

Rec 061697

Rec'd 061697



June 13, 1997

Mr. Scott Sheplak, Jr., P.E.  
Administrator-Title V Section  
Florida Department of Environmental Protection  
Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

**Via FedEx**  
**Airbill No. 3793592121**

**Re: Tampa Electric Company  
Gannon Station  
Title V Application Submittal  
Second Request for Additional Information  
FDEP File No. 0570040-002-AV**

Dear Mr. Sheplak:

Tampa Electric Company (TEC) received the Florida Department of Environmental Protection's (FDEP) request for additional information for our F.J. Gannon Station on March 31, 1997. With regards to the referenced request for additional information, please find enclosed four (4) copies of our responses. Also, included in this package are new Responsible Official and Professional Engineer certifications. Please note that the Responsible Official at this facility has changed to Mrs. Karen A. Sheffield, P.E.

Please feel free to telephone me at (813) 641-5039, if you have any questions or require any clarification. Thank-you.

Sincerely,

Janice K. Taylor  
Senior Engineer  
Environmental Planning

EP\gm\JKT803

**RECEIVED**

JUN 16 1997

BUREAU OF  
AIR REGULATION

Enclosures

c: Lennon Anderson, FDEP-Tallahassee  
Jerry Kissell, FDEP -SW District  
Richard Kirby, EPCHC

*Lennon*

File  
Big Bend  
Gannon  
Hookers  
FACILITY ID 1050233  
0570039  
0570040  
0570036



**RECEIVED**

JUL 02 1997

BUREAU OF  
AIR REGULATION

June 27, 1997

ATTN: Designated Representative  
U.S. Environmental Protection Agency  
Acid Rain Program (6204J)  
401 "M" Street, SW  
Washington, DC 20460

**Certified Mail #P 404 702 928**  
**Return Receipt Requested**

**Re: Tampa Electric Company  
Acid Rain Program  
Allowance Transfer**

Dear Sir/Madam:

Please find enclosed Certification of Representation Forms for Tampa Electric Company's Acid Rain Program effected units Polk Power Station, Big Bend, F.J. Gannon and Hookers Point. Also included are affidavits of public notice given concerning this representation. The enclosed certification is per 40 CFR part 72 for the purpose of establishing Patrick A. Ho as Designated Representative and Authorized Account Representative and Hugh W. Smith as Alternate Designated Representative and Alternate Authorized Account Representative.

Should you have any questions regarding this information, please call me at (813) 641-5036.

Sincerely,

Patrick A. Ho  
Tampa Electric Company  
Designated Representative  
Acid Rain Program

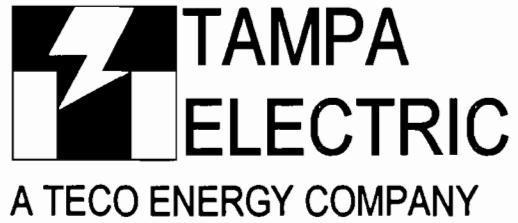
EP/gm/PJM084

Enclosure

c: Mr. Brian McLean, U.S. EPA  
Mr. John C. Brown, FDEP - Tallahassee  
Mr. Jerry Campbell, EPCHC

*Tom*  
*Please handle*  
*update Ed,*  
*Crilly, Steve*  
*Lennon*  
*appropriately*  
*Patrick Scott*  
*7/2*

*Lemon*



**GANNON STATION**

**TITLE V  
OPERATING  
PERMIT APPLICATION**

**JUNE 1996**

**JUNE 1997  
ADDENDUM**

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Signature Pages

Signatures

TEC Responses to FDEP Comments

Responses to Comments

U.S. Department of Energy Prohibition Order

Attachment



**Owner/Authorized Representative or Responsible Official**

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

**Karen A. Sheffield, P.E.  
General Manager, F.J. Gannon Station**

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

Organization/Firm: **Tampa Electric Company**  
Street Address: **P.O. Box 111**  
City: **Tampa** State: **FL** Zip Code: **33601-0111**

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

Telephone: **(813) 641-5400** Fax: **(813) 641-5418**

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 unit.*

Karen A. Sheffield  
Signature

6/13/97  
Date

\* Attach letter of authorization if not currently on file.

**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 98th 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:*

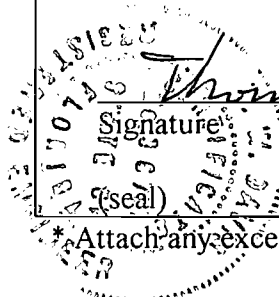
*(1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this Application for Air Permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant 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 [X] 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 emission 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 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. Jones*  
Signature

*6/12/97*  
Date

\*Attach any exception to certification statement.



**RESPONSES TO  
COMMENTS**

**TAMPA ELECTRIC COMPANY  
F.J. Gannon Station  
Title V Permitting Responses  
June 1997**

**Coal Yard and Storage Sources**

**FDEP Comment No. 1:**

Standards of Performance for New Stationary Sources (NSPS), 40 C.F.R. 60, Subpart Y, is applicable to coal preparation plants that process more than 200 tons per day and commences construction or modification after October 24, 1974. The Department is aware that the Gannon Station was originally constructed to utilize coal as a primary fuel well before the promulgation of any applicable NSPS. In permit AC 29-61276, the Department approved the modification of the Gannon Coal yard to accommodate the reconversion of Units 1 through 4 from oil-fired back to coal-fired. According to our records, this approval was done on April 12, 1983. Furthermore, the modification increased the annual coal processed to 2,400,000 (i.e., 6575 ton/day). The coal yard appears to be subject to NSPS, Subpart Y. Please provide documentation that the Gannon Coal Yard is not subject to NSPS, Subpart Y.

**TEC Response:**

*Under 40 CRF 60.14(a), an NSPS modification is defined as any physical or operational change to an existing facility which results in an increase in the emission rate to the atmosphere of any pollutant to which a standard applies, unless the change is otherwise exempt. The list of NSPS modification exemptions includes the following, as cited by 40CFR60.14(e)(4):*

*Use of an alternative fuel or raw material if, prior to the date any standard under this part becomes applicable to that source type, as provided by Section 60.1, the existing facility was designed to accommodate that alternative use. A facility shall be considered to be designed to accommodate an alternative fuel or raw material if that use could be accomplished under the facility's construction specifications as amended prior to the change. Conversion to coal required for energy considerations, as specified in section 111(a)(8) of the Act, shall not be considered a modification.*

*Please find enclosed the Department of Energy's (DOE) Prohibition order as specified in section 111(a)(8) of the Act. Because this reconversion to coal was for energy considerations, the 1983 fuel yard change is not an NSPS-defined modification and NSPS is not applicable.*

*As a point of clarification, FDEP cites 2,400,000 tons per year (tpy) coal as the maximum annual fuel yard throughput. Pursuant to Air Operating permit AO29-216480, Specific Condition 2, the maximum annual coal throughput shall not exceed 2,850,000 tpy.*

**List of Proposed Exempt Activities**

**FDEP Comment No. 2:**

**In response to the Department's question 4, TEC stated, "no solvent cleaning machines using the cited solvents are in use at the F.J. Gannon Station." Part (c), apparently, was not answered. Are buckets, pails and beakers with capacities greater than 7.6 liters (2 gallons) being used? If so, please address appropriately.**

**TEC Response:**

*No buckets, pails and beakers with capacities greater than 2 gallons are being used.*

**Miscellaneous**

**FDEP Comment No. 3:**

**For Unit 6, TEC stated that sulfur trioxide (SO<sub>3</sub>) is added to the flue gas prior to the electrostatic precipitator. Please explain how the molten sulfur is generated. If a combustion source is used, please update the application form appropriately.**

**TEC Response:**

*F.J. Gannon Station receives molten sulfur by truck. The molten sulfur is transferred into a storage tank equipped with steam tracing to maintain the liquid sulfur phase.*

**FDEP Comment No. 4:**

**TEC stated in its response to the Department's question 5 that Storage Tank 7 stores a maximum of 4,000 gallons of molten sulfur. Please explain how the sulfur is kept in the liquid phase. a) What is the annual throughput? b) What is the annual sulfur particulate emissions?**

**TEC Response:**

*As mentioned above, the sulfur is maintained in molten phase by steam tracing in the storage tank. The annual throughput of molten sulfur for 1996 was approximately 10,430 gallons. The flue gas conditioning system is a closed loop within the boiler operations. Sulfur particulate emissions have been previously inventoried within Emission Unit No. 6.*





Department of Energy  
Washington, D.C. 20461

Mr. H. L. Culbreath  
President  
Tampa Electric Company  
Post Office Box 111  
Tampa, Florida 33601

SUBJECT: Gannon Units 1, 2, 3, and 4

ERA-52879-0646-01-82  
ERA-52879-0646-02-82  
ERA-52879-0646-03-82  
ERA-52879-0646-04-82

Dear Mr. Culbreath:

The Economic Regulatory Administration has just issued proposed Prohibition Orders to Tampa Electric Company for Gannon Units 1, 2, 3, and 4. A copy of the orders is enclosed for your information.

These actions are being taken pursuant to the authorities contained in Section 301(b) of the Powerplant and Industrial Fuel Use Act of 1978 (FUA), and pursuant to regulations implementing those authorities appearing in 10 CFR Part 504. Title III of FUA authorizes the Department of Energy (DOE) to prohibit a powerplant or major fuel burning installation from burning natural gas or petroleum products as its primary energy source, provided certain determinations can be made by DOE.

Any questions regarding these orders should be directed to Mr. James W. Workman, Acting Director, Powerplants Conversion Division, Economic Regulatory Administration, Department of Energy, Washington, D. C. 20461 (202) 653-3637.

Sincerely,

Robert L. Davies  
Assistant Administrator  
Office of Fuels Conversion  
Economic Regulatory Administration

Enclosure

# DEPARTMENT OF ENERGY

## ECONOMIC REGULATORY ADMINISTRATION

In the Matter of	)	ERA Case Nos.
Tampa Electric Company	)	52879-0646-01-82
	)	52879-0646-02-82
	)	52879-0646-03-82
	)	52879-0646-04-82

NOTICE AND ISSUANCE OF PROPOSED PROHIBITION ORDERS  
PURSUANT TO SECTIONS 301 AND 701 OF THE POWERPLANT  
AND INDUSTRIAL FUEL USE ACT OF 1978

The Economic Regulatory Administration (ERA) of the Department of Energy (DOE) hereby gives notice pursuant to Section 701(b) of the Powerplant and Industrial Fuel Use Act of 1978 (FUA), 42 U.S.C. 8301 et seq., of the issuance of the following proposed prohibition orders which would prohibit the powerplants named below from burning natural gas or petroleum as their primary energy source.

### PROPOSED PROHIBITION ORDERS

Pursuant to the authority granted it by Section 301(b) of FUA, ERA issues these proposed prohibition orders to the following powerplants owned by Tampa Electric Company (TECO).

<u>ERA NUMBER</u>	<u>GENERATING STATION</u>	<u>POWER- PLANT NUMBER</u>	<u>MW</u>	<u>LOCATION</u>
52879-0646-01-82	Gannon	1	125	Tampa, Florida
52879-0646-02-82	Gannon	2	125	Tampa, Florida
52879-0646-03-82	Gannon	3	179	Tampa, Florida
52879-0646-04-82	Gannon	4	187	Tampa, Florida

## STATEMENT OF BASIS AND RATIONALE FOR PROPOSED PROHIBITION ORDERS

ERA has issued regulations applicable to existing facilities, 10 CFR Part 504. (Regulations), to implement the prohibitions contained in Section 301(b) of Title III of FUA. Section 504.5 of the Regulations sets forth the basis upon which ERA will propose to prohibit by order the use of natural gas or petroleum as a primary energy source by a powerplant where ERA finds that the powerplant has or previously had the technical capability to use an alternate fuel as a primary energy source.

TECO has reported to ERA that it estimates the potential oil displacement in converting Gannon Units 1, 2, 3 and 4 to an alternate fuel (coal) is approximately 8,100 barrels of oil per day or 3 million barrels annually assuming an average utilization factor of 48 percent.

### FINDING OF TECHNICAL CAPABILITY

In accordance with Section 301(b) of Title III of FUA and the Regulations, these proposed orders are based on a finding by ERA that TECO's Gannon Units 1 thru 4 have or previously had the technical capability to use an alternate fuel (coal) as a primary energy source. This finding is based upon ERA's review of FPC Forms 36 and 67 previously submitted by TECO, a May 5, 1980 TECO Position Paper on coal conversion, TECO studies regarding coal conversion and a plant visit to the Gannon plant. The technical capability finding is made in accordance with the requirements of Section 504.5(d) of the Regulations, taking into consideration the ability of the units, from the point of fuel intake, to physically

sustain combustion of coal and maintain heat transfer. This finding also recognizes, in accordance with Section 504.5(d), that Gannon Units 1, 2, 3 and 4 are capable of burning coal, notwithstanding the fact that minor adjustments must be made to the powerplants before they can burn coal as their primary energy source or that air pollution control equipment may be necessary to meet air quality requirements.

#### OTHER REQUIRED FINDINGS

Section 301(b) of FUA requires that prior to the issuance of a final prohibition order ERA must also find that (1) the powerplants have the technical capability to use coal or another alternate fuel as a primary energy source, or they could have such capability without (A) substantial modification of the powerplants or (B) substantial reduction in the rated capacity of the powerplants; and (2) it is financially feasible for the company to use coal or another alternate fuel as a primary energy source in such powerplants.

#### PROPOSED PROHIBITION UNDER TITLE III OF FUA

Subject to the other required findings that ERA must make, ERA hereby proposes to prohibit Tampa Electric Company's Gannon Units 1, 2, 3 and 4 from burning petroleum or natural gas as their primary energy source.



DESCRIPTION OF PROHIBITION ORDER PROCEEDINGS

Pursuant to Section 301 of FUA, ERA has promulgated Regulations applicable to the issuance of prohibition orders to existing facilities, a summary of which follows:

(1) ERA has performed its initial information gathering with respect to the question of technical capability to burn alternate fuels (coal) and has informed TECO that it is considering issuance of the proposed prohibition orders. ERA also has held informal discussions with TECO concerning the issuance of the proposed prohibition orders.

(2) ERA has made a finding that Gannon Units 1, 2, 3 and 4 have or previously had the technical capability of using coal as their primary energy source. ERA is publishing this finding and these proposed prohibition orders in the Federal Register as required by Section 701(b) of FUA. In accordance with Section 301(b) of FUA, the proposed prohibition orders are not required to contain, at this point in the proceeding, the other pertinent findings that ERA must make before final prohibition orders can be issued. These are: (1) that the powerplants have the technical capability to use coal or another alternate fuel as a primary energy source, or they could have such capability without (A) substantial physical modification of the powerplants, or (B) substantial reduction in the rated capacity of the powerplants; and (2) that it is financially feasible for TECO to use coal or another alternate fuel as a primary source in such powerplants.

(3) In accordance with Section 501.51(b)(3) of the Regulations, a public comment period of at least three months is to commence after publication of the proposed prohibition orders, during which period TECO will be given an opportunity to challenge ERA's initial finding of technical capability contained in these proposed prohibition orders. During this three month comment period, under Section 501.51(b)(3) of the Regulations, TECO is required to furnish ERA with such additional evidence as is necessary to enable ERA to make the other statutory findings set forth above, which are required to be made by ERA prior to issuance of final prohibition orders. TECO will also be required, during this period, to identify, but not to demonstrate its entitlement to, any exemptions for which the Gannon Units 1, 2, 3 and 4 may qualify.

(4) Subsequent to the end of the initial three month comment period, ERA will issue a notice of whether ERA intends to proceed with the prohibition orders. Within three months of the issuance of the notice of intention to proceed with the prohibition orders, the owner or operator of the powerplants, that may be subject to an order, may demonstrate prior to issuance of final prohibition orders that the powerplants would qualify for an exemption if the prohibitions had been established by rule.

(5) Subsequent to the end of the second three month period, ERA will, if it intends to issue the final prohibition

orders, prepare and publish a notice of availability of a tentative staff decision.

(6) Under the provisions of Section 701(d) of FUA, any interested person may request a public hearing on the proposed prohibition orders and tentative staff decision. Interested persons wishing a hearing must make their request, in writing, no later than 45 days after publication of the notice of availability of the tentative staff decision. If a hearing is requested, ERA shall provide interested persons with an opportunity to present oral data, views and arguments at a public hearing held in accordance with Subpart C of 10 CFR Part 501.

(7) At the hearing, if any, interested persons will have the opportunity to question the parties about ERA's proposed orders and tentative staff decision, TECO's showing on exemptions and rebuttal of ERA's proposed orders, and ERA's rebuttal to any showing of potential qualification for exemption.

(8) After the hearing, if any, and the second three month comment period, ERA shall determine whether the final prohibition orders will be issued, based upon ERA's review of the entire administrative record. The final prohibition orders, if issued, together with a summary of the basis therefor, will be published in the Federal Register. Such orders shall not take effect earlier than sixty days after publication.

COMMENT AND PUBLIC HEARING PROCEDURES

ERA hereby also gives notice of the opportunity to submit written comments, views, and arguments by interested persons regarding these proposed prohibition orders. Comments need not be limited to ERA's technical capability finding, but may include a discussion of all three statutory findings.

The initial comment period shall remain open for a period of three months after publication of these proposed orders in the Federal Register, unless reduced at the request of the recipient of the proposed prohibition orders pursuant to Section 501.51(b) (8) of the regulations. Notice of any such change during the time for public comment will be published in the Federal Register. Comments should make reference to the case numbers set forth in this notice and proposed orders. Comments should address the adequacy and validity of the finding and any other aspects or impacts of the proposed prohibition orders believed to be relevant.

Written comments on the proposed prohibition orders should be directed to Public Hearing Management (Case Nos. 52879-0646-01-82, 52879-0646-02-82, 52879-0646-03-82 and 52879-0646-04-82), U. S. Department of Energy, Box 4629, Room 3214, 2000 M Street, N. W., Washington, D. C. 20461, and should be received before 4:30 p.m. on September 26, 1980.

In accordance with 10 CFR 501.34, any interested person may request a public hearing on the proposed orders. The request must include a description of the person's interest in the proposed prohibition orders, an outline of the anticipated content of the presentation to be made at the public hearing, and an address and telephone number where the person requesting the public hearing may be reached.

Comments and other documents submitted to DOE Public Hearing Management should be identified on the outside of the envelope in which they are transmitted and on the document itself with the designation "Proposed Prohibition Orders for Gannon Units 1, 2, 3 and 4. Fifteen copies should be submitted. All written comments, all oral presentations, and all other relevant information submitted to or available to ERA will be considered by ERA. Any information or data considered to be confidential by the person furnishing it must be so identified in writing in accordance with 10 CFR 501.7(f). ERA reserves the right to determine the confidential status of the information or data and to treat it in accordance with that determination.

For further information contact:

William L. Webb (Office of Public Information), Economic Regulatory Administration, 2000 M Street, N. W., Room B-110, Washington, D. C., 20461, (202) 653-4055.

Robert L. Davies (Office of Fuels Conversion), Economic  
Regulatory Administration, Department of Energy, 2000 M  
Street, N. W., Room 3128L, Washington, D. C., 20461, (202)  
653-3649.

Douglas F. Mitchell (Office of General Counsel), Department  
of Energy, 1000 Independence Avenue, S. W., Room 6G-087,  
Washington, D. C., 20585, (202) 252-2967.

Issued in Washington, D. C., June 23, 1980.



Robert L. Davies  
Assistant Administrator  
Office of Fuels Conversion  
Economic Regulatory Administration