INPUT DATA

Parameter	Data Source
Mean Wind Speed	Tampa, FL, Climate of the State, Third Edition, 1985.
Potential Quantity Transferred	TEC, 1998.
Material Moisture Content	Average fuel moisture content, TEC, 1994.
Control Efficiency	Table 3.2.17-2, Workbook on Estimation of Emissions and Dispersion Modeling of Fugitive Particulate Sources, UARG, September 1981.

NOTES AND OBSERVATIONS

Future potential Total PM emissions based on 2,850,000 tons per year of coal delivered.

Future potential coal reclaiming was assumed to be equally divided between conveyors G1 and G2, or 1,425,000 tons per conveyor.

Future potential coal reclaiming from conveyors G1 and G2 was also assumed to be equally divided between Crushers 3A and 1, or Crushers 3B and 2; or 712,500 tons per crusher series.

DATA CONTROL

Data Collected by:	T.J.L. Watley	Date:	07/29/98
Evaluated by:	T.J.L. Watley	Date:	07/29/98
Data Entered by:	T.J.L. Watley	Date:	07/29/98
Reviewed by:	A. Trbovich	Date:	07/29/98

FUTURE POTENTIAL EMISSION INVENTORY WORKSHEET

Tampa Electric Company - F.J. Gannon Station

FH-035a

EMISSION SOURCE TYPE

MATERIAL TRANSFER - FUGITIVE EMISSION SOURCES

Figure:

FACILITY AND SOURCE DESCRIPTION

Emission Source Description: Fuel Handling - Hammermill Crusher 3B to Conveyor H2

Emission Control Method(s)/ID No(s): Enclosure with Dust Suppressant

Emission Point ID: FH-035a

Transfer Point ID(s):

EMISSION ESTIMATION EQUATIONS

$$\text{Emission (lb/hr)} = 0.0032 \times \text{material transferred (tons/hr)} \times [(\text{average wind speed (mph)} / 5)E1.3 / (\text{moisture content (pct)} / 2)E1.4] \times [100 - \text{control (pct)} / 100]$$

$$\text{Emission (tpy)} = 0.0032 \times \text{material transferred (tpy)} \times [(\text{average wind speed (mph)} / 5)E1.3 / (\text{moisture content (pct)} / 2)E1.4] \times [100 - \text{control (pct)} / 100] \times (1/2000)$$

Source: Section 13.2.4 - Aggregate Handling and Storage Piles, AP-42, Fifth Edition, January 1995.

INPUT DATA AND EMISSIONS CALCULATIONS

Mean Wind Speed (mph)	Potential Quantity Transferred		Material Moisture Content (pct)	Control Efficiency (pct)	Potential Total PM Emission Rates	
	(tons/hr)	(tons/yr)			(lb/hr)	(tpy)
8.6	600	712,500	6.5	90.0	0.07	0.04

SOURCES OF INPUT DATA

Parameter	Data Source
Mean Wind Speed	Tampa, FL, Climate of the State, Third Edition, 1985.
Potential Quantity Transferred	TEC, 1998.
Material Moisture Content	Average fuel moisture content, TEC, 1994.
Control Efficiency	Table 3.2.17-2, Workbook on Estimation of Emissions and Dispersion Modeling of Fugitive Particulate Sources, UARG, September 1981.

NOTES AND OBSERVATIONS

Future potential Total PM emissions based on 2,850,000 tons per year of coal delivered.

Future potential coal reclaiming was assumed to be equally divided between conveyors G1 and G2, or 1,425,000 tons per conveyor.

Future potential coal reclaiming from conveyors G1 and G2 was also assumed to be equally divided between Crushers 3A and 1, or Crushers 3B and 2; or 712,500 tons per crusher series.

DATA CONTROL

Data Collected by:	T.J.L. Watley	Date:	07/29/98
Evaluated by:	T.J.L. Watley	Date:	07/29/98
Data Entered by:	T.J.L. Watley	Date:	07/29/98
Reviewed by:	A. Trbovich	Date:	07/29/98

APPENDIX B.4

**ACTUAL TOTAL PM
EMISSION CALCULATION**

ACTUAL EMISSION INVENTORY WORKSHEET

Tampa Electric Company - F.J. Gannon Station

FH-032

EMISSION SOURCE TYPE

MATERIAL TRANSFER - FUGITIVE EMISSION SOURCES

Figure:

FACILITY AND SOURCE DESCRIPTION

Emission Source Description: Fuel Handling - Conveyor G1 to Hammermill Crusher 1

Emission Control Method(s)/ID No(s) : Enclosure with Dust Suppressant

Emission Point ID: FH-032

Transfer Point ID(s):

EMISSION ESTIMATION EQUATIONS

$$\text{Emission(lb/hr)} = 0.0032 \times \text{material transferred(tons/hr)} \times [(\text{average wind speed(mph)} / 5)E1.3 / (\text{moisture content(pct)} / 2)E1.4] \times [100 - \text{control(pct)} / 100]$$

$$\text{Emission(tpy)} = 0.0032 \times \text{material transferred(tpy)} \times [(\text{average wind speed(mph)} / 5)E1.3 / (\text{moisture content(pct)} / 2)E1.4] \times [100 - \text{control(pct)} / 100] \times (1/2000)$$

Source: Section 13.2.4 - Aggregate Handling and Storage Piles, AP-42, Fifth Edition, January 1995.

INPUT DATA AND EMISSIONS CALCULATIONS

Mean Wind Speed (mph)	Actual Quantity Transferred		Material Moisture Content (pct)	Control Efficiency (pct)	Actual Total PM Emission Rates	
	(tons/hr)	(tons/yr)			(lb/hr)	(tpy)
8.6	800	1,377,496	6.5	90.0	0.10	0.09

SOURCES OF INPUT DATA

Parameter	Data Source
Mean Wind Speed	Tampa, FL, Climate of the State, Third Edition, 1985.
Actual Quantity Transferred	TEC, 1998.
Material Moisture Content	Average fuel moisture content, TEC, 1994.
Control Efficiency	Table 3.2.17-2, Workbook on Estimation of Emissions and Dispersion Modeling of Fugitive Particulate Sources, UARG, September 1981.

NOTES AND OBSERVATIONS

Actual Total PM emissions based on 2,754,991 tpy of coal delivered. Actual coal throughput is the average of the 1996 and 1997 actual coal delivered, 2,668,955 tons and 2,841,027 tons, respectively.

Actual coal reclaiming was assumed to be equally divided between conveyors G1 and G2, or 1,377,495.5 tons per conveyor.

DATA CONTROL

Data Collected by:	T.J.L. Watley	Date:	07/29/98
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Reviewed by:	A. Trbovich	Date:	07/29/98

ACTUAL EMISSION INVENTORY WORKSHEET

Tampa Electric Company - F.J. Gannon Station

FH-033

EMISSION SOURCE TYPE

MATERIAL TRANSFER - FUGITIVE EMISSION SOURCES

Figure:

FACILITY AND SOURCE DESCRIPTION

Emission Source Description: Fuel Handling - Conveyor G2 to Hammermill Crusher 2

Emission Control Method(s)/ID No(s) : Enclosure with Dust Suppressant

Emission Point ID: FH-033

Transfer Point ID(s):

EMISSION ESTIMATION EQUATIONS

$$\text{Emission(lb/hr)} = 0.0032 \times \text{material transferred(tons/hr)} \times [(\text{average wind speed(mph)} / 5)^{E1.3} / (\text{moisture content(pct)} / 2)^{E1.4}] \times [100 - \text{control(pct)} / 100]$$

$$\text{Emission(tpy)} = 0.0032 \times \text{material transferred(tpy)} \times [(\text{average wind speed(mph)} / 5)^{E1.3} / (\text{moisture content(pct)} / 2)^{E1.4}] \times [100 - \text{control(pct)} / 100] \times (1/2000)$$

Source: Section 13.2.4 - Aggregate Handling and Storage Piles, AP-42, fifth Edition, January 1995.

INPUT DATA AND EMISSIONS CALCULATIONS

Mean Wind Speed (mph)	Actual Quantity Transferred		Material Moisture Content (pct)	Control Efficiency (pct)	Actual Total PM Emission Rates	
	(tons/hr)	(tons/yr)			(lb/hr)	(tpy)
8.6	800	1,377,496	6.5	90.0	0.10	0.09

SOURCES OF INPUT DATA

Parameter	Data Source
Mean Wind Speed	Tampa, FL, Climate of the State, Third Edition, 1985.
Actual Quantity Transferred	TEC, 1998.
Material Moisture Content	Average fuel moisture content, TEC, 1994.
Control Efficiency	Table 3.2.17-2, Workbook on Estimation of Emissions and Dispersion Modeling of Fugitive Particulate Sources, UARG, September 1981.

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Reviewed by:	A. Trbovich	Date:	07/29/98

ACTUAL EMISSION INVENTORY WORKSHEET

Tampa Electric Company - F.J. Gannon Station

FH-034

EMISSION SOURCE TYPE

MATERIAL TRANSFER - FUGITIVE EMISSION SOURCES

Figure:

FACILITY AND SOURCE DESCRIPTION

Emission Source Description: Fuel Handling - Hammermill Crusher 1 to Conveyor H1

Emission Control Method(s)/ID No(s) : Enclosure with Dust Suppressant

Emission Point ID: FH-034

Transfer Point ID(s):

EMISSION ESTIMATION EQUATIONS

$$\text{Emission(lb/hr)} = 0.0032 \times \text{material transferred(tons/hr)} \times [(\text{average wind speed(mph)} / 5)E1.3 / (\text{moisture content(pct)} / 2)E1.4] \times [100 - \text{control(pct)} / 100]$$

$$\text{Emission(tpy)} = 0.0032 \times \text{material transferred(tpy)} \times [(\text{average wind speed(mph)} / 5)E1.3 / (\text{moisture content(pct)} / 2)E1.4] \times [100 - \text{control(pct)} / 100] \times (1/2000)$$

Source: Section 13.2.4 - Aggregate Handling and Storage Piles, AP-42, fifth Edition, January 1995.

INPUT DATA AND EMISSIONS CALCULATIONS

Mean Wind Speed (mph)	Actual Quantity Transferred		Material Moisture Content (pct)	Control Efficiency (pct)	Actual Total PM Emission Rates	
	(tons/hr)	(tons/yr)			(lb/hr)	(tpy)
8.6	800	1,377,496	6.5	90.0	0.10	0.09

SOURCES OF INPUT DATA

Parameter	Data Source
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DATA CONTROL

Data Collected by:	T.J.L. Watley	Date:	07/29/98
Evaluated by:	T.J.L. Watley	Date:	07/29/98
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Reviewed by:	A. Trbovich	Date:	07/29/98

ACTUAL EMISSION INVENTORY WORKSHEET

Tampa Electric Company - F.J. Gannon Station

FH-035

EMISSION SOURCE TYPE

MATERIAL TRANSFER - FUGITIVE EMISSION SOURCES

Figure:

FACILITY AND SOURCE DESCRIPTION

Emission Source Description: Fuel Handling - Hammermill Crusher 2 to Conveyor H2

Emission Control Method(s)/ID No(s) .: Enclosure with Dust Suppressant

Emission Point ID: FH-035

Transfer Point ID(s):

EMISSION ESTIMATION EQUATIONS

$$\text{Emission(lb/hr)} = 0.0032 \times \text{material transferred(tons/hr)} \times [(\text{average wind speed(mph)} / 5)E1.3 / (\text{moisture content(pct)} / 2)E1.4] \times [100 - \text{control(pct)} / 100]$$

$$\text{Emission(tpy)} = 0.0032 \times \text{material transferred(tpy)} \times [(\text{average wind speed(mph)} / 5)E1.3 / (\text{moisture content(pct)} / 2)E1.4] \times [100 - \text{control(pct)} / 100] \times (1/2000)$$

Source: Section 13.2.4 - Aggregate Handling and Storage Piles, AP-42, fifth Edition, January 1995.

INPUT DATA AND EMISSIONS CALCULATIONS

Mean Wind Speed (mph)	Actual Quantity Transferred		Material Moisture Content (pct)	Control Efficiency (pct)	Actual Total PM Emission Rates	
	(tons/hr)	(tons/yr)			(lb/hr)	(tpy)
8.6	800	1,377,496	6.5	90.0	0.10	0.09

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Actual Quantity Transferred	TEC, 1998.
Material Moisture Content	Average fuel moisture content, TEC, 1994.
Control Efficiency	Table 3.2.17-2, Workbook on Estimation of Emissions and Dispersion Modeling of Fugitive Particulate Sources, UARG, September 1981.

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Evaluated by:	T.J.L. Watley	Date:	07/29/98
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Reviewed by:	A. Trbovich	Date:	07/29/98